County of Los Angeles
CHIEF EXECUTIVE OFFICE
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WILLIAM T FUJIOKA
Chief Executive Officer

Board of Supervisors
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Fifth District

September 28, 2010

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

PLAZA DE CULTURA Y ARTES PROJECT
APPROVE THE ADDENDUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT
AND
APPROVE THE REFINEMENTS TO THE APPROVED PROJECT
(FIRST DISTRICT) (3 VOTES)

SUBJECT

Approval of the recommended actions will allow the LA Plaza de Cultura y Artes Foundation (Foundation) to facilitate the physical and programming refinements intended to support the designation of the LA Plaza de Cultura y Artes as a Smithsonian Affiliate.

IT IS RECOMMENDED THAT YOUR BOARD:

1. Certify that the Addendum to the previously certified Final Environmental Impact Report for the Plaza de Cultura y Artes Project has been completed in compliance with the California Environmental Quality Act and reflects the independent judgment and analysis of the Board and that the Board has reviewed and considered the information contained in the Addendum and Final Environmental Impact Report prior to approving the project; and approve the Addendum.

2. Approve the Refinements to the Approved Plaza de Cultura y Artes Project to refocus the space on outdoor activities from previously proposed indoor activities, which Refinements support its designation as a Smithsonian Affiliate.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

The recommended actions seek your Board's approval, as the lead agency, of the Addendum to the previously certified Final Environmental Impact Report (EIR), pursuant to the California Environmental Quality Act (CEQA) and approval of the Refined Approved Project to refocus the current improvement plans on outdoor activities from the previously proposed indoor activities.

Background

In September 2004, your Board approved various actions relative to developing a Mexican American cultural and multimedia center dedicated to broadening the public's appreciation of the diverse contributions of early Mexican American settlers to the history of Los Angeles.

The first phase of the Approved Project included the rehabilitation of the shell and core of the Plaza House and Vickery-Brunswig Building and was managed by the County Chief Executive Office. In December 2009, with the substantial completion of Phase I, the County issued a notice to proceed to the Foundation for the tenant improvements to these two historic structures. The tenant improvements were substantially completed in June 2010 and the Foundation staff was able to move their administrative offices to the fifth floor of the Vickrey-Brunswig Building. The Foundation anticipates completion of the tenant improvements in October 2010.

Refined Approved Project

The Foundation is requesting approval from the County to allow for a more pedestrian-oriented site plan to facilitate the flow of visitor traffic through the Plaza House and Vickrey-Brunswig Building and between Main Street and Spring Street, allow visitors to easily access exhibits on the first and second floors of the two historic buildings, and support the designation of LA Plaza de Cultura y Arte as a Smithsonian Affiliate.

As a Smithsonian Affiliate, the Foundation will be able to showcase collections of the Smithsonian Institution as well as access other Smithsonian resources such as education and performing arts programs and expert speakers to create lasting experiences for the local communities that broaden their perspectives on the Mexican American contributions to the Los Angeles.

The Approved Project was comprised of four chief elements: adaptive reuse of the Plaza House and Vickrey-Brunswig Building, construction of a new community events building, construction of a new theater performing arts center, outdoor classroom space, various paseos and pedestrian walkways to adjacent properties, and a turnaround with edge plantings.

The Refined Approved Project maintains the adaptive reuse of the exiting Plaza House and Vickrey-Brunswig Building; deletes the new construction of a community events building and theater performing arts center; constructs a new restroom/lobby building, shade canopy, performance stage with canopy, turnaround with edge plantings, and central plant workshop; develops a Campo Santo Memorial garden, outdoor classrooms, and a fire department access; and expands the paseos and pedestrian walkways to include media screens, water arches and jets.

FISCAL IMPACT/FINANCING

The total estimated cost of the Refined Approved Project totals $8.7 million. It will be constructed, operated and funded by the Foundation under a Lease Agreement previously approved by your Board in September 2004.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

Upon your Board's approval of the Addendum to the EIR and in accordance with Section 6.2 of the previously Board approved Lease Agreement, the Foundation will satisfy the Conditions to Commence Construction before the County can issue a Notice to Proceed for the Refined Approved Project.

Supervisor Molina currently serves as one of five members of the County Board of Supervisors and a member of the Plaza Foundation Board of Directors. The officers of the Foundation do not benefit financially from services in those positions. As the Plaza Foundation's primary purpose is to support the County Board of Supervisors in the rehabilitation and development of the El Pueblo properties, County Counsel has advised that the conflict of interest laws would not preclude the County from certifying this Addendum to the previously certified Final Environmental Impact Report for the Plaza de Cultura y Artes Project.

ENVIRONMENTAL DOCUMENTATION

On September 2004, your Board certified the Plaza de Cultura y Artes Project EIR. The Refined Approved Project allows for an increase in outdoor programming opportunities in previously identified passive open space thereby eliminating the need for new construction of a community events building and a theater performing arts center building as previously included as part of the Approved Project.

The Addendum to the Final EIR (Attachment A) analyzes potential environmental effects, which may be associated with changes in project scope to allow for a more pedestrian-oriented site plan to facilitate the flow of visitor traffic through the Plaza House and Vickrey-Brunswig Building and between Main Street and Spring Street, allow visitors to easily access exhibits on the first and second floors of the two historic

buildings, and support the designation of LA Plaza de Cultura y Arte as a Smithsonian Affiliate. The Addendum to the Final EIR demonstrates that environmental impacts resulting from the Refined Approved Project would not result in any new significant impacts beyond those previously analyzed in the Final EIR nor would it result in a substantial increase in the severity of significant impacts previously identified in the EIR. In addition, the analysis demonstrates there will be no substantial changes with respect to the circumstances under which the project will take place and no new information of significance to the environmental analysis became known.

CONCLUSION

Upon approval of the recommendations, please forward an adopted copy of the Board letter to my office.

Respectfully submitted,

WILLIAM T FUJIOKA
Chief Executive Officer

Attachment

WTF:BC:SK
DJT:DKM:zu

Attachment

c: Executive Office, Board of Supervisors
County Counsel
LA Plaza de Cultura y Artes Foundation

Addendum to the Environmental Impact Report for LA Plaza de Cultura y Artes (SCH No. 2001101167)

Prepared for:

Mr. Daniel Mendoza
LA Plaza de Cultura y Artes Foundation
1055 Wilshire Boulevard, Suite 800
Los Angeles, California 90017

Prepared by:

Sapphos Environmental, Inc.
430 North Halstead Street
Pasadena, California 91107

September 14, 2010

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SECTION 1.0
INTRODUCTION

This Addendum to the Environmental Impact Report (EIR) has been prepared by the County of Los Angeles (County) Chief Executive Office (CEO) to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts than those disclosed in the Plaza de Cultura y Arte EIR, which was certified in 2004. This Addendum to the EIR describes the physical and programming refinements intended to support the designation of the LA Plaza de Cultura y Artes as a Smithsonian Affiliate.[1] Smithsonian Affiliations are partnerships between the Smithsonian and the affiliate organization to provide collections, exhibitions, documents, and other artifacts in an effort to share America's artistic, scientific, and historic heritage. Through these partnerships, the Smithsonian provides nonprofit or publicly operated museums, arts/culture/science centers, or educational organizations with a variety of resources such as artifact loans, resource identification, educational and other programs, as well as technical assistance and other resources that are then displayed at the affiliate and shared with the public.[2]

LA Plaza de Cultura y Artes is a Smithsonian Affiliate. The Smithsonian's unparalleled collections, scholarship, and exhibitions document the world in all of its beauty, diversity, and complexity. Being a Smithsonian Affiliate allows LA Plaza de Cultura y Artes to share the Smithsonian resources in local communities by developing a collaborative partnership. Together, the Smithsonian and LA Plaza de Cultura y Artes would create lasting experiences that broaden perspectives on history, world cultures, and the arts.[3]

Being a Smithsonian Affiliate offers broader opportunities than those found in standard museum loan programs. In addition to artifact loans, the Smithsonian helps member organizations identify appropriate resources within the Smithsonian to accompany exhibit loans: education and performing arts programs, expert speakers, teacher workshops, and technical assistance. These may also serve as standalone activities developed specifically for affiliate members. Smithsonian affiliation also offers career development workshops for museum professions, internships for affiliate-based students, and research opportunities for affiliate-based visiting professionals. As a Smithsonian Affiliate, LA Plaza de Cultura y Artes may use the tag line, "in Association with the Smithsonian Institution."[4]

This document is prepared as an Addendum to the previously certified EIR in accordance with the State of California Environmental Quality Act (CEQA) Guidelines Section 15164, which requires that an Addendum to the EIR be prepared when changes to the project will require minor modifications of the previous EIR instead of major changes due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.[5] CEQA requires that an EIR be prepared for projects that may have a significant

[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[2] Smithsonian Affiliations. Accessed August 2010. *Program Overview*. Available at: https://affiliations.si.edu/DetailPage.Asp?MenuID=44

[3] Discussion provided by La Plaza De Cultura Y Artes Foundation (Daniel Mendoza), Los Angeles, CA.

[4] Discussion provided by La Plaza De Cultura Y Artes Foundation (Daniel Mendoza), Los Angeles, CA.

[5] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Article 11, Section 15164.

effect on the environment.[6] If changes to a project, which are not considered substantial,[7] are necessary after an EIR has been certified, CEQA provides that an Addendum to the EIR may be prepared documenting the minor technical changes or additions to the approved project.[8] In accordance with State CEQA Guidelines Section 15164, regarding minor modifications to a previously approved EIR, this Addendum to the EIR incorporates, by reference, discussions from the 2004 EIR and concentrates solely on the issues specific to the refined project.[9] Furthermore, the refined project, which would reduce the total exterior footprint and total interior floor area of the approved project by approximately 36,853 square feet and approximately 60,546 square feet, respectively, would not result in significant changes to the project, or new or additional impacts requiring new or additional mitigation measures.

The purpose of the Plaza de Cultura y Arte project analyzed in the 2004 EIR is to provide the regional and local community with a pedestrian-oriented Mexican American cultural heritage center that would serve as a venue for community needs such as local performances, temporary exhibitions, corporate meetings, cultural activities, and other public and private events.[10] Through programming that integrates art, culture, and education, this cultural heritage center would allow visitors to understand and appreciate the diverse contributions of early Mexican American settlers to the history of Los Angeles. The refined project proposes to incorporate nine physical and programming refinements to the approved project (discussed in more detail in Section 2.0, *Project Description*) in order to support the designation of LA Plaza de Cultura y Artes as a Smithsonian Affiliate. The refined project would be aimed at creating a pedestrian-oriented facility that celebrates, promotes, and preserves an understanding and appreciation of Mexican American historical contributions to Los Angeles through a full range of integrated cultural, educational, and arts programming. The County is the lead agency for the refined project pursuant to CEQA.

1.1 PURPOSE AND SCOPE OF THE ADDENDUM TO THE EIR

The purpose of this Addendum to the EIR is to provide compliance with Section 15162(a)(1) through 15162(a)(3) of the State CEQA Guidelines, which states, "When an EIR has been certified...for a project...no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record" that (1) substantial changes are proposed in the project, (2) major revisions to the project analysis are required due to substantial changes in the project, and/or (3) new information of substantial importance will result in significant effects or additional or different mitigation measures or alternatives.

The County CEO has prepared this Addendum to the EIR to support the fulfillment of the six major goals of CEQA:

- To disclose to the decision makers significant environmental effects of the proposed activities;

[6] *Public Resources Code*. Division 13, Chapter 1, Section 21002.1.

[7] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Article 11, Section 15162.

[8] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Article 11, Section 15164(a).

[9] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[10] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

- To identify ways to avoid or reduce environmental damage;
- To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures;
- To disclose to the public the reasons for agency approvals of projects with significant environmental effects;
- To foster interagency coordination in the review of projects; and
- To enhance public participation in the planning process.

The Addendum to the EIR neither controls nor determines the ultimate decision regarding the refined project. The information in the Addendum to the EIR will be considered in compliance with CEQA by the County (and other public agencies that will consider discretionary decisions related to the project) to make determinations concerning the minor modifications to the certified project EIR.[11]

This Addendum to the EIR has been prepared in accordance with Section 15164 of the State CEQA Guidelines:

- The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- An addendum to an adopted [EIR]...may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- The decision making body shall consider the addendum with the final EIR...prior to making a decision on the project.
- A brief explanation of decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in the addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

The refined project, as described and evaluated in this Addendum to the EIR, would not result in any of the conditions specified in Section 15162 of the State CEQA Guidelines that would require the preparation of a subsequent EIR. Specifically, the refined project would not result in: (1) substantial changes to the proposed project (the project changes are minor in nature), (2) major

[11] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

revisions to the project analysis as a result of substantial changes in the project (revisions to the project would not result in any new significant impacts or a substantial increase in any already declared significant impacts), and/or (3) new information of substantial importance that will cause significant effects or additional or different mitigation measures or alternatives (no new or additional significant effects or mitigation measures would be required as a result of the refined project). The refined project would not result in the occurrence of the conditions specified in Section 15162 of the State CEQA Guidelines. As such, it was determined that an Addendum to the EIR was that appropriate document for the refined project as it meets the conditions specified in Section 15164 of the State CEQA Guidelines, as described above for the preparation of an Addendum to the EIR.

SECTION 2.0
PROJECT DESCRIPTION

Consistent with the requirements of Section 15164 of the State of California Environmental Quality Act (CEQA) Guidelines, this section of the LA Plaza de Cultura y Artes Addendum to the Environmental Impact Report (EIR) describes several key aspects of the proposed refinements to the LA Plaza de Cultura y Artes (refined project), including location and boundaries; existing conditions at the refined project site; a statement of the refined project objectives; and technical, economic, and environmental characteristics of the refined project.[1] The Plaza de Cultura y Arte EIR was certified in September 2004.[2] However, since the establishment of the LA Plaza de Cultura y Artes Foundation (Foundation), the project name has been changed to LA Plaza de Cultura y Artes, so the latter name shall be used herein.

2.1 PROJECT TITLE

LA Plaza de Cultura y Artes

2.2 LEAD AGENCY

County of Los Angeles
500 West Temple Street
Los Angeles, California 90012
Attn: Dawn McDivitt, Chief Executive Office – Capital Projects

2.3 PRIMARY CONTACT PERSON

Mr. Daniel Mendoza
LA Plaza de Cultura y Artes Foundation
1055 Wilshire Boulevard, Suite 800
Los Angeles, California 90017
(323) 260-3412

2.4 PROJECT DESCRIPTION

The purpose of the approved project, as certified in the Plaza de Cultura y Arte EIR, is to provide the regional and local community with a pedestrian-oriented Mexican American cultural heritage center that serves as a venue for community needs such as local performances, temporary exhibitions, corporate meetings, cultural activities, and other public and private events. This cultural heritage center would allow visitors to understand and appreciate the diverse contributions of early Mexican American settlers to the history of Los Angeles through programming that integrates art, culture, and education.[3]

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[1] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Article 11, Section 15164.

[2] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[3] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

The Foundation has recommended physical and programming refinements to the approved project to support the LA Plaza de Cultura y Artes as a Smithsonian Affiliate.

The proposed refinements would modify the site plan within the approved project boundaries to facilitate outdoor activities in part to support the designation of LA Plaza de Cultura y Artes as a Smithsonian Affiliate. This analysis will be presented to the County of Los Angeles (County) Board of Supervisors (Board) as the evidence demonstrating the substantial conformance of the refined project with the description of the approved project contained in the certified EIR, as conditioned by the mitigation measures and related motions of the Board.[4]

2.4.1 Approved Project (Analyzed in Alternative A.1.2 in the EIR)

The approved project as analyzed in the 2004 certified EIR is composed of four chief elements (Figure 2.4.1-1, *Approved Project Site Plan*):[5]

Adaptive Reuse of the Plaza House and Vickrey-Brunswig Building. The approved project would adaptively reuse approximately 14,100 square feet of interior space within the rehabilitated Plaza House to support programming. It would also adaptively reuse approximately 28,200 square feet within the rehabilitated Vickrey-Brunswig Building to support exhibition galleries, classroom space for the visual arts and music, offices, and storage.

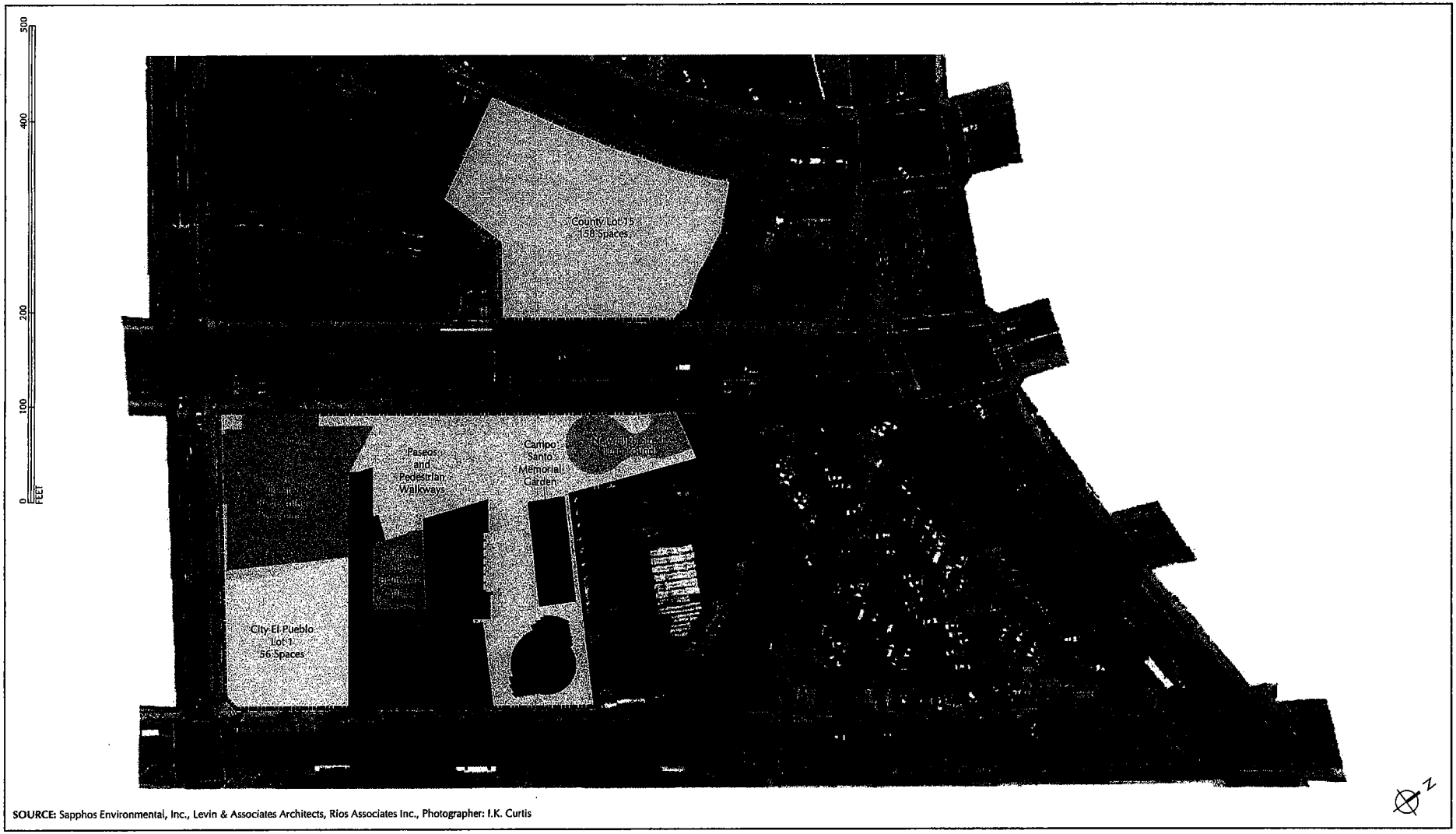
Construction of a New Building. The approved project would entail the construction of a new building on approximately 0.4 acre located west of the Plaza House and the Vickrey-Brunswig Building. The newly constructed building would provide approximately 39,200 square feet of interior building space for community events and a variety of public-oriented uses and an exterior footprint of approximately 17,509 square feet. It would also provide an approximately 4,400-square-foot outdoor terrace on the second floor and an appropriate venue for local performances, cultural activities, and other public and private events.

Construction of a Theater Performing Arts Center. The approved project would include 25,000 square feet of new construction for a theater performing arts center to include a 500-seat theater. This element was acknowledged to require the demolition of the Brunswig Annex (demolished in 2007). To accommodate the new facility, the footprint of the theater performing arts center would be located adjacent to City Parking Lot 1 and an open-space area would be added in front of the structure located on the north side of the structure opposite the New High Street turnaround. City Parking Lot 1 would be retained and County Parking Lot 25 would be eliminated to accommodate the theater performing arts center.

Provision of the Outdoor Classroom Space Southeast of Campo Santo Memorial Garden. This element would provide open space, including paseos, pedestrian walkways, and the outdoor classroom space as part of the approved project. The outdoor classroom would be located in the area southeast of the Campo Santo Memorial Garden rather than in City Parking Lot 1. The hardscape would include paseos and pedestrian walkways to enhance pedestrian connections

[4] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[5] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.



SOURCE: Sapphos Environmental, Inc., Levin & Associates Architects, Rios Associates Inc., Photographer: I.K. Curtis

Proposed Project Boundary

FIGURE 2.4.1-1
Approved Project Plan

between Spring Street and North Main Street and to provide pedestrian paths and public open space adjacent to Arcadia Street.

2.4.2 Proposed Refinements to the Approved Project

This Addendum to the EIR considers nine proposed project refinements (PR-1–9 below) to the approved project included as elements of the refined project (Figure 2.4.2-1, *Refined Project Conceptual Site Plan*). The environmental issue area analysis in this Addendum to the EIR addresses implementation of the refined project in a single phase.

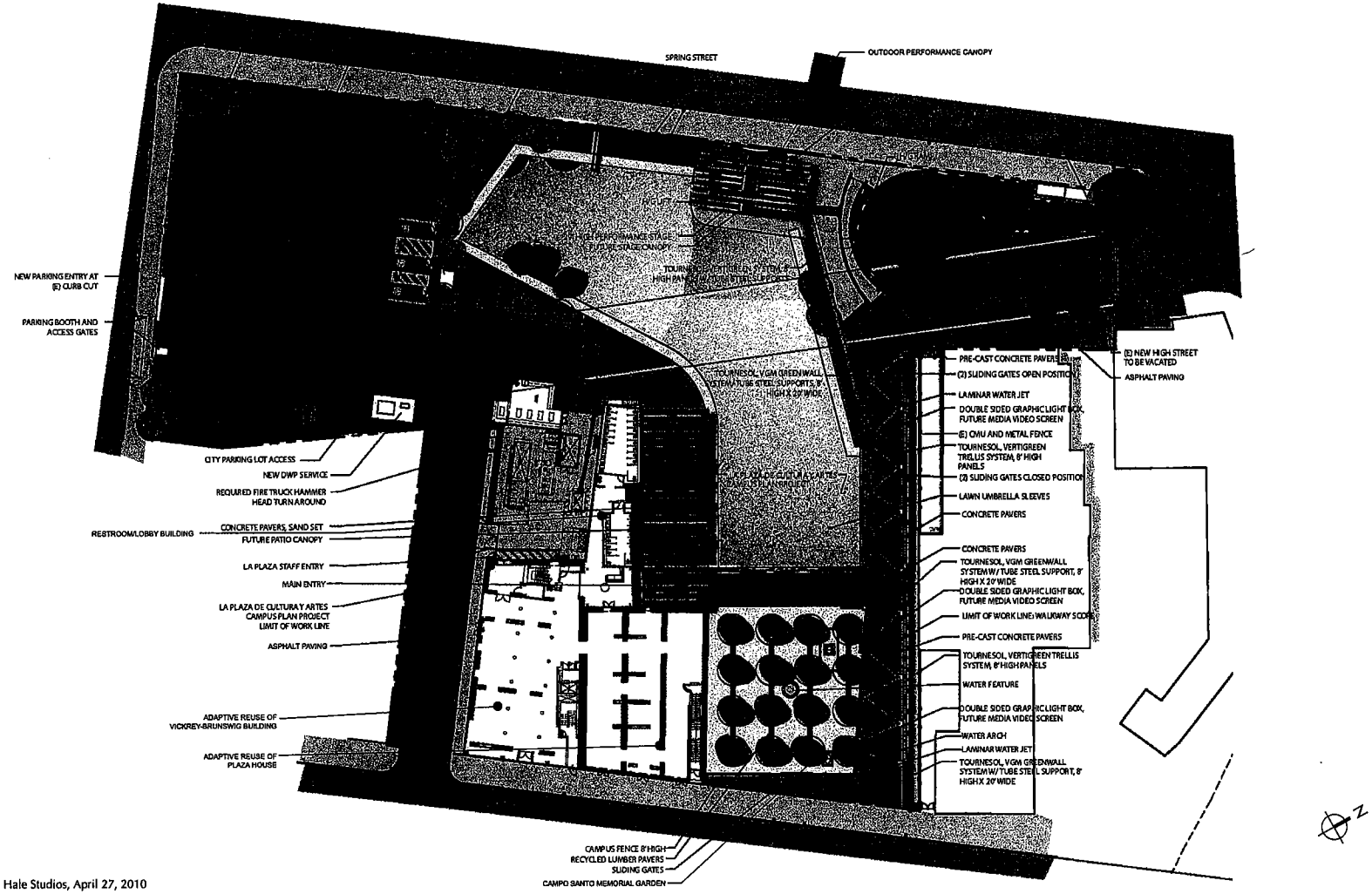
The refined project maintains the adaptive reuse of the existing Plaza House and Vickrey-Brunswig Building of the approved project. The refined project eliminates the two buildings proposed as part of the approved project, namely the Theater Performance Art Center and Newly Constructed Building. Instead, a Restroom/Lobby Building has been added, as well as an outdoor performance canopy and associated space. The approved project incorporated outdoor spaces, paseos, walkways, and other elements that have been carried out by way of comparable elements in the refined project. The Campo Santo Memorial Garden that was part of the approved concept has also been refined; it has been moved and will take the form of an olive grove and water feature. Implementation of the proposed building refinements would reduce the total exterior footprint and total interior floor area of the approved project by approximately 36,853 square feet and approximately 57,546 square feet, respectively.

New construction on the site included as part of the proposed refinements includes a Restroom/ Lobby Building, shade canopy, performance stage with canopy, Central Plant Workshop, Campo Santo Memorial Garden, outdoor classrooms, paseos and pedestrian walkways (including media screens, water arches and jets, fences, lawn, and custom lawn umbrella sleeves), fire department access and turnaround, and edge plantings. The reuse of existing elements as well as the proposed new construction would support the achievement of project objectives itemized in the certified EIR, facilitate the flow of visitor traffic through the Plaza House and Vickrey-Brunswig Building and between Main Street and Spring Street, allow visitors to easily access exhibits on the first and second floors of the two historic buildings, and support the designation of LA Plaza de Cultura y Artes as a Smithsonian Affiliate.

PR-1: Program Use and Overall Spatial Configuration

The refined site plan supports the program of the site as a Mexican American cultural heritage center. Associated uses under the program would include exhibits, the expression of fine and applied arts, educational activities, and the celebration of traditional cultural events. Uses specified in the refined site plan, such as paseos, walkways, outdoor classroom space, garden space, and the New High Street turnaround are consistent with the uses specified in the certified EIR.

The refined site plan modifies the overall spatial configuration of the conceptual plan approved in the certified EIR in regard to relative sizes, locations, and spatial relationships of program activities. The approved conceptual plan included two newly constructed buildings, a theater performing arts center and a newly constructed building, that were intended for community events and other public uses. The refined site plan refocuses the space on outdoor activities and these two buildings were eliminated in the refined plan. In lieu of the buildings, the refined site plan creates new outdoor locations for community events, such as the shade canopy, outdoor classrooms, a performance stage with canopy, and a large lawn. These spaces and functions would be supported by the Restroom/Lobby Building [see PR-3(2), below].



SOURCE: Rios Clementi Hale Studios, April 27, 2010

G:\151f\1515-002\Documents\Addendum EIR

FIGURE 2.4.2-1
Refined Project Conceptual Site Plan

PR-2: Elimination of the Previously Approved Theater Performing Arts Center

The previously approved theater performing arts center, which would have been located on County Lot 25, is eliminated in the refined site plan. In the refined site plan, the area would continue to be used for parking. An outdoor performance stage and canopy has been added elsewhere on the site in the refined site plan (see PR-5, below).

PR-3: Elimination of the Previously Approved Newly Constructed Building and Addition of the Restroom/Lobby Building

PR-3(1): Elimination of the Previously Approved Newly Constructed Building

The previously approved newly constructed building, which would have been located to the west of the Plaza House and Vickrey-Brunswig Building and intended for community events and public-oriented uses, is eliminated in the refined site plan. A portion of this area was formerly the location of the Brunswig Annex, which was demolished consistent with the certified EIR, and is being used for the project mechanical enclosure. The remainder of the area conceptually intended for newly constructed building would be used in the refined site plan for the Central Plant Workshop (see PR-6, below), the Restroom/lobby Building, and the shade canopy (PR-4, below).

PR-3(2): Addition of the Restroom/Lobby Building

Construction of a new 5,562-square-foot building to the west of the Vickrey-Brunswig Building would be located primarily on the building footprint of the Brunswig Annex, which occupied the space adjacent to the Vickrey-Brunswig from 1897 until 2007, when it was demolished in accordance with the approved project. The approved project incorporated a new, four-story, 17,509-square-foot building, which would have occupied this site as well as the area to the north. The Restroom/Lobby Building would be substantially smaller than the approved building in height, massing, and proportion, and would conform to the design specifications contained in the certified EIR. Construction of this new support building is required to support the designation of the LA Plaza de Cultura y Artes as a Smithsonian Affiliate and would also incorporate the restrooms required to operate the rehabilitated Vickrey-Brunswig Building and Plaza House. The support building is appropriately located at the rear of the Vickrey-Brunswig Building, which is a secondary elevation, and would minimize its visibility in the historic district.[6] In addition, the new building would maintain the historic building line along Republic Street. The restrooms would support not only the rehabilitated buildings and Vickery-Burnswig Building but also the outdoor activity areas.

[6] Weeks, Kay P., and Anne E. Grimmer. 1995. *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Washington, DC, p. 112ff.

PR-4: Addition of the Shade Canopy

The shade canopy was not identified in the EIR conceptual plan; however, it is consistent with the site's public event function and the property's program as a Mexican American cultural heritage center. The shade canopy would be an open structure located west of the Plaza House and immediately north of the Restroom/Lobby Building.

PR-5: Addition of the Performance Stage with Canopy

The performance stage with canopy is a new element of the refined LA Plaza Site Plan that was not included in the conceptual plan of the EIR, which originally contained a theater performing arts center (see PR-2 above).

PR-6: Addition of the Central Plant Workshop

In the refined LA Plaza Site Plan, the central plant area of the property that is located to the rear (northwest) of the Vickrey-Brunswig Building has a new workshop that supports exhibit and gallery uses. The new Central Plant Workshop would occupy a portion of the area allocated to central plant uses, consistent with the certified EIR.

PR-7: Plaza House, Minor Modification to Rehabilitation Scheme

In the refined site plan, partial removal of a wall in a secondary corridor of the second floor is proposed in order to widen an existing doorway that is adjacent to the previously approved opening connecting the Plaza House to the second floor of the Vickrey-Brunswig Building.

PR-8: Vickrey-Brunswig Building, Minor Modifications to Rehabilitation Scheme

Nine minor modifications to the approved rehabilitation scheme for this building are included in the refined site plan:

PR-8(1): New Door Opening on the North (Exterior) Wall at the First-Floor Level

The addition of a new opening at the west end of the first-floor north masonry wall of the Vickrey-Brunswig Building is necessary to meet circulation requirements in support of the designation of the LA Plaza de Cultura y Artes as a Smithsonian Affiliate. The approved project included the re-creation of a window opening that physical evidence indicated had been enclosed at this location. The refined project would substitute a door opening.

PR-8(2): Reorientation of Newly Constructed West Staircase

The approved project allowed for the construction of a new staircase at the west end of the Vickrey-Brunswig Building. This new staircase would be rotated 180 degrees to support museum and programming circulation requirements.

PR-8(3): Partial Removal of Dumbwaiter Enclosure

The partial removal of the dumbwaiter enclosure in the Vickrey-Brunswig Building from the basement, first-floor, fourth-floor, and fifth-floor levels is necessary to implement the micro-pylon structural-strengthening scheme selected to comply with seismic-retrofit standards.

The dumbwaiter enclosure would be retained on the second and third floors, which will be accessed most by the public for educational purposes related to the history of the building.

PR-8(4): Brace Frames

Brace frames are added to all floors of the Vickrey-Brunswig Building as one component of the seismic-retrofitting project. In the September 10, 2009, plans,[7] the upper portions of the brace frames would be exposed and reveal an aspect of the building's structural framework to the public. The lower portions of the brace frames would be covered to address code requirements.

PR-8(5): Open Office Plan

In the refined project, the fifth floor of the Vickrey-Brunswig Building would continue to be used as office space; however, the few surviving spatial divisions, which were not original or significant, would be replaced by an open plan. An open plan would support the new use of the building and create multipurpose office space on the fifth floor.

PR-8(6): Acoustic Paneling

Under the new program, the Plaza House and Vickrey-Brunswig Building would be used primarily for exhibits, classes, and offices. Acoustic paneling would provide increased sound absorption for the buildings' high traffic areas, specifically in proposed gallery spaces, classrooms, conference rooms, and corridors.[8]

PR-8(7): Use of Partial Glass Walls

Partial glass walls are proposed to define classrooms and training rooms on the third, fourth, and fifth floors in the refined site plan.

PR-8(8): Treatment of Cosmetic Splits in Structural Wood Columns

Deep cosmetic splits in the exposed structural columns of the Vickrey-Brunswig Building pose a concern to visitors, particularly children, who may be subject to splinters from the exposed wood.

Three options, listed in order of historical merit, are being considered. All would meet the Secretary of the Interior's Standards (Standards):

1) Cover the lower portion (or the entire height) of the columns with plexiglass or a similar transparent covering in order to retain and preserve the columns as an example of the property's distinctive materials, features, finishes, construction techniques, and craftsmanship. Regarding spray paint and other contemporary markings on the columns, the Standards specify that

[7] LA Plaza de Cultura y Artes. 10 September 2009. Tenant Improvements and Restroom Addition. Prepared by: Chu + Gooding Architects, Los Angeles, California.

[8] LA Plaza de Cultura y Artes. 10 September 2009. Tenant Improvements and Restroom Addition. Prepared by: Chu + Gooding Architects, Los Angeles, California, p. TI_A-2.11, TI_A-2.21, TI_A-2.31, TI_A-2.41, TI_A-2.51, and TI_A-8.01.

chemical treatments are permissible provided that they utilize the gentlest means possible and would not cause damage to historic materials;

2) Use a transparent covering in at least one space, for example in a primary public space that conveys the building's historic character such as the first floor, and use wood cladding, modeled after that used in the east end of the second floor in the remaining areas;

3) Install reversible wood cladding, taking care to minimize damage to the columns, in all spaces.

PR-8(9): Interior Paint Schemes

No interior paint scheme was described in the certified EIR. The interior paint scheme for the historic buildings proposed under the refined site plan would consist of shades of white.

PR-9: Site Plan, Relocation and Reconfiguration of Approved Project Elements and Introduction of New Site Elements

Five relocated and reconfigured or new site elements are proposed under the refined site plan.

PR-9(1): Campo Santo Memorial Garden

The Campo Santo Memorial Garden, identified in the conceptual plan approved in the EIR, has been relocated and designed as an olive grove and water feature in the refined site plan. This element supports the site's design and public uses and is consistent with the property's Mexican American cultural heritage center programming.

PR-9(2): Outdoor Classrooms

In the refined site plan, space for outdoor classrooms has been relocated from the single location specified in the conceptual site plan for the approved project and redistributed into three separate outdoor classroom areas. The classrooms will be supported by the Restroom/Lobby Building (see PR-3(2), above).

PR-9(3): Paseos and Pedestrian Walkways (including media screens, water arches and jets, fences, lawn, and custom lawn umbrella sleeves)

The paseos and pedestrian walkways were identified in the conceptual plan included in the certified EIR. The refined site plan executes the concept of paseos and pedestrian walkways by altering proposed sizes and locations, as well as introducing a variety of new associated elements, including the addition of a lawn at the center of the site. The refinements to the paseos and pedestrian walkways are consistent with the property's program as a Mexican American cultural heritage center.

In the conceptual site plan in the certified EIR, only a small portion of the western area of the site located along Spring Street was dedicated to pedestrian uses as paseos and walkways. The refined site plan redistributes pedestrian uses throughout the site by creating an ambulatory circuit for visitors, enriched by an art wall, media screens, water jets, green

screens, and fence panels. The design and spatial configuration of these elements is contemporary. Adaptable for various purposes, the enrichments are in many cases either movable and/or changeable, which facilitate reconfiguration of the site to accommodate a variety of educational programs and special events. For example, the central lawn would be planted with umbrella sleeves, which would increase the site's overall functionality by creating the opportunity for temporary multipurpose uses. The partially transparent fence panels slide to create various configurations, which provide visual access throughout the site and potentially enable concurrent uses.

PR-9(4): Fire Department Access and Turnaround

The fire department access and turnaround, identified in the conceptual plan approved in the certified EIR, are reconfigured slightly in the refined site plan to ensure sufficient space to satisfy code requirements.

PR-9(5): Edge Plantings

The refined site plan proposes edge plantings located in County Parking Lot 25, along the east, south, and west edges of the outdoor classroom area, in areas bordering Spring Street (including a proposed vegetable garden), and at the vehicular drop-off plaza on New High Street.

2.4.3 Approved Project and Refined Project Components

Table 2.4.3-1, *Square Footage of Approved Project and Refined Project Components*, compares the distribution of square footage of the approved building components from the 2004 certified EIR[9] and proposed project refinements. Implementation of the proposed building refinements would reduce the total exterior footprint and total interior floor area of the approved project by approximately 36,853 square feet and approximately 60,546 square feet, respectively. The proposed building refinements were used in the assessment of potential construction impacts to air quality, ambient noise levels, and traffic and circulation. It is understood that the preference of the Foundation is to secure sufficient funding to build out and operate the entirety of the refined project and related programming. The environmental issue area analysis in this Addendum to the EIR addresses a full build-out scenario of the refined project in a single phase.

[9] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

TABLE 2.4.3-1
SQUARE FOOTAGE OF APPROVED PROJECT AND REFINED PROJECT COMPONENTS

Area	Approved Project		Refined Project	
	Exterior Footprint approx. sq. ft.	Interior Floor Area approx. sq. ft.	Exterior Footprint approx. sq. ft.	Interior Floor Area approx. sq. ft.
Rehabilitation and Adaptive Reuse of Existing Buildings				
Plaza House				
Basement	–	4,700	–	4,700
First Floor	–	4,700	–	4,700
Second Floor	–	4,700	–	4,700
Total Plaza House	5,049	14,100	5,049	14,100
Vickrey-Brunswig Building				
Basement	–	4,700	–	4,700
First Floor	–	4,700	–	4,700
Second Floor	–	4,700	–	4,700
Third Floor	–	4,700	–	4,700
Fourth Floor	–	4,700	–	4,700
Fifth Floor	–	4,700	–	4,700
Total Vickrey-Brunswig Building	5,242	28,200	5,242	28,200
Newly Constructed Buildings				
Theater Performing Arts Center				
First Floor	–	25,000		
Total Theater Performing Arts Center	27,500	25,000		
Newly Constructed Building				
Basement	–	10,000		
First Floor	–	17,200		
Second Floor	–	4,000		
Third Floor	–	4,000		
Fourth Floor	–	4,000		
Total Newly Constructed Building	17,509	39,200		
Restroom/Lobby Building				
First Floor			–	3,000
Total Restroom/Lobby Building			3,000	3,000
Central Plant Workshop				
Total Central Plant Workshop			–	654
Shade Canopy				
Total Shade Canopy			1,582	–
Performance Stage				
Total Performance Stage			3,574	–
Total Area	**55,300**	**106,500**	**18,447**	**45,954**

2.5 PROJECT LOCATION

The refined project site is located in the City and County of Los Angeles, California (Figure 2.5-1, *Regional Vicinity Map*). Regional access to the site is provided by State Highway 110 (Harbor Freeway) to the north and west, U.S. Interstate 5 (Golden State Freeway) to the east, and U.S. Highway 101 (US 101) to the south (Figure 2.5-1). The County and City Civic Center is approximately 0.25 mile south and southwest of the refined project site. The refined project site is located within two blocks of Olvera Street and two blocks west of Union Station. Chinatown is located one block to the north.

The proposed LA Plaza de Cultura y Artes location appears on the U.S. Geological Survey (USGS) 7.5-minute series, Los Angeles, California, topographic quadrangle (Township 2 South, Range 13 West, Section 24) (Figure 2.5-2, *Topographic Map*). The elevation of the refined project site ranges from 294 feet mean sea level in the northeast corner along North Main Street to 308 feet mean sea level in the southwest corner at the intersection of Spring Street and Arcadia Street.

The refined project site consists of an approximately 4-acre area composed of a portion of the Antique Block (500 block of North Main Street), County Parking Lot 25, and City Parking Lot 1, located within the El Pueblo de Los Angeles Historic District (Historic District) in the City and County of Los Angeles. The refined project location is composed of two land areas separated by New High Street (Figure 2.5-3, *Local Vicinity Map*). The larger area is bounded by La Iglesia de Nuestra Señora la Reina de Los Angeles (The Church of Our Lady Queen of the Angels, known locally and herein as the Plaza Church) and rectory to the north, North Main Street to the east, Republic Street to the south, and Spring Street to the west (Figure 2.4.2-1).

2.6 PROPOSED SPONSOR

LA Plaza de Cultura y Artes Foundation
1055 Wilshire Boulevard, Suite 800
Los Angeles, California 90017
(213) 975-1360

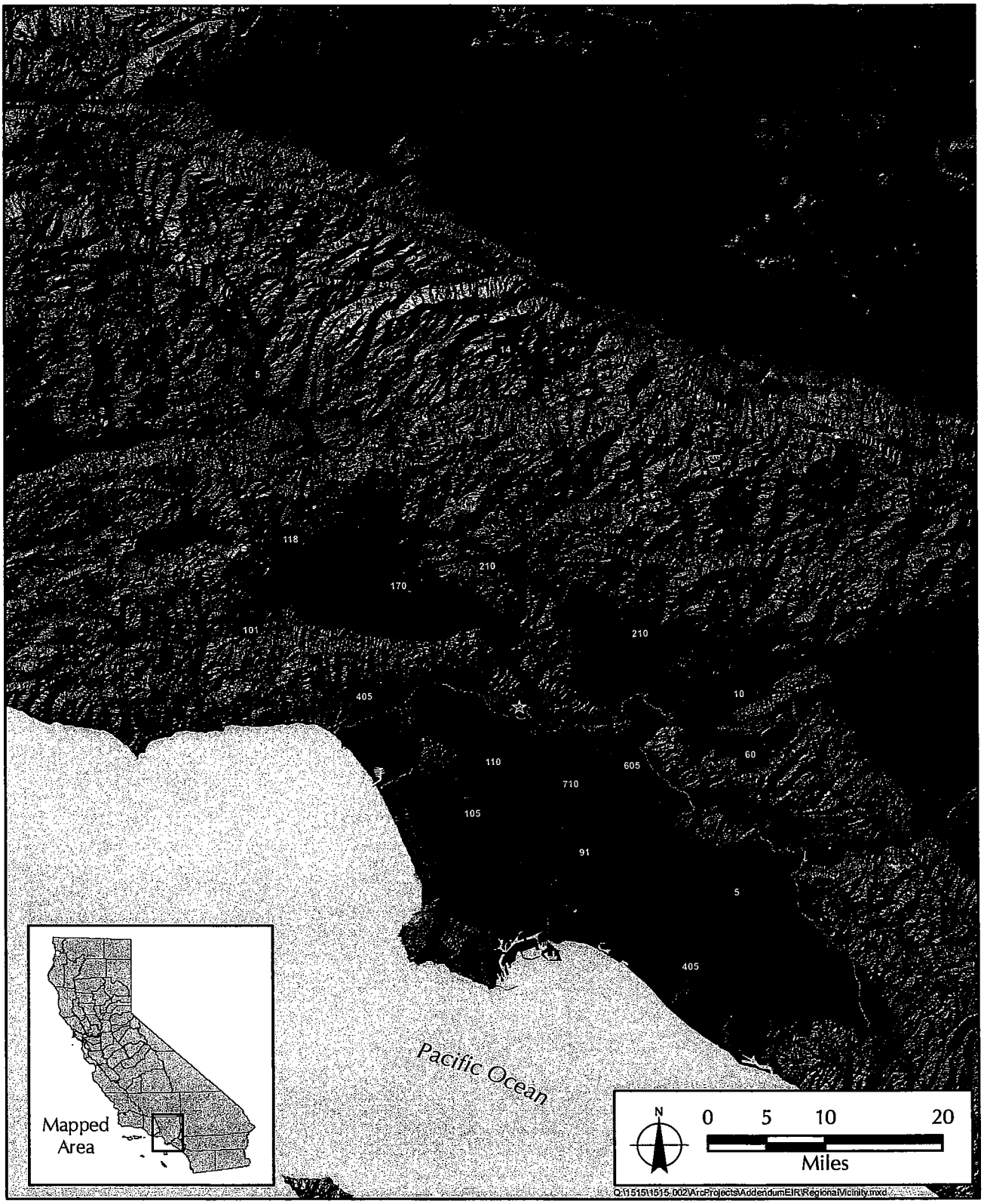
2.7 GENERAL PLAN LAND USE DESIGNATION

The refined project site would be largely developed within the approximately 4-acre Antique Block of the Historic District. The Antique Block is designated for public and semi-public facilities in the Land Use Policy Map of the County General Plan.[10] This area is included in the Central City Community Plan,[11] a part of the City General Plan.[12] The area is designated as Open Space, Public/Quasi-public "Civic Center" in the Community Plan and it is under County ownership. The County owns several parcels that comprise approximately 1.8 acres of the refined project site, and also owns an easement of approximately 0.7 acre comprising Republic Street and New High Street. The City owns approximately 0.5 acre comprising the parking lot. The refined project site is

[10] County of Los Angeles Department of Regional Planning, 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

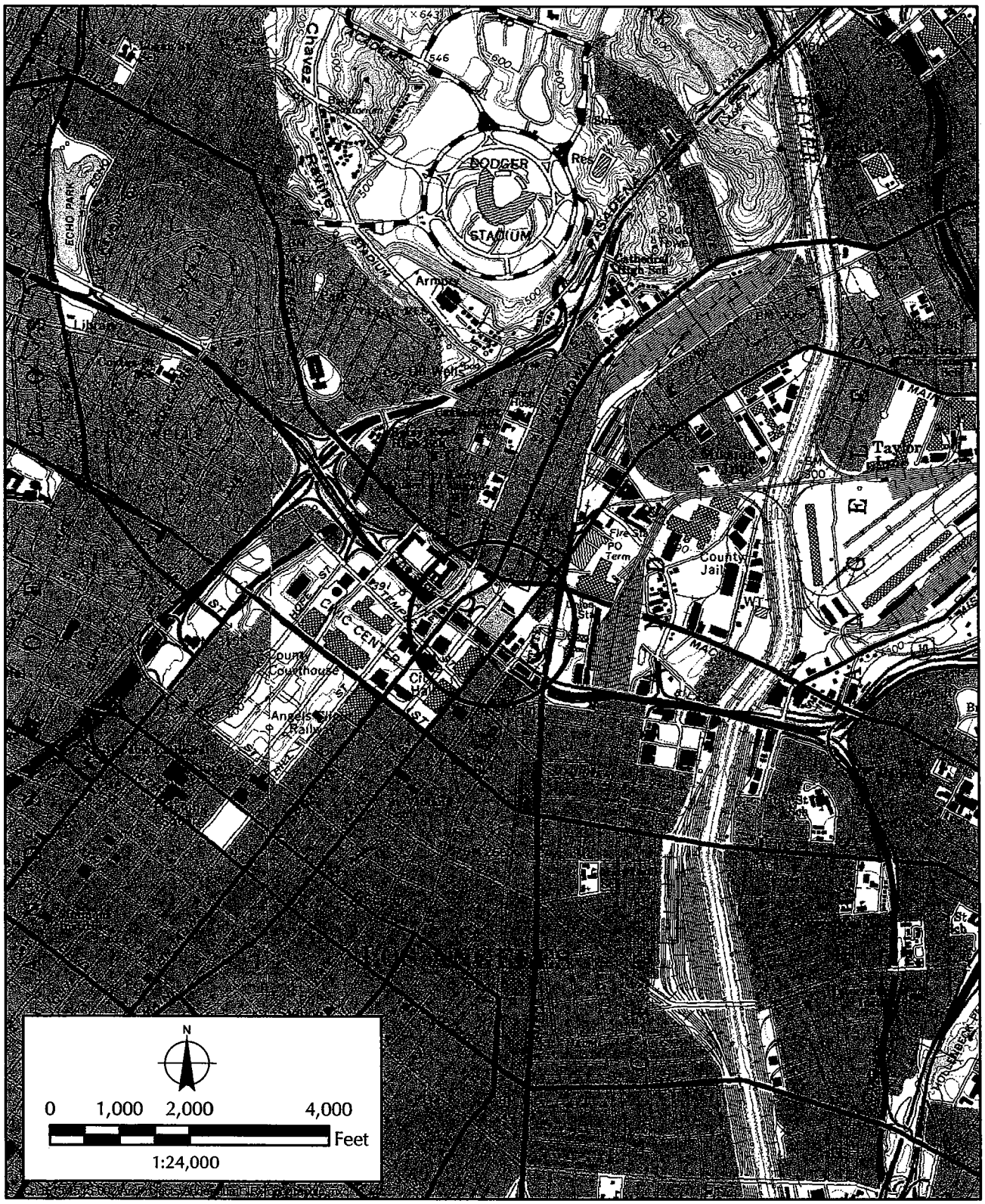
[11] City of Los Angeles Department of City Planning. Adopted 8 January 2003. *Central City Community Plan*. Contact: City of Los Angeles Department of City Planning, 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[12] City of Los Angeles Department of City Planning. March 2001 (Adopted 26 September 2001). *City of Los Angeles General Plan*. Contact: City of Los Angeles Department of City Planning, 200 North Spring Street, Room 525, Los Angeles, CA 90012–4801.



☆ Refined Project Location

FIGURE 2.5-1
Regional Vicinity Map



LEGEND

Refined Project Site

FIGURE 2.5-2

Topographic Map

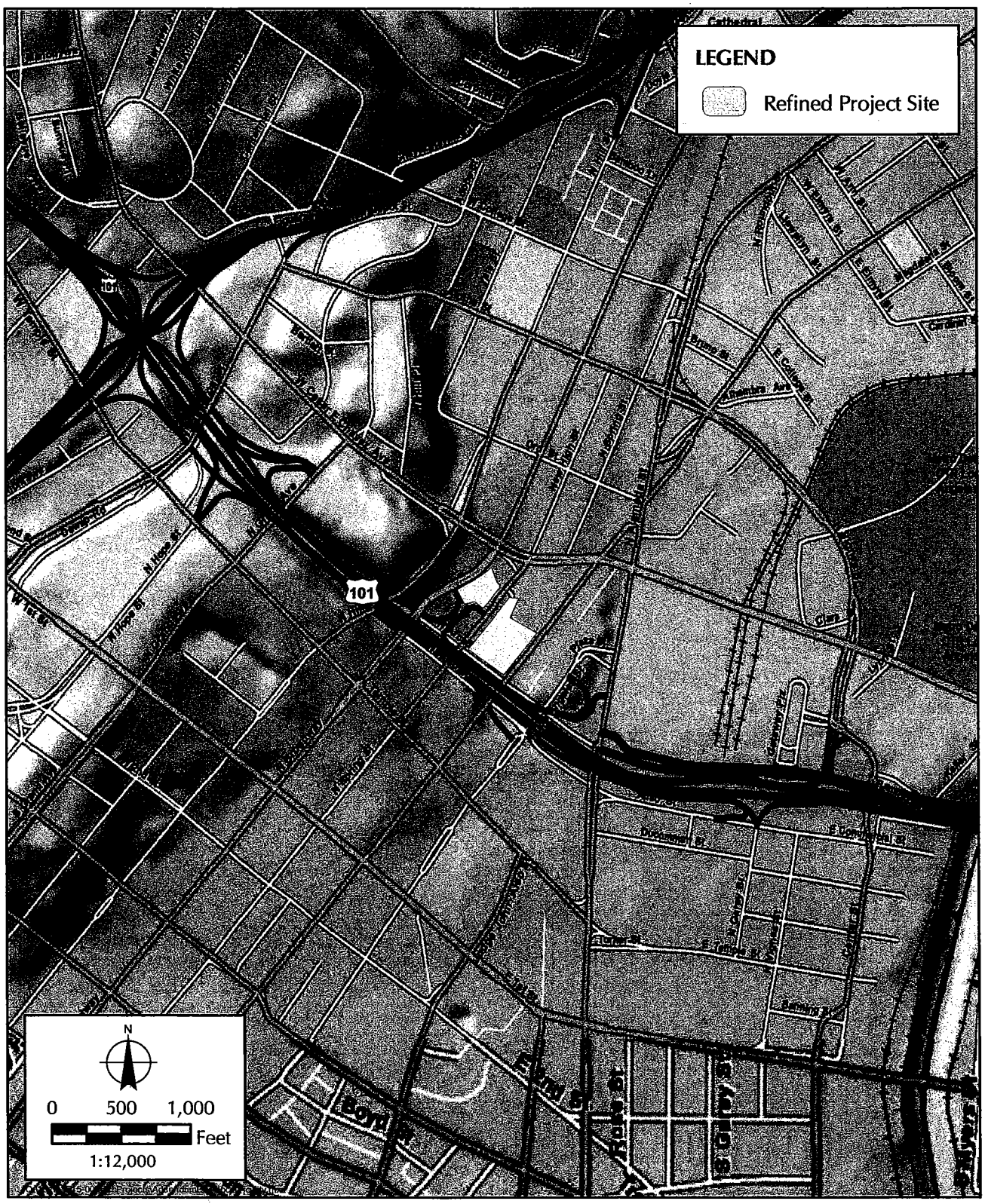


FIGURE 2.5-3
Local Vicinity Map

located on property identified by County Assessor's Parcel Numbers 5480-007-904, 5480-007-901, 5480-006-900, and 5480-005-904.[13]

2.8 ZONING

The refined project area is located wholly within the City; however, with minor exceptions, it is owned by the County and, pursuant to Government Code 53090 et seq., the refined project is not subject to the City's zoning ordinances. The County evaluated consistency with the City's zoning ordinance during preparation of the EIR and determined the project to be consistent with the City zoning ordinance. The City's zoning classification for the lots is [T][Q]c4-2D, which allows commercial uses consistent with Height District No. 2 development restrictions and special development limitations for the lot, including City Ordinance No. 162,013.[14]

2.9 EXISTING CONDITIONS

The larger land area for the refined project is bordered to the north by the existing Plaza Church; to the east by North Main Street and the El Pueblo Plaza; to the south by Arcadia Street and the Golden State Freeway; and to the west by Spring Street and County Parking Lot 15. The second land area, which comprises County Parking Lot 15 is bordered to the north by the Far East Bank site and adjoining parking lot (30 spaces), to the east by Spring Street, to the south by landscaped on-ramp and off-ramps to the US 101, and to the west by North Broadway.

The refined project site is composed of two vacant lots, two streets, and two historic buildings in the process of being rehabilitated consistent with approved project specifications for the Vickrey-Brunswig Building and the Plaza House. The refined project site is primarily owned by the County, except for the 56-space parking lot, which is owned by the City. The existing conditions and related statistical information are described for each existing land area within the refined project site in Table 2.9-1, *Inventory of Project Areas under Existing Conditions.*

[13] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[14] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

TABLE 2.9-1
INVENTORY OF PROJECT AREAS UNDER EXISTING CONDITIONS

Existing Land Areas	Size (approx. acres)	Exterior Footprint (approx. sq. ft.)	Interior Building Space (approx. sq. ft.)	Building Levels
Larger Area				
Vacant Lot 1	0.59	25,623	N/A	N/A
Vacant Lot 2 (Former Brunswig Garage)	0.43	18,870	N/A	N/A
New High Street	0.46	20,172	N/A	N/A
Republic Street	0.15	6,490	N/A	N/A
Plaza House	0.12	5,049	14,100	2 stories + basement
Vickrey-Brunswig Building	0.12	5,242	28,200	5 stories + basement
Former Brunswig Annex (demolished in 2007)	0.09	N/A	N/A	N/A
County Parking Lot 25	0.49	21,525	N/A	N/A
City Parking Lot 1	0.44	19,251	N/A	N/A
Smaller Area				
County Parking Lot 15	1.14	49,573	N/A	N/A

In 2009, the County of Los Angeles completed the exterior and structural rehabilitation and rehabilitation efforts, which included seismic upgrades of the Plaza House and Vickrey-Brunswig Building. At present, the project tenant, LA Plaza de Cultura y Artes Foundation, is in the process of completing tenant improvements to the Vickrey-Brunswig Building and the Plaza House consistent with the approved project.

Vacant Lot 1

The largest portion of the larger area within the refined project site consists of the approximately 0.59-acre fenced Vacant Lot 1, located immediately south of the Plaza Church. A portion of the area immediately adjacent to the Plaza Church is the former site of the Historic District's first cemetery, referred to as the Campo Santo. The Historic District's first settlers were buried in Campo Santo and were later relocated. Approximately half of the vacant lot comprises the former location of the 513 North Main Street Building, which was demolished in spring 2001. Prior to its demolition, the building was most recently used as a County Superior Court building. The remaining area was most recently operated by the County as a surface parking lot, but parking operations ceased in spring 2001. Following the closure of the parking lot, the County replaced the asphalt with grass and fenced the site to prevent unauthorized parking and trespassing.

Vacant Lot 2 (Former Brunswig Garage)

Vacant Lot 2 exists within the larger land area of the refined project site and is composed of the approximately 0.43-acre former location of the Brunswig Drug Laboratory and Brunswig Garage, located east of Spring Street and west of New High Street. The Brunswig Drug Laboratory was constructed in 1924 and operated until several years prior to its demolition in 1999. The Brunswig Garage was constructed in 1919 and was also demolished in 1999. Following demolition of the buildings, the site was paved and fenced and has remained a vacant lot since that time.

New High Street

An approximately 0.46-acre portion of the larger land area of the refined project site is composed of the approximately 279-foot-long and 38-foot-wide New High Street and associated sidewalks. New High Street extends from its intersection with Spring Street at its north end to its termination at Republic Street at its south end. New High Street is primarily used in conjunction with passenger loading and unloading in association with the Plaza Church as a secondary means of access to County Parking Lot 25 and occasional local traffic. New High Street is a City street that is in the process of being vacated at the request of the County.

Republic Street

An approximately 0.15-acre portion of the larger land area of the refined project site is composed of the approximately 281-foot-long and approximately 24-foot-wide Republic Street and associated sidewalks. Republic Street runs east to west between New High Street and North Main Street. Republic Street is used as a secondary access route to County Parking Lot 25, City Parking Lot 1, and occasional local traffic.

Plaza House

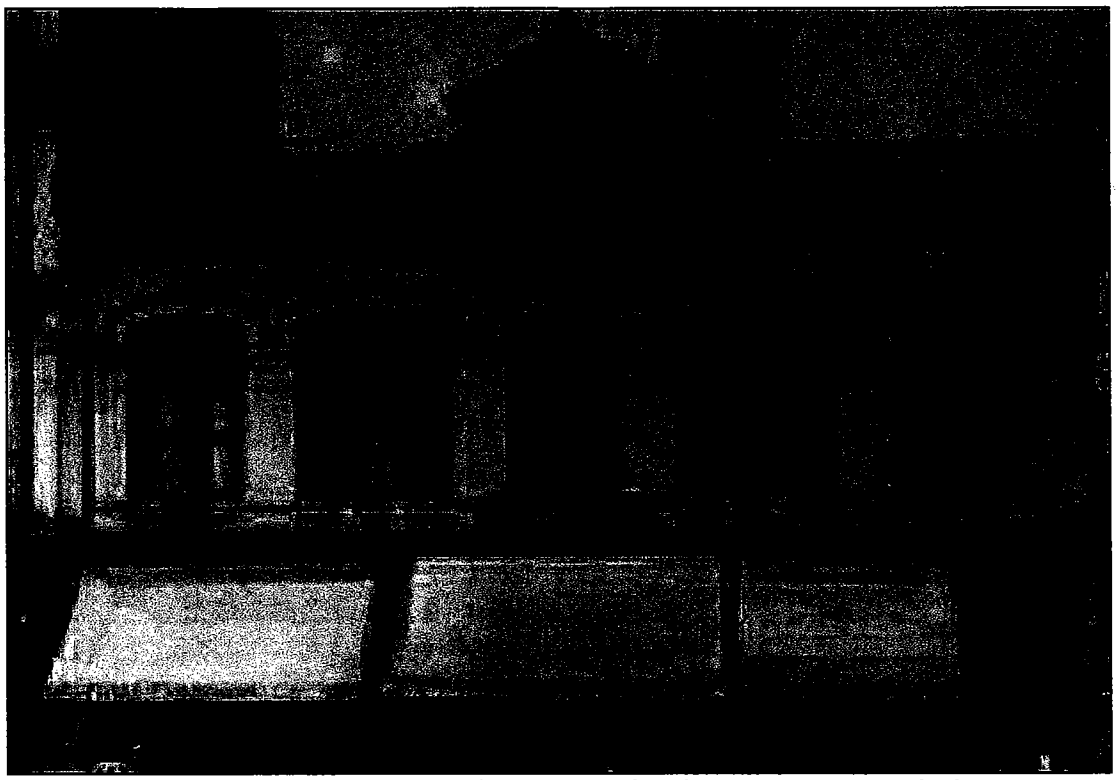
One of the two historic buildings within the larger land area of the refined project site is the Plaza House, with an existing exterior footprint of approximately 0.12 acre (5,049 square feet). The Plaza House is a two-story building with a full basement and a total interior space of approximately 14,100 square feet. It is located at 507 – 511 North Main Street, adjacent to the north side of the Vickrey-Brunswig Building. Design and development of this building is described in a report by Dan Peterson dated 1985.[15] In 1883, Phillippe Garnier commissioned Ezra Frank Kysor and Octavius Morgan of the architectural firm Kysor & Morgan to design and construct the Plaza House. Kysor was Los Angeles' first professional architect and partnered with Morgan. Kysor also designed the Pico House (1869–1870), Merced Theater (1870), and St. Vibiana Catholic Cathedral in Los Angeles (1876) (Figure 2.9-1, *Plaza House, circa 1920 and 2001*).

The Plaza House is a Victorian Italianate–style building that was initially used as a hotel / lodging house with stores, a restaurant, a saloon, and upstairs lodging. One large skylight ran from north to south on the roof, and several small room skylights were included throughout the roof area. Later, the Spanish consul used the Plaza House as an office. There were three entrances on the east facade that were flanked with molded pilasters and originally headed by leaded-glass transoms.

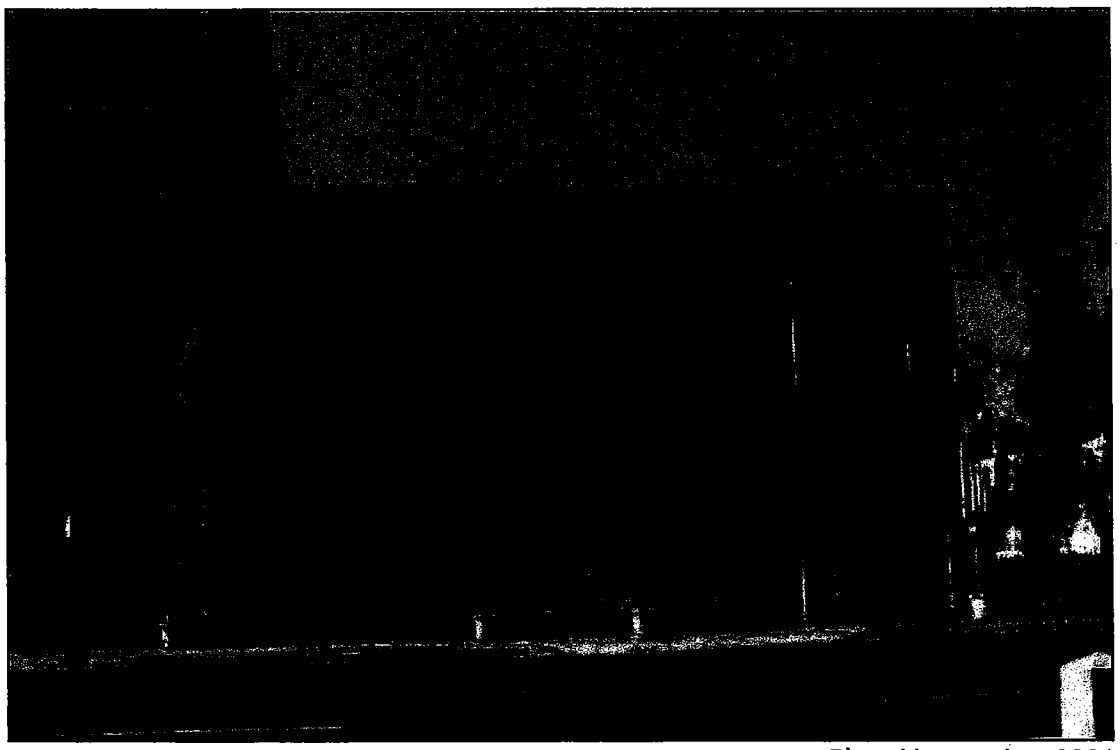
At the time the EIR was certified, the east entrances were boarded up and the windows had been replaced. Above the five windows on the second floor was a continuous frieze that was removed during the 1970s due to earthquake hazard concerns. Other ornaments that had been removed were the original dentils (small, projecting rectangular blocks forming a molding), bracketed building cornice, the detailed center triangular pediment, the "Garnier Block" relief, and the base of the pediment with "Plaza House" relief below.

In November 2002, a fire in the Plaza House started by vagrants caused significant damage to the building. The interior finishes of the building were further compromised by the application of

[15] Dan Peterson and Associates Inc. 1 June 1985. *Historic Structural Report, Antique Block, International Plaza de Los Angeles*. Contact: 1304 Pelican Way, Point Richmond, CA 94801.



Plaza House (then known as Garnier Block), circa 1920



Plaza House, circa 2001

FIGURE 2.9-1
Plaza House, circa 1920 and 2001

water to extinguish the fire.[16] The fire resulted in the complete loss of the roof, including the sky light, which was a major feature of the building. The fire caused extensive damage to approximately 20 percent of the second floor and 10 percent of the first floor. Visual inspections noted that much of the mortar was missing from masonry joints. The fire also damaged the interior walls on the second floor, and it was anticipated that approximately 20 percent of the walls required replacement. The loss of the roof in combination with the weakened condition of the masonry resulted in loss of portions of the west parapet. The *Final Structural Evaluation of the Existing Buildings of the Proposed Plaza de Cultura y Arte, 501 North Main Street, Los Angeles, California* described the Plaza House structure as expected to perform poorly in a severe seismic event and is categorized in the collapse performance level.[17] The Plaza House was red-tagged due to the compromised condition of the structure.[18] The County secured the building to protect public health and safety by enclosing the structure with fencing and closing the sidewalk immediately adjacent to the front of the building on North Main Street.

As a component of the approved project in the 2004 certified EIR, rehabilitation efforts to the building's shell and core and seismic strengthening were undertaken to maintain the historical and structural character of the Plaza House. These efforts were completed in 2009 (Figure 2.9-2, *Plaza House, February 2010*).[19] In addition to the structural upgrade, rehabilitation efforts included rehabilitation of the storefront facades, restoration of missing exterior architectural detailing, repair of exterior masonry, replacement of the skylight, and repair of interior wood elements.

Vickrey-Brunswig Building

The second historic building located within the larger land area of the refined project site is the Vickrey-Brunswig Building, with an existing exterior footprint of approximately 0.12 acre (5,242 square feet). Built in 1888, the Vickrey-Brunswig Building is a five-story building with a full basement and a total interior space of approximately 28,200 square feet. It is located at 501 North Main Street, adjacent to the south side of the Plaza House and east of the former site of the Brunswig Annex (Figure 2.9-3, *Vickrey-Brunswig Building, circa 1920 and 2001*). Design and development of the Vickrey-Brunswig Building is described in a report by Dan Peterson and Associates, Inc. dated 1985.[20] The building was designed in the High Victorian Italianate style by architect Robert B. Young. Building dimensions are 58.10 feet on North Main Street, 96.95 feet on Republic Street, and 106.71 feet along the south wall of the Plaza House.

One of the residential tenants of the Vickrey-Brunswig Building was Thomas Temple, editor of *La Cronica*, a Spanish-language newspaper. William Vickrey owned the building until 1898 when F.W. Braun Drug Company purchased and moved into the building. F.W. Braun Drug Company

[16] John A. Martin and Associates, Inc. August 2003. *Final Structural Evaluation of the Existing Buildings of the Proposed Plaza de Cultura y Arte, 501 North Main Street, Los Angeles, California*. Prepared for: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107.

[17] John A. Martin and Associates, Inc. August 2003. *Final Structural Evaluation of the Existing Buildings of the Proposed Plaza de Cultura y Arte, 501 North Main Street, Los Angeles, California*. Prepared for: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107.

[18] Red-tagged: Severely damaged and unsafe for short-term occupation, or exits are unsafe for building occupancy. Source: Applied Technology Council 20, *Procedures for Earthquake Safety Evaluation of Building*.

[19] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[20] Dan Peterson and Associates, Inc. 1 June 1985. *Historic Structural Report, Antique Block, International Plaza de Los Angeles*. Contact: 1304 Pelican Way, Point Richmond, CA 94801.

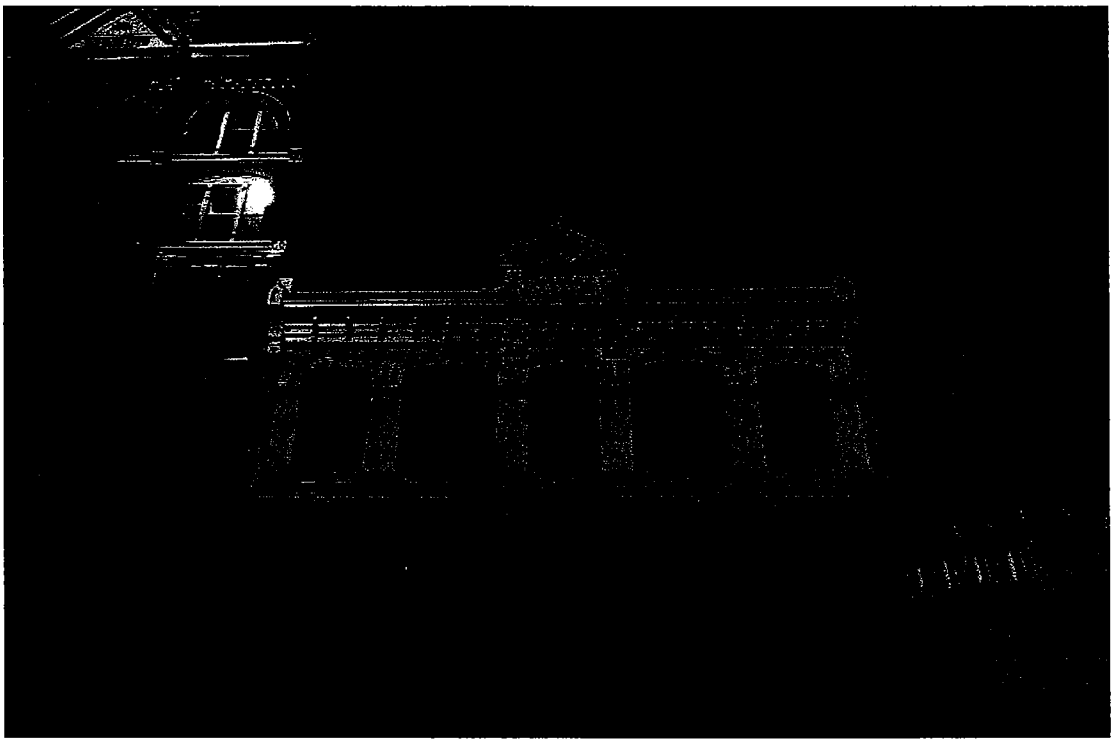
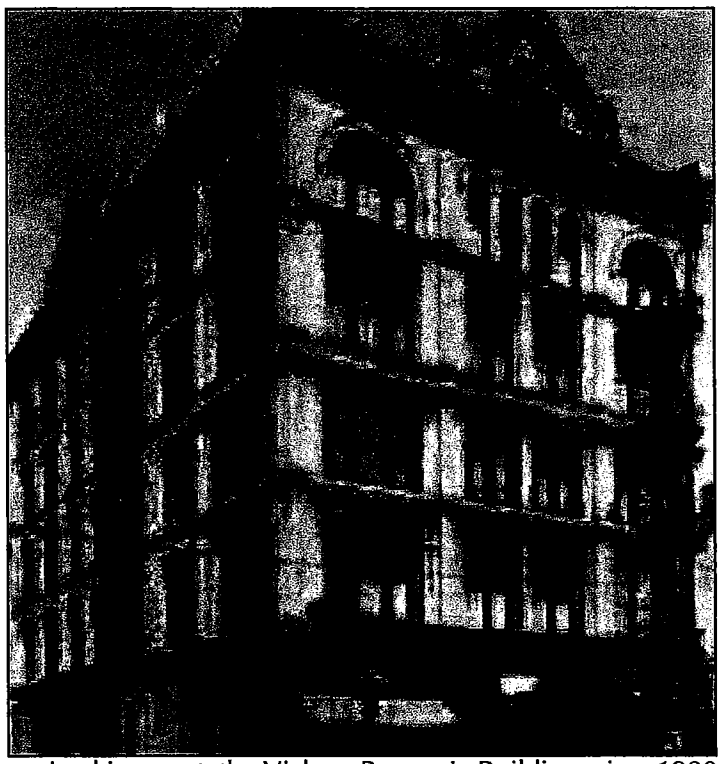
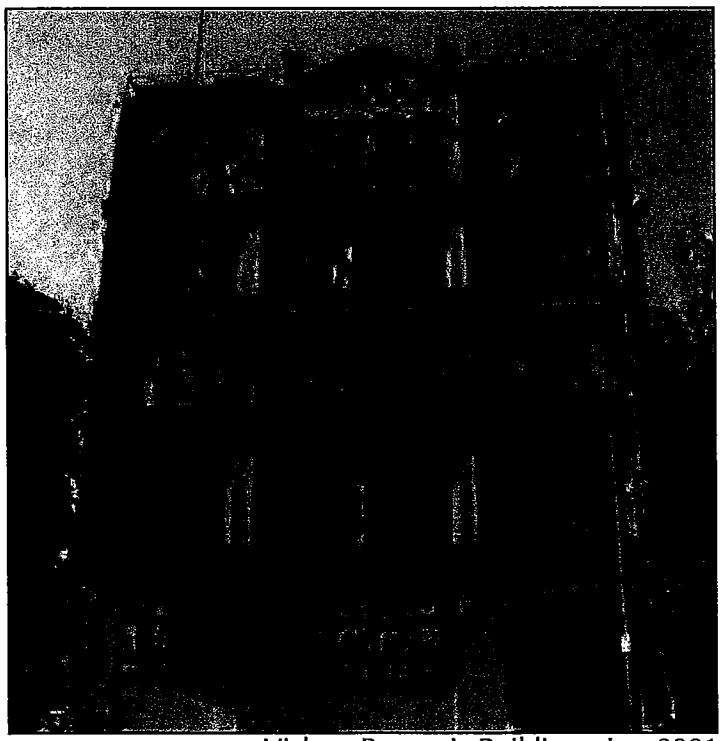


FIGURE 2.9-2
Plaza House, February 2010



Looking west, the Vickrey-Brunswig Building, circa 1920



Vickrey-Brunswig Building, circa 2001

FIGURE 2.9-3
Vickrey-Brunswig Building, circa 1920 and 2001

incorporated in 1902 as the Los Angeles branch of the southern and midwestern firm of Brunswig and Braun. The company's founder, Lucien Brunswig, was a native of France and came to Los Angeles in 1887 from New Orleans to establish a branch of his drug company. By 1907, he had bought out his partner and changed the company name to Brunswig Drug.

At the time the EIR was certified, vertical circulation between stories was via a non-original elevator and a staircase. The original glazing, molded corner posts, and pilasters of the storefronts were removed in 1948. A recessed entrance remains on the north end facing North Main Street. There was a staircase at the North Main Street entrance and a large skylight running east to west on the roof. A molded string course and distinct window type defined each story of the building. Exterior ornamentation included foam facade details replicating the original ornamentation and the central triangular pediment reading "1888 Brunswig." The southern pediment had been removed in addition to the cornice, molded panes in the frieze, the dentiled string course, decorative cresting, and heavy molding.

Although not subject to fire damage from the November 2002 fire, the Vickrey-Brunswig Building was subjected to at least two fires during the 30 years that the building was vacant. Water used to extinguish the Plaza House fire is believed to have further exacerbated the deterioration of the materials and structure of the Vickrey-Brunswig Building. According to the structural evaluation, the fire damage that was evident on the first, second, and fifth floors destroyed some of the framing and sheathing. The structural evaluation report indicated that framing members were charred but remain vertically stable and that shoring remained in some areas of the building. The report also indicated that the bricks and mortar had disintegrated in two of the walls of the basement. The masonry walls in the upper floors were in fair to poor condition and were considered to be repairable.[21] The building was retrofitted in 1948 by substitution of concrete walls on the first floor of the Main Street elevation for the original, and removal of the significant architectural features of the building, thus improving the seismic resistance of the building. The structural evaluation report described the Vickrey-Brunswig Building structure as expected to perform poorly in a severe seismic event and categorized the performance level during a seismic event as near collapse.[22] Thus, the Vickrey-Brunswig Building was a safety concern due to the compromised condition of the structure. The County secured the building to protect public health and safety.[23]

As with the Plaza House, exterior and structural rehabilitation efforts for the Vickrey-Brunswig Building were initiated in 2001 and completed in 2009, as components of the approved project certified in the 2004 EIR (Figure 2.9-4, *Vickrey-Brunswig Building, February 2010*).[24] In addition to structural modifications to improve the performance level, rehabilitation efforts included repair of the masonry exterior walls, restoration of missing exterior architectural ornament, and repair and replacement of windows, interior columns, floors, and ceilings, as required.

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[21] John A. Martin and Associates, Inc. August 2003. *Final Structural Evaluation of the Existing Buildings of the Proposed Plaza de Cultura y Arte, 501 North Main Street, Los Angeles, California*. Prepared for: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107.

[22] John A. Martin and Associates, Inc. August 2003. *Final Structural Evaluation of the Existing Buildings of the Proposed Plaza de Cultura y Arte, 501 North Main Street, Los Angeles, California*. Prepared for: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107.

[23] John A. Martin and Associates, Inc. August 2003. *Final Structural Evaluation of the Existing Buildings of the Proposed Plaza de Cultura y Arte, 501 North Main Street, Los Angeles, California*. Prepared for: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107.

[24] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

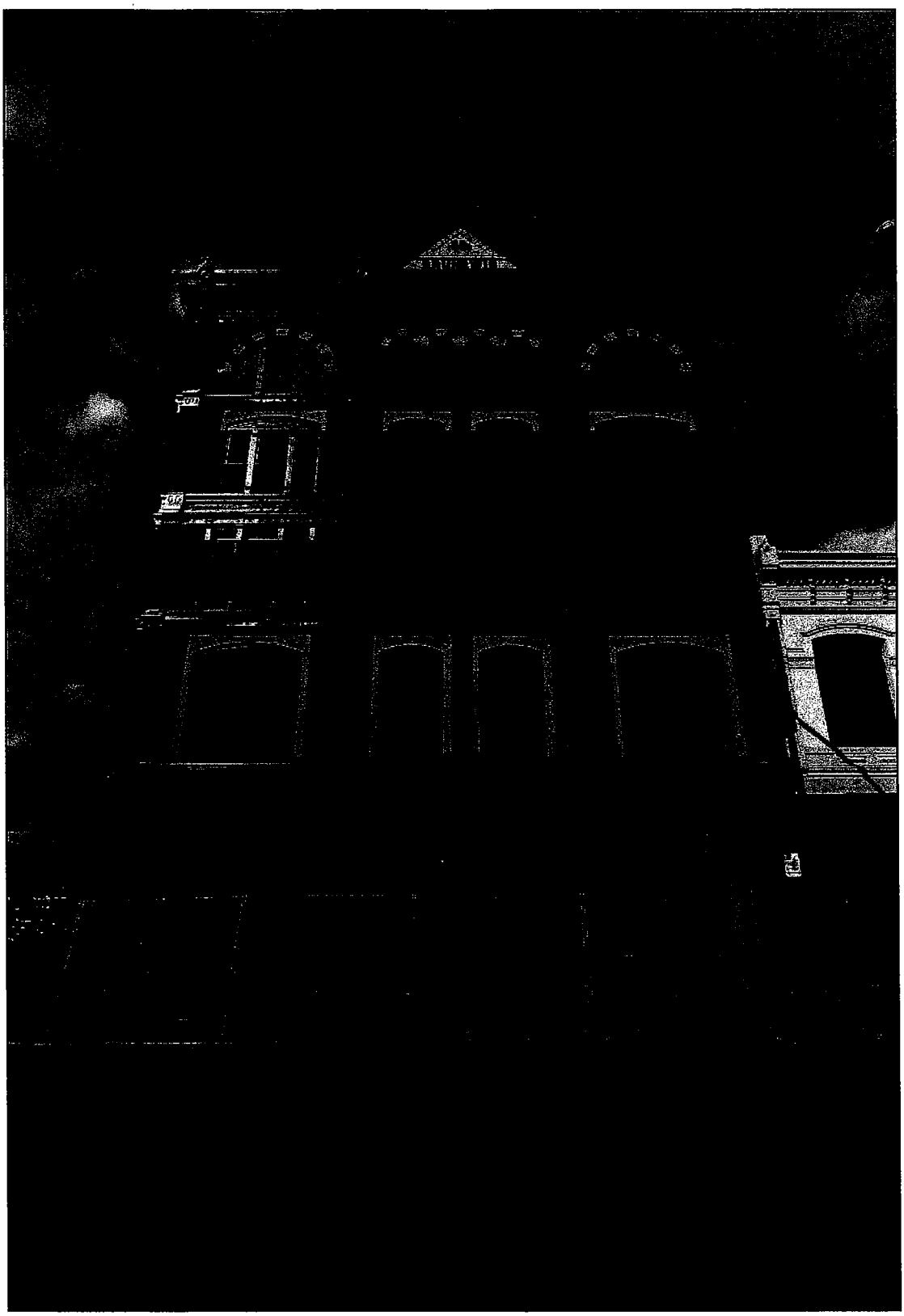

FIGURE 2.9-4
Vickrey-Brunswig Building, February 2010

Former Brunswig Annex

The third of the three historic buildings that was located on the property was demolished in 2007 accordance with the approved project.

County Parking Lot 25

The larger area of the refined project site includes the approximately 0.49-acre County Parking Lot 25, located at the northeast corner of the intersection of Spring Street and Arcadia Street. This parking lot currently contains 72 spaces. The primary access is from Spring Street, with a secondary access from New High Street.

City Parking Lot 1

The larger area of the refined project site includes the approximately 0.44-acre City Parking Lot 1, located between Republic Street and Arcadia Street, immediately adjacent to North Main Street. The primary access is from North Main Street, with a secondary access from Republic Street. This lot currently contains 56 parking spaces·

County Parking Lot 15

The smaller area of the refined project site is composed of the approximately 1.14-acre County Parking Lot 15, located south of Cesar E. Chavez Avenue, west of Spring Street, north of Arcadia Street, and east of North Broadway. This parking lot currently contains 158 spaces utilized for federal court juror parking. The primary access to the parking lot is from Spring Street.

2.10 STATEMENT OF OBJECTIVES

The refined project area would be developed as a multipurpose facility for out-of-state and regional visitors, as well as local residents. This site would be designed to create a pedestrian-oriented facility that celebrates, promotes, and preserves an understanding and appreciation of Mexican American historical contributions to Los Angeles through a full-range of integrated cultural, educational, and arts programming.

Goals

The Foundation and the County are committed to creating a pedestrian-oriented Mexican American cultural heritage center that serves regional and community needs and celebrates, promotes, and preserves an understanding and appreciation of the diverse contributions of early Mexican American settlers in the history and development of Los Angeles through programming that integrates art, culture, and education.

Objectives

The goals of the refined project are consistent with those of the certified EIR. Table 2.10-1, *Approved and Refined Project Goals Comparison,* lists the approved and refined project objectives; although the refined project objectives are consistent with the certified EIR, minor changes to the objectives are italicized in the table below. As shown, 14 of the 15 goals remain the same. The only change relates to the multi-purpose community center, which has been removed.

TABLE 2.10-1
APPROVED AND REFINED PROJECT GOALS COMPARISON

Original Objectives	Refinements to the Objectives
1. Provide a facility inspired by late 19th-century Mexican-style architecture, including plazas, paseos, gardens, and a courtyard, that provides interior and exterior spaces to accommodate approximately 90,000 visitors annually.	1. Provide a facility inspired by late 19th-century Mexican-style architecture, including plazas, paseos, gardens, and a courtyard, that provides interior and exterior spaces to accommodate approximately 90,000 visitors annually.
2. Within the facility, provide at least 20,000 square feet dedicated to educational facilities and programs to support a full range of opportunities for cultural and artistic expression, including, but not limited to, music, theater, dance, visual and applied arts, and heritage and genealogy.	2. Within the facility, provide at least 20,000 square feet dedicated to educational facilities and programs to support a full range of opportunities for cultural and artistic expression, including, but not limited to, music, theater, dance, visual and applied arts, and heritage and genealogy.
3. Within the facility, provide a multipurpose community center with a minimum size of 6,000 square feet to support the continued celebration of traditional cultural events, including festivals, weddings, and other public and private events. This venue would be appurtenant and complementary to other existing venues in the Historic District.	3. *Elements related to this objective have been removed in the refined project.*
4. Within the facility, provide an indoor venue for theatrical and cultural performances for audiences of approximately 100 people.	4. Within the facility, provide a venue for theatrical and cultural performances for audiences of approximately 100 people.
5. Within the facility, provide at least 2,000 square feet (to accommodate three standard school classes) dedicated to interactive exhibits and resources for people of all ages to experience traditional Mexican American and other Latino cultures.	5. Within the facility, provide at least 2,000 square feet (to accommodate three standard school classes) dedicated to interactive exhibits and resources for people of all ages to experience traditional Mexican American and other Latino cultures.
6. Within the facility, provide interior and exterior settings for the concurrent staging of up to three standard classes.	6. Within the facility, provide interior and exterior settings for the concurrent staging of up to three standard classes.
7. Within the facility, provide at least 4,000 square feet of suitable space for historical and cultural exhibitions, including the display and storage of artifacts and archives, concerning the historical significance of the Historic District and past and present Mexican American contributions to the Los Angeles community.	7. Within the facility, provide at least 4,000 square feet of suitable space for historical and cultural exhibitions, including the display and storage of artifacts and archives, concerning the historical significance of the Historic District and past and present Mexican American contributions to the Los Angeles community.
8 Within the facility, support $1,000,000 worth of revenue-generating activities to defray the cost of programming at build-out, consistent with the goals and objectives of the refined project.	8 Within the facility, support $1,000,000 worth of revenue-generating activities to defray the cost of programming at build-out, consistent with the goals and objectives of the refined project.
9. Identify a project design that enhances the utilization of County-owned property adjacent to the Church of Nuestra Señora la Reina de Los Angeles (Plaza Church) and respects and integrates into the historical setting of the Historic District, within which the refined project is proposed to be located.	9. Identify a project design that enhances the utilization of County-owned property adjacent to the Church of Nuestra Señora la Reina de Los Angeles and respects and integrates into the historical setting of the Historic District, within which the refined project is proposed to be located.

TABLE 2.10-1
APPROVED AND REFINED PROJECT GOALS COMPARISON, Continued

Original Objectives	Refinements to the Objectives
10. Consider the feasibility of adaptive reuse of one or both of the two historic structures, consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.	10. Consider the feasibility of adaptive reuse *of the two* historic structures (i.e., the Plaza House and the Vickrey-Brunswig Building), consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
11. Create a park-like setting to honor the historic Campo Santo (recognizing the original location of the cemetery associated with the Plaza Church).	11. Create a park-like setting to honor the historic Campo Santo (recognizing the original location of the cemetery associated with the Plaza Church).
12. Provide a centralized place for visitors to obtain information on LA Plaza de Cultura y Artes, the surrounding Historic District, and other downtown destinations.	12. Provide a centralized place for visitors to obtain information on LA Plaza de Cultura y Artes, the surrounding Historic District, and other downtown destinations.
13. Encourage County residents and visitors to use alternative means of transportation to the site, including walking, public transit, carpools, and alternative fuel–powered vehicles as the primary means of traveling to the facility.	13. Encourage County residents and visitors to use alternative means of transportation to the site, including walking, public transit, carpools, and alternative fuel–powered vehicles as the primary means of traveling to the facility.
14. Improve pedestrian circulation, including access for the disabled, in the area bounded by Cesar E. Chavez Avenue, Main Street, Arcadia Street, and Spring Street, which includes the Antique Block of the Historic District.	14. Improve pedestrian circulation, including access for the disabled, in the area bounded by Cesar E. Chavez Avenue, Main Street, Arcadia Street, and Spring Street, which includes the Antique Block of the Historic District.
15. Enhance pedestrian connections to the Angels' Walk, including Olvera Street, the County and City Civic Center, the Music Center / Walt Disney Concert Hall, Union Station, Japanese American Cultural and Community Center, and Chinatown.	15. Enhance pedestrian connections to the Angels' Walk, including Olvera Street, the County and City Civic Center, the Music Center / Walt Disney Concert Hall, Union Station, Japanese American Cultural and Community Center, and Chinatown.

2.11 CONSTRUCTION SCENARIO

Construction of the refinements would be consistent with the construction described in certified EIR for the approved project. The proposed refinements within the refined project site in the Historic District are consistent with the refined project objectives established by the County.

Construction refinements are proposed for the overall relocation and spatial reconfiguration of site elements as well as the introduction of new elements toward the achievement of the established project goals. Minor improvements related to the project have been initiated; however, substantive changes are anticipated to begin in the fall of 2010. Construction of the refined project would be expected to occur in a simultaneously in a single phase, thereby requiring approximately 12 months to complete construction of the refined project

SECTION 3.0
ENVIRONMENTAL ANALYSIS

The environmental analysis provided in this section describes the information that was considered in evaluating the questions contained in the Environmental Checklist of the California Environmental Quality Act.[1] The information used in this evaluation is derived from the literature review (see Section 4.0, References, for a list of reference material consulted), field reconnaissance, and meetings with the County of Los Angeles Chief Executive Office. The evaluation of direct, indirect, and cumulative impacts considered the existing conditions within the refined project site, immediately adjacent property, and the surrounding City of Los Angeles.

[1] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

3.1 AESTHETICS

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to aesthetics than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Aesthetics at the refined project site were evaluated with regard to the California Department of Transportation (Caltrans) Scenic Highway System designations, previously published information regarding the visual character of the refined project site including light and glare, site reconnaissance, and a review of conceptual elevations and site plans.[2]

The potential for the refined project to result in new or substantially more adverse significant impacts to aesthetics was evaluated in relation to four questions recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines:[3]

Would the refined project:

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

The refined project would not be expected to create a new or substantially more adverse significant impact on scenic vistas.[4] Pursuant to the Recreation element of the County of Los Angeles (County) General Plan, the Regional Recreation Areas Plan identifies scenic vistas as vista points, which are "areas that command a panoramic and in most cases spectacular view by virtue of elevation differential and relative freedom from visual obstructions."[5] In light of the determination that the refined project area is not located in the vicinity of a designated scenic vista, the proposed refinements to the approved project—to modify the site plan within the approved project boundaries to facilitate outdoor activities in part to support the designation of LA Plaza de Cultura y Artes as a Smithsonian Affiliate—would not be expected to result in new or substantially more adverse significant impacts to aesthetics related to substantial adverse effects to scenic vistas.

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

The refined project would not be expected to create a new or substantially more adverse significant impact on scenic resources within a state-designated scenic highway.[6] The officially designated state scenic highway nearest to the refined project site is Angeles Crest Highway, approximately 10 miles north of the refined project site. The County conferred this state designation on the Angeles

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] California Department of Transportation. 2008. "Eligible (E) and Officially Designated (OD) Routes." *The California Scenic Highway Program.* Available at: http://www.dot.ca.gov/hq/LandArch/scenic_highways/scenic_hwy.htm

[3] *California Code of Regulations.* Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[4] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[5] County of Los Angeles Department of Regional Planning, Regional Planning Commission. 7 January 2007. *Los Angeles County Regional Recreation Areas Plan: A Part of the Recreation Element of the General Plan.*

[6] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

Crest Highway by identifying the highway as an "adopted" scenic highway. Interstate 210 (Foothill Freeway), approximately 8 miles north of the refined project site, is another highway in the vicinity of the refined project that is eligible for listing as an officially designated state scenic highway.[7] Interstate 110 (Pasadena Freeway / Arroyo Seco Parkway), approximately 2 miles to the north of the refined project site, was designated as a California Historic Parkway by the State of California in 1993, a new designation in the California Scenic Highway Program.[8] The County does not designate Interstate 110 as a scenic highway.[9] The refined project area is not visible from any of the designated scenic highways or the historic parkway due to the distance and density of urban land uses between these highways and the refined project site. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to aesthetics related to substantial damage to scenic resources within a state scenic highway.

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

The refined project would not be expected to create a new or substantially more adverse significant impact to aesthetics related to the substantial degradation of the existing visual character of the refined project site and its surroundings. The project refinements would be consistent with the character of the existing site, its surroundings, and with the approved project. Based on the approved project, the Plaza House and the Vickrey-Brunswig Building would be adaptively reused according to the *The Secretary of the Interior's Standards for Rehabilitation*.[10] The former site of the Brunswig Annex (demolished in 2007) would be replaced with a support annex building.

The refined project would not be expected to displace or degrade the visual character of the refined project site and its surroundings, but would instead contribute to a visual improvement. Proposed construction would include project refinements 1–9, as described in Section 2.0, *Project Description*, of this Addendum to the EIR. The design elements of the new construction would be inspired by late 19th-century Mexican-style architecture, and would be respectful and compatible with the extant American Victorian Italianate buildings. It is anticipated that new construction would be differentiated from the old through the use of new brick or vibrantly colored brick and stucco exteriors that complement the older brick construction of the Plaza House. Roof material would likely be stone or tile that would be distinguished from and compatible with the surrounding structures with respect to both color and texture. New construction at the refined project site would only consist of the one-story Restroom/Lobby Building. As a one-story structure, this development would not exceed the height of the tallest existing building on the site (i.e., five stories). In addition, the Restroom/Lobby Building would have sufficient setback from the Plaza House with respect to the size, scale and proportion, and massing of the property and adjacent properties. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to aesthetics related to degradation of the existing visual character of the refined project site and its surroundings.

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[7] California Department of Transportation. 2008. "Eligible (E) and Officially Designated (OD) Routes." *The California Scenic Highway Program*. Available at: http://www.dot.ca.gov/hq/LandArch/scenic_highways/scenic_hwy.htm

[8] California Department of Transportation. 2008. "Eligible (E) and Officially Designated (OD) Routes." *The California Scenic Highway Program*. Available at: http://www.dot.ca.gov/hq/LandArch/scenic_highways/scenic_hwy.htm

[9] County of Los Angeles Department of Regional Planning. 1993. *Streamlined County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[10] Weeks, Kay D., and Anne E. Grimmer. 1995. The *Secretary of the Interior's Standards for Rehabilitation: Illustrated Guidelines for Rehabilitating Historic Buildings*. Washington, DC: U.S. Department of the Interior, National Park Service, Heritage Preservation Services.

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

The refined project would not be expected to create a new or substantially more adverse significant impact to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the refined project area.

The refined project area is located in an intensely lit urban setting. Existing sources of light and glare in the vicinity include street lighting at intersections; regularly spaced light towers along Main, Arcadia, and Spring Streets; vehicular traffic; exterior facade lighting on adjacent low- to mid-rise buildings; and interior office lighting. The surrounding Civic Center buildings produce glare from the reflection of the sun off the glass and metal facade materials under certain conditions. The historic structures within the El Pueblo de Los Angeles Historic District produce minimal glare from the windows as they are primarily constructed of wood, plaster, or other nonreflective materials.[11] The proposed refinements to the approved project would also be constructed primarily of wood, plaster, or other nonreflective materials. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

[11] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

3.2 AGRICULTURAL AND FORESTRY RESOURCES

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to agricultural resources than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Therefore, current analysis is evaluated with regard to the County of Los Angeles (County) General Plan,[2] City of Los Angeles (City) General Plan,[3] and the Los Angeles Central City Community Plan.[4] Agricultural resources at the refined project site were evaluated in accordance with guidelines stipulated by the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP),[5] and the County General Plan.[6]

The State of California Environmental Quality Act (CEQA) Statutes define agricultural land as "prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture land inventory and monitoring criteria, as modified for California," and is herein collectively referred to as "Farmland."[7] The potential for the refined project to result in new or substantially more adverse significant impacts to agricultural resources was evaluated in relation to three questions recommended for consideration by the State CEQA Guidelines:[8]

Would the refined project:

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

The refined project would not be expected to create a new or substantially more adverse significant impact to agricultural resources in relation to the conversion of Farmland to non-agricultural use. The refined project location, as determined by existing conditions and refined project boundaries, is not located on land designated as Farmland. The Central City Community Plan designates the land surrounding the refined project site as commercial and open space.[9] The most recent mapping of the County for Farmland delineated by the CDC FMMP was reviewed for the refined project

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[3] City of Los Angeles Department of City Planning. March 2001 (Adopted 26 September 2001). *City of Los Angeles General Plan*. Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012–4801.

[4] City of Los Angeles Department of City Planning. Adopted 8 January 2003. *Central City Community Plan*. Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[5] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. 2004. *Important Farmland in California, 2002*. Sacramento, CA.

[6] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[7] *California Code of Regulations*. Division 13, Chapter 2.5, Sections 21000-21177 [§21060.1(a)].

[8] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[9] City of Los Angeles Department of City Planning. Adopted 8 January 2003. *Central City Community Plan*. Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

site.[10] Based on the review of the land use designations and applicable Important Farmland map for the refined project site, there is no Farmland located in or immediately adjacent to the refined project site. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural resources related to the conversion of Farmland to non-agricultural use.

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

The refined project would not be expected to create a new or substantially more adverse significant impact to agricultural resources in relation to a conflict with existing zoning for agricultural use or a Williamson Act contract. Based on an analysis with relation to the County General Plan[11] and the City General Plan,[12] there is no agricultural land use zoned within the area surrounding the refined project site in the City. Based on the review of the City and County zoning and status of Williamson Act contracts, there would be no expected impacts to agricultural resources related to a conflict with existing zoning for agricultural use or any existing or future Williamson Act contract.[13] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural resources related to a conflict with existing zoning for agricultural use or a Williamson Act contract.

(c) Conflict with existing zoning for, or cause rezoning of, forest land [as defined in Public Resources Code Section 12220(g)], timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production [as defined by Government Code Section 51104(g)]?

The refined project would not create a new or substantially more adverse significant impact to agricultural and forest resources in relation to a conflict with existing zoning for, or rezoning of, forest land [as defined in Public Resources Code Section 12220(g)], timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production [as defined by Government Code Section 51104(g)]. Public Resources Code Section 4526 states:

> "Timberland" means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others.[14]

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[10] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. 2004. *Important Farmland in California, 2002*. Sacramento, CA.

[11] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[12] City of Los Angeles Department of City Planning. March 2001 (Adopted 26 September 2001). *City of Los Angeles General Plan*. Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[13] California Department of Conservation. 2008. Williamson Act Program. Available at: http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx

[14] *California Public Resources Code*. Section 4526.

Government Code Section 51104 (g) states:

> "Timberland production zone" or "TPZ" means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, "timberland preserve zone" means "timberland production zone."[15]

Sections 51112 and 51113 relate to timberland production within timberland production zones.[16] Finally, subdivision (h) states that a "'compatible use' is any use which does not significantly detract from the use of the property for, or inhibit, growing and harvesting timber," and provides six specific instances where such uses would be contrary or inconsistent with the land being considered a compatible use.[17]

According to the Department of Forestry and Fire Protection, the State of California consists of approximately 5,418,979 acres of land that has been classified as a timberland production zone, or TPZ.[18] TPZ is designated in 32 counties within the state. The County of Los Angeles, which includes the City of Los Angeles, does not contain land that is designated as a timberland production zone.[19,20] The refined project site is a developed site in an urbanized area; it is not zoned for forest land, timberland, or timberland production, and it is not adjacent to land zoned as such.[21] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources related to a conflict with existing zoning for, or rezoning of, forest land [as defined in Public Resources Code Section 12220(g)], timberland [as defined by Public Resources Code Section 4526], or timberland zoned Timberland Production [as defined by Government Code Section 51104(g)].

(d) Result in the loss of forest land[22] or conversion of forest land to non-forest use?

The refined project would not create a new or substantially more adverse significant impact to agricultural and forest resources in relation to loss of forest land or conversion of forest land to non-forest use. The refined project includes the proposed refinements to the LA Plaza de Cultura y Artes that would allow for additional outdoor space and activities. New construction would modify the site plan within the approved project boundaries to facilitate outdoor activities in part to support

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[15] *California Government Code*. Article 1, General Provisions, Sections 51100-51104. Section 51104 (g).

[16] *California Government Code*. Article 2, Timberland Production Zones, Sections 51110-51119.5. Sections 51112-51113.

[17] *California Government Code*. Article 1, General Provisions, Sections 51100-51104. Section 51104 (h).

[18] California Department of Forestry and Fire Protection. 3 January 2002. *Timberland Site Class on Private Lands Zoned for Timber Production*. Technical working paper. Sacramento, CA.

[19] California Department of Forestry and Fire Protection. 3 January 2002. *Timberland Site Class on Private Lands Zoned for Timber Production*. Technical working paper. Sacramento, CA.

[20] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Available at: http://ceres.ca.gov/docs/data/0700/791/HYPEROCR/hyperocr.html

[21] City of Los Angeles Department of City Planning. Accessed September 2009. Web site. "Zone Information and Map Access System." Available at: http://zimas.lacity.org/

[22] Public Resources Code Section 12220(g) defines forest land as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."

the designation of LA Plaza de Cultura y Artes as a Smithsonian Affiliate. The existing site is located in the City and County of Los Angeles within two blocks of Olvera Street and two blocks west of Union Station, a highly urbanized area where land uses immediately surrounding the refined project site consist largely of public and semi-public facilities. As such, the refined project would not be expected result in the loss of forest land or conversion of forest land to non-forest use because there is no forest land on or immediately adjacent to the refined project site.[23] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources related to loss of forest land or conversion of forest land to non-forest use.

(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland,[24] to non-agricultural use or conversion of forest land to non-forest use?

Implementation of the refined project would not result in changes to the environment that could convert Farmland to non-agricultural uses. The refined project site is located in an urban setting, and land uses immediately surrounding the refined project site consist largely of public and semi-public facilities with no farmland within several miles. The refined project site is currently being used as the location for the existing LA Plaza de Cultura y Artes, and implementation of the refined project would allow for the creation of a multipurpose facility with integrated cultural, educational, and arts programming on the existing, urbanized refined project site. The refined project would not result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

[23] California Department of Forestry and Fire Protection. Accessed 19 April 2010. Web site. Available at: http://www.fire.ca.gov/

[24] State CEQA Statutes [(§21060.1(a)) Public Resources Code 21000-21177] define agricultural land to mean "prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture (USDA) land inventory and monitoring criteria, as modified for California." These are herein collectively referred to as "Farmland."

3.3 AIR QUALITY

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to air quality than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Air quality at the refined project site was evaluated with regard to the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), the Clean Air Act (CAA),[2] and the County of Los Angeles (County) General Plan.[3]

Data on existing air quality in the South Coast Air Basin (SCAB), in which the refined project site is located, are provided by a network of air monitoring stations operated by the California Environmental Protection Agency (Cal/EPA), the California Air Resources Board (CARB), and the South Coast Air Quality Management District (SCAQMD). The potential for the refined project to result in new or substantially more adverse significant impacts to air quality was evaluated in relation to five questions recommended for consideration by Appendix G of the State CEQA Guidelines.[4]

Would the refined project:

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

The refined project would not be expected to create new or substantially more adverse significant impacts to air quality in relation to conflicts with or obstruction of implementation of the applicable air quality plan. The refined project area is located within the SCAQMD portion of the SCAB, which is in non-attainment for both federal and state ozone (O_3) standards and both federal and state particulate matter (PM_{10} and $PM_{2.5}$) standards.[5] The refined project components, as described in Section 2.0, *Project Description*, of this Addendum EIR, would be expected to be consistent with the County General Plan and the Los Angeles Central City Community Plan land use designation and zoning for the area, and would not be expected to result in new or increased population growth. In addition, the refined project would require a reduced gross square footage of new construction, thereby reducing potential construction-related air quality impacts in relation to obstructing the implementation of the SCAQMD Final 2007 Air Quality Management Plan[6] than anticipated in the 2004 certified EIR.[7] Although construction of the refined project components are expected to result in nitrogen oxide (NO_x) emissions that would exceed the significance threshold

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] U.S. Environmental Protection Agency. 2005. "Clean Air Act: Title I - Air Pollution Prevention and Control." *Clean Air Act*. Available at: http://www.epa.gov/air/caa//

[3] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[4] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[5] South Coast Air Quality Management District. June 2007. *Final 2007 Air Quality Management Plan*. Available at: http://www.aqmd.gov/aqmp/07aqmp/aqmp/Complete_Document.pdf

[6] South Coast Air Quality Management District. June 2007. *Final 2007 Air Quality Management Plan*. Available at: http://www.aqmd.gov/aqmp/07aqmp/aqmp/Complete_Document.pdf

[7] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

established by the SCAQMD for NO_x emissions during construction, this potentially significant, unavoidable, and adverse impact has been identified in the 2004 certified EIR.[8] Construction of the proposed refinements to the approved project would not be expected to result in substantially more adverse significant impacts related to NO_x emissions than analyzed and concluded in the 2004 certified EIR. In addition, operation of the refined project would not be expected to create new or substantially more adverse significant air quality impacts in relation to obstructing implementation of the applicable air quality plan as the refined project would be expected to entail a similar operational scenario to the project analyzed in the 2004 certified EIR.[9] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to air quality in relation to consistency with the applicable air quality plan.

(b) Violate any air quality standard or contribute substantially to existing or projected air violations?

The refined project would not be expected to create new or substantially more adverse significant impacts to air quality in relation to violation of any air quality standard or contribute substantially to existing or projected air quality violations. Construction- and operation-related air quality impacts were analyzed in the 2004 certified EIR due to construction, operation, and maintenance of facilities, including the existing Plaza House, the existing Vickrey-Brunswig Building, and two newly constructed buildings, totaling approximately 55,300 square feet.[10] However, as described in Section 2.0, *Project Description*, of this Addendum EIR, the refined project would entail construction, operation, and maintenance of facilities that would reduce the total footprint of the approved project. Therefore, it is unlikely that construction and operation of the refined project would cause a new air quality violation or a more adverse increase in existing violations than analyzed in the 2004 certified EIR.[11] Impacts to air quality related to air quality standards would be expected to be reduced to below the level of significance with the incorporation of mitigation measures Air-1 through Air-12 specified in the 2004 certified EIR, with the exception of NO_x emissions, which have been identified as a potentially significant, unavoidable, and adverse impact in the 2004 certified EIR.[12] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to air quality related to a violation of any air quality standard or substantial contribution to existing or projected air violations.

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[8] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[9] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[10] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[11] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[12] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

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

The refined project would not be expected to create new or substantially more adverse significant impacts to air quality in relation to a cumulative considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. The refined project site is located within the SCAB, which is in non-attainment for both federal and state O_3 standards and both federal and state PM_{10} and $PM_{2.5}$ standards.[13] During the construction phase, emissions resulting from the operation of construction equipment may include ozone precursor emissions and other criteria pollutants. However, the refined project would be expected to entail construction of reduced square footage in comparison to the approved project analyzed in the 2004 certified EIR, thereby resulting in a smaller construction scale than anticipated.[14] In addition, potential impacts to air quality related to criteria pollutants as a result of implementation of the refined project would be expected to be reduced to below the level of significance with the incorporation of mitigation measures Air-1 through Air-12 specified in the 2004 certified EIR, with an exception of NO_x emissions, which have been identified as a potentially significant, unavoidable, and adverse impact in the 2004 certified EIR.[15] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to air quality related to criteria pollutants.

(d) Expose sensitive receptors to substantial pollutant concentrations?

The refined project would not be expected to create new or substantially more adverse significant impacts to air quality in relation to exposure of sensitive receptors to substantial pollutant concentrations. Sensitive receptors in the vicinity of the refined project area remain the same as those identified in the 2004 certified EIR.[16] Although sensitive receptors may be exposed to emissions, such as fugitive dust, combustion emission, and diesel particulate matter, the refined project would be expected to result in less construction than that approved in the 2004 certified EIR, thus reducing the exposure to these pollutants.[17] In addition, impacts to air quality related to exposing sensitive receptors to substantial pollutant concentrations would be expected to be reduced to below the level of significance with the incorporation of mitigation measures Air-1

[13] South Coast Air Quality Management District. June 2007. *Final 2007 Air Quality Management Plan*. Available at: http://www.aqmd.gov/aqmp/07aqmp/aqmp/Complete_Document.pdf

[14] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[15] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[16] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[17] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

through Air-12 specified in the 2004 certified EIR.[18] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to air quality related to exposing sensitive receptors to substantial pollutant concentrations.

(e) Create objectionable odors affecting a substantial number of people?

The refined project would not be expected to create new or substantially more adverse significant impacts to air quality in relation to the creation of objectionable odors affecting a substantial number of people. Construction of the refined project would require the use of construction equipment and vehicles, which may be fueled by diesel. Odors associated with emissions from diesel equipment and vehicles may be considered unpleasant. In order to project the significance level of impact of the refined project to air quality under the worst-case scenario, construction of the refined project would be expected to be consistent with the approved project. The short-term nature of the construction duration would reduce potential impacts to air quality related to the creation of objectionable odors resulting from the construction of a pedestrian-oriented Mexican American cultural heritage center. In addition, with the incorporation of mitigation measures Air-1 through Air-12 specified in the 2004 certified EIR, potential impacts to air quality in relation to objectionable odors affecting a substantial number of people would be expected to be reduced to below the level of significance.[19] Therefore, the refined project would not be expected to create new or substantially more adverse significant impacts to air quality in relation to objectionable odors affecting a substantial number of people.

[18] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[19] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

3.4 BIOLOGICAL RESOURCES

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to biological resources than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Biological resources at the refined project site were evaluated with regard to the County of Los Angeles (County) General Plan;[2] a query of the California Natural Diversity Database (CNDDB);[3] the U.S. Geological Survey (USGS) 7.5-minute series Los Angeles topographic quadrangle,[4] in which the refined project site is located, and all surrounding USGS 7.5-minute series topographic quadrangles (Burbank,[5] Pasadena,[6] Mt. Wilson,[7] Hollywood,[8] El Monte,[9] Whittier,[10] South Gate,[11] and Inglewood[12]); and a review of published and unpublished literature germane to the refined project.

The potential for the refined project to result in new or substantially more adverse significant impacts to biological resources was evaluated in relation to six questions recommended for consideration by the State California Environmental Quality Act Guidelines:[13]

Would the refined project:

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

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] County of Los Angeles Department of Regional Planning, 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[3] California Department of Fish and Game, 2002. *RareFind 2: A Database Application for the Use of the California Department of Fish and Game Natural Diversity Data Base*. Sacramento, CA.

[4] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

[5] U.S. Geological Survey. [1966] Photorevised 1972; minor revision 1994. 7.5-minute Series, Burbank, California, Topographic Quadrangle. Reston, VA.

[6] U.S. Geological Survey. 1995. 7.5-minute Series, Pasadena, California, Topographic Quadrangle. Reston, VA.

[7] U.S. Geological Survey. [1966] Photorevised 1981. 7.5-minute Series, Hollywood, California, Topographic Quadrangle. Reston, VA.

[8] U.S. Geological Survey. 1988. 7.5-minute Series, Mount Wilson and Pasadena, California Topographic Quadrangle.

[9] U.S. Geological Survey. [1966] Photorevised 1972; minor revision 1994. 7.5-minute Series, El Monte, California, Topographic Quadrangle. Reston, VA.

[10] U.S. Geological Survey. [1965] Pphotorevised 1981. 7.5-minute Series, Whittier, California, Topographic Quadrangle. Reston, VA.

[11] U.S. Geological Survey. [1964] Photorevised 1981. 7.5-minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[12] U.S. Geological Survey. [1964] Photorevised 1981. 7.5-minute Series, Inglewood, California, Topographic Quadrangle. Reston, VA.

[13] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

The analysis undertaken in the Initial Study[14] for the approved project determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.[15] The refined project would not be expected to result in new or substantially more adverse significant impacts, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) and the U.S. Fish and Wildlife Service (USFWS). The refined project site would modify the site plan within the approved project boundaries to facilitate outdoor activities in part to support the designation of LA Plaza de Cultura y Artes as a Smithsonian Affiliate. Site reconnaissance, undertaken on August 30 and September 26, 2001, determined that there was no suitable habitat for the 5 listed plant species, 15 sensitive plant species, 8 sensitive wildlife species, or 19 listed wildlife species that have the potential to be present within the greater Los Angeles metropolitan area. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS.

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

The analysis undertaken in the Initial Study[16] for the approved project determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.[17] Consequently, the refined project would not be expected to result in a potential adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG and USFWS. The USGS 7.5-minute series Los Angeles, California, topographic quadrangle was reviewed to assess the potential presence of lakes, streams, or other drainages that have the potential to support riparian or wetland vegetation.[18] The refined project site contains no such features; therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations.

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[14] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[15] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[16] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[17] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[18] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

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

The analysis undertaken in the Initial Study[19] for the approved project determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.[20] Consequently, the refined project would not be expected to result in a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.[21] No federally protected wetlands are present within the refined project site. Moreover, the USGS 7.5-minute series Los Angeles, California, topographic quadrangle[22] was reviewed to assess the potential presence of lakes, streams, or other drainages that have the potential to support riparian or wetland vegetation and it was found that the refined project site contains no such features. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

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

The analysis undertaken in the Initial Study[23] for the approved project determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.[24] The refined project would not be expected to substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The refined project site consists of urban development and is bordered to the north, east, south, and west by development including buildings, parking lots, and streets. There are no open spaces, water bodies, or stream courses on site or immediately adjacent to the site that would facilitate movement of migratory fish or wildlife. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to movement of any native resident or migratory fish or wildlife species

[19] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[20] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[21] U.S. Code. Title 33, Chapter 26, Subchapter IV, Section 1344. Available at: http://www.4uth.gov.ua/usa/english/laws/majorlaw/33/1344.htm

[22] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

[23] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[24] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

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

The analysis undertaken in the Initial Study[25] for the approved project determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.[26] The refined project would not be expected to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Mature oak trees are afforded some level of consideration and protection pursuant to the County Oak Tree Ordinance.[27,28] The refined project site is located on land owned by the County and City of Los Angeles (City). One parcel owned by the City would be transferred to County ownership, if it were determined to be necessary for the refined project to comply with the tree preservation policy. Site reconnaissance, undertaken on August 30 and September 26, 2001, determined that there were no mature oak trees within the vicinity of the approved project. Therefore, the refined project would not result be expected to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

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

The analysis undertaken in the Initial Study[29] for the approved project determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.[30] The refined project would not be expected to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Based on coordination undertaken with the Carlsbad Field Office of the USFWS on October 10, 2001, there is no adopted or proposed Habitat Conservation Plan that includes or is adjacent to the refined project site.[31] Neither the County nor the City is currently enrolled nor have any future plans to be enrolled in a Natural Community Conservation Plan program. Therefore, the refined project would not be expected to result in a conflict with the

[25] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[26] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[27] Los Angeles County Fire Department, Division of Forestry. 2005. "Environmental Review Oak Tree Ordinance." Available at: http://www.fire.lacounty.gov/Forestry/EnvironmentalReview_OakTreeOrdiance.asp

[28] University of California Agriculture and Resources. "Oak Woodland Policies of 41 California Counties: Los Angeles." Integrated Hardwood Range Management Program. Available at: http://danr.ucop.edu/ihrmp/county/LOSANGELES.pdf.

[29] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[30] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[31] Hoecker, Annie, U.S. Fish and Wildlife Service. 10 October 2001. Personal Communication with Melisa Helton, Sapphos Environmental, Inc.

provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

3.5 CULTURAL RESOURCES

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project[1,2,3,4,5] (refined project) would result in new or substantially more adverse significant impacts in relation to cultural resources than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[6] Potential impacts to cultural resources located within the refined project site were evaluated based on a cultural resources records search conducted in support of the EIR, including a query of historic and prehistoric site records at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, in 2002; available historical photographs from the City of Los Angeles Public Library (Central Library); a historic architectural evaluation of the structures located on the refined project site; paleontological information obtained from the County of Los Angeles Natural History Museum; and review of both published and unpublished literature.[7]

The potential for the refined project to result in new or substantially more adverse significant impacts to cultural resources was evaluated in relation to four questions recommended for consideration by the State of California Environmental Quality Act (CEQA) Guidelines:[8]

Would the refined project:

(a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

The refined project would not be expected to create new or substantially more adverse significant impacts to cultural resources related to a substantial adverse change in the significance of a historical resource. The conclusion was made pursuant to a comparison of the refined project with the certified EIR and the Secretary of the Interior's Standards for Rehabilitation (Standards).[9] All

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[1] LA Plaza de Cultura y Artes. 25 March 2010. LA Plaza Site Plan. Prepared by: Rios Clemente Hale Studios, Los Angeles, CA.

[2] LA Plaza de Cultura y Artes. 12 March 2010. Central Plant Workshop Ground Floor Plan. Prepared by: Chu + Gooding, Los Angeles, CA.

[3] LA Plaza de Cultura y Artes. 22 December 2009. LA Plaza Walkway and North Wall – VGM and Vertigreen Wall. Prepared by: Rios Clemente Hale Studios, Los Angeles, CA.

[4] LA Plaza de Cultura y Artes. 22 December 2009. LA Plaza Walkway South Wall Custom Waterjet Cut Fence Panel. Prepared by: Rios Clemente Hale Studios, Los Angeles, CA.

[5] LA Plaza de Cultura y Artes. 23 September 2009. Patio Garden Canopy. Prepared by: Rios Clemente Hale Studios, Los Angeles, CA.

[6] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[7] Carey & Co. Inc. Architecture, Planning & Conservation. 15 April 2003. *Final Cultural Resources Technical Report, Antique Block, El Pueblo de Los Angeles Historic Monument, Los Angeles, California.* Prepared for: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: Old Engine Co. No. 2, 460 Bush Street, San Francisco, CA 94108.

[8] *California Code of Regulations.* Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[9] Weeks, Kay D. and Anne E. Grimmer. 1995. *The Secretary of the Interior's Standards for the Treatment of Historic Properties: with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.* U.S. Department of the Interior, National Park Service Cultural Resource Stewardship and Partnerships, Heritage Preservation Services, Washington, DC.

elements in the refined site plan are consistent with objectives identified in the approved EIR.[10] Consistent with CEQA, implementation of mitigation measure Cultural-3 specified for the approved project avoids significant adverse impacts to historical resources through conformance with the Standards. As with the approved project, implementation of mitigation measure Cultural-3 would avoid significant impacts related to historical resources. Each element of the refined project is expected to comply with the Standards (Table 3.5-1, *Proposed Project Refinements Compliance with the Secretary of the Interior's Standards*).

TABLE 3.5-1
PROPOSED PROJECT REFINEMENTS COMPLIANCE WITH THE SECRETARY OF THE INTERIOR'S STANDARDS

Proposed Refinement (PR)	Relationship to Certified Project	Does the Proposed Refinement Comply with the Standards?
PR-1: Program Use and Overall Spatial Configuration	The refined site plan modifies the overall spatial configuration of the conceptual plan approved in the certified EIR in regard to relative sizes, locations, and spatial relationships of program activities.	Yes. The refined site plan refocuses the project on outdoor activities. Plan modifications retain the relationship between historic buildings and the landscape and maintain intact the visually and spatially distinct character of the historic buildings. The refined site plan does not obscure any significant vistas to or from primary elevations of the historic buildings. Construction of the elements in the refined site plan would not cause removal or alteration of the character-defining features itemized in the EIR with respect to the Plaza House or the Vickrey-Brunswig Building.
PR-2: Elimination of the Previously Approved Theater Performing Arts Center	A new theater performing arts center, included in the certified project, is eliminated in the refined site plan resulting in a reduction of the construction footprint by approximately 25,000 square feet. In the refined site plan, a parking lot would continue to occupy the area.	Yes. Locations, massing, scale, and resulting density of new improvements in the refined project is appropriate for a historic district. The elimination of the theater performing arts center building is consistent with the Standards and would not cause any new or more severe impacts than those disclosed in the EIR.
PR-3: Elimination of the Previously Approved Newly Constructed Building and Addition of the Restroom/Lobby Building	(See each item discussed below.)	(See each item discussed below.)
PR-3(1): Elimination of the Previously Approved Newly Constructed Building	A new building, included in the certified project, is eliminated in the refined site plan, resulting in a reduction of the construction footprint by approximately 39,200 square feet.	Yes. The elimination of the building is consistent with the Standards.

[10] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

TABLE 3.5-1
PROPOSED PROJECT REFINEMENTS COMPLIANCE WITH THE SECRETARY OF THE INTERIOR'S STANDARDS, Continued

Proposed Refinement (PR)	Relationship to Certified Project	Does the Proposed Refinement Comply with the Standards
PR-3(2): Addition of the Restroom/Lobby Building	A new building with a reduced footprint is proposed.	Yes. The new building does not remove or relocate historic buildings, destroy historic materials and features, or compete with the existing spatial relationships of the historic buildings or the El Pueblo de Los Angeles Historic District. The new building is differentiated in design and materials from the historic buildings and complies with the design guidance for new construction provided in the EIR. If removed in the future, the new building would leave the essential form and integrity of the historic buildings unimpaired.
PR-4: Addition of the Shade Canopy	This element was not identified in the EIR conceptual plan.	Yes. The shade canopy's location, size, and height are appropriate and ensure that the historic buildings remain prominent. The design and massing do not visually conflict with the massing of the historic buildings. The proposed design would allow the historic buildings to be seen through gaps in the overhead covering. Structural supports would be anchored to the ground and cause minimal disturbance to the historic building.
PR-5: Addition of the Performance Stage with Canopy	This element was not identified in the EIR conceptual plan.	Yes. The performance stage is appropriately located at the rear portion of the property west of the streetscape of the El Pueblo de Los Angeles Historic District. The design and materials, differentiated from the historic buildings, would conform to the Standards. The open construction of the performance stage with canopy minimizes its massing. The spatial relationships of the historic buildings would be retained. If removed in the future, the new building would leave the essential form and integrity of the historic buildings unimpaired.
PR-6: Addition of the Central Plant Workshop	This element was not identified in the EIR conceptual plan.	Yes. The building is appropriately located west of the Vickrey-Brunswig Building, and would not obscure or touch a primary elevation. Contemporary in its design and materials, the building is obscured from public view to the north and does not compete with the existing spatial relationships of the historic buildings or the El Pueblo de Los Angeles Historic District.
PR-7: Plaza House, Minor Modification to Rehabilitation Scheme	Identified as a character-defining space.	Yes. The primary axis would remain intact. This wall affects a secondary corridor. Removal would accommodate circulation and museum requirements.
PR-8: Vickrey-Brunswig Building, Minor Modifications to Rehabilitation Scheme	(See each item discussed below.)	(See each item discussed below.)

TABLE 3.5-1
PROPOSED PROJECT REFINEMENTS COMPLIANCE WITH THE SECRETARY OF THE INTERIOR'S STANDARDS, Continued

Proposed Refinement (PR)	Relationship to Certified Project	Does the Proposed Refinement Comply with the Standards?
PR-8(1): New Door Opening on the North (Exterior) Wall at the First-Floor Level	Reopening of an enclosed window was approved for this location.	Yes. The north wall is a secondary elevation and this opening has already been altered. The new doorway is necessary for circulation and museum requirements and would be appropriately detailed.
PR-8(2): Reorientation of Newly Constructed West Staircase	A new staircase was approved for this location but oriented in the opposite direction.	Yes. The staircase would have the same location, occupy the same footprint except for a 180-degree rotation, and have the same design as previously determined to be consistent with the Standards.
PR-8(3): Partial Removal of Dumbwaiter Enclosure	Identified as a character-defining feature for retention.	Yes. The dumbwaiter is retained on the publicly accessible second and third floors. Removal in the basement is necessary to accommodate required structural work and on other levels for functional reasons.
PR-8(4): Brace Frames	Not specifically analyzed.	Yes. The brace frames, a health and safety requirement, would not conflict with any historic materials, features, finishes, spaces, or spatial relationships.
PR-8(5): Open Office Plan	Supports Objective 2 to provide at least 20,000 square feet dedicated to educational facilities and programs.	Yes. The open office plan accommodates functions required for the property's new use and would not conflict with any historic materials, features, finishes, spaces, or spatial relationships.
PR-8(6): Acoustic Paneling	Not specifically analyzed.	Yes. The ceiling-mounted acoustic paneling would not conflict with any surviving historic materials, features, finishes, spaces, spatial relationships, construction techniques, or examples of craftsmanship.
PR-8(7): Use of Partial Glass Walls	Not specifically analyzed.	Yes. The use of partial glass walls in classrooms and training rooms on the third, fourth, and fifth floors would not conflict with any character-defining features previously identified in the certified EIR.
PR-8(8): Treatment of Cosmetic Splits in Structural Wood Columns	Not specifically analyzed.	Yes. Repair of wood features typically requires patching, piecing-in, consolidating, or otherwise reinforcing the wood with recognized preservation methods to comply with the Standards. However, given the safety concern regarding the column's rough surfaces, covering the columns would also visually preserve the columns as an element of the building's structural system. Under the Standards, a treatment to cover the structural wood columns should be fully reversible and undertaken in such a manner that, if removed in the future, would leave unimpaired the essential form and integrity of the columns.

TABLE 3.5-1
PROPOSED PROJECT REFINEMENTS COMPLIANCE WITH THE SECRETARY OF THE INTERIOR'S STANDARDS, Continued

Proposed Refinement (PR)	Relationship to Certified Project	Does the Proposed Refinement Comply with the Standards?
PR-8(9): Interior Paint Schemes	Not specifically analyzed.	Yes. The use of white paint would not contrast with the building's historic fabric and would be on only new or replicated surfaces. Per the Standards, character-defining features would be painted appropriately in a manner that is compatible with historic finishes.
PR-9: Site Plan, Relocation and Reconfiguration of Approved Project Elements and Introduction of New Site Elements	(See each item discussed below.)	(See each item discussed below.)
PR-9(1): Campo Santo Memorial Garden	Identified as a project component in the EIR conceptual plan. In the refined site plan, garden dimensions are defined and the garden is relocated toward North Main Street.	Yes. The design of the grove, consisting of trees planted in rows with a central water feature, is intended to commemorate a cemetery formerly located on the property. In accordance with the Standards, the location and design of the grove does not create a false sense of historical development or add conjectural features or elements from other historic properties.
PR-9(2): Outdoor Classrooms	Represents a relocation of a previously approved project component.	Yes. Outdoor classroom spaces occupy appropriate locations and would be largely hidden from view by the Plaza House and Vickrey-Brunswig Building from the El Pueblo de Los Angeles Historic District.
PR-9(3): Paseos and Pedestrian Walkways (including media screens, water arches and jets, fences, lawn, and custom lawn umbrella sleeves)	Represents a relocation of a previously approved project component.	Yes. The paseos and walkways are appropriately sited and would not affect the exterior appearance of the El Pueblo de Los Angeles Historic District. Design elements, such as transparency, contemporary design, and differentiation in materials, do not introduce new, incompatible features to the historic setting of the Vickrey-Brunswig Building, Plaza House, and El Pueblo de Los Angeles Historic District.
PR-9(4): Fire Department Access and Turnaround	Represents a relocation of a previously approved project component.	Yes. The fire department access and turnaround are located at the edge of the historic district and away from the primary streetscapes and building concentrations. Provision of these spaces would enable continued use of the rehabilitated historic buildings. The refinement is consistent with the Standards and would not cause any new or more severe impacts than those disclosed in the EIR.
PR-9(5): Edge Plantings	Element was not identified in the EIR conceptual plan.	Yes. The plantings would be visually subservient to the historic buildings, be clearly recognizable as newer features, and be appropriately sited so as to not create a false historic appearance. The edge plantings do not compete with the existing spatial relationships of the historic buildings or the El Pueblo de Los Angeles Historic District.

PR-1: Program Use and Overall Spatial Configuration

The refined site plan supports the program of the site as a Mexican American cultural heritage center. Associated uses under the program would include exhibits, the expression of fine and applied arts, educational activities, and the celebration of traditional cultural events. Uses specified in the refined site plan, such as paseos, walkways, outdoor classroom space, garden space, and the New High Street turnaround, are consistent with the uses specified in the certified EIR.

The refined site plan modifies the overall spatial configuration of the conceptual plan approved in the certified EIR in regard to relative sizes, locations, and spatial relationships of program activities. The conceptual plan included two buildings, a theater performing arts center and a newly constructed building that were intended for community events and other public uses. The refined site plan refocuses the space on outdoor activities and eliminates these two buildings. In lieu of the buildings, the refined site plan creates new outdoor locations for community events, such as the shade canopy, outdoor classrooms, a performance stage with canopy, and a large lawn.

The Standards recommend that the relationship between historic buildings and the landscape be retained. The refined site plan continues to retain the spatial relationships that characterize the Vickrey-Brunswig Building, the Plaza House, and the El Pueblo de Los Angeles Historic District. In its layout and uses, the refined site plan design scheme unifies the property's new program with the existing historic buildings yet maintains intact the visually and spatially distinct character of the historic buildings. The site plan's shift toward maximizing outdoor spaces has created a plan that is focused on the center of the property, an area from which only the rear elevations of the historic buildings are visible. The outdoor spaces detailed in the refined site plan are partially obscured from the public right-of-way along North Main Street by historic buildings and the adjacent Plaza Church, which minimizes the visibility of these buildings from the streetscape. The refined site plan does not remove or relocate any historic building, obscure any significant vistas to or from primary elevations of the historic buildings, compete with the existing spatial relationships between the historic buildings or within the El Pueblo de Los Angeles Historic District, or introduce any incompatible intrusions into the historic streetscape. Program use and overall spatial configuration of the refined site plan is in compliance with the EIR and the Standards.

PR-2: Elimination of the Previously Approved Theater Performing Arts Center

The area of the proposed theater performing arts center, which was a new building identified in the conceptual plan approved in the EIR, is eliminated in the refined site plan. In the refined site plan, the area would be used for parking. The elimination of the theater performing arts center does not remove or relocate any historic building, obscure any significant vistas to or from primary elevations of the historic buildings, compete with the existing spatial relationships between the historic buildings or within the El Pueblo de Los Angeles Historic District, or introduce any incompatible intrusions into the historic streetscape. The elimination of the theater performing arts center is in compliance with the EIR and the Standards.

PR-3: Elimination of the Previously Approved Newly Constructed Building and Addition of the Restroom/Lobby Building

PR-3(1): Elimination of the Previously Approved Newly Constructed Building

The area of the property occupied by the previously approved newly constructed building, intended for community events and public-oriented uses and identified in the conceptual

plan in the EIR, would be used in the refined site plan for open space and outdoor events. The new Restroom/Lobby Building would occupy a portion of the area that was identified for the new construction and is therefore consistent with the certified EIR. The new Restroom/Lobby Building satisfies the Standards. The Standards recommend that the relationship between historic buildings and the landscape be retained. The elimination of the newly constructed building and addition of the Restroom/Lobby Building does not remove or relocate historic buildings, destroy historic materials and features, or compete with the existing spatial relationships of the historic buildings or the El Pueblo de Los Angeles Historic District. Consistent with the Standards, the Restroom/Lobby Building, as related new construction, would be differentiated from the older buildings through use of a modern but compatible design and selection of materials. In compliance with the Standards, the Restroom/Lobby Building, if removed in the future, would leave the essential form and integrity of the Vickrey-Brunswig Building and Plaza House unimpaired. The elimination of the previously proposed new building and addition of the Restroom/Lobby Building to the refined site plan is in compliance with the EIR and the Standards.

PR-3(2): Addition of the Restroom/Lobby Building

Construction of a new 5,562-square-foot building to the west of the Vickrey-Brunswig Building would be located primarily within the building footprint of the Brunswig Annex, which occupied the space adjacent to the Vickrey-Brunswig from 1897 until 2007, when it was demolished in accordance with the approved project. The approved project incorporated a new, four-story, 17,509-square-foot building, which would have occupied this site as well as the area to the north. The Restroom/Lobby Building (support annex) would be substantially smaller than the approved building in height, massing, and proportion, and would conform to the design specifications contained in the certified EIR. Construction of this new building would also incorporate the restrooms required to operate the rehabilitated Vickrey-Brunswig Building and Plaza House. This support building is appropriately located at the rear of the Vickrey-Brunswig Building, which is at a higher elevation than this structure, thus minimizing its visibility in the historic district.[11] In addition, the new building would maintain the historic building line along Republic Street. The new restrooms would support not only the rehabilitated buildings and Vickery-Brunswig Building but also the outdoor activity areas.

PR-4: Addition of the Shade Canopy

The shade canopy is a new element of the refined site plan that was not identified in the EIR conceptual plan; however, it is consistent with the site's public event function and the property's program as a Mexican American cultural heritage center. The shade canopy satisfies the Standards. The Standards recommend that related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The shade canopy does not destroy historic materials or features of the historic buildings as it does not connect or otherwise directly attach to the historic fabric of the adjacent Plaza House. Given the shade canopy's rear location to the west of the Main Street streetscape, the shade canopy does not participate in the streetscape rhythm of historic properties facing North Main Street or otherwise affect the exterior

[11] Weeks, Kay P., and Anne E. Grimmer. 1995. *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings.* Washington, DC, p. 112ff.

appearance of the El Pueblo de Los Angeles Historic District. The spatial relationships of the historic buildings would be retained.

The Standards recommend that new construction be differentiated from the old yet remain compatible with the historic buildings. Contemporary in design, the shade canopy has a partially open vinyl fabric roof that is supported by metal poles. The canopy is compatible with the historic construction as its lack of walls ensures that the views of the rear elevations of the historic buildings remain visible. The size of the shade canopy, at 3,027 square feet in area, is appropriate to the site and ensures that the historic buildings remain prominent. Similarly, the shade canopy is appropriately scaled as its height is aligned with the roof of the new Restroom/Lobby Building, which in turn is aligned to the historic floor divisions of the Vickrey-Brunswig Building and Plaza House. The shade canopy's massing, as an open structure, does not visually conflict with the massing of the historic buildings and is therefore appropriate within the context of the site. If removed in the future, the shade canopy would leave the essential form and integrity of the Vickrey-Brunswig Building and the Plaza House unimpaired. The shade canopy in the refined site plan is in compliance with the EIR and the Standards.

PR-5: Addition of the Performance Stage with Canopy

The performance stage with canopy is a new element of the refined site plan that was not included in the conceptual plan of the EIR. The performance stage with canopy satisfies the Standards. As a freestanding structure located at a distance from the Vickrey-Brunswig Building and the Plaza House, the performance stage with canopy does not destroy historic materials or features of the historic buildings. If removed in the future, the performance stage with canopy would leave the essential form and integrity of the property's historic buildings unimpaired. Given its location in the rear of the property, significantly west of the Main Street streetscape, the performance stage with canopy does not participate in the streetscape rhythm of historic properties facing North Main Street or otherwise affect the exterior appearance of the El Pueblo de Los Angeles Historic District.

The Standards recommend that new construction be differentiated from the old yet remain compatible with the historic construction. Contemporary in design, the performance stage with canopy is similar in design to the shade canopy with a vinyl fabric roof that is supported by metal poles. The open construction, without walls, minimizes the massing of the performance stage with canopy. Its height, at 29 feet, and distance to the historic buildings ensure that the historic buildings remain prominent. If removed in the future, the performance stage with canopy would leave the essential form and integrity of the Vickrey-Brunswig Building and the Plaza House unimpaired. The performance stage with canopy in the refined site plan is in compliance with the EIR and the Standards.

PR-6: Addition of the Central Plant Workshop

In the refined site plan, the central plant area of the property that is located to the rear (northwest) of the Vickrey-Brunswig Building, has a new addition composed of a workshop that supports exhibit and gallery uses. The new Central Plant Workshop would occupy a portion of the area allocated to central plant uses, consistent with the certified EIR. The new Central Plant Workshop satisfies the Standards. The building, grouped with other buildings with a similar support function, is not intended as a public element of the complex. The building is largely obscured from public view to the north by the Restroom/Lobby Building. The Central Plant Workshop retains and preserves the property's historic character and does not remove or relocate historic buildings, destroy historic materials and features, or compete with the existing spatial relationships of the

historic buildings or the El Pueblo de Los Angeles Historic District. The Central Plant Workshop is differentiated from the historic buildings with the use of concrete masonry units (CMU), a contemporary material that is used elsewhere on the property and is compatible with the historic material. The building is compatible in size, scale, and massing with the historic buildings. The Central Plant Workshop, if removed in the future, would leave the essential form and integrity of the Vickrey-Brunswig Building and Plaza House unimpaired. The addition of the Central Plant Workshop to the refined site plan is in compliance with the EIR and the Standards.

PR-7: Plaza House, Minor Modifications to Rehabilitation Scheme

The removal of an existing interior, wood-frame partition wall at the southwest corner of the second floor of the Plaza House would not result in new significant impacts or substantially greater impacts to historical resources and would comply with the Standards. The partition wall in question is a component of the original plan layout, is finished with wood wainscoting and wood trim, and contains a wood door and transom, all of which are character-defining features according to the certified EIR and all of which are substantially deteriorated and damaged. Removal of the wall at this location would be the least intrusive solution to the need to accommodate a higher intensity public use of the Plaza House (which would showcase a restored corridor and space at the northeast corner of the second floor) than originally programmed, would facilitate circulation between the Plaza House and Vickrey-Brunswig Building and use of the elevator in the Vickrey Brunswig Building, and would be more accommodating to the physically challenged. The Standards allows for the alteration of building spaces and features to accommodate service functions required for the new use. The Standards stipulates that such alterations should be placed within historically designated service areas, or on upper floors. The portion of the partition that would be removed, constituting less than 10 percent of the upper-story partition walls, is located in a back corner of the second floor. The partition segment defines two of the individual room spaces, as well as a secondary hallway space. The removal of this section of partition wall would not alter the existing character-defining primary space of the second floor, the central hall corridor, which defines the space and reflects the original hotel plan layout. Four other secondary corridors—which exhibit similar layout, design, and finishes—and all other defined room spaces would remain intact and would retain their character-defining partition walls. The second-floor space and remaining partition walls are in compliance with the EIR and the Standards.

PR-8: Vickrey-Brunswig Building, Minor Modifications to Rehabilitation Scheme

PR-8(1): New Door Opening on the North (Exterior) Wall at the First-Floor Level

The addition of a new opening at the west end of the first-floor north masonry wall of the Vickrey-Brunswig Building would comply with the approved project EIR and the Standards. This new door opening is necessary to provide primary access for large groups (such as a classroom-size group of students or other visitors) to the upper floors using the west staircase and to add as a climate control buffer for the gallery exhibits. The approved project included the re-creation of a window opening that physical evidence indicated had been enclosed at this location. The refined project would substitute a door opening. This replacement is consistent with the approved project because new openings are allowable under the Standards, provided that they are placed on secondary elevations.[12] The new

[12] Weeks, Kay P., and Anne E. Grimmer. 1995. *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Washington, DC: U.S. Department of the Interior, National Park Service, p. 87.

opening would be located at the west end of the north elevation, which was identified as a secondary elevation in the certified EIR. The Vickrey-Brunswig Building faces east toward Main Street. The new opening would be situated at the rear of the north elevation, which is currently not visible from the public view. In addition, the new opening would be concealed from view from the public right-of-way by new construction under both the approved project and the refined project. The opening and door would be designed and scaled in a manner that would complement the historic character of the building but would be clearly distinguishable as a new addition. The opening would be framed by a steel lintel, and the brick wall fabric would be visible from the exposed door jamb. The existing historic fabric surrounding the new opening would be retained and protected. The new door opening on the north (exterior) wall at the first floor level is in compliance with the EIR and the Standards.

PR-8(2): Reorientation of Newly Constructed West Staircase

The 180-degree rotation of the staircase orientation near the west end of the Vickrey-Brunswig Building interior would comply with the approved project EIR and the Standards. The approved project allowed for the construction of a new staircase at the current proposed location, which is appropriately placed at the rear of the building in a secondary space that does not interfere with character-defining features or spaces. This refinement to the project would not result in any new impacts to historical resources; the placement, footprint, and design of the approved staircase would not change, only the orientation. The reorientation of the staircase would not result in the removal of any features identified as significant in the certified EIR. The reorientation would support museum and programming and also facilitate circulation of classroom size groups to the upper programming floors due to the limited size and capacity of the one elevator included in the refined project. The reorientation of the west staircase is in compliance with the EIR and the Standards.

PR-8(3): Partial Removal of Dumbwaiter Enclosure

The partial removal of the dumbwaiter enclosure in the Vickrey-Brunswig Building from the basement, first-floor, fourth-floor, and fifth-floor levels would comply with the Standards. The dumbwaiter enclosure was identified as a contributing feature of the Vickrey-Brunswig Building in the certified EIR. The removal of the feature in the basement is necessary to implement the micro-pylon structural-strengthening scheme selected to comply with seismic-retrofit standards. Several structural schemes were considered; the chosen scheme would result in the least disturbance to historical features while bringing the building to the required collapse prevention standard. The Standards allow for the correction of structural deficiencies in support of an appropriate adaptive reuse, provided that they are done in a manner that is sensitive to the historic character of the building.[13] As further discussed in the National Park Service Preservation Brief No. 41, *The Seismic Retrofit of Historic Buildings*, historic materials should be preserved and retained to the greatest extent possible and not replaced wholesale in the process of seismic strengthening.[14] The dumbwaiter enclosure would be retained on the second and third floors, which would be

[13] Weeks, Kay P., and Anne E. Grimmer. 1995. *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Washington, DC: U.S. Department of the Interior, National Park Service, p. 94.

[14] Look, David W., AIA; Terry Wong, PE; and Sylvia Rose Augustus. "The Seismic Retrofit of Historic Buildings, Keeping Preservation in the Forefront." *Preservation Brief, No. 241*. Washington, DC: U.S. Department of the Interior, National Park Service, Technical Preservation Services. Available at: www.cr.npr.gov/hps/tps/briefs/brief41.htm

accessed most by the public for educational purposes related to the history of the building. The partial removal of the dumbwaiter enclosure is in compliance with the certified EIR and the Standards.

PR-8(4): Brace Frames

The brace frames, added to all floors of the Vickrey-Brunswig Building, are one result of the building's recent seismic-retrofitting project. The Standards recommend that health and safety modifications be constructed in such a manner that historic character-defining spaces, features, and finishes are preserved. In the September 10, 2009, plans,[15] the upper portions of the brace frames would be exposed and reveal an aspect of the building's structural framework to the public. The lower portions of the brace frames would be covered to address code requirements. In compliance with the Standards, the treatment of the brace frames would not introduce conjectural features, create a false sense of historical development, or incorporate elements from other historic properties. Prior to the Shell and Core project, the heavily deteriorated condition of the property resulted in scant extant historic fabric, except for portions located primarily on the second floor and the building's exterior walls. The brace frames, therefore, do not destroy historic materials, features, and spatial relationships that characterize the property. The treatment of the brace frames is in compliance with the certified EIR and the Standards.

PR-8(5): Open Office Plan

The Standards allow for the alteration of building spaces to accommodate functions required for a new use, stipulating that the new use requires minimal changes to its distinctive materials, features, spaces, and spatial relationships. In the refined project, the fifth floor of the Vickrey-Brunswig Building would continue to be used as office space; however, the few surviving spatial divisions, which were not original or significant, would be replaced by an open plan. An open plan would support the new use of the building and create multipurpose office space on the fifth floor. No historic interior photos of the fifth floor are known to exist that depict the interior spatial configuration during the building's period of significance. In addition, the heavily deteriorated condition of the interior of the property prior to the proposed project left scant historic fabric on the fifth floor. Given the unknown historical layout and the floor's lack of historic fabric, an open office plan is an appropriate spatial arrangement of the fifth floor. As open, wall-free office floor plans are widely used in contemporary offices, the proposed open office plan would not introduce conjectural features, create a false sense of historical development, or incorporate elements from other historic properties. The open office plan would not destroy historic materials, features, and spatial relationships that characterize the property. The open office plan is in compliance with the certified EIR and the Standards.

PR-8(6): Acoustic Paneling

Under the new program, the Plaza House and Vickrey-Brunswig Building would be used primarily for exhibits, classes, and offices. Acoustic paneling would provide increased sound absorption for the buildings' high traffic areas, specifically in proposed gallery

[15] LA Plaza de Cultura y Artes. 10 September 2009. Tenant Improvements and Restroom Addition. Prepared by: Chu + Gooding Architects, Los Angeles, California.

spaces, classrooms, conference rooms, and corridors.[16] A ceiling treatment is proposed with an acoustic paneling product[17] that is intended to resemble drywall, a modern building material that is visually similar to, yet has largely replaced, plaster walls in contemporary construction. The color and texture of the acoustic paneling is suggestive of the surface appearance of plaster. The acoustic paneling would not affect any surviving distinctive materials, features, finishes, construction techniques, and examples of craftsmanship or significantly alter features, spaces, and spatial relationships. The acoustic paneling, if removed in the future, would leave unimpaired the essential form and integrity of the historic buildings. The acoustic paneling is in compliance with the certified EIR and the Standards.

PR-8(7): Use of Partial Glass Walls

The use of partial glass walls in classrooms and training rooms on the third, fourth, and fifth floors would not conflict with any character-defining features previously identified in the certified EIR. Prior to the Shell and Core project, the building was in a heavily deteriorated condition, with only a small amount of original building fabric extant on the building's upper floors, primarily ceiling heights, window openings, limited wood window surrounds, and extant wood windows. These features were retained through preservation, rehabilitation, or replacement in kind by the Shell and Core project and would remain under the refined project, in compliance with the Standards. Partial glass walls would not affect the building's distinctive materials, features, finishes, construction techniques, and examples of craftsmanship or significantly alter features, spaces, and spatial relationships. No historic interior photos of the third, fourth, and fifth floors are known to exist that depict the interior spatial configuration during the building's period of significance. Partial glass walls would provide visual access without creating a false sense of spatial divisions on the interior of the building. Partial glass walls would also retain sight lines to historic window openings located on the building's south elevation. The use of partial glass walls is in compliance with the certified EIR and the Standards.

PR-8(8): Treatment of Cosmetic Splits in Structural Wood Columns

Deep cosmetic splits in the exposed structural columns of the Vickrey-Brunswig Building pose a concern to visitors, particularly children, who may be subject to splinters from the exposed wood. Per the Standards, repairing wood features by patching, piecing-in, consolidating, or otherwise reinforcing the wood using recognized preservation methods is recommended. Chemical or physical treatments will be gentle and will leave the historic materials undamaged. Provided that the repair of the wood columns adheres to these guidelines, the repair treatment would comply with the certified EIR and the Standards.

The Standards specify retaining and preserving structural systems that are important in defining the overall historic character of the building and recommend against "removing, covering, or radically changing visible features of structural systems which are important in defining the overall historic character of the building." The columns have been previously identified as character-defining features of the building and are therefore considered to be

[16] LA Plaza de Cultura y Artes. 10 September 2009. Tenant Improvements and Restroom Addition. Prepared by: Chu + Gooding Architects, Los Angeles, California, p. TI_A-2.11, TI_A-2.21, TI_A-2.31, TI_A-2.41, TI_A-2.51, and TI_A-8.01.

[17] Wall Technology, Inc. n.d. "New Dimensions Acoustical Wall Panels-Specifications and Product Data Sheet." Ladysmith, WI.

important in defining the building's overall historic character. Covering the columns in their entirety is not recommended under the Standards. However, given the safety concern regarding their surfaces, covering the columns would visually preserve the columns as an element of the building's structural system.

Three options, listed in order of historic merit, have been formulated. All would meet the Standards:

1) Cover the lower portion (or the entire height) of the columns with Plexiglas or a similar transparent covering in order to retain and preserve the columns as an example of the property's distinctive materials, features, finishes, construction techniques, and craftsmanship. Regarding spray paint and other contemporary markings on the columns, the Standards specify that chemical treatments are permissible provided that they utilize the gentlest means possible and would not cause damage to historic materials;

2) Use a transparent covering in at least one space, for example in a primary public space that conveys the building's historic character such as the first floor, and use wood cladding, modeled after that used in the east end of the second floor in the remaining areas;

3) Install reversible wood cladding, taking care to minimize damage to the columns, in all spaces.

Under the Standards, a treatment to cover the structural wood columns should be fully reversible and undertaken in such a manner that, if removed in the future, would leave unimpaired the essential form and integrity of the columns. Such a treatment would comply with the EIR and the Standards.

PR-8(9): Interior Paint Schemes

Exterior paint schemes have been previously identified as a part the Shell and Core project; however, no recommendations were made at that time in regard to interior paint schemes.[18] Per discussions between Sapphos Environmental, Inc. (Ms. Marlise Fratinardo) and the Foundation (Mr. Dan Mendoza) on November 5, 2009, the interior paint scheme for the historic buildings would consist of shades of white. The use of white paint would not contrast with the building's historic fabric and would be on only new or replicated surfaces. Per the Standards, character-defining features would be painted appropriately in a manner that is compatible with historic finishes. No features that were originally unpainted are proposed for painting. The interior paint scheme is in compliance with the certified EIR and the Standards.

[18] Sapphos Environmental, Inc. 10 November 2008. Memorandum for the Record, LA Plaza de Cultura y Arte Shell and Core Project. Pasadena, California.

PR-9: Site Plan, Relocation and Reconfiguration of Approved Project Elements and Introduction of New Site Elements

PR-9(1): Campo Santo Memorial Garden

The Campo Santo Memorial Garden, identified in the conceptual plan approved in the EIR, has been relocated and designed as an olive grove in the refined site plan. The grove supports the site's public uses and is consistent with the property's Mexican American cultural heritage center programming.

The grove satisfies the Standards. The Standards recommend that the relationship between historic buildings and the landscape be retained. The grove does not remove or relocate historic buildings, or compete with the existing spatial relationships of the historic buildings or the El Pueblo de Los Angeles Historic District. In the conceptual plan approved in the certified EIR, the Campo Santo Memorial Garden was located along the site's northern border. The refined site plan would relocate the grove to the site's northeast corner along North Main Street between the Plaza House and the Plaza Church. In its new location, the grove would occupy the vacant property between the Plaza House and the Plaza Church and would be visible from North Main Street. It would maintain the spatial relationship and visual connection between the Plaza House and the Plaza Church and would occupy a portion of the original cemetery location. The grove was originally conceived as the Campo Santo Memorial Garden, which was intended to reference the cemetery that was formerly associated with the Plaza Church (and vacated in the mid 19th century). The design of the grove, consisting of trees planted in rows with a central water feature, commemorates the cemetery's presence at the property yet does not directly reference the property's former cemetery use. In accordance with the Standards, the location and design of the grove does not create a false sense of historical development or add conjectural features or elements from other historic properties. If removed in the future, the grove would leave the essential form and integrity of the Vickrey-Brunswig Building and the Plaza House unimpaired. The grove in the refined site plan is in compliance with the EIR and the Standards.

PR-9(2): Outdoor Classrooms

In the refined site plan, space for outdoor classrooms has been relocated from the single location specified in the EIR and redistributed into three separate outdoor classroom areas. The outdoor classrooms satisfy the Standards. The Standards recommend that the relationships between historic buildings and the landscape be retained. The outdoor classrooms would be located along the site's western edge along Spring Street. Given the location toward the rear of the property, the outdoor classrooms do not participate in the rhythm of the streetscape that is composed of the historic properties facing North Main Street or interrupt the exterior appearance of the El Pueblo de Los Angeles Historic District. The outdoor classrooms do not remove or relocate historic buildings, destroy historic materials, or compete with the existing spatial relationships of the historic buildings or the El Pueblo de Los Angeles Historic District. If removed in the future, the outdoor classrooms would leave the essential form and integrity of the Vickrey-Brunswig Building and the Plaza House unimpaired. The outdoor classrooms of the refined site plan areas are in compliance with the EIR and the Standards.

PR-9(3): Paseos and Pedestrian Walkways (including media screens, water arches and jets, fences, lawn, and custom lawn umbrella sleeves)

The paseos and pedestrian walkways were identified in the conceptual plan included in the EIR. The refined site plan refined the concept of paseos and pedestrian walkways by altering proposed sizes and locations, as well as introducing a variety of new associated elements, including the addition of a lawn at the center of the site. The refinements to the paseos and pedestrian walkways are consistent with the property's program as a Mexican American cultural heritage center.

In the conceptual site plan in the certified EIR, only a small portion of the western area of the site located along Spring Street was dedicated to pedestrian uses as paseos and walkways. The refined site plan redistributes pedestrian uses throughout the site by creating an ambulatory circuit for visitors, enriched by an art wall, media screens, water jets, green screens, and fence panels. The design and spatial configuration of these elements is contemporary. Adaptable for various purposes, the enrichments are in many cases either movable and/or changeable, which facilitate reconfiguration of the site to accommodate a variety of educational programs and special events. For example, the central lawn would be planted with umbrella sleeves, which would increase the site's overall functionality by creating the opportunity for temporary multipurpose uses. The partially transparent fence panels slide to create various configurations, which provide visual access throughout the site and potentially enable concurrent uses.

The paseos and pedestrian walkways satisfy the Standards. The Standards recommend that related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The paseos and walkways wouldnot destroy historic materials or features of the historic buildings. For example, the art wall would be located along the northern edge of the site but would be set back 5 feet from the Plaza Church property line, ensuring that the art wall does not contact the historic building fabric of the Plaza Church. The paseos and walkways do not participate in the streetscape rhythm of historic properties facing North Main Street or otherwise affect the exterior appearance of the El Pueblo de Los Angeles Historic District. The transparency of the fence panels would minimize their massing in the landscape. The paseos and walkways retain the spatial relationships of the historic buildings.

The Standards recommend that new construction be differentiated from the old yet remain compatible with the historic construction. The paseos and walkways are differentiated from the historic buildings yet compatible in materials, size, scale, proportion, and overall design to the historic buildings. Contemporary in design, the paseos and walkways introduce a variety of contemporary features and materials that are new and are therefore visually differentiated from the features and materials of the historic buildings. These materials include 70-inch media screens, water jets and arches, an 8-foot greenwall system, concrete masonry units, and an intricate metal fence. These elements, which focus attention toward the interior portion of the property, do not introduce new, incompatible features to the historic setting of the Vickrey-Brunswig Building, Plaza House, and El Pueblo de Los Angeles Historic District. The paseos and walkways do not restrict views of the Vickrey-Brunswig Building and Plaza House and only partially obscure the lower portion of an adjacent non-primary elevation of the Plaza Church. The massing and scale of the paseos and walkways is appropriate to the site such that the historic buildings remain prominent and does not conflict with the massing of the historic buildings. If removed in the future,

the paseos and walkways would leave the essential form and integrity of the property's historic buildings unimpaired. The paseos and pedestrian walkways of the refined site plan are in compliance with the EIR and the Standards.

PR-9(4): Fire Department Access and Turnaround

The fire department access and turnaround, identified in the conceptual plan approved in the EIR, are reconfigured slightly in the refined site plan. The fire department access and turnaround satisfies the Standards. The Standards recommend that the relationship between historic buildings and the landscape be retained. The fire department access and turnaround does not destroy historic materials, features, or spatial relationships that characterize the property. The fire department access and turnaround does not compete with the existing spatial relationships of the historic buildings or the El Pueblo de Los Angeles Historic District. If removed in the future, the fire department access and turnaround would leave the essential form and integrity of the property's historic buildings unimpaired. The fire department access and turnaround of the refined site plan is in compliance with the EIR and the Standards.

PR-9(5): Edge Plantings

The refined site plan proposes edge plantings located in the parking lot, outdoor classrooms, and vehicular drop-off plaza, and as a vegetable garden, which were not included in the conceptual plan approved in the EIR. Located primarily along the property's western edge, the edge plantings satisfy the Standards. The Standards recommend that the relationship between historic buildings and the landscape be retained. The edge plantings do not destroy historic materials, features, or spatial relationships that characterize the property. No vistas to or from the historic properties would be obscured. The plantings would be visually subservient to the historic buildings, be clearly recognizable as newer features, and be sited appropriately so as to not create a false historic appearance. The edge plantings do not compete with the existing spatial relationships of the historic buildings or the El Pueblo de Los Angeles Historic District. If removed in the future, the edge plantings would leave the essential form and integrity of the property's historic buildings unimpaired. The edge plantings of the refined site plan are in compliance with the EIR and the Standards.

(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The refined project would not be expected to result in new significant impacts or substantially more adverse significant impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource. Potential impacts to cultural resources, including archaeological resources, were investigated in the Initial Study and the 2004 certified EIR.[19] The analysis concluded that the approved project, including a net grading and construction of approximately 55,000 square feet on the 4-acre parcel, may have the potential to result in significant impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource. The refined project would be located within the same parcel

[19] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

previously analyzed for the approved project and would not involve any net increase of grading or new construction in excess of that previously approved. As with the approved project, implementation of mitigation measure Cultural-1 would be expected to reduce significant impacts related to archaeological resources to below the level of significance. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource.

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

The revised project would not be expected to result in new significant impacts or substantially more adverse significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource or unique geologic feature. In conjunction with the Natural History Museum of Los Angeles County, a records search and review of the appropriate Dibblee Map was conducted to identify the nearest known records for paleontological resources to the approved project site, and it was determined that deeper fossil-bearing units on the project site do exist.[20] However, the approved project area is overlain with a layer of Quaternary Alluvium material that is not generally fossiliferous. Since the refined project site is on the same parcel as the approved project site, the refined project is not expected to disturb the deeper fossil-bearing units on the site. Therefore, the refined project would not be expected to result in significant or substantially more adverse impacts to cultural resources related to the destruction of a unique paleontological resource or unique geologic feature.

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

The refined project would not be expected to result in new significant impacts or substantially more adverse significant impacts to cultural resources related to the disturbance of human remains, including those interred outside of formal cemeteries. The potential to encounter human remains was assessed based on information obtained from the SCCIC in support of the certified EIR.[21] A review of the U.S. Geological Survey (USGS) 7.5-minute series Los Angeles topographic quadrangle was conducted, which included a visual search for both the small and large cemetery icons.[22] The refined project site is located less than 0.5 mile from two well-documented former cemeteries. These two cemeteries have been identified as the former Fort Moore Hill Cemetery located approximately 0.15 mile northwest from the refined project site, and the Old Cemetery adjacent to the Plaza Church, within the refined project site. The remains from the Old Cemetery were removed and placed at a new location some time after 1844.

As with the approved project, implementation of mitigation measure Cultural-4 to the proposed refinements to the approved project would similarly reduce significant impacts related to human remains to below the level of significance. Therefore, the refined project would not be expected to result in significant or substantially more adverse impacts to cultural resources related to the

[20] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[21] Dillon, Brian D., and Roy A. Salls. 1989. *Archaeological and Paleontological Reconnaissance and Impact Evaluation of the Central City West Study Area.* Prepared for: Planning Consultants Research, Contact: 16007 Lemarsh Street, Sepulveda, CA 91343. Unpublished document on file at the South Central Coastal Information Center, California State University, Fullerton.

[22] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

disturbance of human remains, including those interred outside formal cemeteries.[23] Research provided in a memorandum for the record, and as discussed above,[24] concluded that all human remains previously on site were relocated more than 100 years ago. As such, it is not anticipated that the work efforts associated with the approved or refined project would result in the discovery of additional remains; however, in the unlikely event that additional remains are found, mitigation measure Cultural-4 has been required.

[23] Sapphos Environmental Inc. 30 September 2008. Memorandum for the Record: LA Plaza de Cultura y Artes Archaeological Resources and Human Remains Impacts Assessment. Pasadena, CA.

[24] Sapphos Environmental Inc. 30 September 2008. Memorandum for the Record: LA Plaza de Cultura y Artes Archaeological Resources and Human Remains Impacts Assessment. Pasadena, CA.

3.6 GEOLOGY AND SOILS

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to geology and soils than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Geology and soils at the refined project site were evaluated in accordance with the methodologies and information provided by the County of Los Angeles (County) General Plan; the Los Angeles Central City Community Plan; publications of the California Geological Society (CGS; formerly the California Division of Mines and Geology); the U.S. Geological Survey 7.5-minute series, Los Angeles, California, topographic quadrangle,[2] in which the refined project site is located, and the most recent Alquist-Priolo Earthquake Fault Zoning (APEFZ) Maps;[3,4,5] and the results of the Structural Evaluation[6] completed for the approved project in the certified EIR.[7]

The potential for the refined project to result in new or substantially more adverse significant impacts to geology and soils was evaluated in relation to seven questions recommended for consideration by the State of California Environmental Quality Act Guidelines:[8]

Would the refined project:

(a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

The refined project would not be expected to create new or substantially more adverse significant impacts related to the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. There are no active or potentially active faults that exhibit a surface expression that intersects the refined

[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

[3] California Geological Survey. Revised 1999. *Fault-Rupture Hazard Zones in California.* Special Publication 42. Sacramento, CA: Office of the State Geologist.

[4] California Geological Survey. 1999. *Seismic Shaking Hazard Maps of California.* Map Sheet 48. Sacramento, CA: Office of the State Geologist.

[5] U.S. Geological Survey. 1989. Map Showing Late Quaternary Faults and 1978–84 Seismicity of the Los Angeles Region, California. Reston, VA.

[6] John A. Martin and Associates, Inc. August 2003. *Final Structural Evaluation of the Existing Buildings of the Proposed Plaza de Cultura y Arte, 501 North Main Street, Los Angeles, California.* Prepared for: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107.

[7] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[8] *California Code of Regulations.* Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

project site or the immediate vicinity. As determined in the certified EIR, three blind thrust faults pass under or nearby the approved project site; however, blind thrust faults would not break the surface in a seismic event.[9] The nearest APEFZ is located approximately 4.7 miles northwest of the proposed project site. As with the approved project, implementation of best management practices and conformance with the Uniform Building Code would reduce impacts to the greatest extent practicable. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects involving rupture of a known earthquake fault than that which was disclosed in the certified EIR.[10]

ii) Strong seismic ground shaking?

The refined project would not be expected to create new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

Analysis in the certified EIR determined that the approved project vicinity was susceptible to strong ground shaking from severe earthquakes.[11] The maximum probable earthquakes on these faults would be expected to be of Richter magnitudes ranging from 6.4 to 7.0. Considering the conservative rather than average, or "mean" values, these earthquake events would be expected to produce a peak horizontal ground acceleration (PHGA) range of 0.3 to 0.7 times that of Earth's gravity (g), representing a risk of severe ground shaking.

As with the approved project, implementation of the refined project would incorporate the California Uniform Building Code, which also includes the California Building Code (CBC), State Historical Building Code (SHBC), and California Code for Building Conservation, to meet minimum standards for the historic structures that would be rehabilitated and seismically retrofitted to maintain life-safety standards as defined by the County Department of Public Works.[12]

All new construction would be expected to be designed to the current life-safety standard specified in the California Uniform Building Code. The impacts related to seismic ground shaking would be reduced to below the level of significance through the incorporation of mitigation measures as specified in the certified EIR.[13] As with the approved project, implementation of mitigation measures Geology-1 and Geology-2 would reduce significant impacts related to seismic ground shaking to below the level of significance. Compliance with existing standards and requirements, as well as the mitigation measures set forth in the certified EIR would ensure an adequate level of

[9] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[10] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[11] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[12] John A. Martin and Associates, Inc. August 2003. *Final Structural Evaluation of the Existing Buildings of the Proposed Plaza de Cultura y Arte*. Prepared for: Sapphos Environmental, Inc. 133 Martin Alley, Pasadena, CA 91105.

[13] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

protection from seismic hazards.[14] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects involving strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction?

The refined project would not be expected to create new or substantially more adverse significant impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

Analysis in the certified EIR determined that the approved project site exhibited geologic and soils conditions with a potential for liquefaction during a seismic event.[15] In addition to sufficiently high seismic shaking levels, shallow groundwater and cohesionless sands were potentially present within at least a portion of the approved project area. The refined project site is included within the liquefaction boundary of the California State Seismic Hazards Map.[16] While regional groundwater levels are estimated to be approximately 20 feet below the ground surface, site-specific groundwater levels are unknown. Underlying alluvium and/or artificial fill layers are expected to be thin throughout the majority of the site. As with the approved project, the actual liquefaction potential may be low to nonexistent, depending on the depth to bedrock at the refined project site.

As with the approved project, detailed liquefaction analyses conforming to the requirements of the California Department of Geology and Mines (CDMG) Special Publication 117 must be undertaken at the grading/building plan stages for the refined project.[17] In addition, the CBC sets standards for the investigation and mitigation of site conditions related to liquefaction. As with the approved project, mitigation of issues related to on-site liquefaction potential must be undertaken in compliance with the CBC to reduce potentially significant impacts from liquefaction to the maximum extent practicable under current engineering practices. Compliance with existing standards and requirements would ensure an adequate level of protection from liquefaction. Therefore, the refined project would not expected to result in new or substantially more adverse significant impacts from exposing people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction.

iv) Landslides?

The refined project would not be expected to create new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. The CDMG Seismic Hazards Map does not

[14] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[15] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[16] California Department of Conservation, Division of Mines and Geology, 1999. State of California Seismic Hazard Zones Map. Available at: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_la.pdf

[17] California Department of Conservation, Division of Mines and Geology. 13 March 1997. *Guidelines for Evaluating and Mitigating Seismic Hazards in California.* Special Publication 117. Contact: 655 South Hope Street, No. 700, Los Angeles, CA 90017.

identify the refined project area as being located in a landslide area.[18] There are no moderate to steep slopes within the refined project area or the immediate vicinity that have the potential to move. The presence of shallow bedrock with layering could result in a landslide if excavated; however, no deep excavation beyond the existing basement structures is anticipated.

Based on a review of the USGS 7.5-minute series Los Angeles topographic quadrangle maps,[19] in which the refined project site is located, no areas susceptible to seismic-induced landslides are shown in the refined project vicinity.[20] Landslides are not considered to be a potential hazard at the refined project site and, therefore, would not affect any of the refined project's modified components. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects involving landslides.

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

The refined project would not be expected to result in new or substantially more adverse significant impacts to geology and soils in relation to substantial soil erosion or the loss of topsoil. The materials most susceptible to erosion are artificial fill, younger alluvium, and soil, all of which can be found beneath the refined project site and could be potentially exposed to erosion during construction. However, the refined project site does not contain any steep slopes or any drainage pathways. As with the approved project, the potential for erosion during construction would be mitigated below the level of significance using best management practices as part of compliance with the required National Pollutant Discharge Elimination System (NPDES) permit and associated urban storm water management plan. Further description of NPDES requirements and best management practices to be utilized are described in Section 3.6, *Hydrology and Water Quality*, of the 2004 certified EIR and Section 3.9, *Hydrology and Water Quality*, of this Addendum to the EIR.[21] Compliance with existing standards and requirements would ensure an adequate level of protection from soil erosion or the loss of topsoil. Therefore, the refined project would not expected to result in new or substantially more adverse significant impacts to geology and soils related to substantial soil erosion or the loss of topsoil.

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

The refined project would not be expected to create new or substantially more adverse significant impacts related to its location on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Some geologic units beneath the refined project site may be susceptible to consolidation, settlement, and hydroconsolidation. Unconsolidated porous materials, such as alluvial deposits and artificial fill, can consolidate and settle when

[18] California Department of Conservation, Division of Mines and Geology. 1999. State of California Seismic Hazard Zones Map. Available at: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_la.pdf

[19] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

[20] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

[21] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

subjected to dynamic shaking loads. Severe seismic shaking could result in substantial surface settlement in areas overlain by structures in the refined project vicinity. However, current applicable building codes require comprehensive geotechnical and soils engineering analysis, recommendations from which are expected to reduce potential impacts below the level of significance. As with the approved project, construction in accordance with the identified engineering techniques would be expected to result in a less than significant impact. Therefore, the refined project would not expected to result in new or substantially more adverse significant impacts to geology and soils related to location on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

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

The refined project would not be expected to create new or substantially more adverse significant impacts related to location on expansive soil creating substantial risks to life or property. The substrate beneath the refined project site is high in granular content and low in clay content, making its risk factor for expansion very low. Construction in accordance with the identified engineering techniques would be expected to result in a less than significant impact. Therefore, the refined project would not expected to result in new or substantially more adverse significant impacts to geology and soils related to location on expansive soil creating substantial risks to life or property.

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

The refined project would not be expected to create new or substantially more adverse significant impacts related to having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Sewers are available for wastewater disposal and would be supporting the needs of the refined project. The refined project site would be connected to the municipal sewer system and would not require the use of septic tanks as alternative wastewater disposal systems. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

3.7 GREENHOUSE GAS EMISSIONS

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to greenhouse gas (GHG) emissions from that disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] GHG emissions from the approved project were not evaluated in the certified EIR, as that document was prepared prior to adoption of the amendments to the California Environmental Quality Act (CEQA) Guidelines in 2010 that address GHG emissions, as directed by Senate Bill (SB) 97. GHG emissions that would be expected to be generated by the refined project were evaluated based on guidance provided by regulatory publications from the California Air Pollution Control Officers Association (CAPCOA),[2] the State Office of the Attorney General,[3] California Air Resources Board (CARB),[4] and the Office of Planning and Research (OPR).[5]

Regulatory Framework

Background Information

This section provides an introduction to the characteristics of the six principal GHGs, the greenhouse effect, potential contributing factors to global climate change, the statewide 1990 and 2004 GHG emission profile, the per-capita GHG emissions equivalency calculation, and the regulatory framework for early GHG emissions reduction measures that must be considered by the County.

Characteristics of Six Principal Greenhouse Gases

According to the California Global Warming Solutions Act of 2006 [Assembly Bill (AB) 32], GHG emissions are defined as emissions of the following gases: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. A detailed description of the characteristics and effects of the six principal GHGs is provided.

Carbon Dioxide

CO_2 is a colorless, odorless, and non-flammable gas that is emitted into the atmosphere through natural processes such as respiration and forest fires and through human activities such as the burning of fossil fuels (oils, natural gas, and coal), deforestation, and industrial processes. CO_2 is

[1] County of Los Angeles Chief Executive Office. 2004 September. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[2] California Air Pollution Control Officers Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act.* Sacramento, CA.

[3] California Department of Justice, Office of the Attorney General. 21 May 2008 (Updated 26 September 2008). *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level.* Sacramento, CA.

[4] California Air Resources Board. 24 October 2008. *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Cases under the California Environmental Quality Act.* Available at: http://www.opr.ca.gov/ceqa/pdfs/Prelim_Draft_Staff_Proposal_10-24-08.pdf

[5] California Governor's Office of Planning and Research Technical Advisory. 19 June 2008. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review.* Sacramento, CA.

removed from the atmosphere when it is absorbed by plants as part of the biological carbon cycle. CO_2 absorbs terrestrial infrared radiation that would otherwise escape to space, and therefore plays an important role in warming the atmosphere. CO_2 has a long atmospheric lifetime of up to 200 years, and is therefore a more important GHG than water vapor, which has a residence time in the atmosphere of only a few days. CO_2 provides the reference point for the 100-year global warming potentials (GWPs) of other GHGs, which is published by the Intergovernmental Panel on Climate Change (IPCC) to be used to express emissions on a $CO_{2equivalent}$ (CO_{2e}) basis. Therefore, the GWP of CO_2 is equal to 1.

Methane

CH_4 is a principal component of natural gas and consists of a single carbon atom bonded to four hydrogen atoms. It is formed and released into the atmosphere by biological processes from livestock and other agricultural sources and by the decay of organic waste in anaerobic environments such as municipal solid waste. CH_4 is about 21 times more powerful at warming the atmosphere than CO_2 (a GWP of 21). Its chemical lifetime in the atmosphere is approximately 12 years. CH_4's relatively short atmospheric lifetime, coupled with its potency as a GHG, makes it a candidate for mitigating global warming over the near term. CH_4 can be removed from the atmosphere by a variety of processes such as the oxidation reaction with hydroxyl radicals (OH), microbial uptake in soils, and reaction with chlorine (Cl) atoms in the marine boundary layer.

Nitrous Oxide

N_2O is a clear, colorless gas with a slightly sweet odor. N_2O has a long atmospheric lifetime (approximately 120 years) and its heat-trapping effects are about 310 times more powerful than CO_2 on a per-molecule basis (a GWP of 310). N_2O is produced by both natural and human-related sources. The primary anthropogenic sources of N_2O are agricultural soil management such as soil cultivation, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, and production of adipic and nitric acids. The natural process of producing N_2O ranges from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests.

Fluorinated Gases

HFCs, PFCs, and SF_6 are synthetic, powerful GHGs that are emitted from a variety of industrial processes, including aluminum production, semiconductor manufacturing, electric power transmission, magnesium production and processing, and chlorodifluoromethane (HCFC-22) production. Fluorinated gases are being used as substitutes for ozone-depleting chlorofluorocarbons (CFCs). Fluorinated gases are typically emitted in small quantities; however, they have high global warming potentials ranging from 140 to 23,900 times more powerful than CO_2 in their capabilities to trap heat in the atmosphere.

Greenhouse Effect

GHGs present in the atmosphere help trap the energy from the sun and maintain the temperature of the Earth's surface, creating a process known as the greenhouse effect. Six percent of the radiation emitted by the sun is reflected back by the atmosphere surrounding the Earth; 20 percent of the solar radiation is scattered and reflected by clouds; 19 percent of the solar radiation is absorbed by the atmosphere and clouds; 4 percent of the solar radiation is reflected back to the atmosphere by the earth's surface; and 51 percent of the solar radiation is absorbed by the Earth.

GHGs, like water vapor and CO_2, are naturally present in the atmosphere. The presence of these gases prevents outgoing infrared radiation from escaping the earth's surface and lower atmosphere, allowing incoming solar radiation to be absorbed by living organisms on Earth. Without these GHGs, the Earth would be too cold to be habitable; however, an excess of GHGs in the atmosphere can raise the earth's temperature, resulting in significant environmental impacts related to snowpack losses, flood hazards, sea-level rises, and fire hazards.

Contributing Factors to Global Climate Change

Global climate change results from a combination of three factors: 1) natural factors such as changes in the sun's intensity or slow changes in the earth's orbit around the sun; 2) natural processes within the earth's climate system such as changes in ocean circulation; and 3) anthropogenic activities, such as fossil fuel combustion, deforestation, reforestation, urbanization, and desertification, that change the composition of atmospheric gases. In its 2007 climate change synthesis report to policymakers, the Intergovernmental Panel on Climate Change (IPCC) concluded that "global GHG emissions due to human activities have grown since pre-industrial times, with an increase of 70% between 1970 and 2004."[6] Therefore, significant attention is being given to the anthropogenic causes of the increased GHG emission levels. In the review of recent regulatory publications from CAPCOA;[7] CARB;[8] the California Department of Justice, Office of the Attorney General;[9] and OPR,[10] there is a consensus on the closely associated relationship between fossil fuel combustion in conjunction with other human activities and GHG emissions.

Greenhouse Gas Emission Profile of California

In California, GHG emissions are largely contributed by the transportation sector, which was responsible for 35 percent and 38 percent of statewide 1990 and 2004 GHG emissions, respectively. The transportation sector is followed by the electricity generation sector, which was responsible for 25 percent of statewide emissions in 1990 and 2004; the industrial sector, which was responsible for 24 percent and 20 percent of statewide 1990 and 2004 GHG emissions, respectively; and the commercial sector, which was responsible for 3 percent of statewide emissions in 1990 and 2004, respectively.[11]

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[6] Intergovernmental Panel on Climate Change. November 2007. *Climate Change 2007: Synthesis Report, Summary for Policymakers*, p.5. Available at: http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr_spm.pdf

[7] California Air Pollution Control Officers Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act.* Sacramento, CA.

[8] California Air Resources Board. 24 October 2008. *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act.* Available at: http://www.opr.ca.gov/ceqa/pdfs/Prelim_Draft_Staff_Proposal_10-24-08.pdf

[9] California Department of Justice, Office of the Attorney General. 21 May 2008 (Updated 26 September 2008). *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level.* Sacramento, CA.

[10] California Governor's Office of Planning and Research Technical Advisory. 19 June 2008. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review.* Sacramento, CA.

[11] California Air Resources Board. 19 September 2008. *California 1990 Greenhouse Gas Emissions Level and 2020 Limit.* Available at: http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm

State

This regulatory framework identifies the state laws that govern the regulation of GHG emissions and must be considered by the County regarding decisions on projects that involve construction, operation, or maintenance activities that would result in GHG emissions. In October 2007, the CARB published a list of 44 early-action measures to reduce GHG emissions in California.[12] This regulatory framework identifies state guidance on early GHG emissions reduction measures that must be considered by the County.

California Clean Air Act

The California Clean Air Act (CAA) of 1988 requires all air-pollution control districts in the state to endeavor to achieve and maintain state ambient air quality standards by the earliest practicable date and to develop plans and regulations specifying how they will meet this goal. On April 2, 2007, the Supreme Court ruled in *Massachusetts, et al. v. Environmental Protection Agency, et al.* (549 U.S. 1438; 127 S. Ct. 1438) that the CAA gives the U.S. Environmental Protection Agency (USEPA) the authority to regulate emissions of GHGs, including CO_2, CH_4, N_2O, and fluorinated gases, such as HFCs, PFCs, and SF_6,[13] thereby legitimizing GHGs as air pollutants under the CAA.

Executive Order S-3-05

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05. Recognizing that California is particularly vulnerable to the impacts of climate change, Executive Order S-3-05 establishes statewide climate change emission reduction targets to reduce $CO_{2equivalent}$ (CO_{2e}) to the 2000 level (473 million metric tons) by 2010, to the 1990 level (427 million metric tons of CO_{2e}) by 2020, and to 80 percent below the 1990 level (85 million metric tons of CO_{2e}) by 2050 (Table 3.7-1, *California Business-as-Usual Greenhouse Gas Emissions and Targets*).[14,15] The executive order directs the California Environmental Protection Agency (Cal/EPA) Secretary to coordinate and oversee efforts from multiple agencies (i.e., Secretary of the Business, Transportation and Housing Agency; Secretary of the Department of Food and Agriculture; Secretary of the Resources Agency; Chairperson of the Air Resources Board; Chairperson of the Energy Commission; and President of the Public Utilities Commission) to reduce GHG emissions to achieve the target levels. In addition, the Cal/EPA Secretary is responsible for submitting biannual reports to the governor and state legislature that outline 1) progress made toward reaching the emission targets, 2) impacts of global warming on California's resources, and 3) measures and adaptation plans to mitigate these impacts. To further ensure the accomplishment of the targets, the Secretary of Cal/EPA created a Climate Action Team made up representatives from agencies listed above to implement global warming emission reduction programs and report on the progress made toward meeting the statewide GHG targets established in this executive order. In 2006, the first report was released and identified that "the climate change emission reduction targets [could] be met without adversely affecting the

[12] California Air Resources Board. October 2007. *Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration.* Available at: http://www.arb.ca.gov/cc/ccea/meetings/ea_final_report.pdf

[13] U.S. Supreme Court. 2 April 2007. *Massachusetts, et al., v. Environmental Protection Agency, et al.* 549 U.S. 1438; 127 S. Ct. 1438. Washington, DC.

[14] California Governor. 1 June 2005. Executive Order S-3-05. Sacramento, CA.

[15] California Climate Action Team. 3 April 2006. *Climate Action Team Report to Governor Schwarzenegger and the California Legislature.* Sacramento, CA.

California economy," and "when all [the] strategies are implemented, those underway and those needed to meet the Governor's targets, the economy will benefit."[16]

TABLE 3.7-1
CALIFORNIA BUSINESS-AS-USUAL GREENHOUSE GAS EMISSIONS AND TARGETS

California Business-as-Usual Greenhouse Gas Emissions and Targets (Million Metric Tons of CO_2 Equivalent)					
Year	1990	2000	2010	2020	2050*
Business-as-usual emissions	427	473	532	596	762*
Target emissions	—	—	473	427	85

NOTE:
* The CARB has not yet projected 2050 emissions under a business-as-usual scenario; therefore, 2050 business-as-usual emissions were calculated assuming a linear increase of emissions from 1990 to 2050.

Assembly Bill 32: Global Warming Solutions Act of 2006

In September 2006, Governor Arnold Schwarzenegger signed into law the Global Warming Solutions Act, or AB 32, which requires a statewide commitment and effort to reduce GHG emissions to 1990 levels by 2020 (25 percent below business-as-usual).[17] This intended reduction in GHG emissions will be accomplished with an enforceable statewide cap on GHG emissions, which will be phased in starting in 2012. To effectively implement the cap, AB 32 requires CARB to develop appropriate regulations and establish a mandatory reporting system to track and monitor global warming emissions levels from stationary sources.

This bill is the first statewide policy in the United States to mitigate GHG emissions and to include penalties for non-compliance. Consistent with goals and targets set by other actions taking place at the regional and international levels, AB 32 sets precedence in inventorying and reducing GHG emissions.

In passing AB 32, the State legislature acknowledged that global warming and related effects of climate change are a significant environmental issue, particularly the anthropogenic causes that are believed to be largely attributable to increased concentration of GHGs in the atmosphere.

Executive Order S-20-06

On October 17, 2006, Governor Arnold Schwarzenegger signed Executive Order S-20-06, which calls for continued efforts and coordination among state agencies on the implementation of GHG emission reduction policies and AB 32 and Health and Safety Code (Division 25.5) through the design and development of a market-based compliance program.[18] In addition, Executive Order S-20-06 requires the development of GHG reporting and reduction protocols and a multi-state registry through joint efforts among CARB, Cal/EPA, and the California Climate Action Registry (CCAR). Executive Order S-20-06 directs the Secretary for Environmental Protection to coordinate

[16] California Climate Action Team. 12 January 2006. *Final Draft of Chapter 8 on Economic Assessment of the Draft Climate Action Team Report to the Governor and Legislature.* Sacramento, CA.

[17] California Air Resources Board. Assembly Bill 32, California Climate Solutions Act of 2006. Sacramento, CA. Available at: http://www.arb.ca.gov/cc/docs/ab32text.pdf

[18] California Governor. 6 October 2006. Executive Order S-20-06. Sacramento, CA.

with the Climate Action Team to develop a plan to create incentives for market-based mechanisms that have the potential of reducing GHG emissions.[19]

California Senate Bill 97

Approved by Governor Arnold Schwarzenegger on August 24, 2007, Senate Bill (SB) 97 is designed to work in conjunction with the State CEQA Guidelines and AB 32. Pursuant to the State CEQA Guidelines, the OPR is required to prepare for and develop proposed guidelines for implementation of CEQA by public agencies. Pursuant to AB 32, the CARB is required to monitor and regulate emission sources of GHGs that cause global warming in order to reduce GHG emissions. SB 97 states, "SB 97 requires OPR, by July 1, 2009, to prepare, develop, and transmit to the [CARB] guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, including, but not limited to, effects associated with transportation or energy consumption."[20] As directed by SB 97, the Natural Resources Agency adopted amendments to the CEQA Guidelines for GHG emissions on December 30, 2009. On February 16, 2010, the Office of Administrative Law approved the amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. The amendments became effective on March 18, 2010.

In addition, OPR and CARB are required to periodically update the guidelines to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental documents, including an EIR, a Negative Declaration, a Mitigated Negative Declaration, or other documents required by CEQA that have not been certified or adopted by the CEQA lead agency by December 30, 2009.

State of California Office of the Attorney General Guidance Letter on California Environmental Quality Act, Addressing Global Warming Impacts at the Local Agency Level

On May 21, 2008, the California Office of the Attorney General provided guidance to public agencies on how to address global warming impacts in CEQA documents. In the publication entitled *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*, the Office of Attorney General directs public agencies to take a leadership role in integrating sustainability into public projects by providing 52 project-level mitigation measures for consideration in the development of projects.[21] In addition, the Office of Attorney General has negotiated four settlement agreements under CEQA, all of which require the project proponents to consider sustainable design for projects and feasible mitigation measures and alternatives to substantially lessen global warming–related effects.

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[19] California Governor. 2006. Executive Order S-20-06. Sacramento, CA.

[20] California Governor's Office of Planning and Research. 24 August 2007. Senate Bill No. 97, Chapter 185. Available at: http://www.opr.ca.gov/ceqa/pdfs/SB_97_bill_20070824_chaptered.pdf

[21] California Department of Justice Office of the Attorney General. 21 May 2008. *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*. Sacramento, CA.

California Climate Action Registry

Established in 2001, the CCAR is a private non-profit organization originally formed by the State of California. The CCAR serves as a voluntary GHG registry and has taken a leadership role on climate change by developing credible, accurate, and consistent GHG reporting standards and tools for businesses, government agencies, and non-profit organizations to measure, monitor, and reduce GHG emissions. For instance, the CCAR General Reporting Protocol, Version 3.1, dated January 2009, provides the principles, approach, methodology, and procedures required for voluntary GHG emissions reporting by businesses, government agencies, and non-profit organizations. In 2007, the County became a member of the CCAR and has committed its efforts to monitor, report, and reduce GHG emissions pursuant to its participation in the CCAR.

Regional

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD), which monitors air quality throughout the South Coast Air Basin, including the refined project site, has jurisdiction over an area of approximately 10,743 square miles and a population of over 16 million. The 1977 Lewis Air Quality Management Act created SCAQMD to coordinate air quality planning efforts throughout Southern California. This act merged four county air pollution agencies into one regional district to improve air quality in Southern California. SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain federal and state ambient air quality standards in the district. In addition, SCAQMD is responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or related stationary sources do not create net emission increases.

On September 5, 2008, the SCAQMD Governing Board approved the SCAQMD Climate Change Policy, which directs SCAQMD to assist the state, cities, local governments, businesses, and residents in areas related to reducing emissions that contribute to global warming.[22]

Pursuant to the policy, the SCAQMD will achieve the following:

a. Establish climate change programs
b. Implement SCAQMD command-and-control and market-based rules
c. Review and comment on future legislation related to climate change and GHGs
d. Prioritize projects that reduce both criteria and toxic pollutants and GHG emissions
e. Provide guidance on analyzing GHG emissions and identify mitigation measures to CEQA projects
f. Provide revisions to *SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*[23] consistent with the state guidance to include information on GHG strategies as a resource for local governments

[22] South Coast Air Quality Management District. 5 September 2008. *SCAQMD Climate Change Policy*. Diamond Bar, CA. Available at: http://www.aqmd.gov/hb/2008/September/080940a.htm

[23] South Coast Air Quality Management District. 6 May 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Diamond Bar, CA.

g. Update the SCAQMD's GHG inventory in conjunction with each air quality management district and assist local governments in developing GHG inventories
h. Reduce SCAQMD climate change impacts
i. Inform the public on various aspects of climate change, including understanding impacts, technology advancement, public education, and other emerging aspects of climate change science

Therefore, SCAQMD Climate Change Policy aims to decrease SCAQMD's carbon footprint, assist businesses and local governments with implementation of climate change measures, and provide information regarding climate change to the public. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, the SCAQMD staff is convening an ongoing GHG CEQA Significance Threshold Working Group.

Local

County of Los Angeles General Plan

The refined project is located within the County; therefore, development in the area is governed by the policies, procedures, and standards set forth in the County General Plan. The refined project would be expected to be consistent with the objectives of the Air Quality element of the County General Plan, which includes objectives related to GHG emissions, and would not be expected to result in a change to the population growth assumption used by the SCAG for attainment planning. The County General Plan has developed goals and policies for improving air quality in the County. Many policies are transportation-based because of the direct link between air quality and the circulation element. There is one objective and related policy relevant to the refined project and capable of contributing toward avoiding and reducing the generation of air quality emissions, which also would have the potential to avoid and reduce the generation of GHG emissions:[24]

- **Objective:** To support local efforts to improve air quality.
- **Policy:** Actively support strict air quality regulations for mobile and stationary sources, and continued research to improve air quality. Promote vanpooling, carpooling, and improved public transportation.

The refined project would be consistent with the above policy and objective.

County of Los Angeles Energy and Environmental Policy

The County Board of Supervisors adopted a County-wide energy and environmental policy (Policy No. 3.045), which became effective on December 19, 2006.[25] The goal of this policy is to provide guidelines for development, implementation, and enhancement of energy conservation and environmental programs within the County. The policy established an Energy and Environmental Team to coordinate the efforts of various County departments, established a program to integrate sustainable technologies into its Capital Project Program, established an energy consumption

[24] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA. Available at: http://ceres.ca.gov/docs/data/0700/791/HYPEROCR/hyperocr.html

[25] County of Los Angeles Board of Supervisors. 19 December 2006. "Policy No. 3.045, Energy and Environmental Policy." *Los Angeles County Board of Supervisors Policy Manual*. Available at: http://countypolicy.co.la.ca.us/

reduction goal of 20 percent by the year 2015 in County facilities, and became a member of the CCAR in 2007 to assist the County in establishing goals for reducing GHGs. In addition, the policy included four program areas to implement green design and sustainable operation of County facilities and reduce the County's environmental footprint. Goals and initiatives for each program area are included as follows:

Energy and Water Efficiency

- Implementing and monitoring energy and water conservation practices
- Implementing energy and water efficiency projects
- Enhancing employee energy and water conservation awareness through education and promotion

Environmental Stewardship

- Investigating requirements and preferences for environmentally friendly packaging, greater emphasis on recycled products, and minimum energy efficiency standards for appliances
- Placing an emphasis on recycling and landfill volume reduction within County buildings
- Investigating the use of environmentally friendly products
- Supporting environmental initiatives through the investigation of existing resource utilization

Public Outreach and Education

- Implementing a program that provides County residents with energy-related information, including energy and water conservation practices, utility rates and rate changes, rotating power outage information, emergency power outage information, and energy efficiency incentives
- Seeking collaboration with local governments, public agencies, and County affiliates to strengthen regional, centralized energy and environmental management resources and identify and develop opportunities for information and cost sharing in energy management and environmental activities

Sustainable Design

- Enhancing building sustainability through the integration of green, sustainable principles into the planning, design, and construction of County capital projects, which complement the functional objectives of the project, extend the life cycle / useful life of buildings and sites, optimize energy and water use efficiency, improve indoor environmental quality and provide

healthy work environments, reduce ongoing building maintenance requirements, and encourage use and reuse of environmentally friendly materials and resources

- Establishing a management approach that instills and reinforces the integration of sustainable design principles into the core competency skill set of the County's planner, architects, engineers, and project managers

- Establishing practical performance measures to determine the level of sustainability achieved relative to the objectives targeted for the individual project and overall capital program

Existing Conditions

In order to establish a reference point for future GHG emissions, CO_{2e} emissions are projected based on an unregulated business-as-usual GHG emissions scenario that does not take into account the reductions in GHG emissions required by Executive Order S-3-05 or AB 32. CARB has stated that California contributed 427 million metric tons of GHG emissions in CO_{2e} in 1990, and under a business-as-usual development scenario, would contribute approximately 596 million metric tons of CO_{2e} emissions in 2020, presenting a linear upward trend in California's total GHG emissions levels.

To characterize the GHG emissions business-as-usual conditions for the County, information on County population was collected from the Southern California Association of Governments (SCAG). It has been projected that the County would increase its population from approximately 10.6 million in 2010 to approximately 12.0 million in 2030.[26] Using the current CO_{2e} emissions factor of 14 metric tons per capita,[27] the County would be expected to be responsible for producing approximately 149 million metric tons of CO_{2e} emissions in 2010 under a business-as-usual emissions scenario, and 168 million metric tons of CO_{2e} emissions in 2030. Each year, more GHGs would be expected to be emitted by the County than the previous year due to the increase in population (Table 3.7-2, *Characterization of Business-as-Usual and Target GHG Emissions for the County*). Using the target emissions necessary for compliance with AB 32 reduction goals,[28] the County would be anticipated to be responsible for producing approximately 141 million metric tons of CO_{2e} emissions in 2010 and 70 million metric tons of CO_{2e} emissions in 2030 (Table 3.7-2). Therefore, the County is responsible for reducing GHG emissions from business-as-usual by 8 million metric tons per year in 2010 and 98 million metric tons per year in 2030.

[26] Southern California Association of Governments. 2 June 2008. E-mail to William Meade, Sapphos Environmental, Inc. Pasadena, CA.

[27] California Air Resources Board. December 2008. *Climate Change Scoping Plan: A Framework for Change*. Available at: http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm

[28] California Air Resources Board. December 2008. *Climate Change Scoping Plan: A Framework for Change*, p. 118 Available at: http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm

TABLE 3.7-2
CHARACTERIZATION OF BUSINESS-AS-USUAL AND TARGET GHG EMISSIONS FOR THE COUNTY

	Year					
	2010	2015	2020	2025	2030
Population	10,615,700	10,829,233	10,971,589	11,329,802	11,678,528	12,015,892
CARB business-as-usual emission factor (metric tons of CO_{2e} per capita)	14	14	14	14	14	14
Total business-as-usual County GHG emissions (million metric tons of CO_{2e})	**149**	**152**	**154**	**159**	**163**	**168**
CARB target emission factors (metric tons of CO_{2e} per capita)	13.3	12.2	11.4	9.6	7.7	5.8
Total target County GHG emissions (million metric tons of CO_{2e})	**141**	**132**	**126**	**108**	**90**	**70**

SOURCES:

1. Minjares, Javier, Southern California Association of Governments. 2 June 2008. E-mail to William Meade, Sapphos Environmental, Inc. Pasadena, CA.
2. California Air Resources Board. 2008. *Summary of Population, Employment, and GHG Emissions Projections Data.* Sacramento, CA.

The refined project is not an industrial project and would not include major increases in stationary sources or significant refrigeration. Therefore, vehicle miles traveled (VMT) and electricity consumption are the two major sources of GHG emissions for the refined project. The other sources of GHG emissions for the refined project are area sources, such as stationary sources and landscape maintenance equipment. In the absence of established guidelines for evaluating GHGs under CEQA, the County has decided to evaluate the ability of the refined project to meet standards for CO_{2e} reduction by evaluating the forecasted electricity use of the refined project and the number of anticipated vehicle miles traveled in both a qualitative and quantitative manner, as well as quantifying project-related area source generation of GHGs.

Assessment Method and Models

The methodology to assess the refined project's impacts on global climate change has not been developed by the SCAQMD or by state or federal agencies. Given the absence of an established methodology to evaluate global climate change impacts of the refined project, the impacts were analyzed qualitatively by considering the refined project's construction and operational scenarios, size, and location. Two tools, URBEMIS and EMFAC, are used in this analysis of the refined project's potential impacts to global climate change.

When calculating the amount of potential GHG emissions contributed by construction of the refined project, CO_2 emissions, the second most abundant type of GHG emissions contributing to global climate change followed by water vapor, were the focus of the calculation. Although methane (CH_4) and nitrous oxide (N_2O) are considered principal GHGs, they are primarily

contributed by landfills, natural gas systems, and enteric fermentation for CH_4 emission levels,[29] and agricultural soil management, on-road mobile sources, and manure management for N_2O emission levels.[30] Since construction of the refined project does not involve landfills, natural gas systems, enteric fermentation, agricultural soil management, or manure management but does require operation of off-road construction equipment for completing daily construction activities without transporting them to and from other off-site locations until the construction phase of the refined project is completed, CO_2 emissions were determined to be primary GHG emissions contributed by construction of the refined project. Therefore, CO_2 emissions were the focus of the analysis for determining the amount of GHG emissions contributed by construction of the refined project.

When calculating the amount of potential GHG emissions contributed by operation of the refined project, CO_2, CH_4, and N_2O emissions were the focus of the calculation. When calculating the CO_2, CH_4, and N_2O emission levels associated with electricity use, the Western Electricity Coordinating Council (WECC) California CO_2 electricity emission factor and the California CH_4 and N_2O electricity emission factors recommended by CCAR for calculating CO_2, CH_4, and N_2O emissions associated with electricity use were used.[31] When calculating CO_2 emission levels associated with mobile sources, the CARB Emissions Factors (EMFAC) 2007, Version 2.3, software recommended by the Office of the Attorney General was used. The CCAR-recommended methodology for calculating CH_4 and N_2O emission levels associated with on-road mobile sources was used.[32]

URBEMIS 2007 Model

The methodology used to analyze construction and operational global climate change impacts is consistent with the methods described in the 1993 CEQA Air Quality Handbook.[33] The CARB URBEMIS 2007, Version 9.2.4, software was used to estimate CO_2 emissions associated construction of the refined project. URBEMIS is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, and office buildings; area sources such as gas appliances, wood stoves, fireplaces, and landscape maintenance equipment; and construction projects. In contrast to the URBEMIS 2002 emissions model, URBEMIS 2007, Version 9.2.4, directly analyzes the CO_2 emissions from a project's mobile and area sources. The URBEMIS 2007 model was used for estimating construction and operational CO_2 emissions, the second most abundant type of GHG emissions contributing to global climate change followed by water vapor. Analyses of construction and operational impacts to GHG emissions were based on the construction and operational scenarios described as an element of Section 2.0, *Project Description*.

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[29] U.S. Environmental Protection Agency. 19 October 2006. "Sources and Emissions." *Methane*. Available at: http://www.epa.gov/methane/sources.html

[30] U.S. Environmental Protection Agency. 19 October 2006. "Sources and Emissions." *Nitrous Oxide*. Available at: http://www.epa.gov/nitrousoxide/sources.html

[31] California Climate Action Registry. January 2009. *California Climate Action Registry General Reporting Protocol, Version 3.1*. Los Angeles, CA.

[32] California Climate Action Registry. January 2009. *California Climate Action Registry General Reporting Protocol, Version 3.1*. Los Angeles, CA.

[33] South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

EMFAC 2007 Model

The CARB Emissions Factors (EMFAC) 2007, Version 2.3, software was used to evaluate the refined project's GHG emission level contributed by mobile sources, such as passenger cars, based on the expected vehicle fleet mix, vehicle speeds, commute distances, and temperature conditions for the estimated start date of the refined project. EMFAC 2007, Version 2.3, which is embedded within the URBEMIS 2007 emissions model, directly calculates CO_2 emissions. Therefore, the transportation-related CO_2 emissions impacts generated by implementation of the refined project were analyzed using the EMFAC 2007 model. In this analysis, fleet mix, vehicle speeds, and commute distances were based on the default values in the URBEMIS 2007 and EMFAC 2007 emissions models.

Significance Thresholds

There are currently no numeric thresholds of significance for evaluating GHG emissions in the CEQA guidelines, and there are no established thresholds of significance for evaluating GHG emissions under CEQA in the County or the SCAQMD. As previously mentioned, no federal or State agency (e.g. USEPA, CARB, or SCAQMD) responsible for managing air quality emissions in the County has adopted a GHG emission significance threshold that may be used in reviewing newly proposed projects in the County.

Although not mandatory for the refined project, the Bay Area Air Quality Management District (BAAQMD) is the only regional agency to have adopted operational GHG emission thresholds. On June 2, 2010, CEQA projects within the BAAQMD area must take the following significance thresholds into consideration:

Stationary sources:

- 10,000 metric tons CO_{2e}/year

Projects other than stationary sources:

- Compliance with Qualified Greenhouse Gas Reduction Strategy; or
- 1,100 metric tons of CO_{2e}/year; or
- 4.6 metric tons CO_{2e} per year per capita service population (residents plus employees).

Plan-level emissions:

- Compliance with Qualified Greenhouse Gas Reduction Strategy; or
- 6.6 metric tons CO_{2e} per year per capita service population (residents plus employees).

CAPCOA has provided several approaches to consider potential cumulative significance of projects with respect to GHGs.[34] GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. A zero threshold approach can be considered based on the concept that climate change is a global phenomenon and all GHG emissions generated throughout the earth contribute to climate change. However, the State CEQA Guidelines also recognize that there may be a point where a project's contribution, although above zero, would not be a considerable contribution to the cumulative impact [CEQA Guidelines, Section 15130 (a)]. Therefore, a threshold of greater than zero is considered more appropriate for the analysis of GHG emissions under CEQA. CAPCOA's summary of suggested thresholds for GHG emissions includes efficiency-based thresholds, quantitative emission limits, and limits on the size of projects (Table 3.7-3, *CAPCOA-Suggested Thresholds for Greenhouse Gases*).

TABLE 3.7-3
CAPCOA-SUGGESTED THRESHOLDS FOR GREENHOUSE GASES

	CAPCOA Suggested Threshold
Quantitative	~ 900 metric tons CO_{2e}/year for residential, office, and non-office commercial projects
Quantitative CARB Reporting Threshold/Cap and Trade	Report: 25,000 metric tons CO_{2e}/year Cap and Trade: 10,000 metric tons CO_{2e}/year
Quantitative Regulated Inventory Capture	~ 40,000 - 50,000 metric tons CO_{2e}/year
Unit-Based Threshold Based on Market Capture	Commercial space > 50,000 SF
Projects of Statewide, Regional or Areawide Significance	Residential development > 500 units Shopping center/business establishment > 500,000 SF Commercial office space > 250,000 SF Industrial park > 600,000 SF

SOURCE:
California Air Pollution Control Office Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act.* Sacramento, CA.

The refined project was considered in relation to the adopted BAAQMD threshold of 1,100 metric tons per year, which applies to projects other than stationary sources, such as the refined project. The BAAQMD threshold of 1,100 metric tons per year is similar to the quantitative threshold suggested by CAPCOA of approximately 900 metric tons CO_{2e}/year. The refined project was also considered in relation to CAPCOA's suggested cap and trade threshold of 10,000 metric tons CO_{2e}/year, which is intended to capture roughly half of new residential and commercial projects.

In October 2008, CARB provided a recommended approach for setting interim significance thresholds.[35] The recommendation for residential and commercial projects is to ensure that a project complies with a previously approved plan that addresses GHG emissions; meets GHG targets consistent with the statewide emission reduction goals in AB 32 and transportation-related GHG reduction targets adopted by CARB; includes a GHG inventory and methods to regularly monitor and evaluate emissions; includes specific, enforceable GHG requirements; incorporates

[34] California Air Pollution Control Office Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act.* Sacramento, CA.

[35] California Air Resources Board. 24 October 2008. *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act.* Available at: http://www.opr.ca.gov/ceqa/pdfs/Prelim_Draft_Staff_Proposal_10-24-08.pdf

mechanisms that allow the plan to be revised in order to meet targets; and has a certified CEQA document.[36] If a project does not meet all aforementioned criteria, the recommendation is to ensure that the project meets minimum performance standards and emits no more than a specified quantitative threshold.[37] However, criteria for setting a quantitative threshold for residential and commercial projects have not yet been developed; SCAQMD is currently evaluating a tiered threshold.[38] The recommended quantitative interim threshold for industrial projects is 7,000 metric tons of CO_{2e} per year due to operational activities, not including transportation.[39] As the refined project is not classified as an industrial project, the recommended threshold would not be applicable.

The potential for the refined project to result in new or substantially more adverse significant impacts to GHG emissions was evaluated in relation to two questions recommended for consideration by Appendix G of the State CEQA Guidelines.[40]

Would the refined project have any of the following effects:

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

The refined project would not be expected to create a new or substantially more adverse significant impact to the environment due to direct or indirect generation of GHG emissions.

Qualitative Impact Analysis on Refined Project's Impacts on GHG Emissions

The refined project's incremental impact on GHG emissions would be considered significant if the size, nature, or the duration of the construction phase would generate a substantial amount of GHG emissions. The size of the project is smaller than 5 acres, which is relatively small and would not be expected to be accountable for a significant portion of GHG emissions in the County. In order to calculate construction-related GHG emissions of the refined project under the worst-case scenario, construction of the refined project would be expected to occur simultaneously, thereby requiring approximately 12 months to complete construction of the refined project. During construction, normal construction equipment would be operated. The short-term nature of the construction duration, the typical nature of the construction activities, and the relatively small size of the construction area would not be expected to substantially increase GHG emissions. Therefore, the refined project's construction would be expected to be below the level of significance with regard to GHG emissions.

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[36] California Air Resources Board. 24 October 2008. *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act.* Available at: http://www.opr.ca.gov/ceqa/pdfs/Prelim_Draft_Staff_Proposal_10-24-08.pdf

[37] California Air Resources Board. 24 October 2008. *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act.* Available at: http://www.opr.ca.gov/ceqa/pdfs/Prelim_Draft_Staff_Proposal_10-24-08.pdf

[38] South Coast Air Quality Management District. 22 April 2009. *Survey of CEQA Documents on Greenhouse Gas Emissions, Draft Work Plan.* Available at: www.aqmd.gov/ceqa/handbook/GHG/april22mtg/GHGWorkPlan.pdf

[39] California Air Resources Board. 24 October 2008. *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act.* Available at: http://www.opr.ca.gov/ceqa/pdfs/Prelim_Draft_Staff_Proposal_10-24-08.pdf

[40] *California Code of Regulations.* Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

During the operational phase of the refined project, the project would be expected to emit less than significant levels of GHGs since it would be expected to incorporate energy efficiency measures and appliances within the refined project. Energy efficiency would be considered as a mitigation measure to reduce or prevent GHG emissions associated with the refined project's operation. The proposed refinements to the approved project are not expected to substantially change the intended use or the capacity of the refined project LA Plaza de Cultura y Artes for patrons, students, visitors, or employees, and would therefore result in the same potential number of vehicle miles traveled for the approved project in the certified EIR.[41] In addition, it is expected that GHG emissions contributed by mobile sources would be less than significant because of the relatively small number of daily vehicle trips that would be expected in conjunction with Countywide population growth. Therefore, the operation of the refined project would be expected to be below the level of significance with regards to GHG emissions.

Quantitative Impact Analysis on Refined Project's Impacts on GHG Emissions

Based on the methods and modeling tools previously described in this section, construction activities associated with the refined project would result in approximately 10,650.97 pounds (lbs) of CO_2 emissions daily or approximately 4.83 metric tons of CO_2 emissions daily in year 2009, and approximately 9,616.91 lbs of CO_2 emissions daily or approximately 4.36 metric tons of CO_2 emissions daily in year 2010, thereby resulting in a maximum of approximately 4.83 metric tons of CO_2 or CO_{2e} daily during the construction phase (Table 3.7-4, *Anticipated CO_{2e} Emissions Associated with the Refined Project*).[42,43] Annual construction-related GHG emissions would be equivalent to approximately 1,256 metric tons of CO_{2e} emissions annually, which is equivalent to 0.000118 metric ton per capita (Table 3.7-4). The construction emissions of the refined project were not evaluated in relation to the adopted BAAQMD significance thresholds, which apply to operational activities, not construction activities. Construction-related GHG emissions would be considered to be below the level of significance in comparison to the CARB CO_{2e} emissions factor of 14 metric tons per capita.[44] When compared with the suggested thresholds for GHG emissions provided by CAPCOA (Table 3.7-3), construction of the refined project would not exceed the suggested cap and trade threshold of 10,000 metric tons CO_{2e} per year. Therefore, GHG emissions associated with construction of the refined project would be expected to be below the level of significance.

[41] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[42] Total $CO_{2equivalent}$ (metric tons) of CO_2 = 4.83 metric tons of CO_2 emissions x 1 (GWP)

[43] Sapphos Environmental, Inc. 10 December 2008. *La Plaza de Cultura y Artes, URBEMIS 2007, Version 9.2.4, Summary Report for Summer Emissions.* Pasadena, CA.

[44] California Air Resources Board. December 2008. *Climate Change Scoping Plan: A Framework for Change.* Available at: http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm

TABLE 3.7-4
ANTICIPATED CO_{2e} EMISSIONS ASSOCIATED WITH THE REFINED PROJECT

	Total Daily CO_{2e} Emissions (metric tons)	Total Annual CO_{2e} Emissions per Capita Population (metric tons)
Construction activity	4.83	0.000118
Operation and maintenance	2.58	0.000089
Area sources	0.18	0.000006

NOTE:
* Data on County population are based on the projected 2010 County population data provided by SCAG.
** Annual construction emissions are calculated assuming that there are 260 working days in a given year.

The analysis of operation-related GHG emissions was based on the operational scenario described in Section 2.0, *Project Description*, of this Addendum to the EIR and operation-related GHG emissions associated with the refined project can be attributed to mobile sources and electricity use for space heating and cooling. It is anticipated that operation of the refined project related to mobile sources would contribute approximately 4,492.26 lbs or approximately 2.04 metric tons of CO_2 emissions daily.[45,] Operation of the refined project related to electricity use for space heating and cooling would be expected to use approximately 1,630 kilowatt-hours per day[46, 47] and contribute approximately 0.54 metric tons of CO_2 emissions daily, approximately 0.000022 metric ton of CH_4 emissions daily or approximately 0.00047 metric ton of CO_{2e} emissions daily,[48] and approximately 0.0000060 metric ton of N_2O emissions daily or approximately 0.0019 metric ton of CO_{2e} emissions daily,[49] thereby resulting in approximately 0.54 metric tons of CO_{2e} emission levels daily associated with electricity use.[50,51] Therefore, operation of the refined project associated with both on-road mobile combustion and electricity use would be expected to contribute a total of approximately 2.58 metric tons of CO_{2e} emissions daily. Daily CO_{2e} emissions potentially contributed by area sources such as gas appliances, wood stoves, fireplaces, landscape maintenance equipment, and consumer products would be expected to be approximately 389.21lbs per day or approximately 0.18 metric ton of CO_2 or CO_{2e} emissions daily.[52]

Based on the data in Table 3.7-4, it is anticipated that operation of the refined project would have the potential to contribute 942 metric tons of CO_{2e} emissions annually, which is equivalent to 0.000089 metric tons per capita of CO_{2e} emissions annually. The annual per capita emissions of

[45] Sapphos Environmental, Inc. 10 December 2008. *LA Plaza de Cultura y Artes, URBEMIS 2007, Version 9.2.4, Summary Report for Summer Emissions*. Pasadena, CA.

[46] Kilowatt-hours per day = [refined building refinements (total interior footprint of 45,954 square feet) x 12.95 kilowatt-hour/square foot/year] / 365 days / year.

[47] South Coast Air Quality Management District. 1993. "Table A9-11-A." *CEQA Air Quality Handbook*. Diamond Bar, CA.

[48] Total CO_{2e} (metric tons) of CH_4 = 0.000008 metric ton of CH_4 emissions x 21 (GWP)

[49] Total CO_{2e} (metric tons) of N_2O = 0.000005 metric ton of N_2O emissions x 310 (GWP)

[50] Daily CO_2 emissions as a result of daily electricity use = (kilowatt-hours per day/1000) x 724.12 lbs of CO_2/Megawatt-hour.

[51] California Climate Action Registry. January 2009. *California Climate Action Registry General Reporting Protocol, Version 3.1*. Los Angeles, CA.

[52] Sapphos Environmental, Inc. 28 August 2008. *LA Plaza de Cultura y Artes, URBEMIS 2007, Version 9.2.4, Summary Report for Summer Emissions*. Pasadena, CA.

the refined project can be considered to be insignificant in comparison to the CARB CO_{2e} emissions factor of 14 metric tons per capita.[53] When compared with the suggested thresholds for GHG emissions provided by CAPCOA (Table 3.7-3), operation of the refined project would not exceed the suggested cap and trade threshold of 10,000 metric tons CO_{2e} per year or the BAAQMD's adopted quantitative threshold of 1,100 metric tons per year. In addition, sustainable building design principles and energy efficiency measures and appliances would be incorporated into the refined project to increase water and energy use efficiency. Therefore, GHG emissions associated with operation of the refined project would be expected to be below the level of significance.

Incorporation of mitigation measures Air-1 through Air-12 recommended in the 2004 certified EIR would be expected to not only reduce criteria pollutants' emissions to below the level of significance, with the exception of NO_x emissions, but also further reduce GHG emissions of the refined project, as the co-benefits of reducing criteria pollutant emissions may substantially reduce GHG emissions.[54]

Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to the environment due to direct or indirect generation of GHG emissions.

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

The refined project would not be expected to create a new or substantially more adverse significant impact to GHG emissions related to creating a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The refined project would not be expected to contribute new or substantially more adverse significant GHG emissions or global climate change impacts. As described in Section 2.0, *Project Description*, of this Addendum to the EIR, the refined project entails reducing the total exterior footprint of the approved project analyzed in the 2004 certified EIR by approximately 36,853 square feet.[55] With a smaller construction footprint and potentially shorter construction duration, construction-related GHG emissions would be expected to be less for the refined project than it would be for the approved project. In addition, the refined project would entail approximately 60,546 square feet less interior footprint than the approved project; therefore, the refined project would be expected to require less energy for space heating and cooling and result in a reduced amount of GHG emissions related to energy use than the approved project. Since the refined project would be operated as a Mexican American cultural heritage center similar to the operational scenario of the approved project, the refined project would not be expected to induce additional daily vehicle trips than those anticipated for the approved project. Incorporation of mitigation measures Air-1 through Air-12 recommended in the 2004 certified EIR would be expected to further reduce GHG emissions of the refined project, as the co-benefits of reducing criteria pollutant emissions may substantially

[53] California Air Resources Board. December 2008. *Climate Change Scoping Plan: A Framework for Change*. Available at: http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm

[54] California Air Resources Board. 25 April 2008. *Summary of ARB Work to Fulfill AB 32 Evaluation Requirements: Technical Stakeholder Workgroup Meeting, April 25, 2008*. Available at: http://www.arb.ca.gov/cc/scopingplan/economics-sp/meetings/042508/evaluations_April_25_final.pdf

[55] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

reduce GHG emissions.[56] Therefore, the refined project would not be expected to create new or substantially more adverse significant impacts to air quality in relation to GHG emissions or global climate change. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to GHG emissions related to creating a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

[56] California Air Resources Board. 25 April 2008. *Summary of ARB Work to Fulfill AB 32 Evaluation Requirements: Technical Stakeholder Workgroup Meeting, April 25, 2008.* Available at: http://www.arb.ca.gov/cc/scopingplan/economics-sp/meetings/042508/evaluations_April_25_final.pdf

3.8 HAZARDS AND HAZARDOUS MATERIALS

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to hazards and hazardous materials than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Hazards and hazardous materials at the refined project site were evaluated based on American Society for Testing and Materials (ASTM) Standard E1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessments*;[2] review of published and unpublished literature; and review of federal, state, and local environmental regulatory databases.[3]

Hazardous wastes are byproducts of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. Hazardous wastes possess at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or appear on special U.S. Environmental Protection Agency lists.[4]

The potential for the refined project to result in new or substantially more adverse significant impacts related to hazards and hazardous materials was evaluated in relation to eight questions recommended for consideration by the State California Environmental Quality Act Guidelines:[5]

Would the refined project:

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

The refined project would not be expected to create new or substantially more adverse significant impacts in relation to a hazard that could affect the public or the environment through the routine transport, use, or disposal of hazardous materials. The refined project would reduce the total square footage of construction from that approved in the 2004 certified EIR.[6]

As with the approved project, during the construction phase of the refined project, asbestos-containing materials (ACMs), lead-based paints (LBPs), and polychlorinated biphenyls (PCBs) identified in the previous surveys of the existing buildings would need to be properly removed and disposed of and/or abated by licensed contractors. In addition, fuels and lubricants that would be potentially used for construction vehicles could impact the refined project site due to leakage, spillage, or accidents. Impacts to the public or the environment related to the routine transport, use, or disposal of hazardous materials would be expected to be reduced to below the level of

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] American Society for Testing and Materials International. 2005. *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (Standard E 1527-05). West Conshohocken, PA.

[3] Environmental Data Resources. 16 April 2003. The EDR Radius Map with GeoCheck. Inquiry Number: 0961494.3s, El Pueblo de Los Angeles 501 and 513 North Main Street Los Angeles, CA 90012.

[4] *Code of Federal Regulations*. Title 40, Chapter 1, Part 261.

[5] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[6] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

significance by the incorporation of the specified mitigation measures in the certified EIR.[7] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to hazards and hazardous materials in relation to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

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

The refined project would not be expected to create a new or substantially more adverse significant impact to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The removal of ACMs, LBPs, and PCBs at the refined project site is comparable to the approved project in the potential for a release of asbestos and lead into the environment. As with the approved project, fuels and lubricants used for construction vehicles may impact the site due to leakage, spillage, or accidents.

As with the approved project, implementation of mitigation measures Hazards-1 through Hazards-3 would reduce significant impacts related to hazards to below the level of significance. Therefore, the refined project would not be expected to result in new or substantially more adverse impacts to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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

The refined project would not be expected to create a new or substantially more adverse significant impact from the emission of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No schools are located within 0.25 mile of the refined project site.[8] According to the Los Angeles Unified School District, the nearest schools are the Castelar Early Education Center located at 840 Yale Street and the Evans Community Adult School located at 717 North Figueroa Street approximately 0.9 mile northwest and west, respectively, of the refined project site. Therefore, the refined project would not be expected to result in new or substantially more adverse impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

[7] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[8] Los Angeles Unified School District. 2008. "Find a School." Web site. Available at: http://notebook.lausd.net/schoolsearch/selector.jsp

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

Based on the review of federal, state, and local environmental regulatory databases, the refined project site is not identified on a list of hazardous materials sites pursuant to Government Code Section 65962.5.[9] In addition, no known hazardous waste sites are located within 1 mile of the refined project boundaries. Therefore, the refined project would not be expected to result in new or substantially more adverse impacts related to being located on a hazardous waste site.

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

The refined project would not be expected to create a new or substantially more adverse significant safety hazard for people residing or working in the refined project area due to impacts resulting from the refined project being located within an airport land use plan or within 2 miles of a public airport or public use airport. A review of the U.S. Geological Survey 7.5-minute series Los Angeles topographic quadrangle indicated that no airports are present within 2 miles of the refined project site.[10] The nearest public airports are the Bob Hope Airport and the Compton Airport, each located approximately 11.5 miles northwest and southwest, respectively, of the refined project site. Therefore, the refined project would not be expected to result in new or substantially more adverse impacts related to the refined project site being located within 2 miles of a public airport or public use airport that would result in a safety hazard for people residing or working in the refined project area.

(f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The refined project would not be expected to create new or substantially more adverse significant impacts related to creating safety hazards for people residing or working in the refined project area due to the refined project being located within the vicinity of a private airstrip because the refined project site is not located in the vicinity of private airstrip.[11] The nearest private airstrip is the Hawthorne Airport located approximately 9 miles southwest of the refined project site, thus making unlikely the possibility of a safety hazard to occur within the vicinity of the refined project due to a private airstrip. Therefore, the refined project would not be expected to result in new or substantially more adverse impacts related to being located within the vicinity of a private airstrip.

(g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The refined project would not be expected to create a new or substantially more adverse significant impact that would impair implementation of or physically interfere with an adopted emergency

[9] Environmental Data Resources. 16 April 2003. The EDR Radius Map with GeoCheck. Inquiry Number: 0961494.3s, El Pueblo de Los Angeles 501 and 513 North Main Street Los Angeles, CA 90012.

[10] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

[11] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

response plan or emergency evacuation plan. Information obtained from the City of Los Angeles Fire Department did not identify any conflicts between the approved project described in the 2004 certified EIR[12] with the local emergency response or emergency evacuation plan.[13] As with the approved project, the refined project would not expected to conflict with any emergency response plan or emergency evacuation plan. The primary fire station that would respond to emergencies in the vicinity of the refined project site is Station Number 4, located at 800 North Main Street, approximately 0.3 mile north of the refined project site. The refined project would not be designated as an emergency staging area and would not contain elements that are anticipated to interfere with local emergency response or evacuation routes.[14] Furthermore, the refined project would not be expected to physically impede existing emergency response plans, emergency vehicle access, or personnel access to the refined project site.[15] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to hazards and hazardous materials related to interference with an adopted emergency response plan or emergency evacuation plan.

(h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The refined project would be located in the highly urbanized section of central Los Angeles; thus, there are no wildlands in the vicinity of the refined project site. As a result, the refined project would not be expected to expose people or structures within the refined project site vicinity to the risks of wildfire. Therefore, the refined project would not be expected to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

[12] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[13] Theule, Mike, Los Angeles Fire Department, Hydrants and Access Unit. 15 April 2003. Personal communication with Kyle McClure, Sapphos Environmental, Inc., Pasadena, CA.

[14] County of Los Angeles Department of Regional Planning. 1993. *Streamlined County of Los Angeles General Plan, Highway Policy Map*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[15] Theule, Mike, Los Angeles Fire Department, Hydrants and Access Unit. 15 April 2003. Personal communication with Kyle McClure, Sapphos Environmental, Inc., Pasadena, CA.

3.9 HYDROLOGY AND WATER QUALITY

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to hydrology and water quality than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Hydrology and water quality at the refined project site were evaluated in relation to the federal Clean Water Act of 1972[2] and its amendment in 1987, which regulates point-source and non-point-source discharges to receiving waters with the National Pollutant Discharge Elimination System (NPDES) program; the State of California's enforcement of the NPDES program;[3] the California Water Resources Control Board; and the Regional Water Quality Control Board (RWQCB), Los Angeles Region. The refined project is regulated by the Los Angeles RWQCB under adopted Order No. 01-182; NPDES Permit CAS004001 for municipal storm water and urban runoff discharges within the County of Los Angeles (County);[4] the Conservation, Open Space, and Recreation elements of the County General Plan,[5] the provisions of which were updated, revised, combined, and included in the Streamlined County General Plan;[6] the City of Los Angeles (City) General Plan;[7] the Flood Protection Policy Map of the County General Plan;[8] and the USGS 7.5-minute series Los Angeles, California, topographic quadrangle (Township 2 South, Range 13 West, Section 24).[9]

The potential for the refined project to result in new or substantially more adverse significant impacts related to hydrology and water quality was evaluated in relation to 10 questions recommended for consideration by the State California Environmental Quality Act Guidelines:[10]

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] U.S. Code. "Certification." Title 33, Chapter 26, Subchapter IV, Section 1341. Available at: http://www.4uth.gov.ua/usa/english/laws/majorlaw/33/1341.htm

[3] U.S. Environmental Protection Agency. "Compliance and Enforcement." Available at: http://www.epa.gov/region09/water/npdes/compliance.html

[4] County of Los Angeles Municipal Storm Water National Pollutant Discharge Elimination System Permit (CAS004001) Order No. 01-182. 13 December 2001. Available at: http://www.swrcb.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/los_angeles_ms4/index.shtml

[5] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan.* Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[6] County of Los Angeles Department of Regional Planning. 1993. *Streamlined County of Los Angeles General Plan.* Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[7] City of Los Angeles Department of City Planning. Adopted 8 January 2003. *Central City Community Plan.* Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[8] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan.* Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[9] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

[10] *California Code of Regulations.* Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

Would the refined project:

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

The refined project would not be expected to create new or substantially more adverse significant impacts to hydrology and water quality in relation to water quality standards or waste discharge requirements that were not previously identified in the certified EIR.[11] Implementation of the approved project required grading that had the potential to violate water quality standards, constituting significant direct and indirect impacts that required implementation of the mitigation measures specified in the certified EIR.[12] Direct impacts would result from the degradation of surface water quality within the refined project area and indirect impacts would result from the influence of polluted storm water runoff flowing off site. Grading would have the potential to transport pollutants from the construction site, including work areas and construction staging areas, to the storm drainage system. The approved project was required to comply with all provisions of the NPDES permit issued to the County by the California RWQCB, Los Angeles Region, related to avoiding impacts from storm water runoff during construction.[13] As with the approved project, implementation of mitigation measures Hydrology-1 and Hydrology-2 would reduce significant impacts related to water quality or waste discharge requirements to below the level of significance. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to water quality standards or waste discharge requirements.

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

The approved project analyzed in the certified EIR was not expected to substantially deplete groundwater supplies or interfere with groundwater recharge.[14] The refined project would not utilize groundwater supplies. All potable and non-potable water would be supplied through existing developed domestic water sources.[15] The refined project would reduce the total area of new construction, as described in Section 2.0, *Project Description*, of this Addendum to the EIR. Moreover, the refined project is not located within a designated groundwater recharge basin; therefore, the refined project would not interfere with groundwater recharge. The refined project would not require subsurface excavations or structures that would interfere with groundwater

[11] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[12] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[13] U.S. Environmental Protection Agency. "Compliance and Enforcement." Available at: http://www.epa.gov/region09/water/npdes/compliance.html

[14] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[15] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

movement or recharge.[16] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to groundwater levels.

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

The refined project would not be expected to create new or substantially more adverse significant impacts related to the alteration of existing drainage patterns in a manner, including the alteration of a stream or river that would result in substantial erosion or siltation on or off site. The materials most susceptible to erosion are artificial fill, soil, and younger alluvium; all three may exist beneath the surface of the refined project area. However, most areas susceptible to erosion are typically characterized as steeper slopes and are located along drainage courses. Due to the urban conditions and relatively flat terrain of the refined project area, severe site erosion is not anticipated.[17] As with the approved project, the refined project would be required to include best management practices (BMPs), which include addressing drainage patterns and potential erosion or siltation, through the design and implementation of the Standard Urban Storm Water Management Plan prepared consistent with the requirements of the applicable NPDES permit. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on site or off site.

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

The refined project would not be expected to create new or substantially more adverse significant impacts related to alteration of the drainage patterns of the site or substantial increasing the rate or amount of surface runoff in a manner that would result in flooding on site or off site. The refined project is expected to create storm water runoff consistent with that delineated in the certified EIR.[18] That rate was anticipated to be between 9.23 to 13.33 cubic feet per second (CFS) during 10-year, 20-year, and 50-year storm events for the entire project. When compared to existing conditions (9.21 to 13.22 CFS during 10-year, 20-year, and 50-year storm events), the approved project was not found to substantially increase the amount of surface runoff.[19] As with the approved project, the refined project is not anticipated to substantially increase the amount of surface runoff beyond significant levels.

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[16] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[17] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[18] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[19] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

Furthermore, the refined project includes an increase in landscaped areas compared to existing conditions, allowing percolation of storm water into soils at a rate greater than the present condition.[20] As with the approved project, the refined project would be subject to BMPs through the design and implementation of the Standard Urban Storm Water Management Plan prepared consistent with the requirements of the applicable NPDES permit. These BMPs include addressing drainage patterns that would affect surface runoff in the event that surface runoff would cause flooding on or off site.[21]

Consequently, the refined project would not be expected to result in new or substantially more adverse significant impacts related to alteration of existing drainage patterns of the site or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site.

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

The refined project would not be expected to create new or substantially more adverse significant impacts related to exceeding the capacity of existing or planned storm water drainage systems or providing substantial additional sources of polluted runoff. The refined project would create storm water runoff consistent with that delineated in the certified EIR.[22] The rate was anticipated to be 9.23 to 13.33 CFS during 10-year, 20-year, and 50-year storm events for the entire approved project. When compared to the existing conditions (9.21 to 13.22 CFS during 10-year, 20-year, and 50-year storm events), the approved project was not expected to substantially increase the amount of runoff.[23] Moreover, the proposed project refinements are anticipated to reduce the impervious area within the campus (i.e., reduced building footprint plus paved area). In turn, this would reduce the amount of surface water runoff, compared to the approved project. Therefore, the refined project would not be expected to increase the amount of surface runoff beyond significant levels, and therefore would not be expected to cause the capacity of existing or planned storm water drainage systems to be exceeded.

The quality of storm water runoff is regulated under the NPDES storm water permit issued to the County, which provides a mechanism for establishing appropriate controls and monitoring the discharge of pollutants to the storm water runoff system.[24] The County requires all development projects within its jurisdiction on sites of 1 acre or larger to comply with the NPDES requirements for construction and operations as appropriate and the design and implementation of the Standard Urban Storm Water Management Plan prepared consistent with the requirements of the applicable

[20] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012

[21] U.S. Environmental Protection Agency. "Compliance and Enforcement." Available at: http://www.epa.gov/region09/water/npdes/compliance.html

[22] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[23] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[24] County of Los Angeles Municipal Stormwater National Pollutant Discharge Elimination System Permit (CAS004001) Order No. 01-182. 13 December 2001. Available at: http://www.swrcb.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/los_angeles_ms4/index.shtml

NPDES permit. As with the approved project, the refined project would be required to conform to the County's NPDES storm water permit. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exceeding the capacity of existing or planned storm water drainage systems or providing substantial additional sources of polluted runoff.

(f) Otherwise substantially degrade water quality?

The refined project would not be expected to create new or substantially more adverse significant impacts related to the substantial degradation of water quality. The quality of storm water runoff is regulated under the NPDES storm water permit issued to the County, which provides a mechanism for establishing appropriate controls and monitoring the discharge of pollutants to the storm water runoff system.[25] The County requires all development projects within its jurisdiction on sites of 1 acre or larger to comply with the NPDES requirements for construction and operations as appropriate and the design and implementation of the Standard Urban Storm Water Management Plan prepared consistent with the requirements of the applicable NPDES permit. This provision would ensure that no substantial amount of polluted runoff would be generated during construction. As with the approved project, implementation of mitigation measures Hydrology-3 and Hydrology-4 for the refined project would mitigate any impact that could degrade water quality. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to substantial degradation of water quality.

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

The refined project would not be expected to create new or substantially more adverse significant impacts related to the placement of housing within a 100-year flood hazard area. The refined project is not located within a 100- or 500-year flood hazard area[26] or within a designated floodplain management area.[27] The refined project site is located west of the Sepulveda Dam in the San Fernando Valley, which is the area of potential inundation due to a catastrophic failure. As with the approved project, the refined project would be constructed in accordance with applicable state requirements. Compliance with existing standards and requirements would ensure an adequate level of protection from flood hazards. The refined project does not include the construction of housing or result in the redirection of flood flows towards residential areas. Therefore, implementation of the refined project would not be expected to result in direct or indirect impacts related to placing housing or other structures within the 100-year flood hazard area or floodplain management area. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to placement of structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map.

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[25] County of Los Angeles Municipal Stormwater National Pollutant Discharge Elimination System Permit (CAS004001) Order No. 01-182. December 2001. Located at: http://www.swrcb.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/los_angeles_ms4/index.shtml

[26] Federal Emergency Management Agency. 2 December 1980. *Flood Insurance Rate Map, Los Angeles County*. Map Number 0601370074C. Contact: Federal Emergency Management Agency Map Service Center, P.O. Box 1038, Jessup, MD 20794.

[27] County of Los Angeles Department of Regional Planning. 1993. *Streamlined County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

(h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?

The refined project would not be expected to create new or substantially more adverse significant impacts related to placement of structures that would impede or redirect flood flows within a 100-year flood hazard area. The refined project is not within a 100- or 500-year flood hazard area[28] or within a designated floodplain management area.[29] The refined project site is located west of the Sepulveda Dam in the San Fernando Valley, which is the site of potential inundation due to a catastrophic failure. Therefore, implementation of the refined project would not be expected to result in direct or indirect impacts related to placing housing or other structures within the 100-year flood hazard area or floodplain management area. As with the approved project, the refined project would be constructed in accordance with applicable state requirements. Compliance with these existing standards and requirements would ensure an adequate level of protection from flood hazards. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to placement of structures (other than housing) within a 100-year flood hazard that would impede or redirect flood flows.

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

The refined project would not be expected to create new or substantially more adverse significant impacts related to exposing people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. The refined project would not result in placement of new structures or people in areas of increased risk of flooding as a result of the failure of a levee or dam. The refined project site is located west of the Sepulveda Dam in the San Fernando Valley, which is the site of potential inundation due to a catastrophic failure. As with the approved project, the refined project would be constructed in accordance with applicable state requirements. Compliance with existing standards and requirements would ensure an adequate level of protection from flood hazards. Therefore, implementation of the refined project would not be expected to result in direct or indirect impacts related to exposing people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the failure of a levee or dam.

(j) Inundation by seiche, tsunami, or mudflow?

The refined project would not be expected to create new or substantially more adverse significant impacts related to inundation by seiche, tsunami, or mudflow. Implementation of the refined project would not be expected to result in inundation by seiche, tsunami, or mudflow. Seiches and tsunamis are the result of tectonic activity, such as an earthquake. A seiche is an oscillation of the surface of a landlocked body of water that can create a hazard to persons and structures on and in the vicinity of the water. A tsunami is a long-period, high-velocity tidal surge that can result in a series of very low (trough) and high (peak) sea levels, with the potential to inundate areas up to

[28] Federal Emergency Management Agency. 26 September 2008. *Flood Insurance Rate Map, Los Angeles County*. Map Number 06037C1636F. Contact: Federal Emergency Management Agency Map Service Center, P.O. Box 1038, Jessup, MD 20794.

[29] County of Los Angeles Department of Regional Planning. 1993. *Streamlined County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

several miles from the coast, creating hazards to people or structures from loss, injury, or death. Most of the hazards created by a tsunami occur when a trough follows the peak, resulting in a rush of sea water back into the ocean. A mudflow is a moving mass of soil that is made fluid by a loss of shear strength, generally as a result of saturation from rain or melting snow.

Due to the sufficient elevation of the refined project area, its 17-mile distance from the Pacific Ocean, and the lack of other major coastal bodies of water, there would be no expected direct or indirect impacts related to seiches or tsunamis. The low relief of the refined project area would not contribute to the risk for earthquake-related ground failures that would result in mudflows. Mudslides and landslides are not considered to be a potential hazard at the refined project site and would not be expected to affect any elements of the refined project. The refined project site is not located near coastlines, lakes, and/or flood control basins or adjacent to any steep-sided slopes covered with soils and/or vegetation. Thus, there is no potential for impacts to hydrology and water quality in relation to the inundation by seiche, tsunami, or mudflow. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to inundation by seiche, tsunami, or mudflow.

3.9 LAND USE AND PLANNING

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to land use and planning than those disclosed in the certified Plaza de Cultura y Artes Environmental Impact Report (EIR).[1] Land use and planning at the refined project site was evaluated with respect to adopted published maps, including the U.S. Geological Survey (USGS) 7.5-minute series Los Angeles, California, topographic quadrangle,[2] in which the refined project site is located; all surrounding USGS 7.5-minute series topographic quadrangles (Hollywood, South Gate, and El Monte);[3,4,5] the National Historic Preservation Act of 1966;[6] the Land Use element of the County of Los Angeles (County) General Plan;[7] the City of Los Angeles (City) Central City Community Plan;[8] and coordination with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG) with regard to the applicable proposed or adopted land use plans and regulations.

The potential for the refined project to result in new or substantially more adverse significant impacts related to land use and planning was evaluated in relation to three questions recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines.[9]

Would the refined project:

(a) Physically divide an established community?

The refined project would not create new or substantially more adverse significant impacts to land use and planning related to the physical division of an established community. According to the U.S. Geological Survey (USGS) 7.5-minute series Los Angeles, California, topographic quadrangle[10] and the Thomas Guide map for the County,[11] the refined project area is within the City. The refined

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

[3] U.S. Geological Survey. [1966] Photorevised 1981. 7.5-minute Series, Hollywood, California, Topographic Quadrangle. Reston, VA.

[4] U.S. Geological Survey. [1966] Photorevised 1981. 7.5-minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[5] U.S. Geological Survey. [1966] Photorevised 1994. 7.5-minute Series, El Monte, California, Topographic Quadrangle. Reston, VA.

[6] U.S. Code. *National Historic Preservation Act of 1966, As amended through 2000 [With annotations]*. Section 470 et seq. Available at: http://www.achp.gov/NHPA.pdf

[7] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[8] City of Los Angeles Department of City Planning. March 2002 (Adopted 8 January 2003). *Central City Community Plan*. Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[9] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[10] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series, Los Angeles, California, Topographic Quadrangle. Reston, VA.

[11] Thomas Bros. Maps. 2001. *The Thomas Guide: Los Angeles and Orange Counties*. Irvine, CA.

project site is located on five parcels: four owned by the County and one owned by the City. The property is designated as a Public Facilities area and as a cultural and historic site in the Los Angeles Central City Community Plan.[12] Proposed refinements to the construction and demolition activities of the approved project would not be expected to create any new impacts to any other parcels and would not be expected to create a new temporary barrier in the neighborhood. In addition, the refined project would not be expected to create a permanent division between neighboring parcels, as the approved project is still designed to be pedestrian-oriented and compatible with the existing community and would not cause a physical division within the established community. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to physical division of an established community.

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

The refined project would not be expected to result in new impacts to land use and planning in relation to a conflict with adopted or proposed land use plans, policies, or regulations of an agency with jurisdiction over the refined project.

The County is not subject to requirements of City plans on this refined project on County property. The project site is located within the City of Los Angeles, which is an incorporated city of the County; however, the refined project site and the development has been undertaken by the County entities for County uses or purposes in the area and as such is subject to the policies, procedures, and standards set forth in the County General Plan. Proposed refinements to modify the site plan within the approved project boundaries to facilitate outdoor activities in part to support the designation of LA Plaza de Cultura y Artes as a Smithsonian Affiliate would not be expected to result in new substantial adverse changes to the El Pueblo de Los Angeles Historic District. The refined project site is within a land use area designated as Public Facilities and is considered a cultural and historic site in the Los Angeles Central City Community Plan Land Use Map.[14] The refined project site is also zoned as "PF," or Public Facilities: the PF zone allows for governmental buildings and structures in addition to agricultural uses, parking under freeways, fire and police stations, public libraries and facilities, public health facilities, and public elementary and secondary schools.[15] The refined project is expected to be consistent with the Public Facilities land use designation and the PF zoning designation. The refined project would not be expected to change the intended use of the property and would conform to the City's zoning code. Thus, the refined project would not be expected to create any new conflicts with any applicable land use plan, policy, or regulation, or with the current zoning and land use designations, and would not be expected to result in new or substantially more adverse significant impacts related to a conflict with adopted or proposed land use plans, policies, or regulations.

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[12] City of Los Angeles Department of City Planning. Adopted 8 January 2003. *Central City Community Plan*. Contact: City of Los Angeles Department of City Planning, 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[14] City of Los Angeles Department of City Planning. Adopted 8 January 2003. *Central City Community Plan*. Contact: City of Los Angeles Department of City Planning, 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[15] City of Los Angeles. 12 November 1936 (Amended 29 June 2008). Official City of Los Angeles Municipal Code Chapter I: General Provisions and Zoning Sixth Edition. Available at: http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lapz_ca

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

The refined project would not create new or substantially more adverse significant impacts to land use and planning in relation to a conflict with any applicable habitat conservation plan or natural community conservation plan. The refined project site is located in a Public Facilities land use–designated area not proposed or adopted as part of a habitat conservation plan,[16] or a natural community conservation plan.[17] No conflicts with any adopted habitat conservation plan or natural community conservation plan were identified in the certified EIR,[18] and the refined project would not be expected to result in any new conflicts. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to a conflict with any adopted habitat conservation plan or natural community conservation plan.

[16] U.S. Fish and Wildlife Service. Conservation Plans and Agreements Database. Available at: http://ecos.fws.gov/conserv_plans/public.jsp

[17] California Department of Fish and Game, Habitat Conservation Branch. "Habitat Conservation Branch." Available at: http://www.dfg.ca.gov/habcon/

[18] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

3.11 MINERAL RESOURCES

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to mineral resources than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report.[1] Mineral resources at the refined project site were evaluated with regard to California Geological Survey publications[2,3] and the adopted County of Los Angeles (County) General Plan[4] and the City of Los Angeles (City) General Plan.[5]

Mineral deposits consist of sand, gravel, and other construction aggregate, oil, and natural gas. The Los Angeles metropolitan area produces and consumes more construction aggregate than any other metropolitan area in the United States.[6] The City has indicated through its general plan that natural mineral deposits are nonrenewable resources that cannot be replaced once they are depleted. The primary mineral resources within the City are rock, gravel, and sand deposits.[7]

The potential for the refined project to result in new or substantially more adverse significant impacts to mineral resources was evaluated in relation to two questions recommended for consideration by the State of California Environmental Quality Act (CEQA) Guidelines:[8]

Would the refined project:

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

The refined project would not be expected to create new or substantially more adverse significant impacts related to the loss of availability of a known mineral resource.

According to *Mines and Mineral Producers Active in California (1977–1998)*, there are 25 mines in the County.[9] According to the California Department of Conservation, Division of Mines and Geology (now, California Geological Survey), 1994 Mineral Land Classification Map (updated 2006), the refined project site and surrounding areas are located within a mineral resource zone

[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] California Geological Survey. [1966] Reprinted 13 March 2008. *Bulletin 189: Minerals of California*. Centennial Volume (1866–1966). Los Angeles, CA.

[3] California Geological Survey. Revised 1999. *Mines and Mineral Producers Active in California (1997–1998)*. Special Publication 103. Los Angeles, CA.

[4] County of Los Angeles Department of Regional Planning, 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[5] City of Los Angeles Department of City Planning. March 2002 (Adopted 8 January 2003). *Central City Community Plan*. Contact: City of Los Angeles Department of City Planning, 200 North Spring Street, Room 525, Los Angeles, CA 90012–4801

[6] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[7] City of Los Angeles Department of City Planning. March 2002 (Adopted 8 January 2003). *Central City Community Plan*. Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[8] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[9] California Geological Survey. Revised 1999. *Mines and Mineral Producers Active in California (1997–1998)*. Special Publication 103. Los Angeles, CA.

classified as Mineral Resources Zones (MRZ)-2.[10] The MRZ-2 are defined as "areas where adequate information indicates significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence."[11]

However, there are no mining districts located in or around the vicinity of the refined project site. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the loss of availability of a known mineral resource.

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

The refined project would not be expected to create new or substantially more adverse significant impacts to mineral resources in relation to the loss of availability of a known mineral resource recovery site.

Consultation with the California Geological Survey, which classifies the regional significance of mineral resources in accordance with the California Surface Mining and Reclamation Act of 1975, substantiated that the refined project site would not be within a locally important mineral resource recovery site.[12] In addition, the refined project site is not delineated within the County or City General Plan as containing a locally important mineral resource. Based on a review of California Geological Survey publications, the County has an abundant reserve of sand and gravel deposits. However, according to the County General Plan, no known mineral resource recovery sites of local importance are located within the refined project site. [13] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the loss of availability of a known locally important mineral resource recovery site.

[10] California Department of Conservation. Updated 2006. "California Geological Survey – SMARA Mineral Land Classification." Map Sheet 52. Available at: http://conservation.ca.gov/cgs/minerals/mlc/Pages/Index.aspx

[11] County of Los Angeles Department of Regional Planning, 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[12] California Department of Conservation, Office of Mine Reclamation. January 2007. *Surface Mining and Reclamation Act and Associated Regulations*. Available at: http://www.conservation.ca.gov/omr/smara/Documents/010107Note26.pdf

[13] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan, Conservation/Open Space Element*. Los Angeles, CA.

3.12 NOISE

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to noise than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Noise at the refined project site was evaluated with regard to the County of Los Angeles (County) General Plan,[2] County Noise Control Ordinance,[3] and the site-specific acoustical analysis and modeling undertaken for the 2004 certified EIR.[4]

The potential for the refined project to result in new or substantially more adverse significant impacts related to noise was evaluated in relation to six questions recommended for consideration by the State of California Environmental Quality Act (CEQA) Guidelines:[5]

Would the refined project result in:

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

The refined project would not be expected to create new or substantially more adverse significant impacts related to exposure of people to or generation of noise levels in excess of established standards.

Construction

The noise impact analysis for the approved project determined that construction activities at the site had the potential to result in short-term noise impacts.[6] Noise levels exceeding 65 dBA (decibels, A-weighted sound levels) for single-family residences and 70 dBA for multi-family residences during construction hours are prohibited. Daily construction activities would be subject to County noise regulation to ensure that the activities conform to the mitigation measures specified in the 2004 certified EIR; thus, the refined project would not be expected to generate additional higher noise levels than those evaluated in the 2004 certified EIR.[7]

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] County of Los Angeles Department of Regional Planning. 1993. *Streamlined County of Los Angeles General Plan.* Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[3] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles.* Ord. 11778, Section 2 (Art. 1, Section 101); Ord. 1, 1773, Section 2 (Art. 1, Section 101). Chapter 12.08. Available at: http://ordlink.com/codes/lacounty/index.htm.

[4] Davy and Associates, Inc. July 2003. *Acoustical Analysis, Proposed Plaza de Cultura y Arte Project, Los Angeles, California, IN 2001-93.* Contact: 2627 Manhattan Beach Boulevard, Suite 212, Redondo Beach, CA 90278.

[5] *California Code of Regulations.* Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[6] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[7] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

La Iglesia de Nuestra Señora la Reina de Los Angeles (known locally and herein as the Plaza Church) is considered to be a sensitive receptor. The 2004 certified EIR determined that noise levels generated by construction could potentially interfere with activities at the Plaza Church, thus requiring the consideration of mitigation measures.[8] The proposed refinements to modify the site plan within the approved project boundaries to facilitate outdoor activities in part to support the designation of LA Plaza de Cultura y Artes as a Smithsonian Affiliate would not be expected to result in a significant change to generated noise levels. The impacts from construction would be reduced to below the level of significance through the incorporation of mitigation measures as specified in the 2004 certified EIR.[9]

Operational

The noise impact analysis conducted for the 2004 certified EIR determined that operation of the approved project would not be expected to generate noise levels that exceed the threshold of significance.[10] The refined project would not be expected to increase operational noise levels above those analyzed in the 2004 certified EIR.[11] The ambient noise levels at the refined project site range from a Community Noise Equivalent Level (CNEL) of 68.9 dBA to a CNEL of 74.8 dBA due to traffic on the arterials that border the site. Based on the existing and anticipated future ambient noise levels, potential noise impacts from the operation of the refined project would not be audible off site and, therefore, would not be expected to generate noise levels in excess of the County noise standards. Increases in the CNEL from the increased traffic generated by the refined project would be similar to those analyzed in the 2004 certified EIR and would not be noticeable.[12] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exposure or generation of noise levels in excess of established standards.

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

The refined project would not be expected to create new or substantially more adverse significant impact to noise in relation to generation of excessive groundborne vibration or groundborne noise. The requirements of the County Noise Ordinance concerning vibration are that motion velocities do not exceed 0.01 inch/second over the range of 1 to 100 Hertz.[13] Groundborne vibration levels

[8] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[9] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[10] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[11] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[12] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[13] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Ordinance 11778, Section 2 (Article 1, Section 101); Ordinance 1, 1773, Section 2 (Article 1, Section 101). Chapter 12.08. Available at: http://ordlink.com/codes/lacounty/index.htm.

typically associated with pile-driving activities, blasting, and major grading activities can exceed this vibration threshold level at distances within 100 feet. The construction activities of the refined project would be similar to those of the approved project and would not include pile-driving activities, blasting, and major grading. Therefore, the refined project would not be expected to generate vibration levels that would exceed established vibration standards during construction, operation, or maintenance of the refined project. Perceptible ground vibration at sensitive receptors and other locations off site are unlikely. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to generation of excessive groundborne vibration or groundborne noise.

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

The refined project would not be expected to create new or substantially more adverse significant impacts to noise in relation to permanent increases in ambient noise levels in the refined project vicinity. The County Noise Ordinance does not define what constitutes a substantial permanent increase to ambient noise levels. In general, one way of estimating a person's subjective reaction to a new noise is to compare the new noise with the existing noise environment to which the person has become adapted (i.e., the increase over the "ambient" noise level). A 5-dBA increase is often considered a significant increase and, thus, a significant impact. Therefore, an increase in the noise levels of 5 dBA would be considered substantial.

The nearest sensitive receptor to the refined project site is the Plaza Church. The 2004 certified EIR determined that increases in ambient noise levels generated by the approved project and additional traffic generation would be less than significant.[14] Since the refined project is reduced in size from the approved project and would not increase the number of visitors or traffic associated with the approved project, the refined project would not be expected to create permanent increases in the levels of ambient noise greater than those generated by the approved project. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to permanent increases in ambient noise levels.

(d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

The refined project would not be expected to create new or substantially more adverse significant impacts to noise in relation to temporary or periodic increases in ambient noise levels in the refined project vicinity. The noise impact analysis for the 2004 certified EIR determined that construction of the project would result in temporary, intermittent increases in ambient noise levels.[15] The construction activities related to the refined project would be similar to those of the approved project and are not expected to create construction-related temporary or periodic increases in ambient noise levels exceeding those analyzed in the 2004 certified EIR.[16]

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[14] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[15] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[16] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

In addition, noise related to the refined project and due to events at the refined project site would be comparable to those analyzed in the 2004 certified EIR and would be consistent with the existing noise in the urban area surrounding the site. The media screens would provide ambient sound, designed to be audible for those who are walking within a fairly close viewing distance of the screens for the purpose of informative, historical commentary on the visual content of the screens. Each one of the screens would present brief and varied content on the mission of LA Plaza de Cultura y Artes to pedestrians walking along the walkway or to potential visitors to LA Plaza de Cultura y Artes.

The outdoor events expected on the campus of LA Plaza de Cultura y Artes would consist of monthly musical presentation on the stage, an outdoor film festival in the summer months, cooking demonstrations in the garden, and presentations in the three outdoor classrooms. All these events would be restricted by sound controls within the campus, such as time restrictions and design elements within the campus. The project design specifies this as a necessary condition for the operation of the facility.

As with the approved project, implementation of mitigation measures Noise-1, Noise-2, and Noise-3 specified in the certified EIR would be expected to further reduce any potential noise impacts related to violations of maximum noise levels to below the level of significance.[17] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to a substantial temporary or periodic increase in ambient noise levels in the refined project vicinity.

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

The refined project would not be expected to create new or substantially more adverse significant impacts to noise in relation to public airports. The nearest public airports are Bob Hope Airport in Burbank, California, and the Compton Airport in Compton, California. Both are located approximately 11.5 miles from the refined project site, to the northwest and southwest, respectively. The distance between these airports from the refined project site determines that the noise generated from refined project construction and potentially from airport land use is unlikely and would not be expected to expose people residing or working in the refined project vicinity to excessive noise levels. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to public airports.

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

The refined project would not be expected to create new or substantially more adverse significant impacts to noise in relation to private airstrips. The refined project site is not located within an airport land use plan or within the vicinity of a private airstrip. The nearest private airstrip is the Hawthorne Municipal Airport in Hawthorne, California, located approximately 9 miles southwest of the refined project site; thus, making unlikely the possibility of excessive noise levels to occur within the vicinity of the refined project. Therefore, the refined project would not be expected to

[17] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

result in new or substantially more adverse significant impacts related to exposing people who reside or work in the refined project area to excessive noise levels from private airstrips.

3.13 POPULATION AND HOUSING

This analysis is undertaken to determine if the proposed refinements to LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to population and housing than those disclosed in the certified Environmental Impact Report (EIR).[1] Population and housing at the refined project site were evaluated with regard to the County of Los Angeles (County) General Plan;[2] City of Los Angeles (City) General Plan;[3] Central City Community Plan;[4] state, regional, and local data and forecasts for population and housing; and the proximity of the refined project site to existing and planned utility infrastructure.

The potential for the refined project to result in new or substantially more adverse significant impacts to population and housing was evaluated in relation to three questions recommended for consideration by the State of California Environmental Quality Act (CEQA) Guidelines: [5]

Would the refined project:

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

The refined project would not create new or substantially more adverse significant impacts to population and housing in relation to inducing substantial direct or indirect population growth. Pursuant to State CEQA Guidelines Section 15064.7, typical established local thresholds of significance for housing and population growth include effects that would induce substantial growth or concentration of a population beyond County and City projections; alter the location, distribution, density, or growth rate of the population beyond that projected in the County General Plan Housing element; result in a substantial increase in demand for additional housing; or create a development that significantly reduces the ability of the County to meet housing objectives set forth in the County General Plan Housing element.[6]

The refined project site is located in the City and County in an urban and densely populated section of the City. The refined project site is surrounded by extensive development and mid- to high-rise buildings. As with the approved project discussed in the certified EIR, the refined project does not include the construction of new homes or business.[7] The refined project does not extend additional infrastructure into areas not currently served by roads and utilities; thus, the project does

[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[3] City of Los Angeles Department of City Planning. March 2001 (Adopted 26 September 2001). *City of Los Angeles General Plan*. Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[4] City of Los Angeles Department of City Planning. Adopted 8 January 2003. *Central City Community Plan*. Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[5] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[6] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan, Housing Element*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[7] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

not require expansion of existing roadways or the construction of new homes. The proposed growth levels associated with the approved project certified in the 2004 EIR and the refined project are consistent with the projected growth for the Southern California Association of Governments (SCAG) projections.[8] The refined project would not be expected to induce substantial growth or concentration of population beyond SCAG regional projections. The refined project would also not be expected to induce substantial growth or concentration of population beyond the City or County regional projections. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to inducing substantial direct or indirect population growth.

(b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

The refined project would not be expected to create new or substantially more adverse significant impacts to population and housing in relation to the displacement of substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere. The refined project does not include the displacement of any type of permanent or temporary residence. In addition, the refined project does not include the construction of any new housing units, and would not be expected to alter the location, distribution, density, or growth of the human population of an area substantially beyond that projected in the City or County General Plan Housing elements.[9,10] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the displacement of substantial amounts of existing housing.

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

The refined project would not be expected to create new or substantially more adverse significant impacts to population and housing in relation to the displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere. There are currently no people residing in the refined project area. In addition, the refined project would not create any need for changes to existing businesses or infrastructure. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the displacement of substantial numbers of people.

[8] Southern California Association of Governments. 2008. "Census Data." Available at: http://www.scag.ca.gov/census/

[9] County of Los Angeles Department of Regional Planning. January 1993. *Streamlined County of Los Angeles General Plan, Housing Element*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[10] City of Los Angeles Department of City Planning. March 2001 (Adopted 26 September 2001). *City of Los Angeles General Plan*. Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

3.14 PUBLIC SERVICES

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to public services than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Public services at the refined project site were evaluated in accordance with the methodologies provided by the City of Los Angeles (City) Central City Community Plan,[2] County of Los Angeles (County) General Plan,[3] published maps,[4,5] and communications with both the City and City service officials.[6,7,8]

The potential for the refined project to result in new or substantially more adverse significant impacts to public services was evaluated in relation to one question recommended for consideration by the State of California Environmental Quality Act (CEQA) Guidelines:[9]

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

1) Fire protection

The refined project would not be expected to create new or substantially more adverse significant impacts to public services in relation to fire protection than those documented in the 2004 certified EIR, which determined that construction of the approved project would cause no significant impacts to fire protection.[10] The refined project proposes a reduction of the total square footage of the approved project site.

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] City of Los Angeles Department of City Planning. Adopted 8 January 2003. *Central City Community Plan.* Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[3] County of Los Angeles Department of Regional Planning. 1993. *Streamlined County of Los Angeles General Plan.* Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[4] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. USGS 7.5-minute Series, Los Angeles, California, Topographic Quadrangle.

[5] Thomas Bros. Maps. 2002. *The Thomas Guide: 2003 Los Angeles and Ventura Counties.* Contact: Thomas Bros. Maps, 17731 Cowan, Irvine, CA 92614.

[6] Hanamaikai, Tanya, Los Angeles Police Department, Community Relations Crime Prevention. 5 May 2003. Personal communication with Kyle McClure, Sapphos Environmental, Inc., Pasadena, CA.

[7] Davis, Paul, City of Los Angeles Department of Recreation and Parks, Planning and Construction Division. 10 April 2003. Personal communication with Kyle McClure, Sapphos Environmental, Inc., Pasadena, CA.

[8] Theule, Mike, Los Angeles Fire Department, Hydrants and Access Unit. 15 April 2003. Personal communication with Kyle McClure, Sapphos Environmental, Inc.

[9] *California Code of Regulations.* Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[10] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

The Los Angeles Fire Department (LAFD) would provide fire protection services for the refined project site. It has a staff of 3,244 uniformed personnel and 333 civilian support staff members who are responsible for carrying out the following duties:

- Firefighting
- Emergency medical care
- Technical rescue
- Hazardous materials mitigation
- Disaster response
- Public education
- Community service

A professionally trained staff of 993 firefighters (including 172 paramedic-trained personnel) is on duty at all times at 103 neighborhood fire stations located across the LAFD's approximately 470-square-mile jurisdiction.[11]

There are a total of eight fire stations within a 2-mile radius of the refined project site. The nearest three fire stations are described in Table 3.14-1, *Existing Fire Stations Serving the Refined Project Site*. The primary emergency responder for the refined project area is Fire Station No. 4, located two blocks north of the Central Post Office and 0.3 mile from the refined project site, at 800 North Main Street. Fire Station No. 3 is located approximately 0.75 mile from the refined project site and will continue to be the secondary emergency responder for the refined project area. Fire Station No. 9 also serves the refined project area and is located 1.5 miles from the refined project site.

TABLE 3.14-1
EXISTING FIRE STATIONS SERVING THE REFINED PROJECT SITE

Station	Location	Personnel/Equipment	Distance from Site
No. 4	800 North Main Street Los Angeles, CA 90012	16 personnel, task force truck, and engine company hazardous materials unit	0.3 mile
No. 3	108 North Fremont Avenue Los Angeles, CA 90012	10 personnel, task force truck, and engine company paramedic rescue ambulance, EMT rescue ambulance, division headquarters	0.75 mile
No. 9	430 East 7th Street Los Angeles, CA 90014	17 personnel, two fully staffed trucks, two fully staffed engines, two ALS rescue units	1.5 miles

KEY:
EMT = Emergency Medical Technician
ALS = Advanced Life Support

The existing fire stations currently maintain an average emergency response time of 5 minutes or less.[12] All eight fire stations provide service to the refined project site and any County fire station may respond to the refined project site according to need and availability, and would draw units from several stations. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to fire protection.

[11] Los Angeles Fire Department. 1 May 2003. Available at: http://www.lafd.org/index.htm

[12] Los Angeles Fire Department. 1 May 2003. Available at: http://www.lafd.org/index.htm

2) Police protection

The refined project would not be expected to create new or substantially more adverse significant impacts to public services in relation to police protection. The 2004 certified EIR found that construction of the approved project would create no significant impact to police protection.[13] The refined project would not be expected to cause any new impacts or substantially increase impacts previously disclosed in the 2004 certified EIR.[14]

Police protection in the City is provided by the Los Angeles Police Department (LAPD), which is responsible for providing police service to 3.4 million residents in an area encompassing approximately 470 square miles. LAPD is divided into 8 bureaus and more than 50 divisions, groups, units, or sections, and is overseen by the Board of Police Commissioners.

Police protection services in the refined project area would be provided by the LAPD Central Division, located at 251 East 6th Street. A part of the Central Bureau, the Central Division has a deployment of approximately 400 sworn officers and 26 support staff members who work in three shifts. Central Division is responsible for all police operations in Downtown Los Angeles, an area that has a population of 40,000 residents, covers approximately 4.5 square miles, and includes the communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Artists Lofts, El Pueblo de Los Angeles Historic District (Historic District), Financial District, Jewelry District, Fashion District, and the Convention Center.[15]

The average City-wide police response time in Los Angeles is 10.2 minutes; the average response time in the Central Division is 8.3 minutes.[16]

The refined project would not be expected to induce population growth and would not require additional LAPD personnel or construction of new LAPD facilities. As discussed in Section 3.13, *Population and Housing*, of this Addendum EIR, the refined project does not extend additional infrastructure into areas not currently served by roads and utilities; thus, it does not require expansion of existing roadways or the construction of new homes. Consequently, the refined project would not be expected to induce substantial growth or concentration of population beyond the City or County's regional projections. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to police protection.

3) Schools

The refined project would not be expected to create new or substantially more adverse significant impacts to public services in relation to schools. The City is served by the Los Angeles Unified School District (LAUSD), which contains 968 schools and centers and is made up of 9 local districts identified by the numbers 1 through 8 and the letter T. The refined project is in District 4, which includes 17 early education centers, 82 elementary schools, 15 middle schools, and 29

[13] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[14] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[15] Los Angeles Police Department. 12 September 2003. Web site. Available at: http://www.lapdonline.org/

[16] Hanamaikai, Tanya, Los Angeles Police Department, Community Relations Crime Prevention. 5 May 2003. Personal communication with Kyle McClure, Sapphos Environmental, Inc., Pasadena, CA.

senior high schools.[17] There are 5 school campuses within 0.75 mile of the refined project, including the Fashion Care Senior High Magnet School, the Evans Community Adult School, the Castelar Children's Center, Ann Street Elementary School, and Central High School Continuation/Tri/C. The closest of these, Central High School Continuation/Tri/C, a continuation high school and community day school for Kindergarten through 6th-grade students, has an enrollment of about 1,500 students and is located at 450 North Grand Avenue, approximately 0.25 mile west of the refined project site. Schools planned for construction near the refined project site include the Belmont Learning Center, a new high school at 1200 West Colton Street, as well as the Central Los Angeles Area New High School Number 9, which will be located along Cesar E. Chavez Avenue, between Grand Avenue and Hill Street.

The refined project would not be expected to induce population growth beyond the growth anticipated in the 2004 EIR.[18] As discussed in Section 3.13, *Population and Housing*, of this Addendum EIR, the refined project does not extend additional infrastructure into areas not currently served by roads and utilities; thus, it does not require expansion of existing roadways or the construction of new homes. Consequently, the refined project would not be expected to induce substantial growth or concentration of population beyond the City or County's regional projections as predicted by Southern California Association of Governments (SCAG).[19] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to schools.

4) Parks

The refined project would not be expected to create new or substantially more adverse significant impacts to public services in relation to parks.

The refined project is located within the existing Historic District. There are 13 additional local and regional parks in the vicinity of the refined project, 9 of which are located within a 1-mile radius of the refined project: Everett Park, Alpine Park, Elysian Park, Downey Playground, Echo Park, Pershing Square, Los Angeles Central Library Park, Prospect Park, and Pecan Playground. Everett Park is located on Everett Street, off Sunset Boulevard and north of the refined project site. Also to the north are Alpine Park, located on Alpine Street between Cleveland Street and Yale Street; Elysian Park, which wraps north around Dodger Stadium; Downey Playground, which can be found at the intersection of Humboldt Street and North Broadway; and Echo Park, which lies along Glendale Boulevard between Temple Street and Park Avenue. Los Angeles Central Library Park and Pershing Square are located southwest of the refined project and are located at the intersections of 5th Street and Grand Avenue, and 5th Street and Hill Street, respectively. To the southeast are Prospect Park and Pecan Playground. Prospect Park is at the intersection of Echandia Street and Bridge Street. Pecan Playground is on Pecan Street between 1st Street and 3rd Street.

In addition to the Historic District and the 9 local and regional parks located within an approximate 1-mile radius of the refined project site, the City has given historical designation to the

[17] Los Angeles Unified School District. 1 October 2008. "Local Districts." Available at: http://notebook.lausd.net/portal/page?_pageid=33,122477&_dad=ptl&_schema=PTL_EP

[18] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[19] Southern California Association of Governments. 2008. "Census Data." Available at: http://www.scag.ca.gov/census/

El Pueblo de Los Angeles Historical Monument, located at the 500 block of North Main Street.[20] The El Pueblo de Los Angeles Historical Monument includes nine statues and plaques commemorating historic people and events:

- L' Annunciazione
- Felipe de Neve
- Carlos III of Spain
- Father Junipero Serra
- Father Miguel Hidalgo
- The Blessing of the Animals
- Tropical America
- Fort Moore Pioneer Memorial
- Recuerdos de Ayer, Sueños de Mañana[21]

The proposed refinements to the approved project are expected to provide significant additional recreational space and programming within the community. Therefore, the refined project would not be expected to result in a significant increase in the number of people, residents, or visitors that would avail themselves of existing park facilities. As discussed in Section 3.13 of this Addendum EIR, the proposed growth levels associated with the refined project are consistent with the SCAG projections for growth. The refined project would not be expected to induce substantial growth or concentration of population beyond SCAG, City, or County regional projections. Consequently, no individual park or recreation facilities would be expected to experience physical deterioration as a result of implementation of the refined project. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to the physical deterioration of existing facilities.

5) Other public facilities

The refined project would not be expected to have significant direct or indirect impacts to other public services resulting from the provision of, or need for, other new or physically altered facilities that would require changes to the physical environment. The refined project area is adequately served by public facilities, including a U.S. Post Office located at 900 North Alameda Street, Los Angeles, California 90012, approximately 0.2 mile to the northeast. Because the refined project would not be expected to lead to an increase in population or housing in the refined project vicinity, as discussed in Section 3.13, it would not require the construction of new, or the physical alteration of existing public facilities, which include the Los Angeles Civic Center, Union Station, and nearby post offices, public libraries, and hospitals. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to other public facilities.

[20] Office of Historic Preservation. 1996. *California Historical Landmarks*. Sacramento, CA: Contact: 1416 9th Street, Room 1442-7, Sacramento, CA 95814. P. 94.

[21] El Pueblo de Los Angeles Historical Monument. 29 August 2003. "Sights & Sounds: celebrate cultural diversity." Available at: http://www.lacity.org/elp/elpssarts.htm

3.15 RECREATION

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to recreation than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Recreation at the refined project site was evaluated with regard to the County of Los Angeles (County) General Plan,[2] expert opinions, and the consideration of the potential for growth-inducing impacts evaluated in Section 3.13, *Population and Housing*, of this Addendum to the EIR and the conclusions of which rely primarily on information contained within these assessments.

The potential for the refined project to result in new or substantially more adverse significant impacts to recreation was evaluated in relation to two questions recommended for consideration by the State of California Environmental Quality Act (CEQA) Guidelines:[3]

(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction, operation, and maintenance of the refined project would not create new or substantially more adverse significant impacts related to an increase in the use of existing neighborhood and regional parks or other recreational facilities.

The refined project is located within the existing Historic District. There are 13 additional local and regional parks in the vicinity of the refined project, 9 of which are located within a 1-mile radius of the refined project: Everett Park, Alpine Park, Elysian Park, Downey Playground, Echo Park, Pershing Square, Los Angeles Central Library Park, Prospect Park, and Pecan Playground. Everett Park is located on Everett Street, off Sunset Boulevard and north of the refined project site. Also to the north are Alpine Park, located on Alpine Street between Cleveland Street and Yale Street; Elysian Park, which wraps north around Dodger Stadium; Downey Playground, which can be found at the intersection of Humboldt Street and North Broadway; and Echo Park, which lies along Glendale Boulevard between Temple Street and Park Avenue. Los Angeles Central Library Park and Pershing Square are located southwest of the refined project and are located at the intersections of 5th Street and Grand Avenue, and 5th Street and Hill Street, respectively. To the southeast are Prospect Park and Pecan Playground. Prospect Park is at the intersection of Echandia Street and Bridge Street. Pecan Playground is on Pecan Street between 1st Street and 3rd Street.

The refined project elements, which would modify the site plan within the approved project boundaries to facilitate outdoor activities in part to support the designation of LA Plaza de Cultura y Artes as a Smithsonian Affiliate, are expected to provide substantial recreational programming for the existing community. Thus, the refined project would not be expected to result in a significant increase in the number of residents or visitors utilizing the existing park facilities in the vicinity.

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] County of Los Angeles Department of Regional Planning, 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[3] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

As discussed in Section 3.12, *Population and Housing*, of the certified Plaza de Cultura y Arte EIR,[4] as well as Section 3.13 of this Addendum to the EIR, the proposed growth levels associated with the approved project are consistent with Southern California Association of Governments (SCAG) growth projections. The refined project would conform to these findings and would not be expected to induce substantial growth or concentration of population beyond SCAG regional projections. Thus, the refined project would not be expected to lead to a substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The refined project would not be expected to create new or substantially more adverse significant impacts related to the construction and expansion of recreational facilities that might have an adverse physical effect on the environment. The refined project site would not include any recreational facilities; therefore, there would be no direct impacts to recreational facilities from construction, operation, or maintenance of the refined project. Construction, operation, and maintenance of these elements of the refined project would not be expected to result in new or substantially more adverse significant impacts related to the construction of recreation facilities that may have an adverse physical effect on the environment.

[4] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

3.16 TRANSPORTATION AND TRAFFIC

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to transportation and traffic than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] Transportation and traffic at the refined project site was evaluated in accordance with the Circulation element of the County of Los Angeles (County) General Plan,[2] the Congestion Management Plan for Los Angeles County,[3] and the County General Plan.[4]

The potential for the refined project to result in new or substantially more adverse significant impacts related to transportation and traffic was evaluated in relation to seven questions recommended for consideration by the State California Environmental Quality Act Guidelines:[5]

Would the refined project:

(a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

The refined project would not be expected to conflict with or create new or substantially more adverse significant impacts to transportation and traffic related to conflicting with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. As with the proposed project, the refined project is intended to be consistent with the existing transportation policies and network surrounding the site. Trip generation estimates were prepared by Linscott, Law & Greenspan Engineers (2004 EIR, Table 3.15-1, *Trip Generation Rates and Estimates*)[6] for the approved project in the certified EIR.[7]

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan: Circulation Element*. Contact: 320 West Temple Street, Los Angeles, CA 90012.

[3] County of Los Angeles Metropolitan Transportation Authority. 2004. *2004 Congestion Management Program for Los Angeles County*. Los Angeles, CA.

[4] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[5] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[6] Linscott, Law & Greenspan Engineers. June 2003. *Traffic Impact Analysis, Plaza de Cultura y Arte Project, City of Los Angeles, California*. Prepared for: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107.

[7] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

Morning and afternoon peak-hour volumes at each of the following eight existing intersections near the refined project site were analyzed with intersection delay calculations in order to determine the volume to capacity (V/C) ratio and the level of service (LOS):

1. North Broadway and Cesar E. Chavez Avenue, located north-northwest of the refined project site
2. North Broadway and Arcadia Street, located west of the refined project site
3. New High Street / North Spring Street and Cesar E. Chavez Avenue, located north of the refined project site
4. North Spring Street and Arcadia Street, located southwest of the refined project site
5. North Main Street and Cesar E. Chavez Avenue, located northeast of the refined project site
6. North Main Street and Arcadia Street, located south of the refined project site
7. Alameda Street and Cesar E. Chavez Avenue located northeast of the refined project site
8. Alameda Street and Arcadia Street / U.S. 101 Freeway northbound off-ramp, located southeast of the refined project site

All eight study intersections are presently operating at LOS D (approaching unstable) or better during the weekday afternoon and/or Saturday peak hours under existing conditions. The analysis in the 2004 certified EIR determined that construction of the approved project was expected to cause a substantial increase in traffic at the intersection of North Broadway and Cesar E. Chavez Avenue during weekday afternoon peak hours with the addition of ambient growth, related projects traffic, and project-related traffic.[8] However, the proposed refinements to the approved project are not expected to substantially change the intended use or the capacity of LA Plaza de Cultura y Artes for patrons, students, or employees. The design of the refined project is consistent with the approved project as discussed in the approved EIR.[9] Therefore, the refined project would allow for adequate traffic circulation within the campus, and result in the same potential impact of increasing traffic at the intersection of North Broadway and Cesar E. Chavez Avenue.

As discussed in Section 3.13, *Population and Housing*, of this Addendum to the EIR, the refined project does not extend additional infrastructure into areas not currently served by roads and utilities; thus, the project does not require expansion of existing roadways or the construction of new homes. Therefore, the refined project would not be expected to induce substantial growth or concentration of population beyond the City or County regional projections. The impacts related to this intersection would be reduced to below the level of significance through the incorporation of mitigation measures as specified in the 2004 certified EIR.[10] As with the approved project, implementation of mitigation measures TRA-1 and TRA-2 would reduce significant impacts related to creating a substantial increase to the existing traffic load and capacity of the street system to below the level of significance. Therefore, the refined project would not be expected to result in

[8] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[9] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[10] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

new or substantially more adverse significant impacts related to creating a substantial increase in traffic.

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

The refined project would not be expected to conflict with or create new or substantially more adverse significant impacts to transportation and traffic in relation to exceeding, either individually or cumulatively, the LOS established by the County Metropolitan Transportation Authority (Metro) designated roads or highways. All eight study intersections are presently operating at LOS D (approaching unstable) or better during the weekday afternoon and/or Saturday peak hours under existing conditions. The 2004 certified EIR determined that the approved project was expected to create significant impacts according to the County's impact criteria during the peak hour shown below with the addition of ambient growth, related projects traffic, and project-related traffic to the intersection of North Broadway and Cesar E. Chavez Avenue.[11]

Incremental, but not significant, impacts are noted at the remaining seven study intersections due to the implementation of the approved project. The proposed refinements to the approved project are not expected to substantially change the intended use or the capacity of LA Plaza de Cultura y Artes for patrons, students, or employees and would therefore result in the same potential impact of increasing traffic at the intersection of North Broadway and Cesar E. Chavez Avenue. The impact related to this intersection would be reduced to below the level of significance through the incorporation of the mitigation measures specified in the 2004 certified EIR.[12] As with the approved project, implementation of mitigation measures TRA-1 and TRA-2 would reduce significant impacts related to LOS to below the level of significance. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to transportation and traffic related to exceeding an LOS standard established by Metro for designated roads or highways.

(c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The refined project would not be expected to create new or substantially more adverse significant impacts to transportation and traffic in relation to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. The refined project site is not in close proximity to any airports. The refined project site is located approximately 11.5 miles from both the Bob Hope Airport and the Compton Airport. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to transportation and traffic related to a change in air traffic patterns, which would result in substantial safety risks.

[11] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

[12] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

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

The refined project would not be expected to create new or substantially more adverse significant impacts to transportation and traffic in relation to substantially increasing hazards due to a design feature or incompatible uses. The proposed refinements are consistent with the approved project and do not include any significant road improvements or construction, thus the refined project would not be expected to adversely impact the external street system or the internal circulation system. The result of any modifications would be aimed at improving overall traffic flow and circulation patterns in the immediate vicinity of the refined project site. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to transportation and traffic related to substantially increasing hazards due to a design feature.

(e) Result in inadequate emergency access?

The refined project would not be expected to create new or substantially more adverse significant impacts to transportation and traffic in relation to inadequate emergency access. The 2004 certified EIR determined that the approved project would not be expected to result in significant impacts to emergency access.[13] One of the proposed refinements includes the slight reconfiguration of the fire department access and turnaround, which was determined to be in compliance with City of Los Angeles Fire Department regulations to achieve optimal emergency access. Emergency access is expected to be adequate during construction activities and operation of the refined project. The refined project would not involve any activity that would create a deficiency in the emergency access system. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to transportation and traffic related to inadequate emergency access.

(f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The refined project would not be expected to create new or substantially more adverse significant impacts to transportation and traffic in relation to conflicting with adopted policies, plans, or programs supporting alternative transportation. As with the approved project, the refined project is designed to be pedestrian friendly and utilize the extensive public transit network and bicycles in the vicinity of the refined project site. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to a conflict with adopted policies, plans, or programs supporting alternative transportation.

[13] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, California 90012.

3.17 UTILITIES AND SERVICE SYSTEMS

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to utilities and service systems than those disclosed in the certified Plaza de Cultura y Arte Environmental Impact Report (EIR).[1] The potential for impacts to utilities and service systems has been analyzed in accordance with the methodologies and information provided by the City of Los Angeles (City) Central City Community Plan;[2] the County of Los Angeles (County) General Plan;[3] the City Department of Water and Power (LADWP) Urban Water Management Plan, Fiscal Year 2001–2002 Annual Update;[4] the Water Quality Control Plan, Los Angeles Region (4);[5] the Executive Summary of the Countywide Integrated Waste Management Summary Plan;[6] and the County Integrated Waste Management Plan, 2000 Annual Report on the Countywide Summary Plan and Countywide Siting Element.[7]

The potential for the refined project to result in new or substantially more adverse significant impacts to utilities and service systems was evaluated in relation to seven questions recommended for consideration by the State of California Environmental Quality Act (CEQA) Guidelines:[8]

Would the refined project:

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

The refined project would not be expected to result in significant impacts that would exceed wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB) Los Angeles Region or result in the expansion or construction of new water or wastewater treatment facilities.[9] The refined project would not produce only domestic wastewater, not industrial wastewater; therefore, the refined project would not be expected to result in the elevation of

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] City of Los Angeles Department of City Planning. Adopted 8 January 2003. *Central City Community Plan*. Contact: 200 North Spring Street, Room 525, Los Angeles, CA 90012-4801.

[3] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[4] City of Los Angeles Department of Water and Power. 2002. *City of Los Angeles Department of Water and Power Urban Water Management Plan, Fiscal Year 2001 – 2002 Annual Update*. Contact: 1394 Sepulveda Boulevard, Los Angeles, CA 90025.

[5] California Regional Water Quality Control Board Los Angeles Region (4). 13 June 1994. *Water Quality Control Plan Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*. Contact: 320 West Fourth Street, Suite 200, Los Angeles, CA 90013.

[6] County of Los Angeles Department of Public Works. 1997. *Los Angeles County Integrated Waste Management Summary Plan, Executive Summary*. Contact: 900 South Fremont Avenue, Alhambra, CA 91803.

[7] County of Los Angeles Department of Public Works. 2001. *Los Angeles County Integrated Waste Management Plan, 2000 Annual Report on the Countywide Summary Plan and Countywide Siting Element*. Contact: 900 South Fremont Avenue, Alhambra, CA 91803.

[8] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000-15387, Appendix G.

[9] California Regional Water Quality Control Board Los Angeles Region (4). 13 June 1994. *Water Quality Control Plan Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*. Contact: 320 West Fourth Street, Suite 200, Los Angeles, CA 90013.

constituents regulated by wastewater treatment requirements. All wastewater from the refined project would flow into the existing sewer system. There would be connections installed from the new facilities to the existing sewer system. The 8-inch sewer line in New High Street, combined with existing wastewater discharge [with a capacity of 0.38 cubic feet per second (CFS)], will experience a flow of 0.34 CFS. The total amount of wastewater that would be produced by the approved project was determined to be approximately 0.056 CFS. The total capacity of the sewer lines at the refined project site is 1.38 CFS. Wastewater from the refined project area is treated at the Hyperion Wastewater Treatment Plant, located at 12000 Vista del Mar, Playa del Rey, California, approximately 19.74 miles southwest of the refined project site. The Hyperion Wastewater Treatment Plant, which began operations in 1950 and has received numerous upgrades since then, has the capacity to treat a total of 450 million gallons of wastewater per day (equivalent to about 696.3 CFS[10]).[11] It currently treats between 300 million and 350 million gallons of wastewater per day. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts in relation to exceeding wastewater treatment requirements of the applicable RWQCB.

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

The refined project area is served by the Hyperion Wastewater Treatment Plant, which has the current capacity to treat up to a total of 450 million gallons of wastewater per day. The total amount of wastewater that would be produced at the approved project site will be approximately 0.056 CFS,[12] which would include existing wastewater discharge, as well as discharge from the theater performing arts center and other newly constructed buildings. However, the refined project would reduce the total square footage of new construction (see Section 2.0, *Project Description*, Table 2.4.3-1). It is therefore anticipated the proposed refinements would not produce wastewater amount of greater than the previously projected 0.056 CFS, and thus the refined project would not be expected to result in exceedance of wastewater treatment requirements that would require or result in the expansion or construction of new water or wastewater treatment facilities. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts in relation to new water or wastewater treatment facilities and their environmental effects.

(c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?

The refined project would not be expected to result in significant impacts on utilities or service systems related to new or expanded storm water drainage facilities. As determined in Table 3.17-1, *Existing Total Peak Flow Rates Versus Projected Total Peak Flow Rates for 10-, 25-, and 50-Year Floods*, the projected peak flow rates in CFS are not significantly greater than existing peak flow rates at the refined project site.

[10] The conversion factor for CFS and gallons per day is as follows: 1.0 CFS = 646,272 gallons per day.

[11] City of Los Angeles Stormwater Program. 1 October 2008. *City of Los Angeles Hyperion Sewage Treatment Plant.* Los Angeles, CA. Available at: http://www.lacity.org/SAN/Wpd/Siteorg/general/hypern1.htm

[12] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

TABLE 3.17-1
EXISTING TOTAL PEAK FLOW RATES VERSUS
PROJECTED TOTAL PEAK FLOW RATES FOR 10-, 25-, AND 50-YEAR FLOODS

Storm Type	Existing Total Peak Flow Rates (CFS)	Projected Total Peak Flow Rates (CFS)
10-year storm	9.21	9.23
25-year storm	11.32	11.33
50-year storm	13.22	13.27

Currently, runoff from the approved project site flows directly to nearby storm drains and catch basins. For the refined project, these flows would be collected on site and handled with various methods to reduce the amount of runoff going directly into the storm drains. Consequently, the refined project would not be expected to result in the expansion of existing drainage facilities in order to reduce the amount of runoff going directly to the storm drains. As indicated in the 2004 certified EIR, approximately one half of the runoff from the Plaza House would drain to a new catch basin, where it would then be released at a curb outlet on Main Street; the second half would drain into the bioretention area.[13] Storm water in the Campo Santo Memorial Garden would be expected to percolate directly into the soil. The small amount of storm water that does not percolate in the soil would flow to five area drains. The expansion of existing storm drain facilities including the new catch basins, pumps, pipes, and drains would not be expected to result in significant impacts to the environment. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to utilities and service systems related to the new or expanded storm drain systems.

(d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Implementation of the refined project would not be expected to have a significant impact on the supply of water resources. It is expected that the refined project would connect to the existing water lines that serve the approved project site. LADWP calculates demand for water services by resident and employment population estimates derived from Southern California Association of Governments data on population distributions shown by census tract. Demand estimates have been extrapolated for the years 2010, 2050, and 2090. Accordingly, the demand represented by the approved project in the 2004 certified EIR[14] had been anticipated by LADWP and confirmed its availability to supply water to the approved project.[15] The refined project would not be expected to increase the anticipated water supply need by LADWP. The refined project would reduce the total exterior footprint of new construction. Therefore, the refined project would not be expected to deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. No new or expanded entitlements would be required to provide sufficient water as a result of the refined project. Therefore, the refined project would not be expected to result in new or

[13] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[14] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[15] City of Los Angeles Department of Water and Power. 17 July 2003. Letter to Ms. Claudia Anticona, Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Subject: El Pueblo de Los Angeles Historic Park Project Review of Environmental Documentation.

substantially more adverse significant impacts to utilities and service systems in relation to requiring new or exceed existing entitlements allocated for the City.

(e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing conditions?

The Hyperion Wastewater Treatment Plant currently serves the approved project site and has the current capacity to treat up to a total of 450 million gallons of wastewater per day. The refined project is anticipated to produce a total wastewater amount of no greater than the 0.056 CFS projected for the approved project, as the refined project would reduce the total exterior footprint of new construction (see Section 2.0, *Project Description*, Table 2.4.3-1). Thus, the refined project would not be expected to increase wastewater requirements or usage at the refined project site. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to utilities and service systems in relation to exceedance of wastewater treatment requirements, or the expansion or construction of new water or wastewater treatment facilities.

(f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Implementation of the refined project would be expected to generate solid waste during both construction and operation. Sunshine Canyon Landfill County Extension, located at 14747 San Fernando Road, Sylmar, California, approximately 26.75 miles northwest of the refined project site, was determined to have the capacity to accommodate the construction and demolition solid waste disposal needs of the approved project.[16] It is anticipated that the solid waste produced by building and maintenance of the refined project would be similar to that of the approved project described in the 2004 certified EIR.[17] As with the approved project, the refined project would continue to require implementation of the specified mitigation measures for solid waste provisions. The refined project would be expected to result in less than significant impacts to utilities and service systems in relation to solid waste disposal needs. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to utilities and service systems related to a landfill with sufficient space to accommodate the refined project's waste disposal needs.

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

The refined project would not be expected to create new or substantially more adverse significant impacts to utilities and service systems in relation to compliance with federal, state, and local statutes and regulations related to solid waste. Upon full build-out, the refined project would be expected to have the capacity to serve approximately 90,000 County residents and visitors per year. The refined project would comply with the California Integrated Waste Management Act of 1989 and the California Solid Waste Reuse and Recycling Access Act of 1991, as amended. The refined project would comply with federal, state, and local statutes and regulations to reduce the

[16] City of Los Angeles Department of Water and Power. 17 July 2003. Letter to Ms. Claudia Anticona, Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Subject: El Pueblo de Los Angeles Historic Park Project Review of Environmental Documentation.

[17] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

amount of solid waste through implementation of the mitigation measures specified in the certified EIR.[18] Moreover, both Bradley Landfill West and West Extension, located at 9081 Tujunga Avenue, Sun Valley, California, approximately 17.03 miles northwest of the refined project site and the Sunshine Canyon Landfill County Extension have the capacity to provide municipal solid waste services for the approved project as determined in the 2004 certified EIR.[19] Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts to utilities and service systems related to compliance with federal, state, and local statutes.

[18] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[19] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

3.18 MANDATORY FINDINGS OF SIGNIFICANCE

This analysis is undertaken to determine if the proposed refinements to the LA Plaza de Cultura y Artes project (refined project) would result in new or substantially more adverse significant impacts in relation to Mandatory Findings of Significance from that disclosed in the Plaza de Cultura y Arte Environmental Impact Report (EIR), which was certified in 2004.[1] Mandatory Findings of Significance at the refined project site were evaluated with regard to the County of Los Angeles (County) General Plan[2] and the certified Plaza de Cultura y Artes EIR.[3]

The State of California Environmental Quality Act (CEQA) Guidelines recommend the consideration of three questions when addressing the potential for significant impact to Mandatory Findings of Significance:

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

The refined project would not be expected to result in impacts to Mandatory Findings of Significance in relation to the degraded quality of the environment. Site reconnaissance undertaken on August 30 and September 26, 2001, for analysis included in the 2004 certified EIR, determined that there was no suitable habitat for the 5 listed plant species, 15 sensitive plant species, 19 listed wildlife species, or 8 sensitive wildlife species that have the potential to be present within the greater Los Angeles metropolitan area.[4] Consequently, the changes to the physical site and surrounding environment, including the construction, operation, and maintenance of the proposed refinements to the approved project, would not be expected to result in new or substantially more adverse significant impacts related to wildlife habitat. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to degradation of the quality of the environment, substantial reduction of the habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, possible elimination of a plant or animal community, reduction of the number or restriction of the range of a rare or endangered plant or animal, or elimination of important examples of the major periods of California history or prehistory.

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[1] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[2] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan.* Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

[3] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[4] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte.* Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

The refined project would not be expected to result in impacts to Mandatory Findings of Significance in relation to individually limited but cumulatively considerable impacts. As was determined in all sections of the certified EIR[5] addressing the environmental impact issue areas of CEQA,[6] as well as the Greenhouse Gas Emissions section as provided in the Addendum to the EIR, incorporation of the mitigation measures to the approved project would reduce significant impacts related to a particular issue area to below the level of significance. As with the approved project, implementation of these mitigation measures to the proposed refinements to the approved project would similarly reduce significant impacts related to the respective issue area to below the level of significance. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to each individual environmental issue area; thus, there would be no expected impacts to Mandatory Findings of Significance related to cumulatively considerable impacts.

(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The refined project would not be expected to result in impacts to Mandatory Findings of Significance in relation to causing substantial adverse effects on human beings. Each environmental issue area addressed in this Addendum to the EIR analyzes the effects of the refined project on human beings directly and indirectly, and determined that these effects would not be expected to be significant. The hazards and hazardous materials, hydrology and water quality, and noise environmental issue areas, in particular, best illustrate the expected lack of these effects.

Hazards and Hazardous Materials

As addressed in Section 3.8, *Hazards and Hazardous Materials*, of this Addendum to the EIR, the refined project would not be expected to create a new or substantially more adverse significant impact to the public in the following ways:

- There would be no reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The removal of asbestos-containing materials, lead-based paints, and polychlorinated biphenyls at the refined project site is comparable to the approved project in the potential to release asbestos and lead into the environment. As with the approved project, fuels and lubricants used for construction vehicles may impact the refined project site due to leakage, spillage, or accidents. Implementation of mitigation measure Hazards-1 through Hazards-3 specified for the approved project would reduce significant impacts related to hazards and hazardous materials to below the level of significance.

[5] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[6] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

- The refined project would not be expected to create a new or substantially more adverse significant impact from the emission of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No schools are located within 0.25 mile of the refined project site.[7]

- Based on the review of federal, state, and local environmental regulatory databases, the refined project site is not identified on a list of hazardous materials site pursuant to the Government Code Section 65962.5.[8] In addition, no known hazardous waste sites are located within 1 mile of the boundaries of the refined project. Therefore, the refined project would not be expected to result in new or substantially more adverse impacts related to being located on a hazardous waste site.

- The refined project would not be expected to create a new or substantially more adverse significant safety hazard for people residing or working in the refined project area due to impacts resulting from the refined project being located within an airport land plan or within 2 miles of a public airport or public use airport. A review of the U.S. Geological Survey (USGS) 7.5-minute series Los Angeles, California, topographic quadrangle indicated that no airports are present within 2 miles of the refined project.[9] Therefore, the refined project would not be expected to result in new or substantially more adverse impacts related to being located within 2 miles of a public airport.

- The refined project would be located in the highly urbanized section of central Los Angeles; thus, there are no wildlands in the vicinity of the refined project site. As a result, the possibility of exposure of people or structures within the refined project vicinity to the risks of wildfire is highly unlikely.

Hydrology and Water Quality

As addressed in Section 3.9, *Hydrology and Water Quality*, of this Addendum to the EIR, the refined project would not be expected to create a new or substantially more adverse significant impact to the public in the following way:

- The refined project would not be expected to create new or substantially more adverse significant impacts related to exposing people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. The refined project would not result in placement of new structures or people in areas of increased risk of flooding as a result of the failure of a levee or dam.

[7] Los Angeles Unified School District. 2008. "Find a School." Web site. Available at: http://notebook.lausd.net/schoolsearch/selector.jsp

[8] Environmental Data Resources. 16 April 2003. The EDR Radius Map with GeoCheck. Inquiry Number: 0961494.3s, El Pueblo de Los Angeles 501 and 513 North Main Street Los Angeles, CA 90012.

[9] U.S. Geological Survey. [1966] Photorevised 1981; minor revision 1994. 7.5-minute Series Los Angeles, California, Topographic Quadrangle. Reston, VA.

Noise

As addressed in Section 3.12, *Noise*, of this Addendum to the EIR, the refined project would not be expected to create a new or substantially more adverse significant impact to the public in the following ways:

- The refined project would not be expected to create new or substantially more adverse significant impacts related to exposure of people to or generation of noise levels in excess of established standards. The noise impact analysis for the approved project determined that construction activities at the site would have the potential to result in short-term noise impacts.[10] Noise levels exceeding 65 dBA (decibels, A-weighted sound levels) for single-family residences and 70 dBA for multi-family residences during construction hours are prohibited. Daily construction activities would be subject to the County noise regulation to ensure that the activities conform to the mitigation measures specified in the 2004 EIR.[11] Thus, the refined project would not be expected to generate additional higher noise levels than those evaluated in the 2004 certified EIR.[12]

- The refined project would not be expected to create new or substantially more adverse significant impacts to noise in relation to generation of excessive groundborne vibration or groundborne noise. Groundborne vibration levels are typically associated with pile-driving activities, blasting, and major grading activities can exceed this vibration threshold level at distances within 100 feet. The construction activities of the refined project would be similar to those of the approved project, and would not include pile-driving activities, blasting, and major grading. Therefore, the refined project would not be expected to generate vibration levels that would exceed established vibration standards during construction, operation, or maintenance of the refined project. Perceptible ground vibration at sensitive receptors and other locations off site would be unlikely.

- The refined project would not be expected to create new or substantially more adverse significant impacts to noise in relation to public airports. The distance of these airports from the refined project site determines that the noise generated from construction on the refined project and potentially from airport land use would be unlikely and would not be expected to expose people in the refined project area to excessive noise levels.

As these findings have determined, there would be no new or substantially more adverse significant expected impacts to Mandatory Findings of Significance related to substantial adverse effects on human beings, either directly or indirectly.

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[10] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[11] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

[12] County of Los Angeles Chief Executive Office. September 2004. *Final Environmental Impact Report: Plaza de Cultura y Arte*. Prepared by: Sapphos Environmental, Inc., 430 North Halstead Street, Pasadena, CA 91107. Contact: 500 West Temple Street, Los Angeles, CA 90012.

SECTION 4.0
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