

# Executive Summary

---

This Draft Environmental Impact Report (Draft EIR) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA, Public Resources Code sections 21000 et. seq.) in accordance with CEQA Guidelines Section 15123. Accordingly, this chapter of the Draft EIR includes (1) a brief description of the Project; (2) issues raised during the Notice of Preparation (NOP) process and public scoping meeting, including areas of controversy known to the lead agency; (3) identification of potentially significant impacts and proposed mitigation measures or alternatives that would reduce or avoid those impacts; and (4) issues to be resolved, including the choice among alternatives and whether and how to mitigate the potential significant impacts.

## 1. Project Description

The Fourth & Central Project (Project) would generally be located at 400 South Central Avenue and consists of three distinct sites (North, South and West Sites – collectively referred to as the Project Site), with a total land area of approximately 7.6 acres (333,603 gross sf of lot area pre-dedication). The Project Site is comprised of the following areas: North Site (1.35 acres) located at the northeast corner of 4th Street and Central Avenue; South Site (5.98 acres) located south of 4th Street between Central Avenue and Alameda Street; and West Site (0.32 acres) located at the northwestern intersection of Gladys Avenue and Central Avenue.

The Project would demolish the existing surface parking and cold storage facility uses on the West and South Sites. The Project intends to adaptively reuse a portion of a six-story cold storage warehouse building located on the North Site, while demolishing the remaining attached single-story warehouse building on the North Site. However, because the currently operating North Site cold storage warehouse building has been “frozen” for over 100 years, a confirmation of its structural integrity cannot be made until the existing operations cease (when and if the Project is approved) and the North Site building is “unfrozen.” Accordingly, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, such as construction air emissions, solid waste, and haul trips, the Project is assumed to demolish the entire six-story cold storage warehouse building and attached single-story warehouse on the North Site. Whether a portion of the six-story cold storage warehouse building on the North Site is adaptively reused or not, the development programming on the North Site (and Project) would remain similar under either development scenario.

The Project would include a mix of residential, office, restaurant/retail, and hotel uses within 10 distinct buildings over the Project Site totaling 2,318,534 sf, for a floor area ratio (FAR) of 7.13:1. The Project would include: 1,521 residential units, including affordable housing

units, totaling 1,731,849 sf; 411,113 sf of office uses; 101,088 sf of restaurant/retail uses<sup>1</sup>; and 68 hotel rooms (74,484 sf of hotel floor area). The Project would include 163,325 sf of Los Angeles Municipal Code (LAMC) required usable open space. In addition, the Project would include 90,113 sf of publicly-accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. The proposed buildings would range in height from two to 44 stories, with a maximum height of 497 feet. The Project would provide 2,475 vehicle parking spaces within subterranean parking (up to four levels) and six levels of podium parking in Building 2 and four levels of podium parking in Building 9. The Project would also provide 146 short-term bicycle parking spaces and 596 long-term bicycle parking spaces.

## 2. Issues Raised During Notice of Preparation Process

The following summarizes the potential environmental issues raised by public agencies, organizations and individuals in response to the NOP. The comments included both support for the Project and certain environmental concerns that are requested to be addressed in the Draft EIR. The following is a summary list of environmental concerns received in response to the NOP. The reference in parenthesis is the EIR chapter/section in which the environmental analysis is provided. The comments on the Initial Study as part of the NOP process are contained in Appendix A of this Draft EIR.

- The Draft EIR should evaluate air quality impacts to nearby residential uses (Refer to Section IV.A, *Air Quality*, of this EIR.)
- The Draft EIR should evaluate the potential of the Project to exceed the South Coast Air Quality Management District's (SCAQMD) regional air quality CEQA threshold levels during all phases of construction and during operation. (Refer to Section IV.A, *Air Quality*, of this EIR.)
- The Draft EIR should evaluate the potential of the Project to exceed SCAQMD's regional air quality CEQA threshold levels from indirect sources, such as sources that generate or attract vehicle trips. (Refer to Section IV.A, *Air Quality*, of this EIR.)
- The Draft EIR should evaluate the potential of the Project to exceed SCAQMD's regional air quality CEQA threshold levels from overlapping construction and operation activities. (Refer to Section IV.A, *Air Quality*, of this EIR.)

<sup>1</sup> The 101,088 square feet of restaurant/retail floor area includes floor area for purposes of calculating floor area per Los Angeles Municipal Code (LAMC) requirements. An additional potential 12,477 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, Environmental Impact Analysis, of this Draft EIR, evaluates a total of 113,565 square feet of restaurant/retail uses. It is assumed there would be 45,266 square feet of retail uses and 68,299 square feet of restaurant uses (indoor and outdoor uses combined).

- The Draft EIR should analyze direct and indirect impacts to historic resources, including impacts to the on-site Los Angeles Cold Storage (LACS) Building (Refer to Chapter II, *Project Description*, and Section IV.B, *Cultural Resources*, of this EIR.)
- The Draft EIR should evaluate the adaptive reuse of the on-site historic building as well as a range of preservation-based alternatives that maintain the building's eligibility for local, state, and national designation. (Refer to Section IV.B, *Cultural Resources*, and Chapter V, *Alternatives*, of this EIR.)
- Concern that the depth of excavation for subterranean garages would adversely impact archaeological resources (Refer Sections IV.B, *Cultural Resources*, of this EIR.)
- Concern that greenhouse gas emissions would adversely impact nearby seniors and persons with chronic illnesses (Refer to Sections IV.A, *Air Quality*, and IV.E, *Greenhouse Gas Emissions*, of this EIR.)
- Concern that the Project would generate greenhouse gas emissions and impact climate change (Refer to Section IV.E, *Greenhouse Gas Emissions*, of this EIR.)
- The Draft EIR should evaluate the Project's consistency with applicable land use plans and policies. (Refer to Section IV.F, *Land Use and Planning*, of this EIR.)
- The Draft EIR should address noise impacts to nearby residential uses (Refer to Section IV.G, *Noise*, of this EIR.)
- The Draft EIR should evaluate the Project's growth in relation to the Southern California Association of Governments (SCAG) regional and local forecasts and potential to displace working class neighborhoods. (Refer to Section IV.H, *Population and Housing*, of this EIR.)
- Concern that the Project would impact police protection services (Refer to Section IV.I.2, *Public Services - Police Protection*, of this EIR.)
- The Draft EIR should evaluate vehicle miles traveled (VMT) transportation-related impacts. (Refer to Section IV.J, *Transportation*, of this EIR.)
- The Draft EIR should evaluate the impacts on alternative transportation facilities (Refer to Section IV.J, *Transportation*, of this EIR.)
- The Draft EIR should evaluate the potential of transportation demand management (TDM) strategies and Intelligent Transportation System (ITS) applications to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. (Refer to Section IV.J, *Transportation*, of this EIR.)
- The Draft EIR should include a traffic safety impact analysis (Refer to Section IV.J, *Transportation*, of this EIR.)
- The Draft EIR should evaluate strategies to reduce parking. (Refer to Section IV.J, *Transportation*, and Chapter V, *Alternatives*, of this EIR.)

- Concerns about hazardous materials impacts, including those related to methane. Refer to the analysis of hazardous materials in the Initial Study, which is provided in Appendix A of this Draft EIR).

### 3. Significant and Unavoidable Environmental Impacts

Section 15126.2(a) of the State *CEQA Guidelines* requires that an EIR describe significant environmental impacts of a project on the environment. Direct and indirect significant effects shall be clearly identified and described, giving due consideration to short-term and long-term effects. Based on the analysis contained in Chapter IV, *Environmental Impact Analysis*, of the Draft EIR and as evaluated in Sections IV.A, *Air Quality*, IV.B, *Cultural Resources*, and IV.G *Noise*, and summarized below, implementation of the Project would result in significant impacts that cannot be mitigated with respect to Project-level and cumulative air quality, historic resources, and on-site and off-site noise/vibration sources during construction

#### a) Air Quality

##### (1) Cumulatively Considerable Increase in Criteria Pollutants

###### (a) Construction

###### (i) Project-Level

Construction of the Project would result in emissions that exceed the VOC, NO<sub>x</sub>, and CO regional thresholds, and impacts would be potentially significant prior to mitigation. Implementation of Mitigation Measure AQ-MM-1 (construction equipment emission reduction features) and AQ-MM-2 (concrete trucks with emission reduction features) would reduce short-term and temporary VOC and NO<sub>x</sub> emissions, including from heavy-duty equipment, haul trucks, and concrete trucks during the foundation pouring activities. With implementation of Mitigation Measure AQ-MM-1 and AQ-MM-2, short-term construction NO<sub>x</sub> emissions would be reduced, and CO emissions would increase due to the use of Tier 4 Final equipment and CNG trucks. However, even with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2, Project-level short-term construction NO<sub>x</sub> and CO emissions would exceed the applicable regional emission significance threshold and would, thus, continue to be significant and unavoidable.

###### (ii) Cumulative

As the Project's short-term construction impacts would be significant and unavoidable, Project construction-related NO<sub>x</sub> and CO emissions combined with emissions from construction of related projects could also exceed the applicable regional NO<sub>x</sub> and CO emissions significance thresholds and would, thus, result in a cumulatively significant and unavoidable impact.

(b) *Operation*

(i) *Project-Level*

The analysis of operational air quality impacts analyzed an interim scenario where a portion of the Project Site would be in operation, while a portion of the Project's construction activities would also occur. Thus, with the overlap in operation and construction, emissions were combined as part of this analysis and compared to applicable SCAQMD regional thresholds.

The Project would result in potentially significant operational impacts due to regional VOC and NO<sub>x</sub> emissions above the regional significance thresholds. Mitigation Measures AQ-MM-1 (construction equipment emission reduction features) and AQ-MM-2 (concrete trucks with emission reduction features) would be required to reduce overlapping construction-related NO<sub>x</sub> emissions that would be concurrent with the interim regional operational emissions. Mitigation Measure AQ-MM-3 (emergency generator maintenance and testing requirements) would reduce regional VOC and NO<sub>x</sub> emissions from operations by scheduling routine maintenance of emergency generators so that only one emergency generator is maintained on any given day, Mitigation Measure AQ-MM-4 would reduce VOC and NO<sub>x</sub> emissions from landscaping equipment and Mitigation Measure AQ-MM-5 would reduce VOC emissions associated with coating activities during operations. With implementation of AQ-MM-1 and AQ-MM-2, NO<sub>x</sub> emissions would be reduced to below the SCAQMD regional significance threshold from construction activities that would overlap with the interim operations of the Project. However, emissions of CO from construction activities that would overlap with the interim operations of the Project would exceed the SCAQMD regional significance threshold due to the Tier 4 Final equipment and CNG truck engine technology, whereby the technology used to reduce NO<sub>x</sub> emissions leads to slightly higher CO emissions. This is the result of NO<sub>x</sub> being formed through high combustion temperatures whereas CO is formed through incomplete combustion from lower combustion temperatures. CO is a pollutant of lesser air quality concern as compared to NO<sub>x</sub> given that the Air Basin is in attainment for CO but is in non-attainment for ozone, with NO<sub>x</sub> constituting an ozone precursor emission. Thus, AQ-MM-1 and AQ-MM-2 represent overall environmentally beneficial mitigation measures as they would reduce emissions of an ozone precursor, NO<sub>x</sub>, despite increasing emissions of CO during Project construction activities that would be concurrent with the interim regional operational emissions.

Therefore, while NO<sub>x</sub> impacts related to overlapping construction and interim operational emissions would be mitigated to less than significant with implementation of mitigation measures AQ-MM-1, AQ-MM-2, AQ-MM-3, AQ-MM-4, and AQ-MM-5 CO impacts related to regional emissions during this overlapping short-term timeframe would remain significant and unavoidable after implementation of mitigation measures.

(ii) *Cumulative*

As the Project's interim operational impacts would be significant and unavoidable, Project CO emissions during the interim scenario where a portion of the Project Site would be in operation, while a portion of the Project would be in construction, combined with emissions from operations of related projects could also exceed the applicable regional CO emissions significance thresholds and would, thus, result in a cumulatively significant and unavoidable impact.

**b) Historic Resources: Demolition of the LACS Building**

As more fully described in Chapter II, *Project Description*, of this Draft EIR, the Project would demolish all the existing improvements, uses, and surface parking on the South and West Sites. On the North Site, the single-story warehouse would also be demolished, however, the Project intends to preserve and adaptively reuse a portion of the existing six-story industrial building for retail and residential amenity purposes. However, because the currently operating Los Angeles Cold Storage (LACS) Building on the North Site has been "frozen" for over 100 years, a confirmation of its structural integrity cannot be made until the existing operations cease (when and if the Project is approved) and the LACS building is "unfrozen." For purposes of this Draft EIR to provide a conservative analysis of impacts, the Project is assumed to demolish the LACS Building (both the East and West Volumes), which is a historical resource as defined by CEQA. The demolition of a historical resource constitutes a significant adverse impact that cannot be mitigated to a less-than-significant level. However, CEQA requires that all feasible mitigation be undertaken even if it does not mitigate below a level of a significant effect on the environment. Accordingly, Mitigation Measures CUL-MM-1 to CUI-MM-8 would be implemented by the Project.

If it is confirmed that the West Volume of the LACS Building would remain substantially intact and structurally sound following the thawing process, and therefore would be retained, rehabilitated, and adaptively reused as part of the Project, the West Volume would represent a remnant of a significant industrial building in the original industrial core of Los Angeles. The demolition of the East Volume would remove nearly 50% of the historic fabric of the LACS Building, representing the original portion of the building as constructed in 1903, which established the cold storage use at the Project Site. There would therefore be a significant loss of integrity of design, materials, and workmanship to the LACS Building with the demolition of the East Volume. The LACS Building, not its component parts, is the historical resource as defined by CEQA; therefore, for purposes of this analysis, the West Volume is not considered a historical resource on its own and the loss of the East Volume is considered a significant adverse impact to a historical resource. However, there is historical value in the potential retention of the West Volume of the LACS Building. If retained, the West Volume would represent one of the earliest surviving examples of reinforced concrete construction in the City, would remain in its original location, would retain its historic relationship along Central Avenue, and would reflect the early industrial development of Los Angeles. Therefore, although the retention of the West Volume would

not mitigate Project impacts to a less-than-significant level, it would preserve a physical remnant of Los Angeles' industrial history from the first decade of the 20th century.

The LACS Building, composed collectively of the East and West Volumes, represents a historical resource as defined by CEQA. Therefore, despite the potential benefits of retaining the West Volume if it is determined that it would remain substantially intact and structurally sound following the thawing process, the demolition of the East Volume represents a loss of approximately 50% of the historic square footage and the corresponding historic fabric of the LACS Building. The West Volume would therefore represent a remnant of a historical resource; for purposes of this analysis, it would not be considered a historical resource as defined by CEQA because it is only a portion of the LACS Building as it exists prior to implementation of the Project. As a result, even if it is determined that the West Volume can be retained and rehabilitated as specified in the recommended mitigation measures, impacts to historical resources would be lessened but would not be reduced to a less-than-significant level. Therefore, whether the LACS Building is demolished in whole or in part, the Project would result in a significant and unavoidable adverse impact to a historical resource on the Project Site that cannot be mitigated to a less-than-significant level.

## **c) Noise**

### **(1) On-Site Construction Noise**

#### *(a) Project Level*

Implementation of Mitigation Measure NOI-MM-1 (noise barriers) and Mitigation Measures NOI-MM-2 (location of compressors and generators 100 feet from sensitive receptors), NOI-MM-3 (construction equipment muffling and shielding), and NOI-MM-4 (prohibition of foundation concrete trucks from traveling on Central Avenue between 1st Street and 4th Street between Alameda Street and Hewitt Street) would reduce the Project's construction noise impacts at off-site ground-level noise sensitive receptors to the extent technically feasible. Noise barriers, however, are not capable of blocking noise at noise-sensitive receptors that are elevated above a construction work site, such as residential units and hotel rooms located on the upper levels of a mid-rise or high-rise building. It is not feasible to install noise barriers with height sufficient to block the line-of-sight for all noise-sensitive receptors located on the upper levels of a mid-rise or high-rise residential or hotel building due to barrier foundation and wind load restrictions. Because there could be receptors elevated above the construction work sites throughout the Project area within the upper levels of a noise-sensitive receptor building (receptor locations R2 through R6), construction noise would represent a temporary noise increase in excess of standards for these receptors. Therefore, ground-level construction noise impacts associated with on-site noise sources would be less than significant with mitigation incorporated. However, construction noise impacts associated with on-site noise sources at elevated noise-sensitive receptor locations located on the upper floors of buildings at receptor locations R2 through R6 would be significant and unavoidable.

(b) *Cumulative*

Cumulative construction noise impacts associated with on-site construction equipment could be significant in the event that construction activities as part of the related projects that occur within 1,000 feet of the Project Site.<sup>2</sup> The Project would implement Mitigation Measures NOI-MM-1, NOI-MM-2, and NOI-MM-3 to reduce construction noise impacts. Implementation of these mitigation measures would reduce the Project's ground-level construction noise impacts at receptor locations R2 through R6 to less than significant at the ground-level. However, construction noise impacts at elevated noise-sensitive receptor locations associated with on-site Project construction noise sources would be significant and unavoidable.

Although it is expected that the related projects with identified significant impacts would implement mitigation that would reduce construction noise impacts similar to the Project, overlapping construction activities could result in significant cumulative impacts. The Project and the related projects could together contribute to construction noise at the ground-level noise-sensitive uses located at location R2 and those located on the upper levels of a mid-rise or high-rise building at locations R2, R3, R4, R5, and R6 that may exceed the significance threshold. Thus, it is conservatively concluded that the Project's contribution to cumulative construction noise associated with on-site construction equipment would be cumulatively considerable and would represent a significant and unavoidable cumulative impact.

(2) **Off-Site Construction Traffic Noise (Cumulative Only)**

Cumulative construction noise impacts associated with off-site construction truck traffic from multiple related projects could potentially overlap with the Project on some days and generate noise in excess of the significance thresholds.

For Project-related haul trucks, with implementation of Mitigation Measure NOI-MM-4, Project haul trucks would be prohibited from traveling on Central Avenue between 1st Street and 2nd Street, which would mitigate the Project-level impact to less than significant. However, if the related projects would contribute 31 truck trips per hour or more and travel along the same roadway segments as the Project (see roadway segments in Table IV.G-10, *Estimate of Off-Site Construction Traffic Noise Impacts*), the combined off-site construction noise from Project haul trucks and related project trucks could exceed the significance threshold.

For Project-related foundation concrete pour trucks, there is no feasible mitigation measure that would reduce the Project-level impact to below the significance thresholds. Therefore, related projects contributing any additional truck trips on the same roadway segments at the same time as the Project (see roadway segments in Table IV.G-10) would generate a cumulative noise impact along these same roadway segments.

---

<sup>2</sup> See Table IV.G-26, *Related Projects within 1,000 Feet of the Project Site*, in Section IV.G, *Noise*, of this Draft EIR.



Residential land uses comprise the majority of existing noise-sensitive uses within the Project Site area that could be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as they would be impractical (i.e., due to their placement on street frontages) and create aesthetic and access concerns. Thus, given that it is possible that the Project and related projects could contribute to cumulative off-site construction traffic noise levels and could exceed a significance threshold with sufficiently high cumulative traffic levels, it is conservatively concluded that the Project's contribution to cumulative construction noise associated with off-site construction truck traffic would be cumulatively considerable and would represent a significant and unavoidable cumulative impact.

### (3) Groundborne Vibration: Structural Building Damage

#### (a) *Project-Level*

Mitigation Measure NOISE-MM-6 prohibits the use of vibratory construction equipment at distances that would result in significant impacts to vibration receptor V3 (commercial buildings to the south, west, and southwest of the Project Site) and other buildings in the area. With implementation of Mitigation Measure NOI-MM-5, potential structural vibration impacts at receptor V3 would be mitigated to a less than significant level. Mitigation Measure NOI-MM-7 provides additional protections by requiring that the physical condition of vibration receptor V3 be documented prior to the commencement of construction activity and that daily inspections of receptor V3 occur when construction activities involving vibration-generating equipment such as bulldozers, jackhammers, loaded trucks, and drill rigs are used within 15 feet of receptor V3. In the event that unanticipated or unexpected construction-related vibration or structural damage occurs, the contractor shall arrange for inspection and repair as necessary. With implementation of Mitigation Measures NOI-MM-6 and NOI-MM-7, impacts with regard to structural damage for receptor V3 would be mitigated to less than significant. However, because receptor V3 includes privately-owned structures, inspections and repairs pursuant to Mitigation Measure NOI-MM-7 would require the consent of the property owner, who may not agree. Thus, impacts to receptor V3 would be significant and unavoidable.

Therefore, short term construction groundborne vibration impacts associated with structural damage would be less than significant with mitigation incorporated for the majority of on-site construction activities, but would be significant and unavoidable for receptor V3.

#### (b) *Cumulative*

The Project would implement Mitigation Measures NOI-MM-6 and NOI-MM-7 to reduce construction vibration impacts. Implementation of these mitigation measures would reduce, but not eliminate, the Project's ground-level construction vibration impacts at receptor location V3 but impacts would remain significant and unavoidable.

Although it is expected that the related projects listed with identified significant impacts would implement mitigation that would reduce construction vibration impacts similar to

the Project, overlapping construction activities could result in significant cumulative impacts. Thus, the Project and related projects could together contribute to construction vibration at receptor V3 that may exceed the significance threshold. Thus, it is conservatively concluded that the Project's contribution to cumulative construction vibration associated with on-site construction equipment would be cumulatively considerable and would represent a significant and unavoidable cumulative impact.

## **4. Alternatives that Would Reduce or Avoid Significant Impacts**

### **a) Alternative 1: No Project/No Build Alternative**

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development Project on an identifiable property would be the circumstance under which the Project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that the existing uses, including industrial, parking, and office, would continue in operation at the Project Site as under existing conditions and the Project would not be developed..

### **b) Alternative 2: Above Grade Parking Alternative**

The purpose of Alternative 2 is to reduce the Project's excavation volumes and, thus, reduce the Project's significant and unavoidable construction-related air quality and noise impacts associated with excavation, grading, and hauling. As with the Project, Alternative 2 would remove all the existing buildings and associated surface parking from the Project Site. However, as with the Project, a portion of the Los Angeles Cold Storage Building in the North Site would be retained, if feasible. Alternative 2 would eliminate the Project's subterranean parking garages; reduce the Project's 2,475 parking spaces to 990 spaces, a reduction of 60 percent; and locate all parking in above-grade, enclosed parking podiums within the building footprints. Excavation would be reduced from 651,000 cubic yards (CY) to 36,286 CY, an approximate 94 percent reduction. Alternative 2 would provide the same number of buildings and LAMC calculated floor area (2,318,534 sf) as the Project. However, the Project's hotel would be removed from the scope of the Project and the Project's residential uses would be increased from 1,521 units to 1,589 units. With the inclusion of parking podiums in the lower stories, the heights of some of the buildings would be greater than under the Project. The configuration of the buildings, including the size of the building footprints and the relative location of the buildings within the Project Site, would be similar to the Project. As with the Project, Alternative 2 would provide 113,565 sf of retail and restaurant uses (indoor and outdoor spaces) and 90,113 sf of landscaped and publicly-accessible open space and paseos at ground level.

### **c) Alternative 3: Historic Preservation/Reduced Density Alternative**

Alternative 3 would preserve the North Site in its existing condition and industrial function by eliminating the North Site component from the scope of the Project. Alternative 3 was selected to eliminate the significant and unavoidable historical resources impact on the historic, six-story LACS Building in the North Site. Alternative 3 would also reduce the scale of the Project's construction activities and, thus, reduce the Project's respective significant and unavoidable construction emissions, noise, and vibration impacts. The South Site would be developed with 1,559,533 sf of building floor area and the West Site would be developed with 63,422 sf of building floor area for a total of 1,622,975 sf. Similar to Alternative 2, the Project's hotel would be removed under Alternative 3. Alternative 3 represents a 30 percent reduction in the Project's 2,318,534 sf of new building floor area and would reduce the Project's FAR from 7.13:1 to 5.90:1. Alternative 3 would retain the Project's open space and paseos in the South Site. Parking would be reduced from the Project's 2,475 spaces to 990 spaces, a 60 percent reduction compared to the Project. Alternative 3 would reduce the Project's grading, excavation, and soils export from 651,000 CY to 321,365 CY, a reduction of approximately 51 percent.

### **d) Alternative 4: Historic Preservation/ Office Use Alternative**

Alternative 4 would retain the Project Site's existing M2 (Light Industrial) zoning designation. The North Site would not be redeveloped and the existing historical LACS Building on the North Site would be maintained in its current condition. As such, Alternative 4 would avoid the Project's significant and unavoidable historical resources impact on the LACS Building. The existing industrial uses in the South and West Sites would be removed and these sites would be developed with office buildings in accordance with the underlying M2 zone. Parking would be reduced from 2,475 spaces to 928 spaces, a 62.5 percent reduction compared to the Project. The South Site would be developed with three, nine-story office buildings totaling 1,125,207 sf and a six-level parking structure, and the West Site would be developed with a three-story office building totaling 34,060 sf. Total new floor area, which would be located in the South and West Sites only, would be 1,159,267 sf. Alternative 4 would reduce the Project's 7.13:1 FAR to 4.22:1. Because the existing Height District 2D limits the underlying non-residential FAR to 3:1, a Height District/Zone Change would be required. However, Alternative 4 would not require a change in land use designation for development of the Project Site. Alternative 4 would reduce the Project's grading, excavation, and soils export from 651,000 CY to 40,532 CY, a reduction of approximately 93.8 percent.

### **e) Environmentally Superior Alternative**

Section 15126.6(e)(2) of the State *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "No Project" alternative is the

environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible Alternatives includes Alternative 2: Above Grade Alternative; Alternative 3: Historic Preservation/Reduced Density Alternative; and, Alternative 4: Historic Preservation/Office Use Alternative.

A comparative summary of the environmental impacts anticipated under each Alternative to the environmental impacts associated with the Project is provided in **Table V-13, Comparison of Impacts Associated with the Alternatives and the Project**, in Chapter V, *Alternatives*, of this Draft EIR. As indicated in Table V-14, the No Project/No Build Alternative would result in no impacts or less than significant impacts on the environment and, as such, would reduce environmental impacts compared to the Project or other Alternatives. Further, the No Project/No Build Alternative would avoid the Project's short term significant and unavoidable construction noise impacts and the Project's significant and unavoidable cultural resources impacts on the historic LACS Building. Therefore, the No Project/No Build Alternative is considered the overall environmentally superior Alternative.

However, this Alternative would not provide the beneficial effects of the Project and other Alternatives. As shown in **Table V-14 Ability of Alternatives to Meet Project Objectives**, in Chapter V, *Alternatives*, of this Draft EIR, the No Project/No Build Alternative would not achieve the underlying purpose of the Project to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, office, retail, hotel and restaurant uses, as well as publicly-accessible open spaces, that would revitalize the Project Site and the surrounding neighborhood, promote walkability and use of public transit, and enhance the City's economic base.

In accordance with the State *CEQA Guidelines* requirement to identify an environmentally superior Alternative other than the No Project/No Build Alternative, Alternative 3 was selected as the environmentally superior alternative. Despite not reducing the construction duration and excavation quantity to the largest extent of the Alternatives, Alternative 3 would reduce the highest number of the Project's significant and less than significant environmental impacts, including reducing long-term operational impacts related to air emissions, as well as avoiding the Project's significant and unavoidable impacts on the historic LACS building. In addition, Alternative 3 would substantially meet the underlying purpose of the Project to redevelop the underutilized Project Site with a high-quality mixed-use development, provide publicly-accessible open spaces, revitalize the Project Site and the surrounding neighborhood, promote use of public transit, and enhance the City's economic base.

## 5. Summary of Environmental Impacts

This section summarizes the environmental impacts of the Project as evaluated in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR. The summary is provided by environmental issue area in **Table ES-1, Summary of Project Impacts, Project Design Features, and Mitigation Measures**. The Project's proposed Project Design Features (PDFs) and required mitigation measures (MMs) are also listed below.

As shown in Table ES-1, based on analyses contained in this Draft EIR the Project would result in significant and unavoidable air quality impacts during construction and during intermittent overlapping construction activities and operations, significant and unavoidable impacts related to historical resources, and changes and potential removal of the historic, six-story cold storage building, and temporary construction-related noise and vibration (structural damage) impacts. The implementation of project design features and/or feasible mitigation measures would not reduce these impacts to less than significant levels.

Other issues evaluated in the Draft EIR, in which impacts were determined to be less than significant with or without mitigation, include cultural resources (archaeological resources), energy, geology and soils (paleontological resources), greenhouse gas emissions, land use and planning, noise (operational noise/vibration), population and housing, public services (fire, police, schools, parks/recreation and libraries), transportation, tribal cultural resources, and utilities and service systems.

### a) Project Design Features

#### (1) Air Quality

**AIR-PDF-1: Construction Power Pole Usage.** The Project contractor(s) will use electricity from power poles (where available) and/or solar-powered generators rather than temporary diesel or gasoline generators during construction.

#### (2) Greenhouse Gas Emissions

**GHG-PDF-1: Green Building Features.** The Project will include the following green building features:

- The Project's buildings will be designed to achieve the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification or equivalent and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code.
- The Project will promote alternatives to conventionally fueled automobiles by designating a minimum of eight percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles and shall pre-wire, or install conduit and panel capacity for a minimum of 30 percent of the LAMC-required electric vehicle parking spaces, with 10 percent of the LAMC-required spaces further improved with electric vehicle charging stations.

**TABLE ES-1  
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

<b>Environmental Impact</b>	<b>Project Design Features (PDF)</b>	<b>Mitigation Measures (MM)</b>	<b>Project Impact Determination</b>
<b>IV.A AIR QUALITY</b>			
<b>CONSISTENCY WITH APPLICABLE AIR QUALITY PLAN</b>			
<i>Construction</i>	See Project Design Feature AQ-PDF-1 (construction power pole usage)	See Mitigation Measure AQ-MM-1 (Construction Equipment Features) and Mitigation Measure AQ-MM-2 (Concrete Truck Features).	Less Than Significant with Mitigation
<i>Operation</i>	Not applicable	See Mitigation Measure AQ-MM-3 (Emergency Generator Maintenance & Testing) and Mitigation Measure AQ-MM-4 (Electric Landscaping Equipment), Mitigation Measure AQ-MM-5 (Use of Super-compliant VOC Paints).	Less Than Significant with Mitigation
<b>CUMULATIVELY CONSIDERABLE INCREASE OF CRITERIA POLLUTANT IN NONATTAINMENT AREA: REGIONAL EMISSIONS</b>			
<i>Construction</i>	See Project Design Feature AQ-PDF-1 (construction power pole usage).	See Mitigation Measure AQ-MM-1 (Construction Equipment Features) and Mitigation Measure AQ-MM-2 (Concrete Truck Features).	Significant and Unavoidable with Mitigation (Project-Level and Cumulative)

**TABLE ES-1  
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

<b>Environmental Impact</b>	<b>Project Design Features (PDF)</b>	<b>Mitigation Measures (MM)</b>	<b>Project Impact Determination</b>
<i>Operation</i>	See Project Design Feature AQ-PDF-1 (construction power pole usage).	See Mitigation Measure AQ-MM-1 (Construction Equipment Features), Mitigation Measure AQ-MM-2 (Concrete Truck Features), Mitigation Measure AQ-MM-3 (Emergency Generator Maintenance & Testing), Mitigation Measure AQ-MM-4 (Electric Landscaping Equipment), and Mitigation Measure AQ-MM-5 (Use of Super-compliant VOC Paints).	- Significant and Unavoidable with Mitigation (during overlapping construction and operations) (Project-Level and Cumulative) - Less than Significant with Mitigation (during full Project operations)
<b>SENSITIVE RECEPTOR EXPOSURE TO POLLUTANT CONCENTRATIONS</b>			
<b>LOCALIZED EMISSIONS</b>			
<i>Construction</i>	See Project Design Feature AQ-PDF-1 (construction power pole usage).	See Mitigation Measure AQ-MM-1 (Construction Equipment Features).	Less than Significant with Mitigation
<i>Operation</i>	Not applicable	See Mitigation Measure AQ-MM-3 (Emergency Generator Maintenance & Testing) and Mitigation Measure AQ-MM-4 (Electric Landscaping Equipment).	Less Than Significant with Mitigation
<b>Carbon Monoxide Hotspots</b>	Not applicable	None required	Less Than Significant

**TABLE ES-1**  
**SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
<b>Toxic Air Contaminates</b>			
<i>Construction</i>	See Project Design Feature AQ-PDF-1 (construction power pole usage).	See Mitigation Measure AQ-MM-1 (Construction Equipment Features) and Mitigation Measure AQ-MM-2 (Concrete Truck Features).	Less than Significant with Mitigation
<i>Operation</i>	Not applicable	None required	Less Than Significant
<b>IV.B CULTURAL RESOURCES</b>			
<b>HISTORICAL RESOURCES</b>			
	Not applicable	See Mitigation Measures CUL-MM-1 (Documentation), CUL-MM-2 (Interpretation), CUL-MM-3 (Thawing Plan), CUL-MM-4 (Structural Analysis), CUL-MM-5 (Historical Architect), CUL-MM-6 (Historic Structure Report), CUL-MM-7 (Mothballing Plan), and CUL-MM-8 (Protection Plan).	Significant and Unavoidable with Mitigation (Project-Level only)
<b>ARCHAEOLOGICAL RESOURCES</b>			
	Not applicable	See Mitigation Measures CUL-MM-9 (Use of Archaeologist), CUL-MM-10 (Sensitivity Training), CUL-MM-11 (Unearthed Resources Plan), and CUL-MM-12 (Resources Memorandum/Report).	Less Than Significant with Mitigation
<b>IV.C. ENERGY</b>			
<b>WASTEFUL, INEFFICIENT, AND UNNECESSARY CONSUMPTION OF ENERGY RESOURCES</b>			
	See Project Design Feature GHG-PDF-1 (Green Building Features).	None required	Less Than Significant



**TABLE ES-1  
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

<b>Environmental Impact</b>	<b>Project Design Features (PDF)</b>	<b>Mitigation Measures (MM)</b>	<b>Project Impact Determination</b>
<b>CONFLICT OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY</b>	See Project Design Feature GHG-PDF-1 (Green Building Features).	None required	Less Than Significant
<b>IV.D GEOLOGY AND SOILS</b>			
<b>PALEONTOLOGICAL RESOURCES</b>	Not applicable	See Mitigation Measures PALEO-MM-1 (Use of Paleontologist), PALEO-MM-2 (Monitoring), and PALEO-MM-3 (Curation and Reporting).	Less Than Significant with Mitigation
<b>IV.E GREENHOUSE GAS EMISSIONS</b>			
<b>GREENHOUSE GAS EMISSIONS GENERATION; CONFLICT WITH ANY APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GHGS</b>	See Project Design Features WS-PDF-1 (Water Conservation Features), and GHG-PDF-1 (Green Building Features).	None Required	Less Than Significant
<b>IV.F LAND USE AND PLANNING</b>			
<b>SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY APPLICABLE LAND USE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT Project</b>	See Project Design Feature GHG-PDF-1 (Green Building Features).	None required	Less Than Significant
<b>IV.G NOISE</b>			
<b>SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS</b>			

**TABLE ES-1**  
**SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
<i>Construction – On Site Noise</i>	See Project Design Features NOI-PDF-1 (Impact Pile Drivers Prohibited) and NOI-PDF-2 (Construction Equipment Maintenance).	See Mitigation Measures NOISE-MM-1 (Temporary Noise Barriers), NOISE-MM-2 (Compressors and Generators), and NOISE-MM-3 (Construction Equipment Muffling and Shielding Devices).	Significant and Unavoidable with Mitigation (Project-Level and Cumulative)
<i>Construction – Off Site Noise</i>	Not Applicable	See Mitigation Measure NOISE-MM-4 (Foundation Concrete Trucks).	Less Than Significant with Mitigation (Project-Level only)  Significant and Unavoidable with Mitigation (Cumulative only)
<i>Operation</i>	See Project Design Features NOISE-PDF-3 (Mechanical Equipment Noise) and NOI-PDF-4 (Loading Dock Screening).	See Mitigation Measure NOISE-MM-5 (Amplified Noise – Special Events).	Less Than Significant with Mitigation
<b>GROUNDBORNE VIBRATION AND GROUNDBORNE NOISE</b>			
<i>Construction – Structural Damage</i>	See NOI-PDF-1 (Impact Pile Drivers Prohibited).	See Mitigation Measures NOISE-MM-6 (Construction Vibration - Except Shoring) and NOISE-MM-7 (Inspections).	Significant and Unavoidable with Mitigation (Project-Level and Cumulative)
<i>Construction – Human Annoyance</i>	See NOI-PDF-1 (Impact Pile Drivers Prohibited).	None required	Less Than Significant
<i>Operation – Structural Damage and Human Annoyance</i>	Not applicable	None required	Less Than Significant

**TABLE ES-1  
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

<b>Environmental Impact</b>	<b>Project Design Features (PDF)</b>	<b>Mitigation Measures (MM)</b>	<b>Project Impact Determination</b>
<b>IV.H POPULATION AND HOUSING</b>			
<b>INDUCE UNPLANNED POPULATION GROWTH</b>			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
<b>IV.I-1 FIRE PROTECTION SERVICES</b>			
<b>FIRE PROTECTION</b>			
<i>Construction</i>	See Project Design Features TRAF-PDF-1 (Construction Management Plan).	None required	Less Than Significant
<i>Operation</i>	Not applicable	See Mitigation Measure PS-MM-1 (Infrastructure Upgrades).	Less Than Significant with Mitigation
<b>IV.I-2 POLICE PROTECTION SERVICES</b>			
<b>POLICE PROTECTION</b>			
<i>Construction</i>	See Project Design Features POL-PDF-1 (Security Features during Construction) and TRAF-PDF-1 (Construction Management Plan).	None required	Less Than Significant
<i>Operation</i>	See Project Design Feature POL-PDF-2 (Security Features during Operation).	None required	Less Than Significant

**TABLE ES-1  
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

<b>Environmental Impact</b>	<b>Project Design Features (PDF)</b>	<b>Mitigation Measures (MM)</b>	<b>Project Impact Determination</b>
<b>IV.I.3 SCHOOLS</b>			
<b>SCHOOL SERVICES</b>			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
<b>IV.I.4 PARKS AND RECREATION</b>			
<b>CONSTRUCTION OF PARKS AND RECREATION FACILITIES</b>	Not applicable	None required	Less Than Significant
<b>DETERIORATION OF PARK FACILITIES</b>			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
<b>EFFECTS OF PROJECT-RELATED RECREATIONAL FACILITIES</b>	Not applicable	None required	Less Than Significant
<b>IV.I.5 LIBRARIES</b>			
<b>LIBRARY SERVICES</b>			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
<b>IV.J TRANSPORTATION</b>			
<b>CONFLICT WITH A PROGRAM, PLAN, ORDINANCE OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE AND PEDESTRIAN FACILITIES</b>	Not applicable	None required	Less Than Significant
<b>CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B) - VEHICLE MILES TRAVELED (VMT)</b>	Not applicable	None required	Less than Significant

**TABLE ES-1  
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

<b>Environmental Impact</b>	<b>Project Design Features (PDF)</b>	<b>Mitigation Measures (MM)</b>	<b>Project Impact Determination</b>
<b>GEOMETRIC HAZARDS</b>	Not applicable	None required	Less than Significant
<b>IV.K TRIBAL CULTURAL RESOURCES</b>			
<b>TRIBAL CULTURAL RESOURCES</b>	Not applicable	See Mitigation Measures TCR-MM-1 (Native American Monitor), TCR-MM-2 (Monitoring Logs), and TCR-MM-3 (Treatment Plan).	Less Than Significant with Mitigation
<b>IV.L.1 UTILITIES AND SERVICE SYSTEMS - WATER SUPPLY</b>			
<b>WATER INFRASTRUCTURE</b>			
<i>Construction</i>	See Project Design Feature TRAF-PDF-1 (Construction Management Plan).	None required	Less than Significant
<i>Operation</i>	Not applicable	See Mitigation Measure PS-MM-1 (Infrastructure Upgrades).	Less than Significant with Mitigation
<b>SUFFICIENCY OF WATER SUPPLY</b>			
<i>Construction</i>	Not applicable	None required	Less than Significant
<i>Operation</i>	See Project Design Feature WS-PDF-1 (Water Conservation Features).	None required	Less than Significant
<b>IV.L.2 UTILITIES AND SERVICE SYSTEMS - WASTEWATER</b>			
<b>WASTEWATER INFRASTRUCTURE</b>			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	See Project Design Feature WS-PDF-1 (Water Conservation Features).	None required	Less Than Significant

**TABLE ES-1  
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

<b>Environmental Impact</b>	<b>Project Design Features (PDF)</b>	<b>Mitigation Measures (MM)</b>	<b>Project Impact Determination</b>
<b>WASTEWATER TREATMENT CAPACITY</b>			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
<b>IV.L.3 UTILITIES AND SERVICE SYSTEMS - SOLID WASTE</b>			
<b>SOLID WASTE GENERATION</b>			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
<b>CONSISTENCY WITH STATE AND LOCAL SOLID WASTE STATUTES</b>			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
SOURCE: ESA, 2023.			

### (3) Noise and Vibration

**NOI-PDF-1 (Impact Pile Drivers Prohibited):** The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating augured, drilled, or vibratory piles are permitted.

**NOI-PDF-2 (Construction Equipment Maintenance):** During plan check for each phase of the Project, the contractor will provide a statement to the City indicating their powered construction equipment (including combustion engines), fixed or mobile, will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

**NOI-PDF-3 (Mechanical Equipment Noise):** All outdoor mounted building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Los Angeles through the use of quiet fans, duct silencers, parapets, enclosures, mufflers, or similar noise attenuation methods.

**NOI-PDF-4 (Loading Dock Screening):** All loading docks will be acoustically screened from off-site noise-sensitive receptors. Acoustical screening of loading docks will be achieved through the use of physical barriers (i.e., walls, buildings or other structures that fully block the line-of-sight between the loading dock and off-site noise-sensitive receptors), or with loading dock seals installed between the truck and loading dock. Acoustical screening may also be achieved by requiring loading activities to be conducted fully inside buildings, or by similar methods.

### (4) Police Services

#### (a) Construction

**POL-PDF-1: Security Features During Construction.** Private security personnel will monitor vehicle and pedestrian access to the construction areas and patrol the Project Site, construction fencing with gated and locked entry will be installed around the perimeter of the construction site, and security lighting will be provided in and around the construction site.

#### (b) Operation

**POL-PDF-2: Security Features During Operation.** The Project will incorporate a security program to ensure the safety of its residents, employees, and visitors. Design strategies within the Project design would include, but not be limited to, the following:

- Hallways and corridors would be straight forward with no dark corners, as possible;
- Outdoor areas would be exposed to windows and allow for natural surveillance;

- Clear transitional zones would be provided between public, semi-public and private spaces;
- Access key cards and cameras would be used, as necessary; and
- Interior and exterior spaces would be well lit with proper signage to direct the flow of people and decrease opportunities for crime.

In addition, the following security measures would be implemented by the Project:

- Installing and utilizing a security camera network throughout the Project Site.
- Controlled access to all building elevators, residences, and resident-only common areas through electronic access control equipment specific to each user, as possible.
- Training employees on appropriate security policies for the Project's buildings. Duties of the staff would include, but would not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and monitoring the Project Site.
- Providing a security program for the ground level open space areas.
- Access to commercial uses would be unrestricted during business hours, with public access discontinued after businesses, such as retail and restaurant uses, have closed.

## (5) Transportation

**TRAF-PDF-1: Construction Management Plan.** Prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan, including haul routes and a staging plan, will be prepared and submitted to the City for review and approval. The Construction Management Plan will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;



- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

## (6) Utilities and Service Systems – Water Supply

**PDF WS-1: Water Conservation Features:** The Project will provide the following specific water efficiency features:

- Fixtures for the entire Project
  - ENERGY STAR Certified Commercial Clothes Washers – utilizing less than a Water Factor of “4” and a max capacity of “6” cubic feet
  - ENERGY STAR Certified Residential Clothes Washers – Front-loading or Top-loading with Integrated Water Factor and capacity as follows:
    - Front-loading with capacity greater than “2.5” cubic feet: Integrated Water Factor of less than “3.2”
    - Top-loading with capacity greater than “2.5” cubic feet: Integrated Water Factor of less than “4.3” or less
    - Either front- or top-loading with capacity of less than or equal to “2.5” cubic feet: Integrated Water Factor of “4.0” or less
  - ENERGY STAR Certified Residential Dishwashers – standard with 3.2 gallons/cycle or less or compact with less than “3.1” gallons/cycle
  - Hybrid Waterless Urinals with a flush volume of one gallon per 72 hours, (WaterSense labels are not available for hybrid or waterless urinals)
  - WaterSense-labeled High Efficiency Toilets with a flush volume of “1.1” gallons per flush, or less
  - WaterSense-labeled Showerheads with a flow rate of 1.5 gallons per minute, or less in all residential units

- Landscape and irrigation
  - California Friendly® plants or native plants
  - Drip/Subsurface Irrigation (Micro-Irrigation)
  - Irrigation Controls programmed to real-time weather conditions
  - Leak Detection System for irrigation
  - Micro-Spray
  - Design and use where feasible water-efficient flowing/recirculating water features such as fountains in ways to reduce evaporation and makeup water
  - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
  - Rainwater Harvesting and Grey Water Use/Storage where and when feasible and if space is available for the system (e.g., tanks, pumps, and filtration systems). Greywater sources may include bathroom faucets, showers, clothes washers, and mechanical cooling condensate, among other allowable sources.
  - Xeriscaping (landscaping that reduces or eliminates the need for irrigation), while still ensuring that heat island effects are mitigated
- Pool
  - Install a meter on the pool make-up line so water use can be monitored, and leaks can be identified and repaired
  - Pool splash troughs around the perimeter that drain back into the pool
  - Pool/Spa recirculating filtration equipment
  - Reuse pool backwash water for irrigation
  - Water-Saving Pool Filter
- Utilities
  - Individual metering and billing for water use for every commercial unit
  - Individual meters for water supply and water subsystems to analyze water demand and identify additional water savings by tracking water consumption
  - Allocate space and clearance to support non-potable water (purple pipe) infrastructure with a connecting port for future connection to a municipal recycled water system when made available.

## b) Mitigation Measures

### (1) Air Quality

#### (a) Construction

The following mitigation measures would reduce potentially significant impacts regarding conflict with the AQMP:

**AQ-MM-1: Construction Equipment Features:** The Applicant shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.

**AQ-MM-2: Concrete Truck Features:** The Applicant shall implement the following measures to reduce the emissions of air pollutants generated by concrete trucks:

- The contractor shall use concrete trucks with an average capacity of 10 cubic yards to minimize the number of concrete truck trips;
- The contractor shall use local concrete suppliers with concrete supplied by one or more facilities located within a driving distance of approximately 10 miles per one-way trip (approximately 20 miles per round trip).
- The contractor shall be required to ensure that trucks used to deliver concrete are made by CNG-fueled concrete trucks or trucks that achieve the same or lower NO<sub>x</sub> emissions as CNG-fueled concrete trucks.
- During plan check, the Project representative shall make available to the lead agency and SCAQMD a comprehensive inventory of all concrete trucks that will be used during the days of concrete pouring. The inventory shall include the concrete truck capacity, fuel specification, and NO<sub>x</sub> emissions rating. A

copy of each such unit's certified emissions rating shall be provided on-site at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified emissions specification.

(b) *Operations*

The following mitigation measures would reduce potentially significant impacts regarding operational emissions:

**AQ-MM-3: Emergency Generator Maintenance & Testing:** The Project representative shall schedule routine maintenance and testing of the emergency generators installed on the Project Site on different days. Prior to the installation of emergency generators, the Project representative shall supply documentation to the City that emergency generator testing by contractors, service providers, or maintenance crews will be conducted in accordance with the specified requirements. The Project representative shall maintain records of emergency generator testing, including testing dates, which shall be made available to the City upon request.

**AQ-MM-4: Electric Landscaping Equipment:** The Project representative shall only allow for electric landscaping equipment to be used at the Project Site. If electric landscaping equipment for specific types of equipment are not commercially available from landscaping contractors then up to two pieces of landscaping equipment per day may be gasoline-fueled. The Project representative shall require that landscaping contract documents include the requirement to use electric landscaping equipment for all future operational landscaping activities.

**AQ-MM-5: Use of Super-Compliant VOC Paints.** The Project representative shall only allow "Super-Compliant" architectural coating paints to be used at the Project Site as defined by SCAQMD to be less than 10 grams per liter VOC for all future operational on-going maintenance coating and painting activities (does not apply to coating activities for future new construction, tenant improvements, and additions). The Project representative shall require that all tenant and lease contract documents include the requirement to use "Super-Compliant" architectural coating paints for all future operational coating and painting activities.

(2) *Cultural Resources*

**CUL-MM-1: Documentation.** In order to document the LACS Building and its contribution to the early industrial history of Los Angeles, prior to the issuance of demolition permits, or any abatement or demolition work on the North Site, the LACS Building shall be documented according to Historic American Building Survey (HABS) Level III standards, appropriate for a building that has not been formally designated but which has been identified as significant in a historic resources survey. The Project would result in a cumulative impact to the cold storage property type; therefore, the documentation shall provide information to

future researchers on an increasingly rare property type that played a crucial role in the industrial development of the City in the early 20th century. The HABS Level III documentation shall be prepared by a historian or architectural historian who meets the Secretary of the Interior's Historic Preservation Professional Standards in the relevant discipline. The documentation shall be reviewed and approved by the Department of City Planning, Office of Historic Resources. Digital copies of the documentation shall be offered to the following repositories: the Los Angeles Public Library; Department of City Planning, Office of Historic Resources; and the Los Angeles Conservancy.

**CUL-MM-2: Interpretation.** The Applicant shall develop an interpretive program describing the history of the LACS Building and Los Angeles Cold Storage. The interpretive program shall be made accessible to the public and may include historic photographs or other ephemeral materials documenting the history of the Los Angeles Cold Storage, the development of the Industrial core of Los Angeles, the history of the Project Site as an early ice production and cold storage facility, and other relevant themes as determined. The format and location of the interpretive program shall be reviewed and approved by the Department of City Planning, Office of Historic Resources.

**CUL-MM-3: Thawing Plan.** Once the LACS Building is no longer in operation as a cold storage facility, a thawing process shall be undertaken prior to conducting any testing to determine the condition of the structural elements and other historic features. In order to minimize potential damage to the LACS Building resulting from thawing a building that has been used for cold storage for over 100 years, the Applicant shall retain a qualified structural engineer who meets the Secretary of the Interior's Historic Preservation Professional Standards in Engineering to prepare a "Thawing Plan." The Thawing Plan shall be prepared prior to the issuance of any demolition permits for the North Site, and shall be reviewed and approved by the Department of City Planning, Office of Historic Resources.

**CUL-MM-4: Structural Analysis.** Once the thawing process of the LACS Building is complete, and prior to the issuance of any demolition permits for the North Site, the Applicant shall retain a qualified structural engineer to conduct the appropriate "Structural Analysis" to determine whether the West Volume of the LACS Building can be retained, rehabilitated, and adaptively reused as part of the Project. The structural engineer shall meet the Secretary of the Interior's Historic Preservation Professional Standards in Engineering and shall have specific expertise in the evaluation of historical resources. The methodology for the Structural Analysis shall be reviewed and approved by the Department of City Planning, Office of Historic Resources, and is to include the following tests:

- Compressive Strength of Concrete Test. The compressive strength of the structural concrete must be a minimum of 2,000 pounds per square inch (psi). A lower number might indicate damaged concrete due to freeze and thaw and increases the unreliability of the quality of concrete to support future loads for the new lifespan of the Project.

- Yield/Tensile Strength of Reinforcing Steel Test. The yield/tensile strength of the rebar must be a minimum 20,000 psi. A lower number might indicate excessive rusting of the reinforcing steel and increases the unreliability of the reinforcing steel to support future loads for the new lifespan of the Project.
- Foundation/Soil Sampling. The soil bearing capacity must be a minimum of 1,500 pounds per square foot (psf). A lower number might indicate erosion of the soil due to freeze and thaw and would be unsuitable to support future loads for the new lifespan of the Project due to excessive settlement.

The results of the Structural Analysis shall be submitted for review and approval by the Department of City Planning, Office of Historic Resources and the Los Angeles Department of Building and Safety. A qualified structural engineer shall make a determination on the potential for the West Volume of the LACS Building to be retained and rehabilitated based on the results of the Structural Analysis testing. If, as determined by a qualified structural engineer, the Structural Analysis demonstrates that the strength of concrete, strength of reinforcing steel, or the foundation/soil sampling tests do not meet the required thresholds as outlined above and therefore the West Volume of the LACS Building would be unreliable to support future loads for the lifespan of the Project; or, if it is determined that the West Volume of the LACS Building meets the definition of a “Hazardous Building” as specified in LAMC Division 89, Section 91.8902, the Applicant may apply for and receive a demolition permit for the West Volume of the LACS Building.

If the Structural Analysis, as approved by the Department of City Planning, Office of Historic Resources and the Los Angeles Department of Building and Safety, demonstrates that the West Volume of the LACS Building is structurally sound for human occupancy, it shall be retained, rehabilitated, and adaptively reused as part of the Project.

The following recommended mitigation measures would apply only if the West Volume of the LACS Building is to be retained:

**CUL-MM-5: Historic Architect.** If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, the Applicant shall retain a historic architect who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Historic Architecture. The historic architect shall prepare the Historic Structure Report and Mothballing Plan as specified; shall review the proposed plans for the rehabilitation and adaptive reuse of the West Volume of the LACS Building to ensure the appropriate treatment of the significant character-defining features of the West Volume of the LACS Building; and shall be responsible for overseeing the implementation of the proposed plans for the rehabilitation and adaptive reuse related to historical resources on behalf of the Applicant.

**CUL-MM-6: Historic Structure Report.** If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, in order to provide adequate documentation to guide the rehabilitation of the West Volume of

the LACS Building, a Historic Structure Report (“HSR”) shall be prepared for the West Volume of the LACS Building. The HSR shall be prepared in conformance with the National Park Service’s *Preservation Brief 43: The Preparation and Use of Historic Structures Reports*.<sup>3</sup> The HSR shall provide complete documentary, graphic, and physical information about both the history and existing condition of the West Volume of the LACS Building. In addition, the report shall include appropriate methods for treatment of the West Volume, which would be retained and rehabilitated as part of the Project, outline a recommended scope of work, and provide information and recommendations for further treatment. The HSR shall be prepared by a qualified historic architect who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Historic Architecture. The HSR shall be reviewed and approved by the Department of City Planning, Office of Historic Resources.

**CUL-MM-7: Mothballing Plan.** If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, because the Project is proposed to be undertaken in phases, in order to protect the West Volume of the LACS Building until it is rehabilitated as part of the Project, a Mothballing Plan shall be prepared and implemented for the West Volume of the LACS Building. The Mothballing Plan shall be prepared in conformance with the National Park Service’s *Preservation Brief 31: Mothballing Historic Buildings*.<sup>4</sup> The Mothballing Plan shall outline the steps required to temporarily protect the West Volume of the LACS Building from damage or deterioration and shall be updated after five years. The Mothballing Plan shall be prepared by a qualified historic architect who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Historic Architecture. The Mothballing Plan shall be reviewed and approved by the Department of City Planning, Office of Historic Resources.

**CUL-MM-8: Protection Plan.** If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, prior to issuance of a grading permit, a structural engineer who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Engineering shall prepare a “Protection Plan” to ensure that the West Volume of the LACS Building is properly protected from potential damage resulting from demolition, excavation, and construction procedures on the Project Site, including an appropriate shoring plan to mitigate the possibility of settlement due to the removal of adjacent soil. The Protection Plan shall be reviewed by a historic architect who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Historic Architecture, and approved by the Department of City Planning, Office of Historic Resources.

---

<sup>3</sup> U.S. Department of the Interior, National Park Service. “Preservation Brief 43: The Preparation and Use of Historic Structures Reports,” 2005.

<sup>4</sup> U.S. Department of the Interior, National Park Service, “Preservation Brief 31: Mothballing Historic Buildings,” 1993.

**CUL-MM-9:** Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for professional archaeology (qualified Archaeologist) to carry out and ensure proper implementation of mitigation measures that address archaeological resources. The Applicant shall submit a letter of retention to the City of Los Angeles Department of City Planning (City) before construction activities commence to demonstrate to the City that the Applicant has retained a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards. The letter shall include a resume for the qualified Archaeologist.

The qualified Archaeologist shall oversee an archaeological monitor who has a bachelor's degree in a relevant field of study and either two months of archaeological construction monitoring experience or two months of supervised training with prehistoric or historic archaeological materials in a field or laboratory setting. The archaeological monitor shall be present during construction activities on the Project Site deemed by the qualified Archeologist to have the potential for encountering archeological resources, such as demolition, pavement removal, clearing/grubbing, drilling/auguring, potholing, grading, trenching, excavation, tree removal, or other ground disturbing activity associated with the Project. The activities to be monitored may also include off-site improvements in the vicinity of the Project Site, such as utilities, sidewalks, or road improvements. The archeological monitor shall have the authority to reasonably direct the pace of construction equipment activity in areas reasonably expected to be of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of archaeological resources in coordination with the qualified Archaeologist. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the qualified Archaeologist.

**CUL-MM-10:** Prior to commencement of construction activities, a Sensitivity Training shall be given by the qualified Archaeologist for construction personnel. The training shall focus on how to identify archaeological resources that may be encountered during construction activities, and the procedures to be followed in such an event. Within five days of completing the training, a list of those in attendance shall be provided by the qualified Archaeologist to the Applicant. The Applicant shall maintain the documentation of this training, including the list of attendees, for inspection by the City upon its reasonable request.

**CUL-MM-11:** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the archaeological monitor in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the



discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue until the evaluation is completed. Work shall be allowed to continue outside of the buffer area.

All resources unearthed by Project construction activities shall be evaluated by the qualified Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resource. The treatment plan established for the resource shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified Archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.

**CUL-MM-12:** Within 14 days of concluding the archaeological monitoring, the qualified Archaeologist shall prepare a memorandum stating that the archaeological monitoring requirement of the mitigation measure has been fulfilled and summarize the results of any archaeological finds. The memorandum shall be submitted to the Applicant and City. Following submittal of the memorandum, the qualified Archaeologist shall prepare a technical report that follows the format and content guidelines provided in California Office of Historic Preservation’s Archaeological Resource Management Reports (ARMR). The technical report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. Appropriate California Department of Parks and Recreation Site Forms (Site Forms) shall also be prepared and provided in an appendix to the report. The technical report shall be submitted to the City within 150 days of completion of the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.

### (3) Geology and Soils

**PALEO-MM-1:** Prior to the issuance of demolition permits, the Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall

attend the Project kick-off meeting to go over the monitoring requirements, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.

**PALEO-MM-2:** Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments that exceed 10 feet in depth. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist. If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school or historical society in the area for educational purposes.

**PALEO-MM-3:** Any significant fossils recovered during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository. The Qualified Paleontologist shall prepare a final report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City and the Natural History Museum of Los Angeles County to signify the satisfactory completion of the Project and required mitigation measures.

## (4) Noise and Vibration

### (a) Construction Noise

**NOI-MM-1: Temporary Noise Barriers.** Temporary noise barriers shall be used along the western, northern, southern, and eastern property boundaries to block the line-of-sight between the construction equipment and the noise-sensitive uses.

- Temporary noise barriers shall be placed along the Project's North site eastern property line. The noise barrier shall be a minimum of eight feet in height and provide a minimum 3-dBA noise reduction at the ground-level for the residences to the east (receptor location R2).
- Temporary noise barriers shall be placed along the Project's Upper South site and West site northern property lines. The noise barriers shall be a minimum of 12 feet in height and provide a minimum 12-dBA noise reduction at the ground-level for the hotel uses to the north/northwest of the Upper South site and West site (receptor locations R5 and R6) and to the residential uses to the east of the Upper South site (receptor location R2).
- Temporary noise barriers shall be placed along the Project's Upper South site and Lower South site eastern property line. The noise barriers shall be a minimum of 12 feet in height and provide a minimum 12-dBA noise reduction at the ground-level for the residences to the east of the Upper South site and Lower South site (receptor location R2).
- Temporary noise barriers shall be placed along the Project's North site, Upper South site, Lower South site, and West site western property lines. The noise barriers shall be a minimum of 12 feet in height and provide a minimum 13-dBA noise reduction at the ground-level for the residences and hotel uses to the west (receptor locations R3 through R6).
- Temporary noise barriers shall be placed along the Project's West site and Lower South site southern property line. The noise barrier shall be a minimum of 12 feet in height and provide a minimum 13-dBA noise reduction at the ground-level for the residential and hotel uses to the south of the West site and Lower South site (receptor locations R3 and R4).

These noise barriers shall be in-place during early Project construction phases (remain up to the start of building framing) and during paving when heavy equipment is used. Temporary barriers shall provide acoustically sealed gate access as needed for construction activities, deliveries, and site access by construction personnel.

**NOI-MM-2: Compressors and Generators.** Construction equipment whose specific location on the Project Site may be flexible (e.g., compressors and generators) shall be located at least 100 feet away from the nearest off-site sensitive land uses, or barriers (e.g., intervening construction trailers, walls, enclosures, etc.) shall be used to screen propagation of noise from such equipment towards these land uses.

**NOI-MM-3: Construction Equipment Muffling and Shielding Devices.** The Project contractor shall use power construction equipment with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. Flexible sound control curtains shall be placed around all stationary compressors and generators, drilling apparatuses, drill rigs, and jackhammers when in use. The flexible sound control curtains shall have a minimum Sound Transmission Class (STC) rating of 25.

**NOI-MM-4: Foundation Concrete Trucks.** Contractors shall include in all concrete truck contracts used during the foundation pouring phase of construction a requirement for trucks traveling to and from the Project Site to prohibit travel on Central Avenue between 1st Street and 2nd Street, Central Avenue between 2nd Street and 3rd Street, and 4th Street between Alameda Street and Hewitt Street during the Project's foundation concrete pouring duration. The construction contractor shall provide a flag person along the segments identified above to ensure that all concrete trucks do not travel along the identified segments.

*(b) Operation Noise*

**NOI-MM-5: Amplified Speakers – Special Events.** Outdoor amplified sound systems, if any, will be limited to a sound level equivalent to 90 dBA ( $L_{eq-1hr}$ ) measured at a distance of 25 feet from the amplified speaker sound system during special events occurring at the Central Courtyard or Pop-Up Plaza. A qualified noise consultant shall provide written documentation that the design of the system complies with the maximum noise level. Compliance will be ensured through pre-performance noise tests/measurements for performances or ambient music speakers with potential to exceed the sound level, along with any necessary adjustments to the location and nature of proposed performances or ambient music speakers. Speakers will be downward or inward facing and shielded from off-site sensitive uses. The Applicant or Operator shall prepare standard operating procedures for the use of amplified speakers at this location consistent with this requirement. The standard operating procedures shall be provided to the City and the Los Angeles Police Department (LAPD) prior to the issuance of a special event permit for the Project and posted on-site in the event of LAPD response to noise complaints.

*(c) Construction Vibration*

**NOI-MM-6: Construction Vibration (Except Shoring).** The operation of construction equipment that generates high levels of vibration, such as large bulldozers, loaded trucks, jackhammers, and small bulldozers shall be prohibited within 15 feet, 14 feet, eight feet, and two feet, respectively, of receptor V3 (commercial buildings to the south, west, and southwest of Project's West site). The contractor(s) shall require and document compliance with the minimum allowable setbacks in a construction vibration management plan, which shall be provided to the City prior to issuance of a demolition permit. The construction vibration management plan shall detail the specific types of equipment to be used during demolition, grading, and building construction, estimated vibration

velocities, and distance to vibration receptor V3. Equipment and or alternative construction techniques to be used within the required setbacks for large bulldozers, loaded trucks, jackhammers, and small bulldozers shall be identified to ensure that vibration velocities will not exceed thresholds for potential structural damage. This measure does not apply to temporary shoring activities and shoring infrastructure that must be installed to provide adequate physical support for subterranean excavation.

**NOI-MM-7: Inspections.** Prior to the issuance of a demolition or building permit, the Applicant shall retain the services of a third-party licensed building inspector or structural engineer to inspect and document (video and/or photographic) vibration receptor V3 (Commercial buildings to the south, west, and southwest of Project's West site) for the physical condition of the building's readily-visible features. Daily inspections shall occur when construction activities involving vibration-generating equipment such as bulldozers, jackhammers, loaded trucks, and drill rigs are used at 15 feet, 14 feet, eight feet, and two feet, respectively of V3. In the event that unanticipated or unexpected damage occurs due to construction vibration at receptor location V3's older structure based on assessment by the third-party inspector or engineer, the Applicant/or the Applicants designated representative, shall arrange for repairs during the construction phase. Such repairs, if needed shall be undertaken by a contractor licensed by the State of California to conduct commercial building repairs.

#### (5) Public Services – Fire Protection

**PS-MM-1:** Prior to building occupancy, the Project shall implement the following improvements as shown in Exhibit 2 of the Infrastructure Report prepared for the Project by KPFF Consulting Engineers, dated May 2023: 1) upgrade approximately 110 linear feet of the existing six-inch line in 4th Street to an eight-inch line; 2) Relocate the hydrant (FH 16418) to the north due to the proposed 4th Street dedication and reconnect it to the upsized eight-inch line; and 3) Reconnect the hydrant (FH 9377) on the south to the upsized eight-inch line.

#### (6) Tribal Cultural Resources

**TCR-MM-1:** Prior to the issuance of a demolition permit, the Applicant shall retain a Native American Monitor from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe) who shall be present during construction activities deemed by the Native American Monitor to have the potential for encountering tribal cultural resources, such as demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project. The activities to be monitored may also include off-site improvements in the vicinity of the Project Site, such as utilities, sidewalks, or road improvements. A monitoring agreement between the Applicant and Kizh Nation shall be prepared that outlines the roles and responsibilities of the Native American Monitor and shall be submitted to the City prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. A

qualified Archaeologist, along with a Native American Monitor (if available), shall also provide Sensitivity Training to construction personnel as required by Mitigation Measure CUL-MM-10.

The Native American Monitor, in coordination with the qualified Archaeologist and archaeological monitor as identified in Mitigation Measure CUL-MM-9, shall have the authority to direct the pace of construction equipment activity in areas of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of tribal cultural resources. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the Applicant or Lead Agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project Site or in connection with the Project are complete; or (2) a determination and written notification by the Kizh Nation to the Project Applicant/Lead Agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact tribal cultural resources.

**TCR-MM-2:** The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Gabrieleño Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Project Applicant/Lead Agency upon written request to the Gabrieleño Tribe. The Applicant shall not be deemed to be out of compliance with this measure if the Native American Monitor fails to complete or submit any such monitoring logs.

**TCR-MM-3:** In the event that prehistoric/Native American (e.g., hearths, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Native American Monitor and archaeological monitor in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making and evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the qualified Archaeologist, the Gabrieleño Tribe, and the

City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City of Los Angeles determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, a treatment plan shall be developed by the Gabrieleño Tribe, with input from the qualified Archaeologist as necessary, and with the concurrence of the City's Planning Director. The treatment measures in the treatment plan shall be implemented prior to construction work continuing in the buffer around the find. The preferred treatment is avoidance, but if not feasible may include, but would not be limited to, capping in place, excavation and removal of the resource and follow-up laboratory processing and analysis, interpretive displays, sensitive area signage, or other mutually agreed upon measures. The treatment plan shall also include measures regarding the curation of the recovered resources. The recovered prehistoric or Native American resources may be placed in the custody of the Gabrieleño Tribe who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Gabrieleño Tribe nor institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

This page intentionally left blank