

Appendices



Appendix FEIR-1

Draft EIR Comment Letters





EDMUND G. BROWN JR.
GOVERNOR December 18, 2017

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Peter Burgis
Los Angeles County
500 w. Temple Street, Room 754
Los Angeles, CA 90012

Subject: LACMA Building for the Permanent Collection
SCH#: 2016081014

Dear Peter Burgis:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 15, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

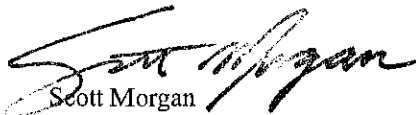
Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,


Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2016081014
Project Title LACMA Building for the Permanent Collection
Lead Agency Los Angeles County

Type EIR Draft EIR
Description Note: Review Per Lead

Museum Associates proposes the LACMA Building for the Permanent Collection (the Museum Building) within the eastern portion of the LACMA Campus (LACMA East) and the adjacent property owned by Museum Associates on the south side of Wilshire Blvd. at the corner of Wilshire Blvd. and Spaulding Ave. The Museum Building would comprise one building of approx. 387,500 gross sq. ft. and would replace four buildings within LACMA East collectively comprising approx. 392,871 gross sq. ft. Overall, the Museum Building would result in a decrease in the sq. footage of museum buildings by approx. 24,571 sq. ft. and a reduction in the maximum theater size from 600 seats to 300 seats. A new parking facility providing approx. 260 parking spaces is also proposed on the Ogden Lot.

Lead Agency Contact

Name Peter Burgis
Agency Los Angeles County
Phone 213-974-1417 **Fax**
email
Address 500 w. Temple Street, Room 754
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long 34° 03' 48.04" N / 118° 21' 29.35" W
Cross Streets Wilshire Blvd./ Spaulding Ave./Ogden Dr.
Parcel No. 5508016901; 5089011154, 5086010032
Township **Range** **Section** **Base**

Proximity to:

Highways I-10
Airports
Railways
Waterways
Schools Fairfax HS, Shalhevet HS, Hancock Park ES, Carthay Center ES
Land Use Museum and Parking / PF, [Q]C4-2-CDO, R3-1, [Q]C2-1-CDO / Public Facilities and Regional Commercial

Project Issues Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual; Tribal Cultural Resources

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Resources, Recycling and Recovery; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 10/26/2017 **Start of Review** 10/26/2017 **End of Review** 12/15/2017

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
www.dot.ca.gov

clear 12/15/2017
E



Governor's Office of Planning & Research
*Serious drought!
Making Conservation
California Way of Life.*

December 15, 2017

Peter Burgis
County of Los Angeles
500 West Temple Street, Room 754
Los Angeles, CA 90012

DEC 15 2017
STATE CLEARINGHOUSE

RE: LACMA Building for
Permanent Collection
Vic: LA-10 / PM: 9.979
GTS# 07-LA-2016-01193
SCH# 2016081014

Dear Mr. Burgis,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project proposes the LACMA Building for the Permanent Collection within the eastern portion of the LACMA Campus, over a portion of Wilshire Boulevard, and within the adjacent property owned by Museum Associates. A new parking facility providing approximately 260 parking spaces is also proposed.

Upon reviewing the Draft Environmental Impact Report (DEIR), Caltrans has the following comments:

State-level policy goals related to sustainable transportation seek to reduce the number of trips made by driving, reduce greenhouse gas emissions, and encourage alternative modes of travel. Caltrans' Strategic Management Plan has set targets of tripling trips made by bicycling and doubling trips made by walking and public transit by 2020. The Strategic Plan also seeks to achieve a 15% reduction in statewide per capita vehicle miles traveled by 2020. Similar ambitious goals are embedded in Caltrans' 2040 Transportation Plan, and Southern California Association of Governments' Regional Transportation Plan. Statewide legislation such as AB 32 and SB 375, as well as Executive Orders S-3-05 and B-16-12, echo the need to pursue more sustainable development. Such climate change goals can only be achieved through support from local partners.

Research on parking suggests that abundant car parking enables and encourages driving. While it may not be possible to reduce parking associated with the project, in order to promote public transit and reduce vehicle miles traveled it may be possible to implement Transportation Demand Management (TDM) improvement measures as part of the project. Measures can include providing plentiful and convenient bicycle parking as well as providing incentives for transit use among employees and visitors alike. Such measures can also help ensure the project is actively consistent with efforts to reduce vehicle trips, transportation-related GHG emissions while promoting public

Mr. Peter Burgis
December 15, 2017
Page 2

transit along transit corridors such as Wilshire Boulevard.

Note that project objectives include transportation-related elements such as: maximizing use of existing and future mass transit infrastructure; and improving the pedestrian environment and engage Wilshire Boulevard. Caltrans supports such objectives and encourages efforts to promote public transit and active transportation. The DEIR states bicycle parking will be provided within an Ogden Parking Structure along with existing bicycle parking on-site. Any new bicycle parking should be safe, pleasant, and convenient in order to promote bicycle use and make for a meaningful addition.

As a reminder, be aware any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. Also, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. The project needs to be designed to discharge clean run-off water.

If you have questions regarding these comments, contact project coordinator Severin Martinez at (213)-897-0067 or severin.martinez@dot.ca.gov and refer to GTS# 07-LA-2016-01193.

Sincerely,



MIYA EDMONSON
Acting IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

From: Martinez, Severin@DOT [mailto:Severin.Martinez@dot.ca.gov]
Sent: Friday, December 15, 2017 4:06 PM
To: Peter Burgis
Subject: Comments on LACMA Building for Permanent Collection: SCH# 2016081014

Dear Mr. Burgis,

Thank for accepting comments from Caltrans regarding the above referenced project, we appreciate it. Our comments will be sent to the County and State Clearinghouse. Attached is a .pdf copy for your review.

Thanks again and have a nice weekend,

Severin

Severin Martinez

Transportation Planner
Local Development/Intergovernmental Review Branch
Caltrans District 7
(213)-897-0067

DEPARTMENT OF TRANSPORTATION

DISTRICT 7-OFFICE OF REGIONAL PLANNING

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 897-0067

FAX (213) 897-1337

www.dot.ca.gov



*Serious drought!
Making Conservation
a California Way of Life.*

December 15, 2017

Peter Burgis

County of Los Angeles

500 West Temple Street, Room 754

Los Angeles, CA 90012

RE: LACMA Building for

Permanent Collection

Vic: LA-10 / PM: 9.979

GTS# 07-LA-2016-01193

SCH# 2016081014

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Mr. Peter Burgis
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If you have questions regarding these comments, contact project coordinator Severin Martinez at (213)-897-0067 or severin.martinez@dot.ca.gov and refer to GTS# 07-LA-2016-01193.

Sincerely,



MIYA EDMONSON
Acting IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

From: Williams, Marquis [mailto:WilliamsMar@metro.net]
Sent: Friday, December 15, 2017 4:03 PM
To: Peter Burgis
Cc: Hull, Derek
Subject: Metro Comment Letter - LACMA Building for the Permanent Collection NOA

Hi Peter,

Thank you for the opportunity to comment on the LACMA Building DEIR. Per our phone conversation, Metro will submit a comment letter for this project no later than close of business Tuesday, December 19. I appreciate your consideration.

Best,

Marquis Williams

LA Metro
Transportation Associate
Countywide Planning & Development, Joint Development
213.922.3729
metro.net | facebook.com/losangelesmetro | @metrolosangeles
Metro provides excellence in service and support.

From: Williams, Marquis [<mailto:WilliamsMar@metro.net>]
Sent: Friday, December 15, 2017 5:03 PM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Cc: Hull, Derek <HullD@metro.net>
Subject: LACMA Building for the Permanent Collection - Metro Comment Letter

Dear Mr. Burgis,

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the LACMA Building for the Permanent Collection located at 5905 Wilshire Boulevard in the City of Los Angeles. Please find Metro's comment letter and related documents attached. If you have any questions, please contact Derek Hull (copied) or me.

Best,

Marquis Williams

LA Metro

Transportation Associate

Countywide Planning & Development, Joint Development

213.922.3729

metro.net | [facebook.com/losangelesmetro](https://www.facebook.com/losangelesmetro) | [@metrolosangeles](https://twitter.com/metrolosangeles)

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Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

December 15, 2017

Peter Burgis, Capital Projects
Chief Executive Office
County of Los Angeles
500 West Temple Street, Room 754
Los Angeles, CA 90012

RE: LACMA Building for the Permanent Collection – 5905 Wilshire Boulevard – Notice of Completion and Availability of a Draft Environmental Impact Report

Dear Mr. Burgis:

Thank you for the opportunity to comment on the Notice of Completion and Availability of a Draft Environmental Impact Report for the LACMA Building for the Permanent Collection Project located at 5905 Wilshire Boulevard in the City of Los Angeles. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Description

The project would consist of one new museum building of approximately 368,300 gross square feet (Museum Building) and a new parking facility referred to as the Ogden Parking Structure. The Museum Building would replace four existing LACMA buildings collectively comprising of approximately 392,871 gross square feet: the Ahmanson building, the Hammer Building, the Art of the Americas Building, and the Bing Theater (which currently provides 600 seats). Overall, the proposed Museum Building would result in a decrease in the square footage of the existing museum buildings by approximately 24,571 square feet and a reduction in the theater size from 600 to 300 seats. The Museum Building is proposed to consist of eight semi-transparent Pavilions that would support an elevated, continuous, transparent main gallery level and extend over Wilshire Boulevard. The design of the Museum Building would include outdoor landscaped plazas, public programming and educational spaces, sculpture gardens, and native and drought tolerant vegetation. The Ogden Parking Structure would be developed southwest of the intersection of Ogden Drive and Wilshire Boulevard on

continuous parcels. The Ogden Parking structure would replace an existing surface parking lot and provide the same number of spaces.

Metro Comments

Bus Stop Adjacency

Metro Bus Lines 20 and 720 operate on Wilshire Boulevard, adjacent to the proposed Project. One Metro bus stop on the corner of Wilshire Boulevard and Spaulding Avenue is directly adjacent to the proposed Project. The following comments relate to bus operations and the bus stop:

1. Although the Project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final Project.
2. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.
3. Metro encourages the installation of bus shelters with benches, way finding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access transit stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site.
4. Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
5. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

Purple Line Extension (PLE) Adjacency

Metro requests that because of the close proximity to the PLE, the project sponsor considers the following:

1. The project sponsor should be advised that upon completion, the Metro Purple Line Extension (formerly known as the Westside Subway Extension) will operate peak service as often as every four minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the tunnel below the proposed project.
2. When the planned building crosses Wilshire, between Stanley and Spaulding, any building structural supports in the center of Wilshire or at the curb lines could impact the existing/future tunnels. Metro requires that neither temporary Support of Excavation elements, nor permanent load bearing elements of the newly constructed building(s) and/or overpasses would impose any "surcharge loads" (side or vertical whatsoever) on the in place tunnel

- concrete lining. Any needed load analysis is to be conducted by the Project and coordinated with Metro.
3. Metro encourages the Project sponsor to consider the inclusion of a second entrance/knockout panel at the Wilshire/Fairfax Station to any future LACMA development projects. To provide guidance on this matter, Metro has attached the Board Report from April 2012 with the approved defined scope of the Wilshire/Fairfax Station. It was anticipated that the second entrance would be located on the north side of Wilshire, across from the Orange Grove entrance.
4. The planned parking structure south of Wilshire on the west side of Ogden is currently part of the WPLE Section 1 Fairfax Station construction staging area (that runs westerly to Orange Grove Ave) and property is being used by Metro under a Temporary Construction Easement (TCE) from LACMA. Any premature loss of this staging area prior to the turnover date indicated in the C1045 Contract (1/10/23) would have a major impact to the C1045 Contractor's ability to complete/open the station on time.
5. Considering the proximity of the proposed project to the subway tunnel, the Metro Purple Line will produce noise and vibration that may be perceptible within the proposed project. A recorded Noise and Vibration Easement Deed in favor of Metro is required, a form of which is attached. The easement recorded in the Deed will extend to successors and tenants as well. In addition, any noise or vibration mitigation required for the project will be borne by the developers of the project and not Metro.
6. Neither Metro nor its contractors have continuing, ongoing responsibility to reduce or avoid impacts, other than what is specified in the Final Environmental Impact Report/Environmental Impact Statement for the Westside Subway Extension. For additional information regarding this project please visit: <http://www.metro.net/projects/westside/>. The FIER can be accessed from the following link: <http://www.metro.net/projects/westside/final-eis-eir/>
7. The construction and operation of the proposed project must not disrupt the operation and maintenance activities of the Metro Purple Line or the structural and systems integrity of Metro's Purple Line subway tunnels.
8. Consistent with ZI No. 1117, prior to the City issuing a building permit within 100 feet of the Metro Rail construction area, clearance shall be obtained from Metro. Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations. Please refer to the attached Metro "Design Criteria and Standards, Volume III - Adjacent Construction Design Manual" for more details regarding submitting drawings and calculations to Metro for review. Please note that Metro requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed building to Metro's existing structures.
9. Metro staff shall be permitted to monitor construction activity to ascertain any impact to the subway tunnel.
10. The project sponsor should be advised that Metro may request reimbursement for costs incurred as a result of project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure.

11. The project sponsor will be required to notify Metro of any changes to the construction/building plans that may or may not impact the subway tunnel.
12. Aspet Davidian, Director, Project Engineering Facilities, should be contacted at 213-922-5258 regarding the project's potential impacts on Metro's Purple Line station and tunnels.
13. Metro is requesting that the Project utilize the CLA TCTMC group, where in the Project is then required to submit their traffic control plans to Metro to determine if there are any potential conflicts with the PLE Project. If for some reason the Project is given permission from the CLA to not use the TCTMC, then Metro requires that the Project share their TCP's with Metro prior to implementation, so Metro can review for any potential traffic control conflicts.
14. Metro requires the Project to provide to Metro all of the proposed tie-ins for their new utility services. This will allow Metro to check for any impacts to the PLE Project and to have for future reference.
15. Please be advised that the Purple Line Extension makes use of construction staging sites as an integral part of Metro's project operations. Construction staging areas along the MPLA PLE route include:
 - the Northeast corner of Wilshire Blvd/Manhattan Pl
 - the Southwest corner of Wilshire Blvd/Crenshaw Blvd
 - the Northwest and Southwest corners of Wilshire Blvd/La Brea Blvd
 - the Northwest corner of Wilshire Blvd/Fairfax Ave
 - the South side of Wilshire Blvd between Orange Grove Ave and Ogden Dr
 - the Northeast corner of Wilshire Blvd/La Cienega Blvd
 - the Northwest corner of Wilshire Blvd/Gale Dr

These areas will be in use until 2023 and the project sponsor should take appropriate measures to soundproof windows and walls facing the laydown area and to inform residents of that use.

16. Please contact the PLE Project Director David Mieger for further coordination regarding construction. Mr. Mieger can be reached at 213-922-3040 or miegerd@metro.net. Information about the PLE Project can also be found on the Metro website at <http://www.metro.net/projects/westside/>.

Transit Orientation

Considering the proximity to transit, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of the developments. Metro encourages the City and Project sponsor to be mindful of the Project's proximity to transit, including orienting pedestrian pathways toward the stops.

2. Metro would like to inform the Project sponsor of Metro's employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Business Transit Access Pass (B-TAP) programs which offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Devon Deming at 213-922-7957 or DemingD@metro.net.
3. Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities or parking benefit districts. These strategies could be pursued to encourage more transit-oriented development and reduce automobile-orientation in design and travel demand.
4. With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the station including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.
5. The Project should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting stations with housing and employment concentrations. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at:
http://media.metro.net/docs/sustainability_path_design_guidelines.pdf
6. Metro encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along the primary building frontage to improve pedestrian safety and comfort to access the nearby bus stops. The City should consider requesting the installation of such amenities as part of the development of the site.

Active Transportation

Metro encourages the Project to promote bicycle use through adequate short-term bicycle parking, such as ground level bicycle racks, as well as secure and enclosed long-term bicycle parking for guests and employees. The Project applicant should coordinate with Metro Bike Share program for potential Bike Share station at this development. Additionally, the applicant should help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations such as the future Wilshire/Fairfax Station. The project is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation.

Congestion Management Program

Beyond impacts to Metro facilities and operations, Metro must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County," Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Derek Hull at 213-922-3051 or by email at DevReview@metro.net.

Sincerely,



Derek Hull
Manager, Transportation Planning

Attachments: Noise Easement Deed
 Adjacent Construction Design Manual
 CMP Appendix D: Guidelines for CMP Transportation Impact Analysis
 Metro Board Report: Westside Subway Extension April 18, 2012

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY
Real Estate Department
Deputy Executive Officer - Real Estate
P: 213-922-2415 F: 213-922-2400
One Gateway Plaza, Mail Stop 99-18-4
Los Angeles, CA 90012-2932

Space Above Line for Recorder's Use

[Recordation of this Public Document is Exempt from all Recording Fees and Taxes Pursuant to
Government Code Section 6103]

Public Agency - No Tax Statement

NOISE EASEMENT DEED

For valuable consideration, receipt of which is hereby acknowledged, **(Name of Owner)**, a
_____, for themselves, their heirs, administrators, executors,
successors, assigns, tenants, and lessees do hereby grant, bargain, sell, and convey to the
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY, a public
agency existing under the authority of the laws of the State of California ("Grantee"), its
successors and assigns, for the use and benefit of the public and its employees, a perpetual,
assignable easement in that certain real property in the City of Los Angeles, County of Los
Angeles, State of California described in Exhibit "A" attached hereto and incorporated herein by
this reference,

Said easement shall encompass and cover the entirety of the Grantors' Property
having the same boundaries as the described Property and extending from the sub-
surface upwards to the limits of the atmosphere of the earth, the right to cause in said
easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic
disturbances, and all other effects that may be caused or may have been caused by
the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit
or action of any purpose, including or not limited to, property damage or personal
injuries, against Grantee, its successors and assigns, for any necessary operating and
maintenance activities and changes related to the Project which may conflict with
Grantors' use of Grantors' property for residential and other purposes, and Grantors
hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors' right to further modify or
develop the Property for any permitted use. However, Grantor's rights of development shall
not interfere with the continued operation of Grantee's Project.

It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, assigns, tenants and lessees of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of _____, 20____

By: _____
Name

By: _____
Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of _____)

On _____ before me, _____
Date Here Insert Name and Title of the Officer

personally appeared _____
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____ Document Date: _____
Number of Pages: _____ Signer(s) Other Than Named Above: _____

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Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Grant Deed from _____, a **California Limited Partnership**, ("Grantor") to **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

Dated this ____ day of _____, 20__

By: _____
Velma C. Marshall
Deputy Executive Officer - Real Estate

ADJACENT CONSTRUCTION DESIGN MANUAL

1.0 INTRODUCTION

- 1.1 Parties planning construction over, under or adjacent to a Metropolitan Transportation Authority (MTA) facilities or structures are advised to submit for review ~~seven (7)~~ **two (2) hard** copies **and one (1) electronic copy** of their **design** drawings and ~~four (4) copies of their calculations~~ showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.
- 1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments (~~usually includes Construction, Operations, Maintenance, and Real Estate~~) **for MTA departments review**. Parties shall be responsible for all costs related to ~~MTA drawing reviews by MTA~~. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:
- A. Site Plan
 - B. Drainage Area Maps and Drainage Calculations
 - C. Architectural drawings
 - D. Structural drawings and calculations
 - E. Civil Drawings
 - F. Utility Drawings
 - G. Sections showing Foundations and MTA Structures
 - H. Column Load Tables
 - I. Pertinent Drawings and calculations detailing an impact on MTA facilities
 - J. A copy of the Geotechnical Report.
 - K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.
 - L. Drawings and calculations should be sent to:
MTA Third Party Administration (Permits Administration)
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

- 1.3 If uncertainty exists on the possible impacts a project may have on the MTA facilities, and before submitting a formal letter requesting a review of a construction project adjacent to the Metro System, the party or his agent may contact the MTA Third Party Administrator (Permits). The Party shall review the complexity of the project, and **contact MTA to** receive an informal evaluation of the amount of detail required for the MTA review. In those cases, whereby it appears the project will present no risk to MTA, the Third Party Administrator (Permits) shall immediately route the design documents to **Engineering**, Construction, Operations, Maintenance, and Real Estate departments for a preliminary evaluation. If it is then confirmed that MTA risk is not present, the Administrator shall process an approval letter to the party.
- 1.4 A period of 30 working days should be allowed for review of the drawings and calculations. Thirty (30) work days should be allowed for each successive review as required. It is noted that preliminary evaluations are usually produced within 5 working days.
- 1.5 The party shall reimburse the MTA for any technical review or support services costs incurred that are associated with his/her request for access to the Metro **TransitRail** System
- 1.6 The following items must be completed before starting any construction:
- A. Each part of the project's design may be reviewed and approved by the MTA. The prime concern of the MTA is to determine the effect of the project on the MTA structure and its transit operations. A few of the other parts of a project to be considered are overhead protection, dust protection, dewatering, and temporary use of public space for construction activities.
 - B. Once the Party has received written acceptance of the design of a given project then the Party must notify MTA prior to the start of construction, in accordance with the terms of acceptance.
- 1.7 Qualified Seismic, Structural and Geotechnical Oversight
- The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

2.0 REVIEW PROCEDURE

- 2.1 All portions of any proposed design that will have a direct impact on an MTA facility or structure will be reviewed to assure that the MTA facility or structure is not placed in risk at any time, and that the design meets all applicable codes and criteria. Any portion of the proposed design that is to form part of an MTA controlled area shall be designed to meet the MTA Design Criteria and Standards.
- 2.2 Permits, where required by the local jurisdiction, shall be the responsibility of the party. City of L.A. Dept. of Bldg. and Safety and the Bureau of Engineering permit review shall remain in effect. Party shall refer to MTA Third Party Administration policies and procedures, THD5 for additional information.
- 2.3 Monitoring of the temporary support of excavation structures for adjacent construction shall be required in all cases for excavations within the geotechnical zone of influence of MTA structures. The extent of the monitoring will vary from case to case.

- 2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tiltmeters, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.
- 2.5 The calculations submitted for review shall include the following:
- A. A concise statement of the problem and the purpose of the calculation.
 - B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.
 - C. References to articles, manuals and source material shall be furnished with the calculations.
 - D. Reference to pertinent codes and standards.
 - E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.
 - F. The source or derivation of all equations shall be shown where they are introduced into the calculations.
 - G. Numerical calculations shall clearly indicate type of measurement unit used.
 - H. Identify results and conclusions.
 - I. Calculations shall be neat, orderly, and legible.
- 2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:
- A. Program Name.
 - B. Program Abstract.
 - C. Program Purpose and Applications.
 - D. Complete descriptions of assumptions, capabilities and limitations.
 - E. Instructions for preparing problem data.
 - F. Instructions for problem execution.
 - G. List (and explanation) of program acronyms and error messages.
 - H. Description of deficiencies or uncorrected errors.
 - I. Description of output options and interpretations.
 - J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.
 - K. Computer printout of all supporting calculations.

- L. The "User's Manual" shall also include a certification section. The certification section shall describe the methods and how they cover the permitted options and uses of the program.
- 2.7 Drawings shall be drawn, to scale, showing the location and relationship of proposed adjacent construction to existing MTA structures at various stages of construction along the entire adjacent alignment. The stresses and deflections induced in the existing MTA structures should be provided.
- 2.8 The short-term and long-term effects of the new loading due to the adjacent construction on the MTA structures shall be provided. The soil parameters and other pertinent geotechnical criteria contained in existing contract documents for the affected structure, plus any additional conditions shall be used to analyze the existing MTA structures.
- 2.9 MTA structures shall be analyzed for differential pressure loadings transferred from the adjacent construction site.

3.0 MECHANICAL CRITERIA

- 3.1 Existing services to MTA facilities, including chilled water and condenser water piping, potable and fire water, storm and sanitary sewer, piping, are not to be used, interrupted nor disturbed without written approval of MTA.
- 3.2 Surface openings of ventilation shafts, emergency exits serving MTA underground facilities, and ventilation system openings of surface and elevated facilities are not to be blocked or restricted in any manner. Construction dust shall be prevented from entering MTA facilities.
- 3.3 Hot or foul air, fumes, smoke, steam, etc., from adjacent new or temporary facilities are not to be discharged within 40 feet of existing MTA ventilation system intake shafts, station entrances or portals. Tunnel ventilation shafts are both intake and discharge structures.
- 3.4 Clear access for the fire department to the MTA fire department connections shall be maintained at all times. Construction signs shall be provided to identify the location of MTA fire department connections. No interruption to fire protection water service will be permitted at any time.
- 3.5 Modifications to existing MTA mechanical systems and equipment, including ventilation shafts, required by new connections into the MTA System, shall only be permitted with prior review and approval by MTA. If changes are made to MTA property as built drawings shall be provided reflecting these changes.

At the option of MTA, the adjacent construction party shall be required to perform the field tests necessary to verify the adequacy of the modified system and the equipment performance. This verification shall be performed within an agreed time period jointly determined by MTA and the Party on a case by case basis. Where a modification is approved, the party shall be held responsible to maintain original operating capacity of the equipment and the system impacted by the modification.

4.0 OPERATIONAL REQUIREMENTS

4.1 GENERAL

- A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.
- B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:
1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.
 2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis, **with the approval of Construction Work Plan by MTA Construction Safety Department.**
 3. All cranes must be stored and secured facing away from energized tracks, when appropriate.
 4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity. **All members of the work crew will be required to attend MTA Safety Training.**
 5. **In order to provide a safe zone to maintain adjacent developments. All developments adjacent to Metro At-Grade Stations, Aerial Stations or Track Guideways shall provide a minimum 5 foot setback from the Metro and developer's shared property line to the outside face of the proposed structure at Metro or the developer's property for maintenance to be performed or installed from within the zone created by this setbacks.**

4.2 OVERHEAD PROTECTION - Station Entrances

- A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.
1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.
 2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the

shield shall be constructed and maintained watertight.

- B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.
- C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.
- D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:
 - 1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".
 - 2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.
 - 3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.
 - 4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.
- E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be constructed of four (4") inch thick Portland cement concrete or four (4") inches of asphaltic concrete placed **over a minimum four (4") inches of untreated base material**, and finished by a machine.

4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

- A. MTA Rail Operations Control Center shall be informed of any intent to work above, on, or under the MTA right-of-way. Crews shall be trained and special flagging operations shall be directed by MTA Rail Operations Control Center. The party shall provide competent persons to serve as Flaggers. These Flaggers shall be trained and certified by MTA Rail Operations prior to any work commencing. All costs incurred by MTA shall be paid by the party.
- B. A construction project that will require work over, under or adjacent to the at grade and aerial MTA right-of-way should be aware that the operation of machinery, construction of scaffolding or any operation hazardous to the operation of the MTA facility shall require that the work be done during non-revenue hours and authorized through the MTA Track Allocation process.
- C. MTA flagmen or inspectors from MTA Operations shall observe all augering, pile driving or other work that is judged to be hazardous. Costs associated with the flagman or inspector shall be borne by the Party.

- D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.-

4.4 OTHER METRO FACILITIES

- A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See Exhibit A for details.
- B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.
- C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.

- D. Isolation of MTA Facilities from Blast

Subsurface areas of new adjacent private buildings where the public has access or that cannot be guaranteed as a secure area, such as parking garages and commercial storage and warehousing, will be treated as areas of potential explosion. NFPA 130, Standard for Fixed Guideway Transit Systems, life safety separation criteria will be applied that assumes such spaces contain Class I flammable, or Class II or Class III Combustible liquids. For structural and other considerations, isolation for blast will be treated the same as seismic separation, and the more restrictive shall be applied.

- E. Any proposed facility that is located within 20 feet radius of an existing Metro facility will require a blast and explosion study and recommendations to be conducted by a specialist who is specialized in the area of blast force attenuation. This study must assess the effect that an explosion in the proposed non-Metro facility will have on the adjacent Metro facility and provide recommendations to prevent any catastrophic damage to the existing Metro facility. Metro must approve the qualifications of the proposed specialist prior to commencement of any work on this specialized study.

4.5 SAFETY REGULATIONS

- A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual (Part F) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required

- B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, (Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.
- C. Party and contractor personnel while within the operating MTA right-of-way shall coordinate all safety rules and procedures with MTA Rail Operations Control Center.
- D. When support functions and electrical power outages are required, the approval MUST be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

5.0 CORROSION

5.1 STRAY CURRENT PROTECTION

- A. Because stray currents may be present in the area of the project, the Party shall investigate the site for stray currents and provide the means for mitigation when warranted.
- B. Installers of facilities that will require a Cathodic Protection (CP) system must coordinate their CP proposals with MTA. Inquiries shall be routed to the Manager, Third Party Administration.
- C. The Party is responsible for damage caused by its contractors to MTA corrosion test facilities in public right-of-way.

End of Section

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
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REVISÉ
PLANNING AND PROGRAMMING COMMITTEE
APRIL 18, 2012

SUBJECT: WESTSIDE SUBWAY EXTENSION

**ACTION: APPROVE PROJECT DEFINITION, CERTIFY
FINAL ENVIRONMENTAL IMPACT STATEMENT/REPORT (FEIS/FEIR)
AND RELATED ACTIONS**

RECOMMENDATION

A. Approve the Project Definition for the Westside Subway Extension Project, which is based on the Locally Preferred Alternative (LPA) of a 9.0 mile Heavy Rail subway project previously designated by the Board in October 2010 and which incorporates several station, alignment and phasing refinements, including:

1. An Initial Construction Segment Interim Terminus extended from Wilshire/Fairfax to Wilshire/La Cienega, to be effectuated in the event that funding can only build less than the full 9-mile project;
2. Station locations and alignments for the westernmost three stations as follows:
 - a) Century City Station location under Constellation Boulevard at Avenue of the Stars with corresponding subway alignments between Beverly Hills and Westwood;
 - b) Westwood/UCLA Station under Wilshire Boulevard at Westwood Boulevard with corresponding subway alignment;
 - c) Westwood/Veterans Administration (VA) Hospital Station south of Wilshire Boulevard between the I-405 Freeway and Bonsall Avenue with corresponding subway alignment.

3. Station entrances and construction staging sites for the seven stations as follows:
 - a) Wilshire/La Brea Station entrance on the northwest corner with two construction staging sites on the north and south sides of Wilshire Boulevard between La Brea and Detroit Avenue;
 - b) Wilshire/Fairfax Station entrance on the southeast corner of Wilshire and Orange Grove Avenue ~~northwest corner (west of Johnie's)~~ with two construction staging sites on the northwest corner and on the south side of Wilshire Boulevard between Orange Grove and Ogden Drive;
 - c) Wilshire/La Cienega Station entrance on the northeast corner with two construction staging sites on the northeast corner and on the northwest corner of Wilshire Boulevard and Gale Drive;
 - d) Wilshire/Rodeo Station entrance on the southwest corner of Wilshire Boulevard and Reeves Drive (Ace Gallery site) with two construction staging sites on the southwest corner of Wilshire/Reeves and on the northeast corner of Wilshire/Canon Drive;
 - e) Century City Station entrance on the northeast corner of Constellation/Avenue of the Stars with two construction staging sites on the northeast corner of Constellation/Avenue of the Stars and on the east corner of Constellation/Century Park East;
 - f) Westwood/UCLA Station entrances at three locations with a full entrance at UCLA Lot #36 and split entrances on the northwest and southwest corners of Wilshire/Westwood Boulevards and construction staging site on UCLA Lot #36;
 - g) Westwood/VA Hospital Station entrance on the southeast corner of Wilshire Boulevard and Bonsall Avenue with construction staging sites in the VA Hospital north parking lot, within the Caltrans I-405 right-of-way and within the Westwood Federal Building property.

4. Rail Storage and Maintenance Facility expansion of Metro Division 20 located in Downtown Los Angeles and other support facilities including special track work (crossovers, tail tracks, etc.), traction power substations, emergency generators and vent shafts as identified in the FEIS/FEIR volume 3- Appendices A and B.

Attachment A shows the Recommended Project Definition Maps including the three construction segments and the seven proposed new stations including the recommended station entrances and construction staging sites.

- B. Certify the Westside Subway Extension Final Environmental Impact Statement/Final Environmental Impact Report (FEIS/FEIR). Attachment B contains the Executive Summary. The full report is available upon request or at www.metro.net/westside.
- C. Authorize the Chief Executive Officer (CEO) to file a Notice of Determination (Attachment C) with the Los Angeles County Clerk and State of California Clearinghouse; and
- D. Adopt the:
 - 1. Findings of Fact and Statement of Overriding Considerations in accordance with the California Environmental Quality Act (CEQA) (Attachment D); and
 - 2. Mitigation Monitoring and Reporting Plan (MMRP) (Attachment E).

ISSUE

The FEIS/FEIR defines the project. The Board may now approve the project as defined and certify the FEIS/FEIR; adopt the Findings of Fact and Statement of Overriding Considerations and the MMRP; and authorize the CEO to file a Notice of Determination. The Westside Subway Extension project is a Measure R project and is contained in the Long Range Transportation Plan (LRTP) and the Southern California Association of Governments Regional Transportation Plan.

DISCUSSION

CEQA requires that we balance, as applicable, the economic, social, technological, and other benefits of the project against its unavoidable impacts when considering project approval. CEQA Guidelines Section 15091(a) states that if the specific economic, legal, social, technological or other benefits of the project outweigh the unavoidable adverse effects, those effects may be considered acceptable. The Board must find that notwithstanding the disclosure of these significant and unavoidable impacts, there are specific overriding reasons for approving this project and that these reasons serve to override and outweigh the project's significant unavoidable effects. CEQA requires us to support, in writing, the specific reasons for considering a project acceptable when significant impacts cannot be avoided or substantially lessened. These findings are included in Appendix D along with the necessary Statement of Overriding Considerations. Since the Westside Subway Project will be constructed entirely below ground, there are very few long term adverse environmental impacts of the project. Most of the long-term impacts are beneficial. Adverse impacts are primarily during the temporary construction phase. The FEIS/FEIR identifies 88 specific mitigation measures to reduce impacts during the temporary construction phase of the project.

Section 21086.6 of the California Public Resources Code requires that public agencies approving a project with an EIR adopt a MMRP. The purpose of the MMRP is to ensure that the mitigation measures identified in the FEIR that mitigate the potentially

significant environmental effects of the project are, in fact, properly carried out. We are responsible for assuring full compliance with the provisions of the MMRP (Attachment E).

A comprehensive community outreach program was conducted throughout the environmental planning phase of the project. A total of 71 community meetings were hosted by Metro in addition to many rounds of agency and elected official briefings and individual stakeholder meetings. Five formal Public Hearings were conducted following the release of the Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) in 2010. More than 500 persons attended the hearings. In total, we received comments from approximately 800 individuals. Copies of all public testimony and comments, along with our responses, have been included in the FEIS/FEIR. During the time that the FEIS/FEIR has been in preparation, additional outreach meetings continued. Nine general community outreach meetings and nine station area planning meetings were held. In addition, following the release of the FEIS/FEIR, notices were sent to those who commented on the DEIS/DEIR, all those who own property that would be required in whole or in part for construction of the project and all those whose names appear on the project database mailing list that was developed over the past four years. In addition, advertisements were placed in newspapers with general circulation in the project corridor to inform the public of the availability of the document and the opportunity to submit comments through April 23, 2012.

FEIS/FEIR Recommendations

With the adoption of the LPA by the Board in October 2010, several options were carried forward for further analysis in the FEIS/FEIR. In order to address these outstanding issues, three Station Area Advisory Groups (SAAGs) were established comprised of station area residents and stakeholders. Each of these groups met on three occasions between February and June 2011. In addition, two rounds of community meetings were held during this time.

Recommendations included in the FEIS/FEIR are based on input received at these meetings as well as further engineering, environmental and financial analysis. Engineering recommendations were reviewed by our Tunnel Advisory Panel (TAP) and specific technical analyses in the Century City area were reviewed by an Independent Review Panel comprised of experts in geotechnical and seismic fields. The findings regarding the geological and seismic issues affecting the Century City Station location were presented to the Planning & Programming Committee in October 2011. The preliminary recommendation regarding the terminus and length of the Initial Construction Segment was presented to the Planning & Programming Committee in February 2012.

Eight of the most significant recommendations include the following:

Initial Construction Segment (Attachment A-1)

The Draft EIS/EIR identified three construction segments for the full 9-mile project ending at Wilshire/Fairfax (Segment 1), Century City (Segment 2) and the Westwood/VA Hospital Station (Segment 3). During the course of Preliminary Engineering (PE), the interim terminus for the first construction segment was recommended to be moved from Wilshire/Fairfax to Wilshire/La Cienega. This change would increase the length of the first segment from 3.1 miles to 3.9 miles and would decrease the length of the second segment accordingly from 3.4 miles to 2.6 miles. If Wilshire/Fairfax were to be used as an interim terminus station, it would require the construction of a crossover structure that would not be needed when the line is extended farther west. This would add several hundred feet of underground excavation and construction in an area that has the highest proportion of underground gasses and paleontological resources along the entire line. Moving the interim terminus would allow for the use of the crossover structure at Wilshire/La Cienega that is required for the full 9-mile project and would reduce the amount of excavation and construction at the environmentally sensitive Wilshire/Fairfax Station.

Century City Station Location and Alignment (Attachment A-2)

The DEIS/DEIR identified two possible sites for the Century City Station. The first site was under Santa Monica Boulevard with an entrance at Avenue of the Stars. The second site was under Constellation Boulevard with an entrance at Avenue of the Stars. The DEIS/DEIR cited concerns about the feasibility of the Santa Monica Boulevard station site due to its location in close proximity to the Santa Monica fault which runs parallel to Santa Monica Boulevard in this area. As a result of further testing and analysis, the station site at Santa Monica Boulevard/Avenue of the Stars was determined to be infeasible and a proposed station site on Santa Monica Boulevard slightly to the east at Century Park East was advanced for consideration in the FEIS/FEIR as it was located farther from the Santa Monica fault.

At Board direction, further geotechnical and seismic studies were conducted for both the Constellation and Santa Monica Boulevard alignments. In October 2011, two reports were released and presented to the Board titled Century City Area Tunneling Safety Report and Century City Area Fault Investigation Report. These reports found significant seismic and geotechnical concerns with the station site at both Santa Monica Boulevard locations that were considered and found that the station site and tunnels for the Constellation Station could be constructed safely with minimal impact from passing beneath a portion of Beverly Hills High School and other properties in Beverly Hills, Comstock Hills and Westwood.

The FEIS/FEIR incorporates the analysis contained in the above studies, as well as further environmental evaluation of these two alignments. The FEIS/FEIR finds that tunnels can be built safely under the high school and that the tunnels are sufficiently

deep to allow additional construction of academic facilities above the tunnels that would not be impacted by noise or vibration. Any abandoned oil wells on the school property could be safely removed in advance of the tunneling and gassy conditions from the oil fields under the high school are at lower levels of density than other parts of the existing and planned tunnels in the Fairfax District and other parts of the subway system and would be safe for construction. Structural foundations of new structures could be reinforced to span over the tunnels, as has been done for other projects along the subway line. It is common practice for subway lines to be built beneath developments such as Beverly Hills High School throughout the world and the FEIS/FEIR found no special conditions that would preclude safe construction of tunnels under properties in Beverly Hills, Century City, Comstock Hills and Westwood.

The DEIS/DEIR also found that the Constellation Station was located closer to the center of Century City and would therefore provide more convenient service to a greater number of people. During the FEIS/FEIR, we updated demographic data and the resulting ridership forecasts. The analysis found that the number of existing jobs within ¼ mile of the Constellation Station is approximately double the number of jobs within the same distance of the Santa Monica Boulevard Station (20,200 versus 10,300). This more detailed demographic data was used in the revised ridership forecasts which indicate significantly higher ridership potential for the Constellation Station when compared to the potential station located at Santa Monica/Century Park East (8,500 versus 5,500 average daily boardings). The ridership figures were reviewed by the Federal Transit Administration (FTA) for accuracy and consistency. In addition, independent experts were asked to conduct an assessment of the preferred station site based on best practices in transit systems throughout the U.S. The results of those analyses support the Constellation site and are contained in the technical reports that support the FEIS/FEIR.

The Century City SAAG expressed a strong preference for the Constellation Station location because it would be more centrally located in Century City. During the time that the Century City SAAG was meeting, community meetings were held adjacent to Century City in the City of Beverly Hills where strong opposition to the Constellation alignment was expressed by residents of Southwest Beverly Hills and the Beverly Hills High School because the tunnels serving the Constellation Station would pass beneath a small portion of the high school property (approximately one acre of the 25 acre site) and under or near residential properties along Lasky Drive. The Beverly Hills Unified School District Board and the Beverly Hills City Council have strongly opposed the Constellation tunnel alignment and station location.

Westwood/UCLA Station Location and Alignment (Attachment A-3)

The DEIS/DEIR identified two possible sites for the Westwood/UCLA Station. The first site was under UCLA Parking Lot #36 on the north side of Wilshire Boulevard between Gayley Avenue and Veteran Avenue. The second site was under Wilshire Boulevard between Westwood Boulevard to just west of Gayley Avenue.

Early in the development of preliminary engineering (PE) for these station sites, a project was entitled for a high-rise hotel on the corner of Wilshire and Gayley that blocked the alignment of the first station option. Also, further analysis of the UCLA Parking Lot determined that the subway station proposed for that site would significantly impact the future development potential of that parcel. Based on these two issues, and the potential greater access to Westwood Village, the FEIS/FEIR recommends the second station site under Wilshire Boulevard.

Westwood/VA Hospital Station Location and Alignment (Attachment A-3)

The DEIS/DEIR identified two possible station sites for the Westwood/VA Hospital Station. The first site was in the parking lot in front of the main VA Hospital on the south side of Wilshire Boulevard. The second site was on the north side of Wilshire Boulevard in the parking lots between the historic Wadsworth Theater and the Wadsworth Chapel near Eisenhower Drive. Because both of these station options were located completely within the VA property, no SAAG was established for this station and meetings were conducted directly with the VA regarding the preferred station location.

The south of Wilshire site is preferable because it provides the best access to the hospital and does not impact historic properties. It would also preserve the best alignment for future extensions of the line to the west along Wilshire Boulevard. The VA was concerned about construction impacts to the hospital, loss of hospital parking during the construction phase and impacts to the future development of the parking lot for other VA uses. As a result of these concerns, we identified a location for the south station that would be immediately adjacent to Wilshire Boulevard in a location that would be farther from the hospital and would minimize impacts to parking and the long-term development potential of the parking lot. The FEIS/FEIR also commits to provide a parking structure that would be built prior to the start of subway construction so that any parking displaced for construction would be replaced in kind so that the hospital would not experience any loss of parking during the construction phase.

Based on the above, the FEIS/FEIR recommends the south station location for the Westwood/VA Hospital Station.

- Wilshire/La Brea Station Entrance and Construction Staging Sites (Attachment A-4)

The Wilshire/La Brea Station SAAG considered three possible locations for the station entrance at the Wilshire/La Brea Station and reached consensus for the northwest corner of Wilshire/La Brea on land that is already owned by us. The FEIS/FEIR concurs with this recommendation and also recommends that the site on the south side of Wilshire Boulevard between La Brea and Detroit be acquired as a construction staging site. This property is required in order to serve as the launch site for tunnel boring machines that will drive the tunnel eastward from this site

toward Wilshire/Western and westward from this site toward Wilshire/La Cienega. In addition to the 1.26 acres of property already owned by us at this station site, another 1.96 acres will need to be acquired on the north and south sides of Wilshire Boulevard to accommodate the construction staging operations.

- Wilshire/Fairfax Station Entrance and Construction Staging Sites (Attachment A-5)

The Wilshire/Fairfax SAAG considered three possible locations for the station entrance and generally supported the northeast corner of Wilshire/Fairfax within the existing Los Angeles County Museum of Art (LACMA) West (former May Company Department Store building). Later in 2011, however, LACMA entered into an agreement with the Academy of Motion Pictures Arts & Sciences (AMPAS) to develop a museum dedicated to film in this structure and the availability of this building for a station entrance became uncertain. It was further determined that because of the need to retrofit a station entrance into an older, historic building that the costs would be \$9-10 million more expensive than at the other two possible locations. As a result, we are recommending one of the two alternative sites located on the southeast corner of Wilshire/Orange Grove. ~~northwest corner of Wilshire/Fairfax, adjacent to the former Johnie's Coffee Shop which would be preserved. Two parcels totaling 0.56 acres would be acquired on this corner for the future station entrance. This site is closer to the bus stops on Fairfax and Wilshire than the alternative site on the south side of Wilshire between Orange Grove and Ogden Streets. It would therefore provide more convenient access to bus transfers which will provide a significant portion of the ridership at this station.~~

Many SAAG members favored a station located farther to the east on Wilshire to provide more convenient access to LACMA, Hancock Park, the Page Museum and the other museums and cultural uses that are almost exclusively east of Fairfax. The alternative site at Wilshire/Orange Grove is somewhat less convenient than the site near Johnie's for bus to rail transfers, but it does provide better access to the museums and cultural institutions. Based on recent conversations with LACMA, we now mutually understand and agree that there are nearly two million visitors a year to LACMA and the Page Museum, a figure that we previously thought would only be attained in 2035 but, in fact, they are attaining now. In light of this information, we now agree that it is preferable to have the main entrance to the Wilshire/Fairfax subway station built across the street from LACMA at the Wilshire/Orange Grove site. Also, LACMA has provided a letter to Metro indicating that they will commit, subject to the approval of their Board of Trustees, to raising the funds necessary to pay for the construction of a second subway entrance on the north side of Wilshire Boulevard directly across from the Orange Grove entrance. It is anticipated that this LACMA entrance will be constructed concurrent with the Wilshire/Fairfax subway station and would not result in any increase in cost to the project. For the above reasons, we are now recommending the primary entrance site be

~~shifted from the site recommended in the FEIS/FEIR on the northwest corner of Wilshire/Fairfax to the site at the southeast corner of Wilshire/Orange Grove. We had concerns about pedestrian safety at this site as there is no crosswalk at Wilshire/Orange Grove and all subway riders would need to cross at least one street to reach bus stops. This site would be an excellent location for a station entrance if it were coupled with another entrance on the north side of Wilshire which would resolve concerns about pedestrian street crossing issues at this site. LACMA has recently indicated a willingness to seek funding to develop a second entrance on the north side of Wilshire Boulevard at no additional costs to the project if the primary site is located on the south side at Wilshire/Orange Grove. Since the costs of the two alternative sites at the NW corner of Wilshire/Fairfax and the SE corner of Wilshire/Orange Grove are virtually identical, and the site between Orange Grove and Ogden is recommended for acquisition as a construction staging site, the Wilshire/Orange Grove would also be an acceptable primary entrance instead of the NW corner of Wilshire/Fairfax, if it were coupled with a LACMA supported entrance on the north side of Wilshire. The Ogden/Orange Grove site is 1.85 acres in size and will require the acquisition of six parcels.~~

- Wilshire/La Cienega Station Entrance and Construction Staging Sites (Attachment A-6)

The SAAG was unanimous in their endorsement of a station entrance on the northeast corner of Wilshire/La Cienega on a site that is presently occupied by a one-story bank and a one-story restaurant. The other three corners of this intersection are developed with three to ten story office developments and were not considered feasible for a station entrance due to their size and impacts to the underground parking structures. For these reasons, the FEIS/FEIR recommends the northeast corner for the station entrance. Two parcels totaling 0.52 acres would be acquired for the entrance. Construction staging for this station will require approximately one acre of land adjacent to the underground station box and therefore additional property will be needed for construction staging at this station. Because of the highly built-out nature of properties at this location, the FEIS/FEIR identified only one other location that is not historic or densely developed. This required an additional construction laydown site and the acquisition of three parcels totaling 0.72 acres, occupied by one to two story structures on the northwest corner of Wilshire/Gale Drive. Following construction of the subway station, this property could be redeveloped in accordance with existing zoning and land use plans for the area.

- Wilshire/Rodeo Station Entrance and Construction Staging Sites (Attachment A-7)

The DEIS/DEIR identified five possible locations for a station entrance at the Wilshire/Rodeo Station. Following more detailed engineering review, two of these sites were determined to be infeasible and the SAAG reviewed the remaining three options. The Wilshire/Rodeo SAAG initially preferred the two westernmost sites at the northwest corner of Wilshire/Beverly and the southeast corner of Wilshire/EI Camino because they would be closer to the Beverly Hills business district and Rodeo Drive. Further analysis determined, however, that each of these sites would have significant impacts on adjacent properties. The Beverly Drive station entrance would either impact the underground parking of the Bank of America building which extends under the public sidewalk or would require removing on-street parking and one southbound traffic lane. The SAAG felt these impacts were unacceptable. The EI Camino site would have required the removal of a significant portion of the parking structure that serves the adjacent Union Bank office tower. This was also considered unacceptable. As a result, the majority of the SAAG members concurred that the third site at the southwest corner of Wilshire/Reeves that is currently occupied by the Ace Gallery would be the preferred site for the station entrance. The façade of the Ace Gallery building was determined to be historic in the FEIS/FEIR, however, the State Historic Preservation Office concurred that there is no reasonable or prudent alternative to the taking of this building. The other two proposed station sites were also determined to be historic. Specific mitigation measures have been included in the FEIS/FEIR to address the loss of the Ace Gallery building.

Construction of the Wilshire/Rodeo Station will require approximately one acre of land adjacent to the underground station box for construction staging. The Ace Gallery site is 0.38 acres in size and would provide part of the land required. Another site was needed and there was only one remaining site that was not historic or densely built-out. For these reasons, the site at the northeast corner of Wilshire/Canon is recommended for acquisition. This site is comprised of three parcels fronting on Wilshire Boulevard comprising 0.37 acres which are one to two stories in height and are presently occupied by commercial office and retail uses.

- Century City Station/Constellation Station Entrance and Construction Staging Sites (Attachment A-8)

The Century City SAAG considered two possible primary station entrances on both the northeast and southwest corners of Constellation/Avenue of the Stars. Of these, the SAAG preferred the primary station entrance to be located on the northeast corner of Constellation/Avenue of the Stars on a presently vacant site. The site of this subway entrance is approximately six acres in size and is also

recommended as the site for construction staging. In the event that subway construction in this area is delayed until after this property is developed or in the event that a subway entrance is not deemed feasible because of changes in conditions, alternative sites have been identified on the southwest corner for a subway entrance and along Century Park East for construction staging. The SAAG also supported a pedestrian connection from the subway station to the Century City Shopping Center. Because of the importance of the retail center as a regional destination and with the condition that it will not increase the overall project budget, we will work with the property owner on plans to extend a pedestrian accessway westerly from the station box, including any necessary easements, so a second portal can be developed with a direct connection to the shopping center.

- Westwood/UCLA Station Entrance and Construction Staging Sites (Attachment A-9)

Two station entrances will be needed for the Wilshire/UCLA Station because of the high ridership that is forecasted. The SAAG focused their discussions on the preferred entrance locations. They strongly felt that one of the two entrances should be located at the intersection of Wilshire and Westwood Boulevards and that the second, should be located at UCLA Lot #36 to provide connections to the main UCLA campus and other UCLA facilities located just north of that site. The SAAG was divided on whether the Wilshire/Westwood entrance should be on the north or the south side of Wilshire Boulevard. Several members felt that subway riders should not be forced to cross Wilshire Boulevard at-grade because of the high traffic volumes and the width of that street. Ultimately, a solution was identified to split the Wilshire/Westwood entrance by placing one half of the entrance (one escalator, stair and elevator on the north side in a portion of the parking garage that serves the Westwood Medical Building) and a second half entrance on the south side of Wilshire Boulevard, just to the side of the entrance to the Murdock Plaza office building (one stair and one escalator).

A construction staging site has been identified on UCLA Parking Lot #36. This construction site would be leased during the construction phase of the project and UCLA would retain ownership for future development of the property.

- Westwood/VA Hospital Station Entrance and Construction Staging Sites (Attachment A-10)

The station entrance is recommended to be located on the southeast corner of Wilshire Boulevard and Bonsall Avenue. This subway entrance would be directly adjacent to the existing bus boarding and alighting zone on Wilshire Boulevard which will allow for direct vertical connections from the eastbound bus zone and the subway station. Connections from the subway to the westbound bus boarding and alighting zone would be via the Bonsall Avenue underpass that is grade separated from Wilshire Boulevard traffic. Construction staging is

recommended to be located in the VA Hospital north parking lot adjacent to Wilshire Boulevard and on the western portion of the VA property and the West Los Angeles Army Reserve Center.

Project Cost

The 2009 LRTP provides \$6.015 billion (YOE) to construct the project in three phases to be completed in 2019, 2026, and FY 2036. This phased cost includes all planning and environmental process costs, but does not include any financing costs, consistent with our practice for all other projects. Going forward, our Life-of-Project (LOP) budget will typically omit the planning and environmental and finance costs. The FTA omits the planning and environmental costs, but requires that certain finance costs be shown in the project budget. In addition to these variables, the Board of Directors approved the 30/10 advocacy policy that would introduce a construction phasing and acceleration variable to the Westside Subway Extension costs (if we are successful).

Table 1: "Forecasted Westside Subway Extension Costs" summarizes the various views of the project cost used in the past or anticipated to be used going forward, based on the phased approach to construction or on the 30/10 accelerated pathway, as applicable:

Table 1: Forecasted Views of Westside Subway Extension Costs (YOE in Millions)

Westside Subway Nov. 2011 Phasing Plan	LRTP Estimate (Nov 2011-Omits Finance Costs)	Life of Project (Omits Plan. & Env.)	FTA Cost (Adds Finance Costs, Omits Plan. & Env.)
Seg. 1 Opens 2019	\$2,331.4	\$2,231.4	\$2,606.4
Seg. 2 Opens 2026	\$1,583.8	\$1,733.6	\$1,583.8
Seg. 3 Opens 2035	\$2,099.8	\$2,013.4	\$2,099.8
Total all Segs. 2035	\$6,015.0	\$5,978.4	\$6,290.0
30/10 Opens 2022	\$5,159.4	\$5,129.5	\$5,662.3

All views of costs shown in Table 1 are consistent with each other once the proper adjustments are made for the planning, environmental, finance cost, phasing, and timing costs as required for each purpose shown. The Measure R Unified Cost Management Process and Policy adopted by the Board in March 2011 uses the April 2010 Financial Update to the 2009 LRTP as the cost against which cost increases are to be measured at key milestones for purposes of the policy. For this policy purpose, an "apples-to-apples" cost comparison is presented in Table 2: "Forecasted Westside Subway LRTP Cost Comparison":

Table 2: Forecasted Westside Subway Cost Comparison (YOE in Millions)

Westside Subway (As Phased in LRTP)	LRTP Estimate (April 2010-Omits Finance Costs)	LRTP Estimate (Nov 2011-Omits Finance Costs)	Increase/(Decrease)
Seg. 1 Opens 2019	\$1,950.0	\$2,331.4	\$ 381.4
Seg. 2 Opens 2026	\$2,450.0	\$1,583.8	(\$866.2)
Seg. 3 Opens 2035	\$1,615.0	\$2,099.8	\$ 484.8
Total all Segs. 2035	\$6,015.0	\$6,015.0	\$ 0

As one can see in Table 2, the cost of the first Segment of the Westside Subway Extension has increased by \$381.4 million. This is because we are also recommending that the initial construction segment should extend to Wilshire/La Cienega instead of Wilshire/Fairfax. This 0.8 mile increase in length results in the \$381 million increase. Although the overall project cost would not change, the additional Phase 1 funding would be required earlier in time. These funds have been identified in the LRTP Financial Forecast Update (March 2012) to come from additional New Starts funds, fund transfers from Segment 2 and deferral of later portions of the Wilshire BRT Project. The analysis required by the Board of Directors through the Measure R Unified Cost Management Process and Policy is described more fully in Appendix F.

As we continue with Advanced PE, project costs will be further refined through risk assessment, value engineering, evaluation of contract strategies and other project refinements. Further, we will continue to follow the Board-adopted Measure R Unified Cost Management Process and Policy as we strive to align the project cost with available funding. The Board will be asked later this year to adopt a LOP budget. Per the Measure R Unified Cost Management Process and Policy, the project will not move forward unless the project costs are in alignment with the \$6.015 billion allocated in the LRTP, as adjusted for the particular purposes described in Table 1.

DETERMINATION OF SAFETY IMPACT

The development of the project followed our adopted policies. The approval will have no impact on safety.

FINANCIAL IMPACT

Funding of \$3,345,000 to complete the FEIS/FEIR is included in the FY12 budget in cost center 4350 (Westside Area Team), project 465518 (Westside Subway Extension Project). Funding of \$20.35 million for PE/Advanced PE is included in the FY12 budget in cost center 8510 (Construction Project Management), project 865518 (Westside Subway Extension Project). Since this is a multi-year project, the Cost Center Manager and Executive Director Transit Project Delivery will be responsible for budgeting future year costs.

Impact to Budget Bus and Rail Operating and Capital Budget

Funding for FY12 expenditures come from the State Repayment of Capital Project Loans account, which are funds derived from previous reimbursements to us from State Letters of No Prejudice agreements on various projects and free these funds for use on other capital projects. Although eligible for bus and rail operating and capital expenditures, these funds were assumed in the LRTP for the Regional Connector and the Westside Subway Extension, since both projects are not eligible for Propositions A and C funding (due to proposed tunneling element of the projects) and are not eligible for Measure R funding at this time. Other potentially eligible sources (TDA Article 4 and State Transit Assistance) are used for bus and rail operations and were therefore not considered.

ALTERNATIVES CONSIDERED

The Board could delay or defer action to approve the Project Definition, certify the FEIS/FEIR, adopt the Findings of Fact and Statement of Overriding Considerations, as well as the MMRP. Deferral of any of these actions is not recommended as this would delay the project schedule which calls for entry into Final Design later this year and the award of a construction contract following the award of a Full Funding Grant Agreement with the Federal government in 2013. Such a delay could add cost to the project.

NEXT STEPS

Upon Board approval, we will file the Notice of Determination for the Westside Subway Extension Project with the Los Angeles County Clerk and the State of California Clearinghouse, and will work with FTA to obtain a Record of Decision. We will continue with Advanced PE and submit a request to enter Final Design with the FTA. We will return later in the year for the Board to consider adopting a LOP budget.

ATTACHMENTS

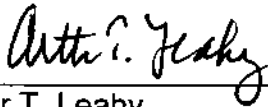
- A. Recommended Project Definition Maps Revised
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- D. Findings of Fact and Statement of Overriding Considerations
- E. Mitigation Monitoring and Reporting Program
- F. Measure R Cost Management Process and Policy Evaluation

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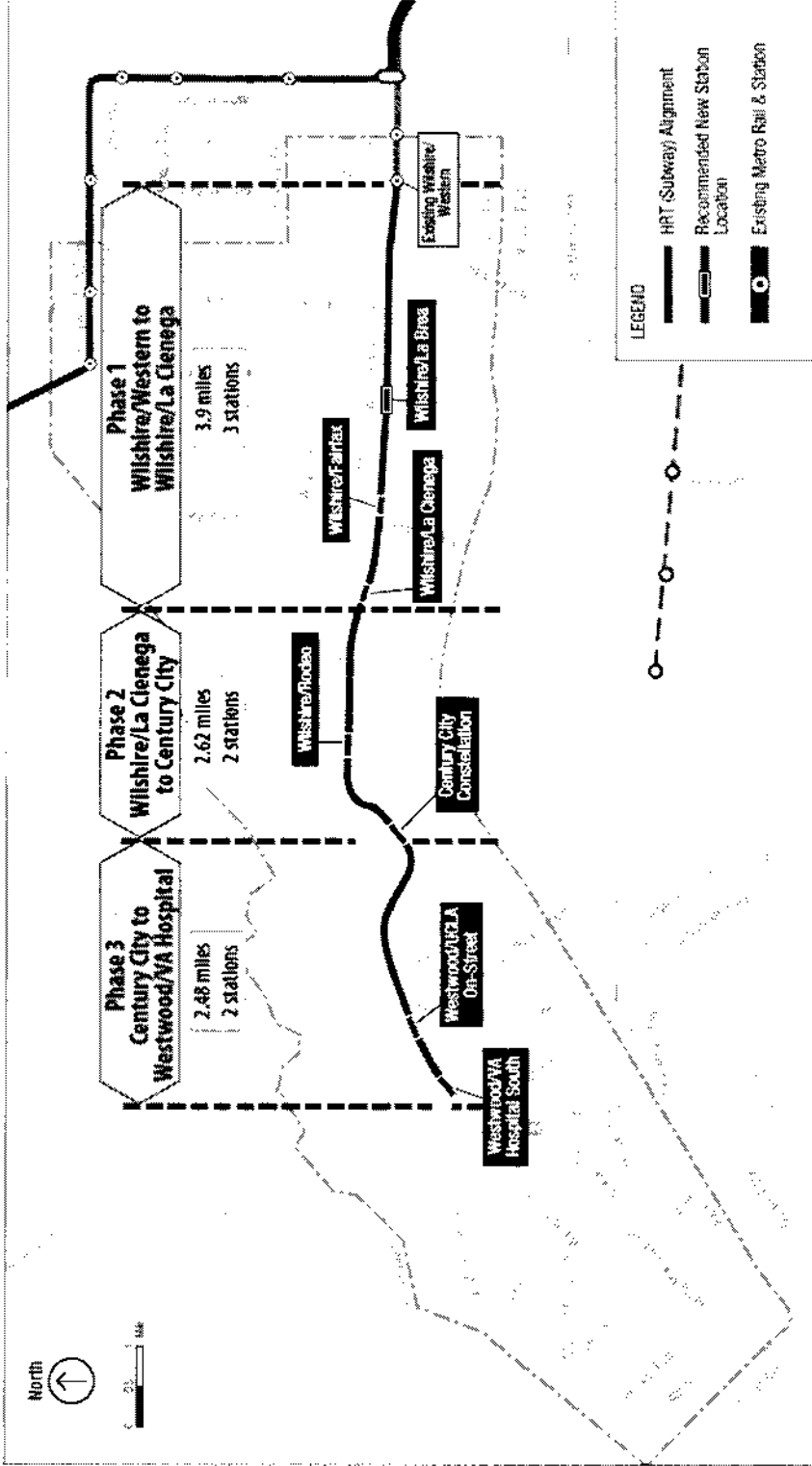


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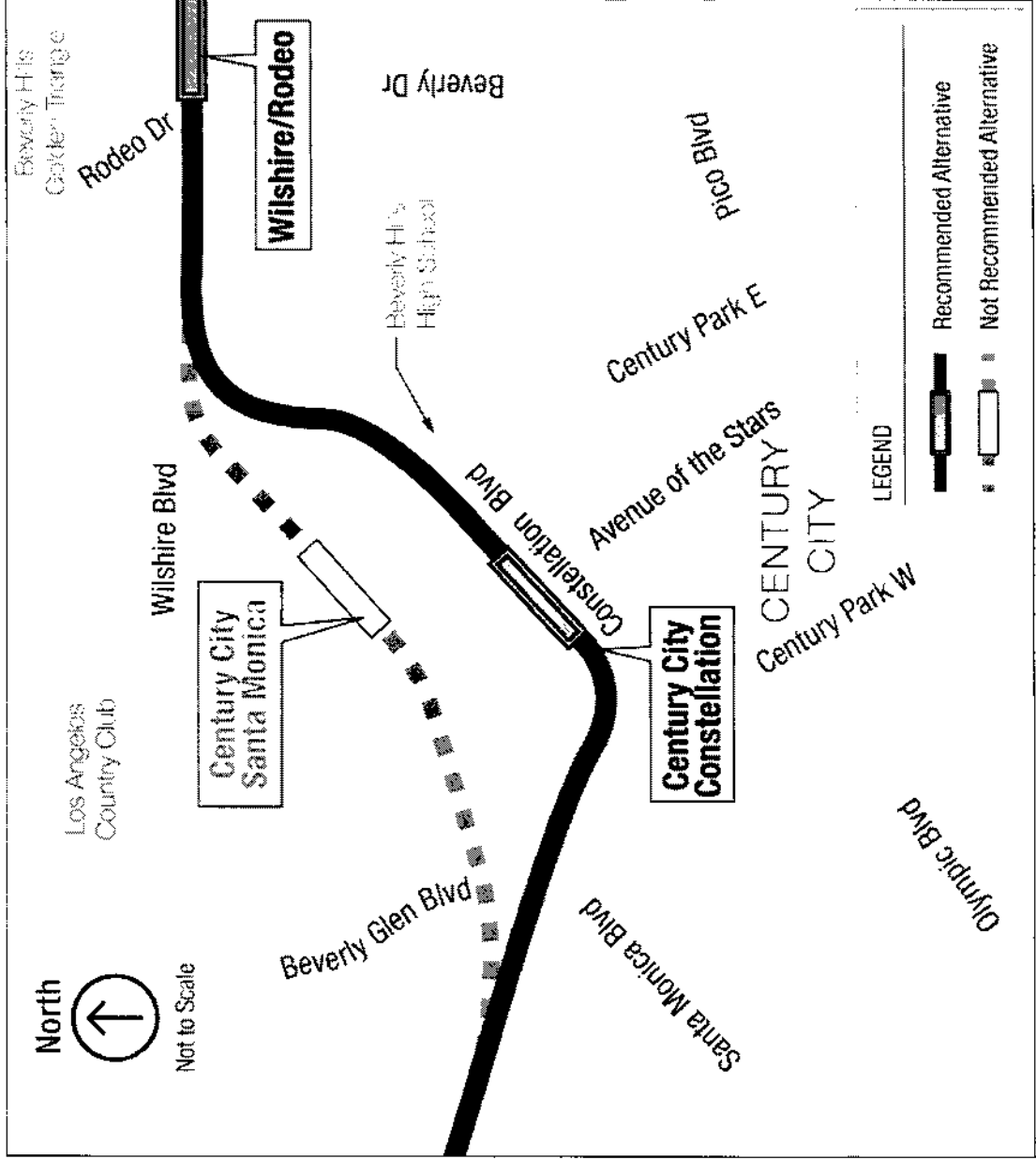


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Chief Executive Officer

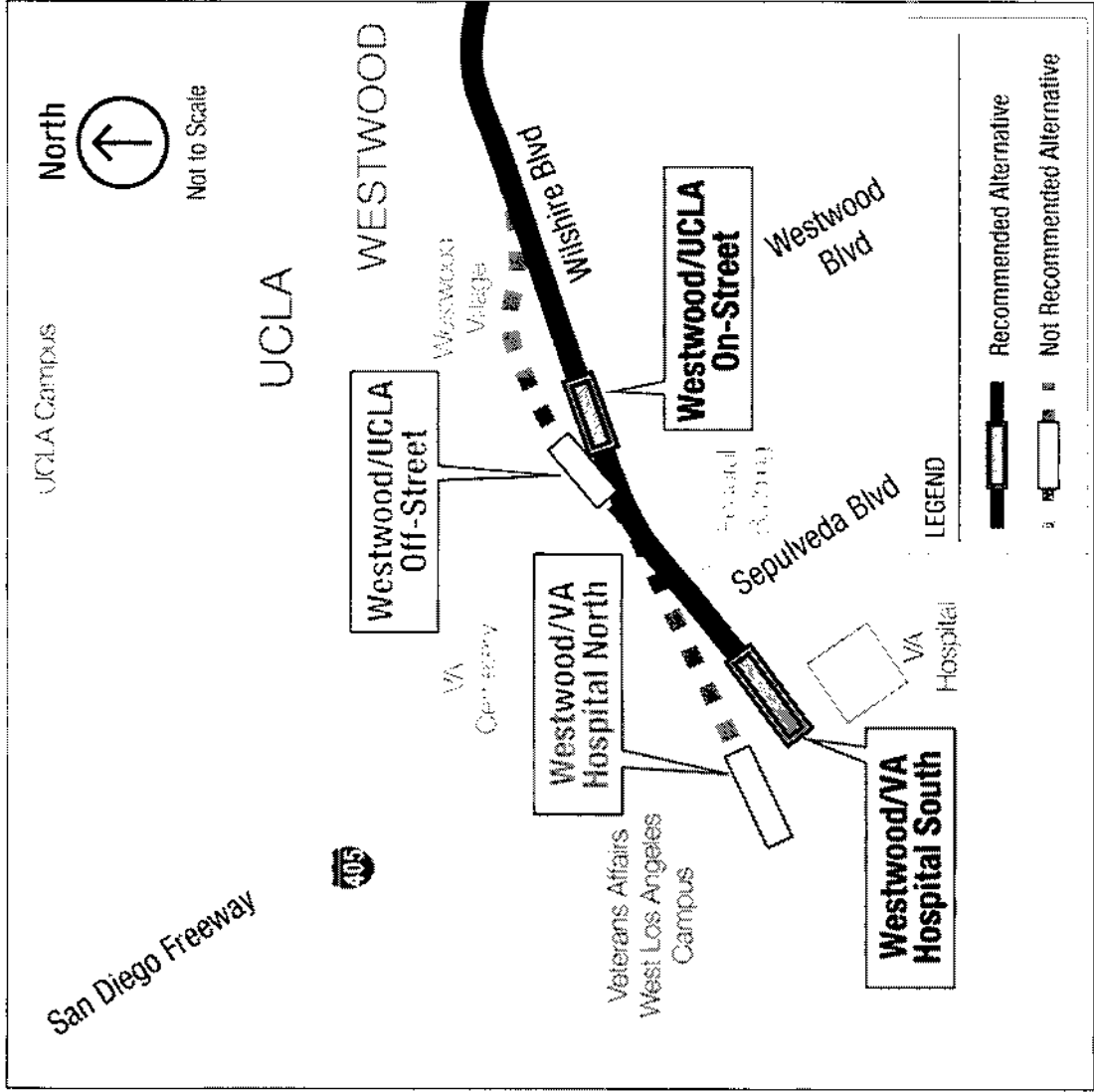
Recommended Project Definition Maps A-1: Alignment & Construction Segments



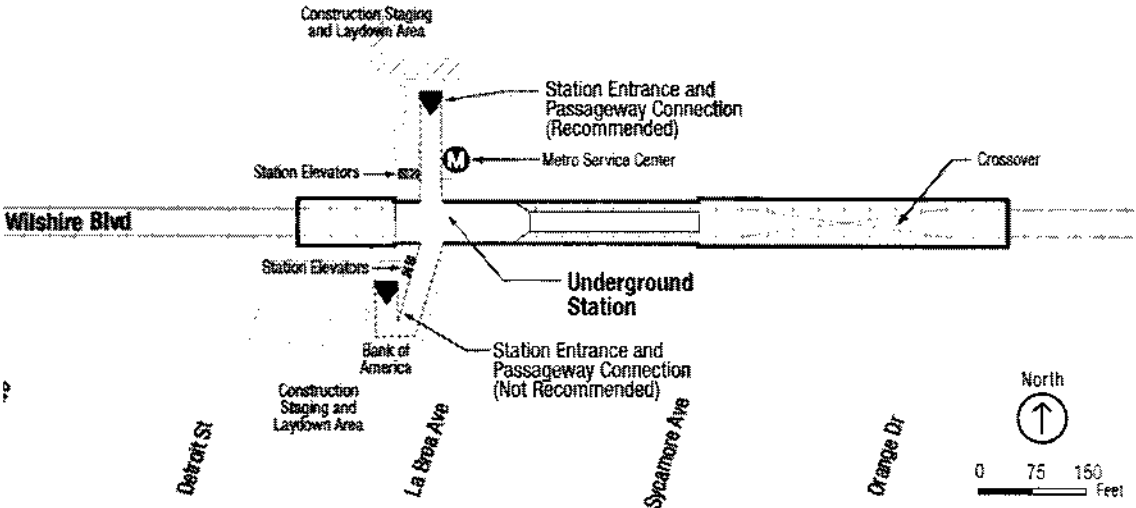
A-2: Century City Recommended Alignment and Station Location



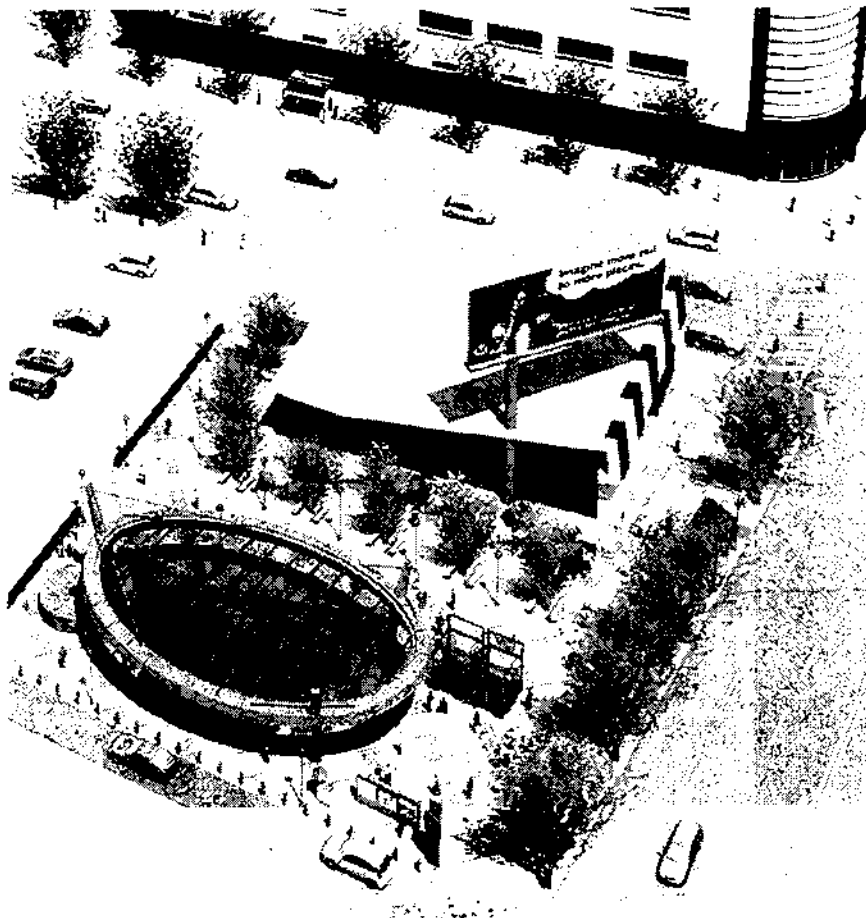
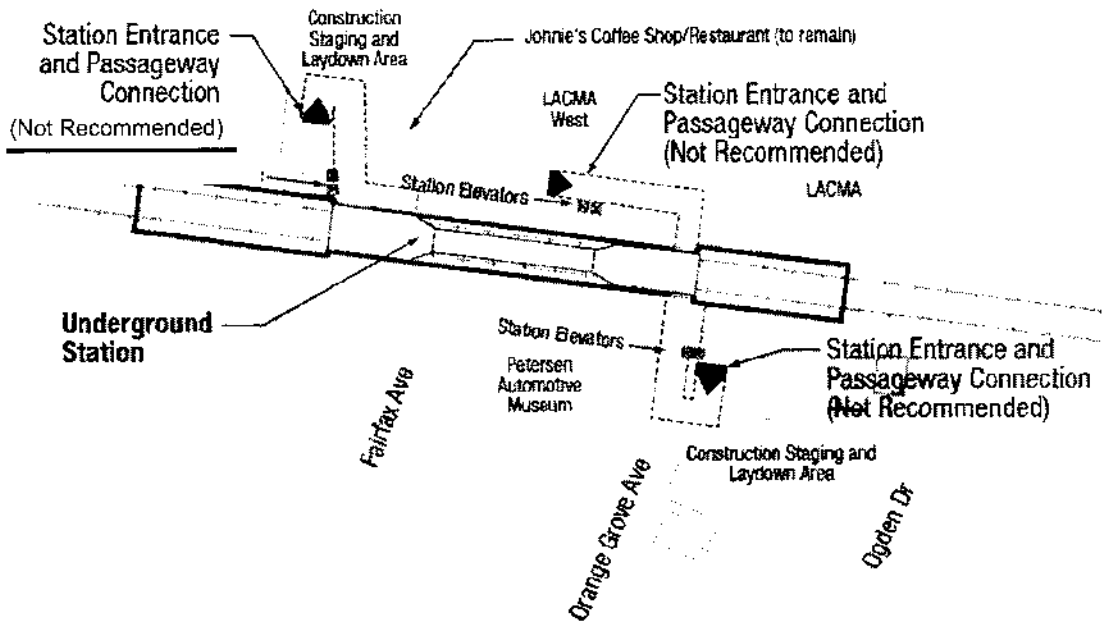
A-3: Westwood/UCLA and Westwood/VA Hospital Recommended Alignments and Station Locations



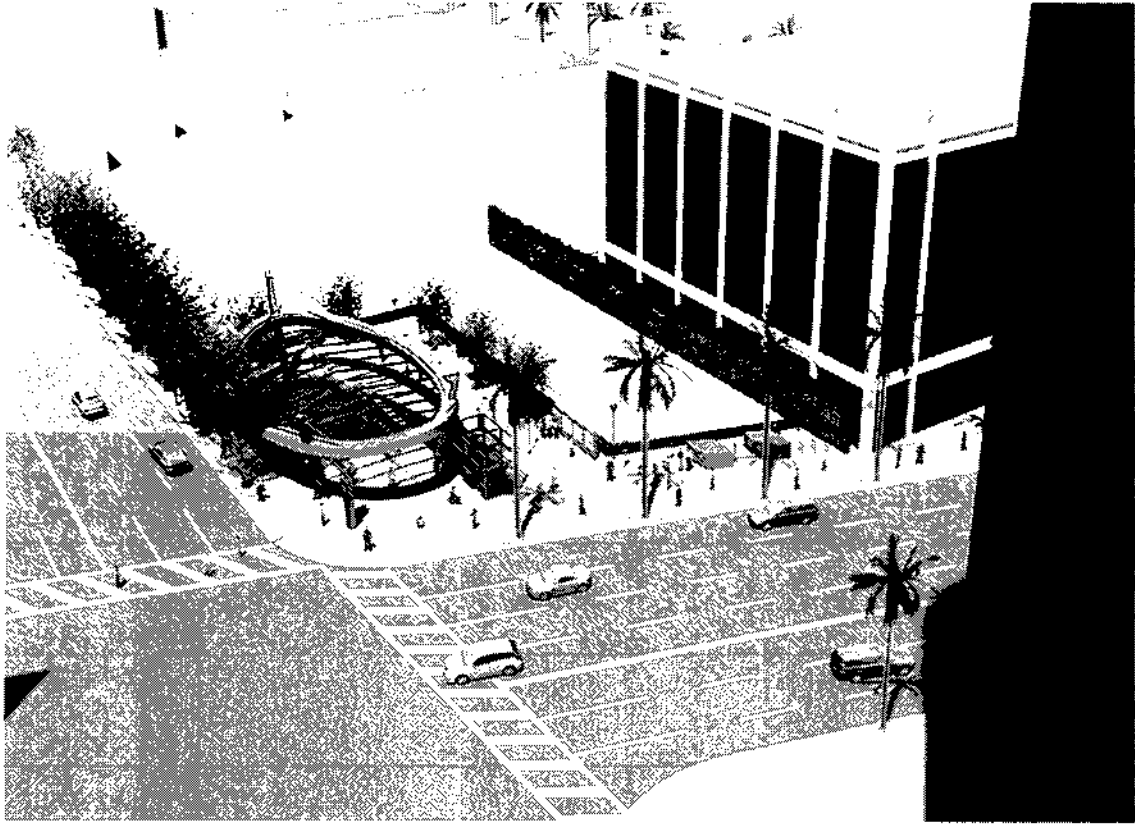
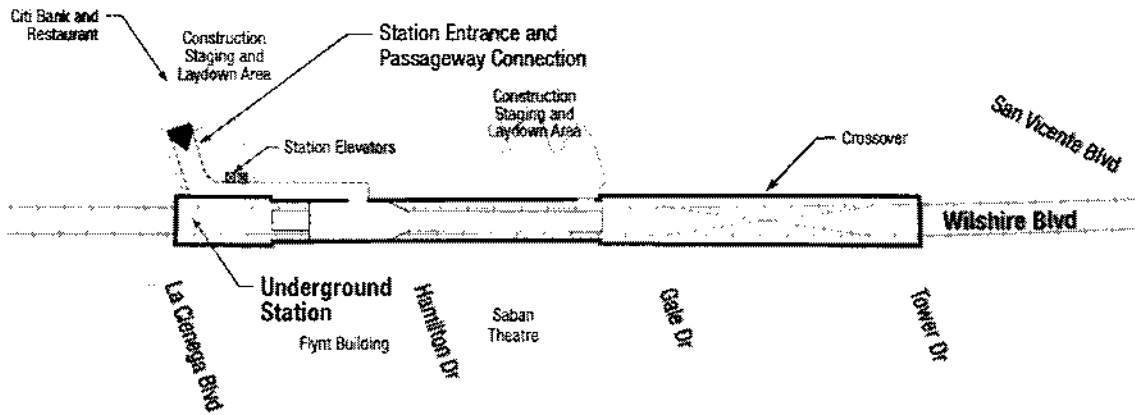
A-4: Wilshire/La Brea Station



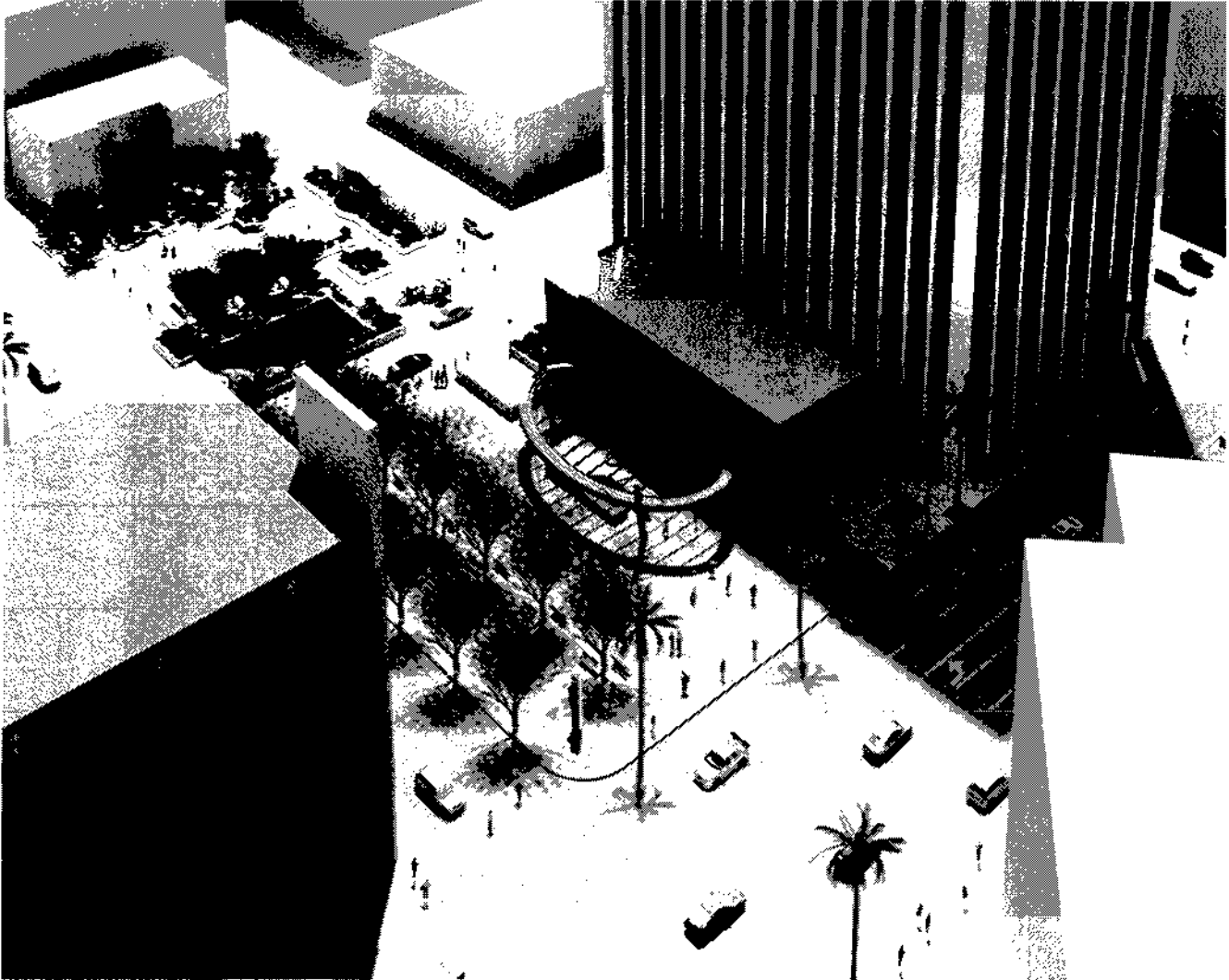
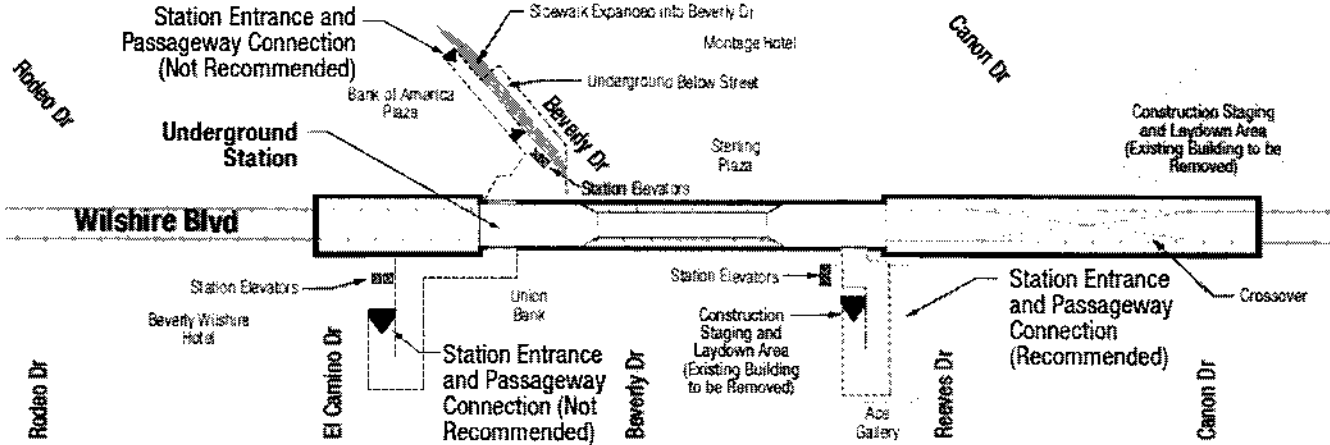
A-5: Wilshire/Fairfax Station



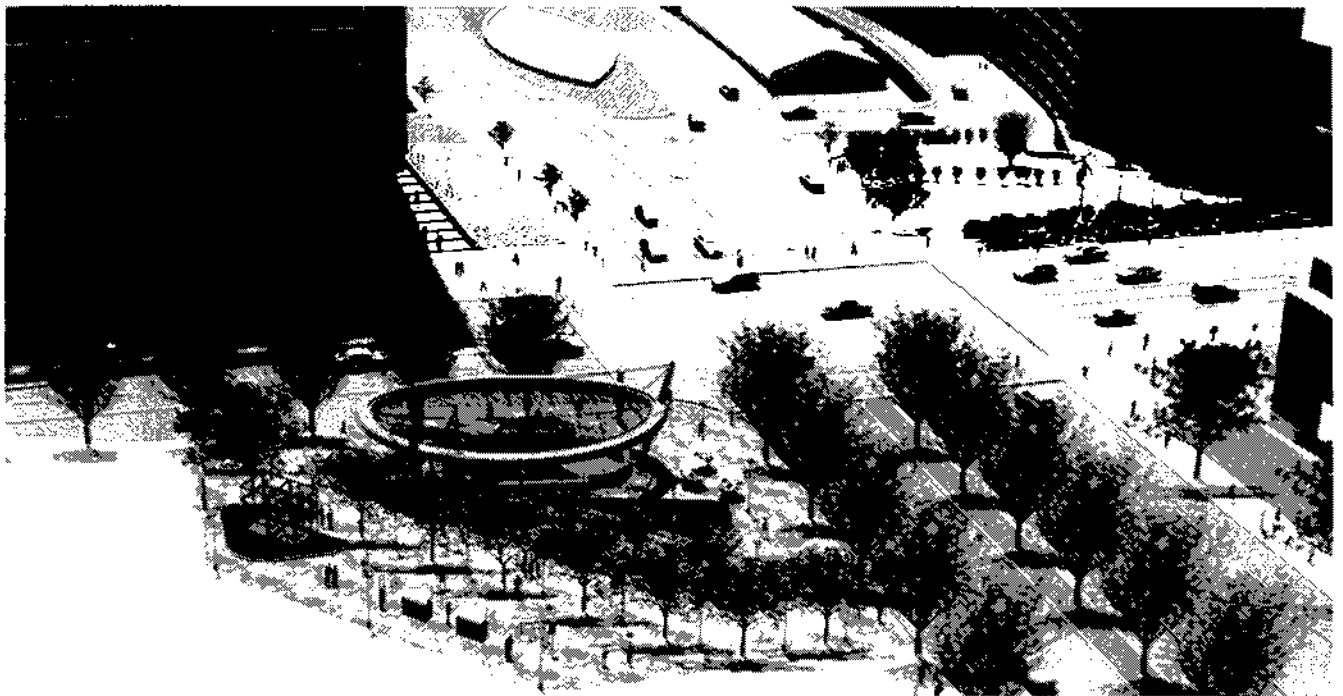
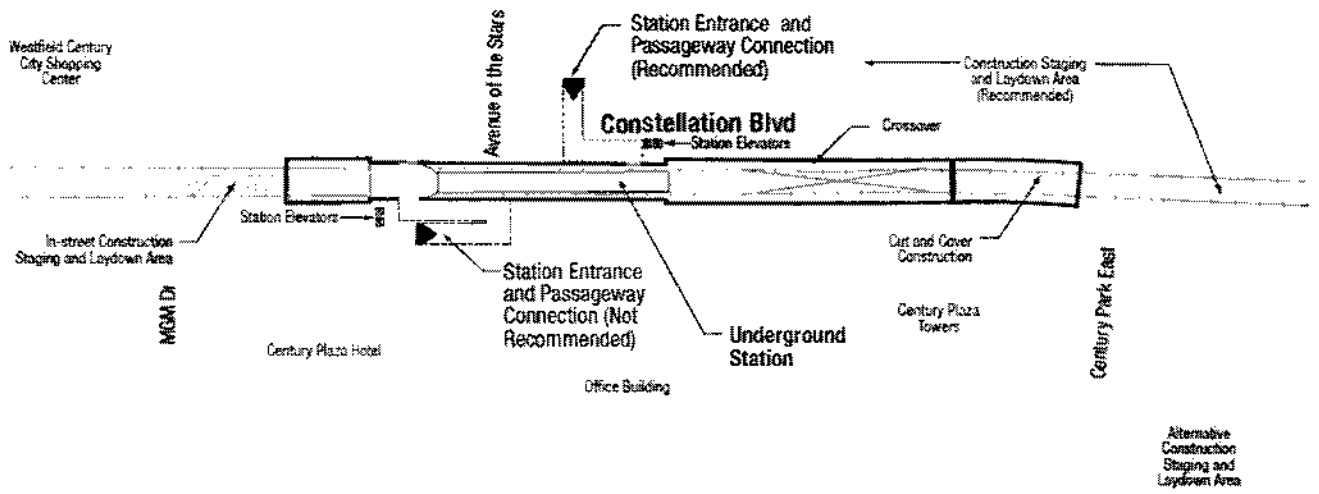
A-6: Wilshire/La Cienega Station



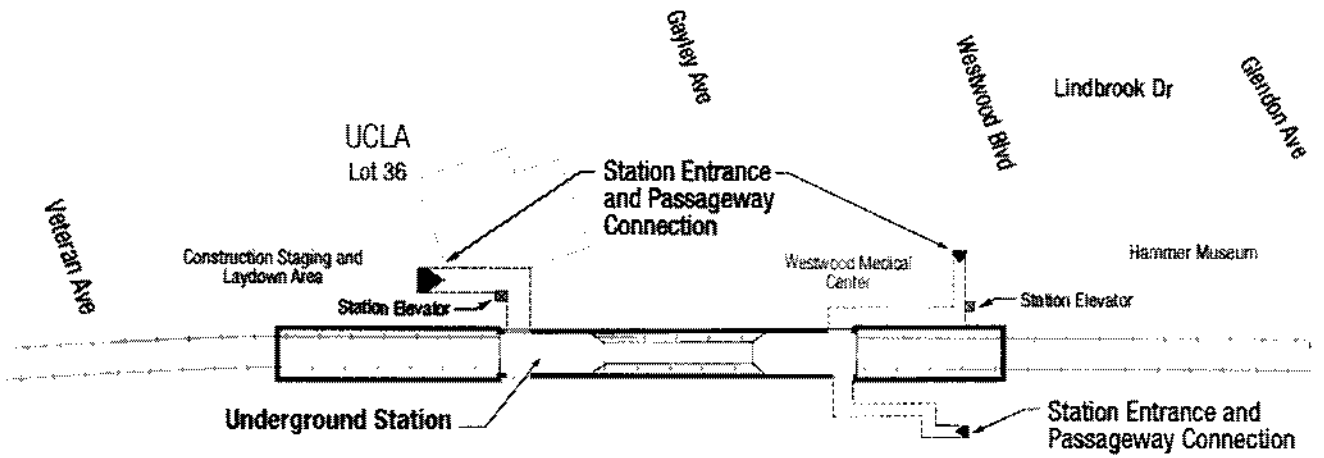
A-7: Wilshire/Rodeo Station



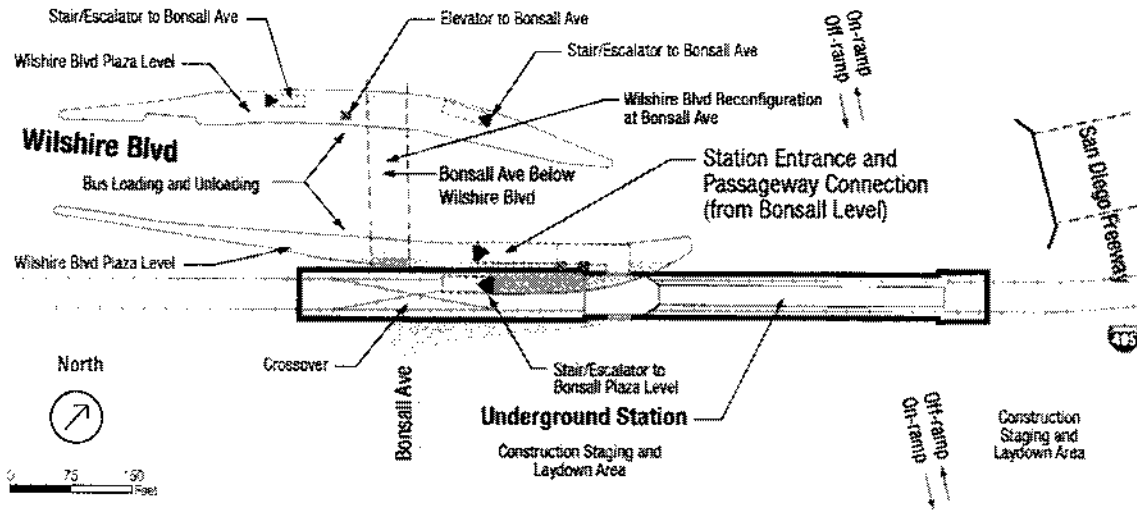
A-8: Century City Station



A-9: Westwood/UCLA Station



A-10: Westwood/VA Hospital Station



FEIS/FEIR Executive Summary

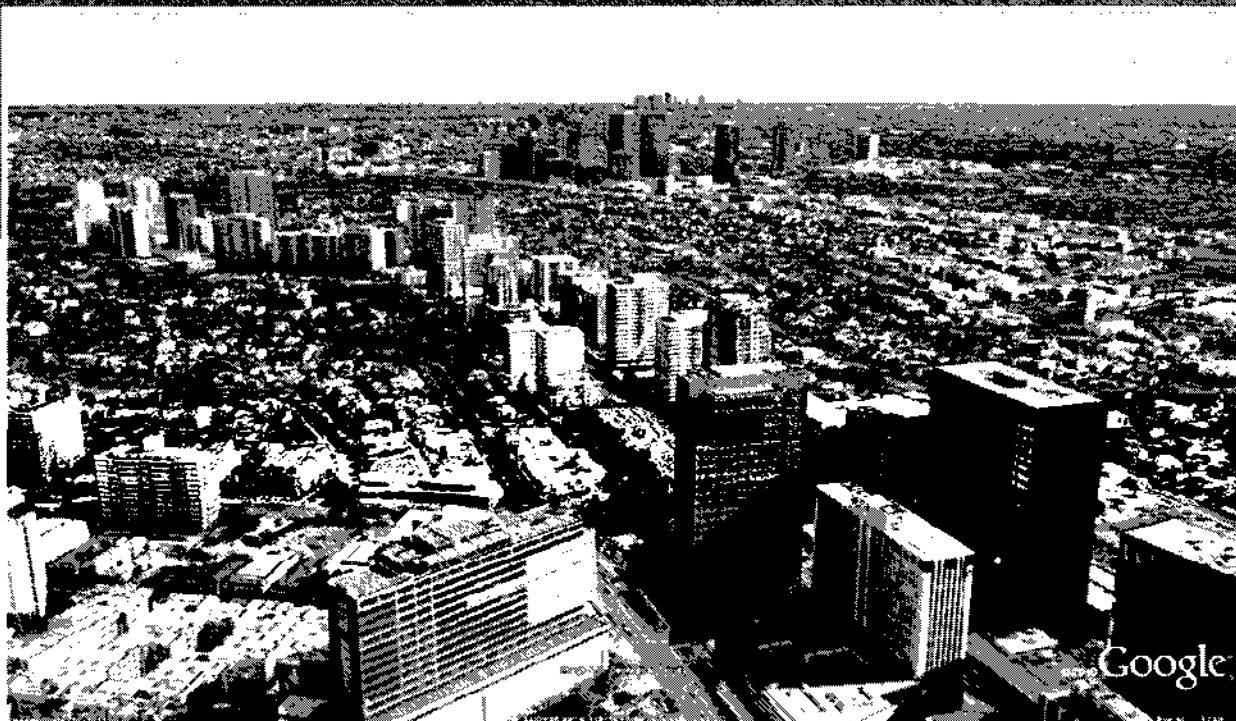
Los Angeles County
Metropolitan Transportation Authority

Westside Subway Extension

Final Environmental Impact Statement/Environmental Impact Report

> **Executive Summary**

March 2012



Westside of Los Angeles (Westwood Village looking east toward Century City and Downtown Los Angeles)

This Executive Summary provides an overview of the information contained in the Westside Subway Extension Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR).

Introduction

The U.S. Department of Transportation Federal Transit Administration (FTA) and the Los Angeles County Metropolitan Transportation Authority (Metro) are analyzing the Los Angeles Westside Subway Extension. On October 28, 2010, the Metro Board of Directors selected the Westwood/VA Hospital Extension (Alternative 2 in the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR)) as the Locally Preferred Alternative (LPA) for further evaluation in this Final EIS/EIR.

The LPA will improve mobility and provide fast, reliable, high-capacity, and environmentally sound transportation solutions in the Westside of Los Angeles.

This Final EIS/EIR for the LPA was prepared, with specific direction from the Metro Board of Directors, to further evaluate station and alignment options and rail support facilities. The Final EIS/EIR evaluation includes two station location options for each of the Century City, Westwood/UCLA, and Westwood/VA Hospital Stations, and station entrance options at most of the LPA station locations. The results of these evaluations will be used by the Metro Board of Directors to select the project for implementation (Figure S-1).

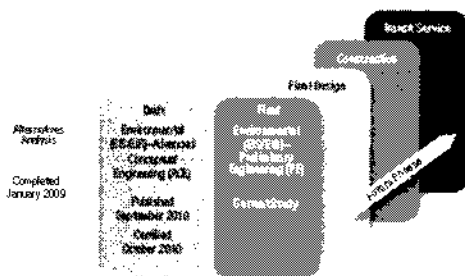


Figure S-1. Steps in the FTA Project Development Process

At the conclusion of the Final EIS/EIR process, a Notice of Determination will be issued by the State and a Record of Decision will be issued by FTA, thereby completing the environmental clearance process.

The Study Area population and employment densities are among the highest in the metropolitan region. Approximately 5 percent of the Los Angeles County population and 10 percent of the jobs are concentrated in the Study Area.

The Study Area for the Project is located in western Los Angeles County and encompasses approximately 38 square miles. The Study Area is east/west oriented and includes portions of the Cities of Los Angeles, West Hollywood, Beverly Hills, and Santa Monica, as well as portions of unincorporated Los Angeles County. The Study Area boundaries generally extend north to the base of the Santa Monica Mountains along Hollywood, Sunset, and San Vicente Boulevards; east to the Metro Rail stations at Hollywood/Highland and Wilshire/Western; south to Pico Boulevard; and west to the Pacific Ocean (Figure S-2).

The LPA will extend heavy rail transit (HRT), in subway, approximately 9 miles from the existing Metro Purple Line western terminus at the Wilshire/Western Station to a new western terminus at the West Los Angeles Veterans Affairs (VA) Hospital (Westwood/VA Hospital Station, (Figure S-3)). The LPA will include seven new stations spaced in approximately 1-mile intervals, as follows:

- ▶ Wilshire/La Brea
- ▶ Wilshire/Fairfax
- ▶ Wilshire/La Cienega
- ▶ Wilshire/Rodeo
- ▶ Century City (Century City Santa Monica or Century City Constellation)
- ▶ Westwood/UCLA (Westwood/UCLA On-Street or Westwood/UCLA Off-Street)
- ▶ Westwood/VA Hospital (Westwood/VA Hospital South or Westwood/VA Hospital North)

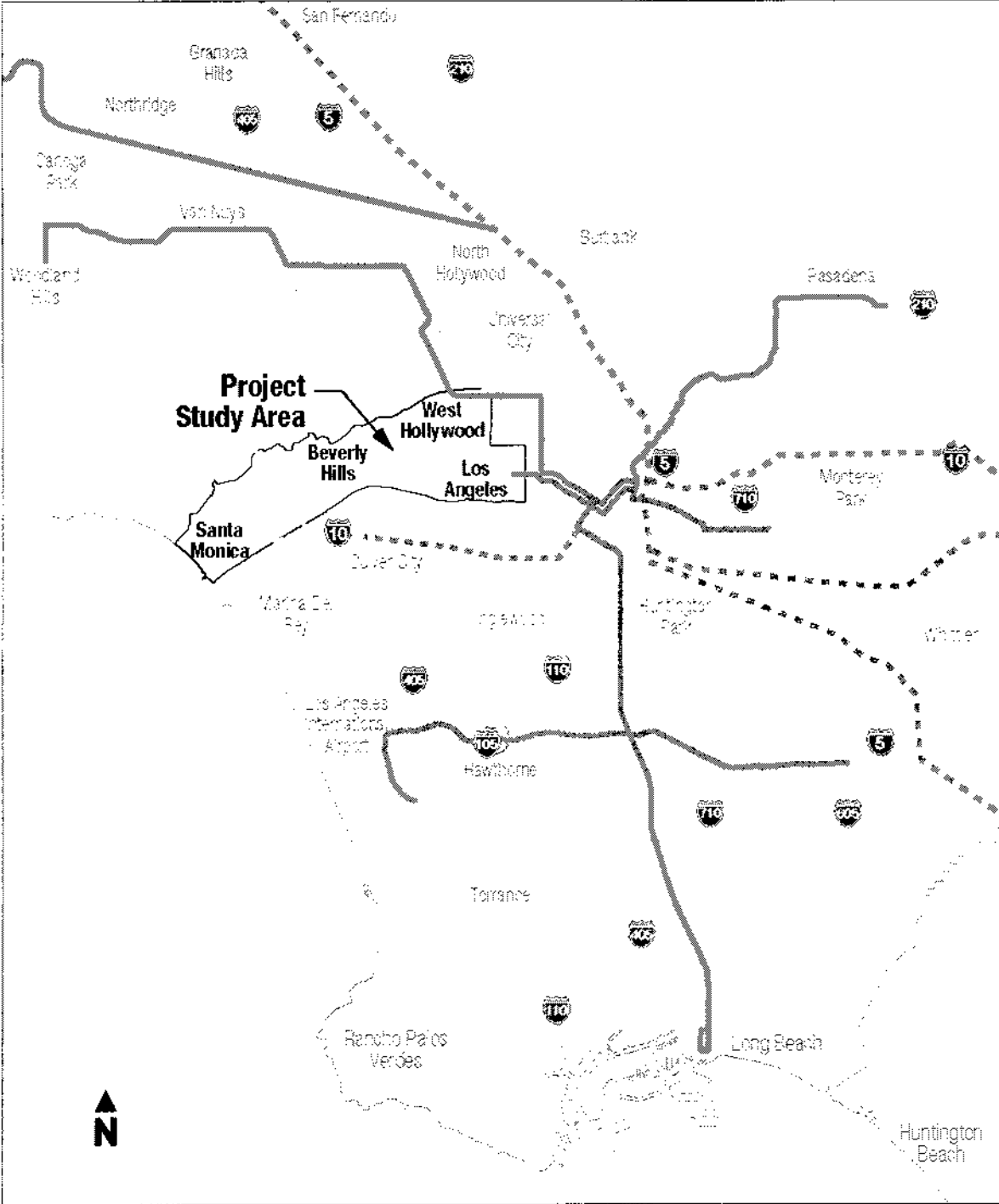


Figure S-2. Westside Subway Extension Project Area

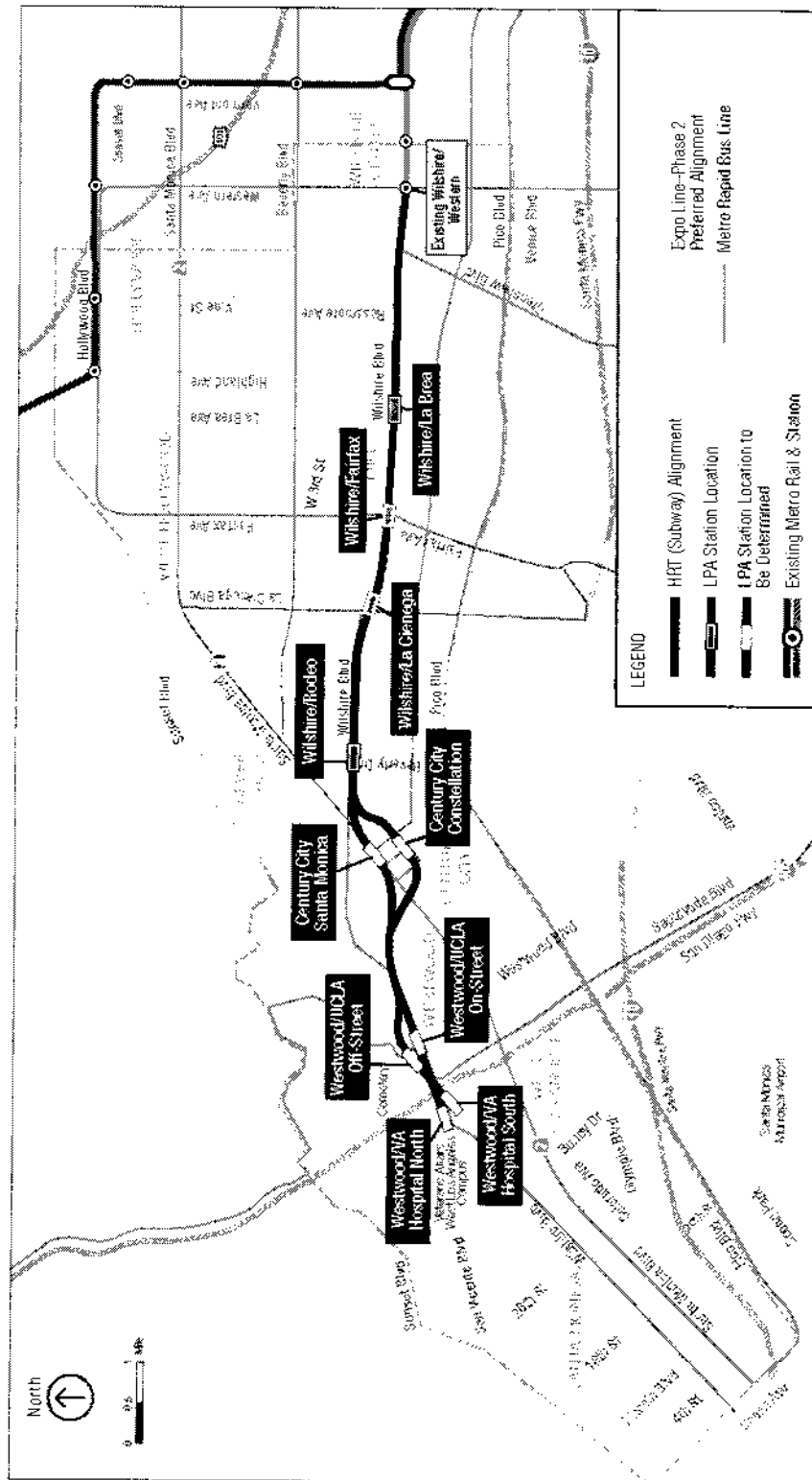


Figure S-3. Westside Subway Extension Project

The estimated one-way running time ranges from approximately 14 minutes, 26 seconds to 15 minutes, 21 seconds from the Wilshire/Western Station to the Westwood/VA Hospital Station depending on the alignment between the Wilshire/Rodeo and Westwood/VA Hospital Stations. Total projected daily boardings for the LPA range from approximately 46,000 to 49,300 per day.

Recommendations for further refinements to the LPA are detailed on page S-87 of this Executive Summary and Chapter 7 of the Final EIS/EIR. The Metro Board of Directors will decide on further refinements to the LPA following the circulation and public review of this Final EIS/EIR.

As part of the LPA, Metro also is planning several enhancements to the Division 20 Maintenance and Storage Facility located in Downtown Los Angeles. All of the LPA elements are listed in Table S-1 and are detailed in Chapter 2 of this Final EIS/EIR.

The construction schedule for the LPA is partially dependent on the timing of Federal funding availability. Two LPA construction scenarios are considered in this Final EIS/EIR – the America Fast Forward (30/10) Scenario (Concurrent Construction) and the Metro Long Range Transportation Plan (LRTP) Scenario (Phased Construction).

Under the Concurrent Construction Scenario, the LPA is expected to be operational to Westwood/VA Hospital in 2022, with construction beginning in 2013. Under this scenario, the parallel construction of portions of the alignment and stations will allow the entire LPA to be open and operational at the same time rather than opening in phases.

In the event that accelerated Federal funding is not secured, the LPA will be constructed in three sequential phases under the Phased

Construction Scenario. The first phase to the Wilshire/La Cienega Station will open in 2020; the second phase to the Century City Station will open in 2026; and the final phase to the Westwood/VA Hospital Station will open in 2036.

The LPA is estimated to cost approximately \$5.66 billion (in Year of Expenditure dollars) if constructed under the Concurrent Construction Scenario. Alternatively, if the LPA is constructed under the Phased Construction Scenario, it is estimated to cost approximately \$6.29 billion (in Year of Expenditure dollars).

Stations

Typical HRT stations consist of a station “box,” or area in which the basic components are located. The station box will be accessed from street-level entrances by stairs, escalators, and elevators that will bring patrons to a concourse level where the ticketing functions and fare gates will be located. The 450-foot-long platforms will be one level below the concourse level and will allow level boarding (the train car floor will be at the same level as the platform) for full accessibility. Stations will have a center platform.

Each station will be constructed with one entrance, with the exception of the Westwood/UCLA Station, which will have two entrances due to projected high ridership. This Final EIS/EIR analyzes several possible station entrance locations for a number of the stations. The station entrance location recommendations are detailed on page S-87 and will be decided by the Metro Board of Directors following the circulation and public review of this Final EIS/EIR.

The LPA will include seven new stations, each serving major activity and employment centers on the Westside of Los Angeles.

Table S-1. LPA Elements

LPA Element	Description
Tunnel Alignment	<ul style="list-style-type: none"> • Approximately nine miles of twin-bored tunnels extending west from the existing Wilshire/Western Station to a Westwood/VA Hospital Station • Tunnels approximately 20 to 21 feet in diameter and bored side-by-side and separated by a pillar of ground between; subway train tracks range from 35 to more than 100 feet below the surface (Figure S-4) • Tunnels primarily under city streets and public rights-of-way; however, in a few areas between the Wilshire/Rodeo and Westwood/VA Hospital Stations, tunnels will be located beneath private properties
Stations	<p>Seven stations located in approximately one-mile intervals along the alignment (Figure S-5):</p> <ul style="list-style-type: none"> • Wilshire/La Brea • Wilshire/Fairfax • Wilshire/La Cienega • Wilshire/Rodeo • Century City¹ (Century City Santa Monica OR Century City Constellation) • Westwood/UCLA¹ (Westwood/UCLA On-Street OR Westwood/UCLA Off-Street) • Westwood/VA Hospital¹ (Westwood/VA Hospital South OR Westwood/VA Hospital North)
Station Entrances	<ul style="list-style-type: none"> • One station entrance at each of the seven stations, with the exception of the Westwood/UCLA Station, which will have two station entrances
Construction Laydown Areas	<ul style="list-style-type: none"> • Four station construction sites, each approximately one to two acres, located at the Wilshire/Fairfax, Wilshire/La Cienega, Wilshire/Rodeo, and Westwood/UCLA Stations • Three combined tunnel boring machine launch and station construction sites, each approximately three acres, located at the Wilshire/La Brea, Century City, and Westwood/VA Hospital Stations • Two additional construction staging sites to support construction activities, each approximately one acre, located at the existing Wilshire/Western Station and the Wilshire/Crenshaw intersection
Special Trackwork	<ul style="list-style-type: none"> • Five sets of double crossovers located at the Wilshire/La Brea, Wilshire/La Cienega, Wilshire/Rodeo, Century City, and Westwood/VA Hospital Stations • Tail tracks at the Westwood/VA Hospital Station
Traction Power Substations (TPSS)	<ul style="list-style-type: none"> • One TPSS at each of the seven stations, with the exception of the Wilshire/Fairfax Station
Emergency Generators	<ul style="list-style-type: none"> • Two emergency generators, one located at the Wilshire/La Brea Station and one located at the Westwood/VA Hospital Station
Emergency Exit Shafts	<ul style="list-style-type: none"> • One emergency exit shaft located at the western terminus of the tail track, west of the Westwood/VA Hospital Station
Maintenance Yard	<ul style="list-style-type: none"> • Expansion of the Division 20 Maintenance and Storage Facility to accommodate additional heavy rail vehicles
Replacement Parking Structure	<ul style="list-style-type: none"> • Permanent parking structure at the Westwood/VA Hospital South Station to replace parking losses on the VA property resulting from construction staging activities
Operating Plan	<ul style="list-style-type: none"> • Seven days per week, 365 days per year, 4:30 a.m. to 1:30 a.m. • Peak-period headways of 4 minutes • Off-peak headways of 10 minutes

¹Station location to be determined by the Metro Board of Directors following the circulation and public review of this Final EIS/EIR

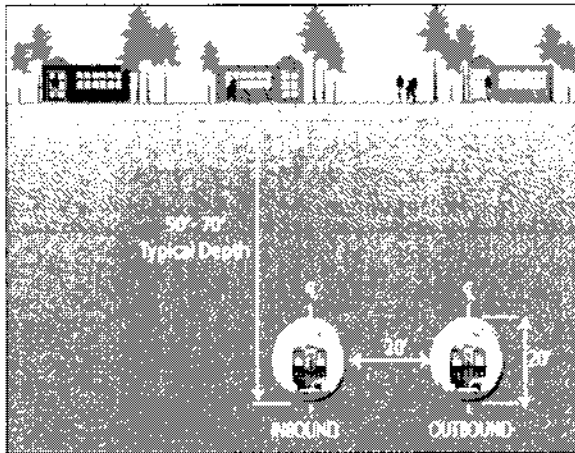


Figure S-4. Typical Subway Tunnels

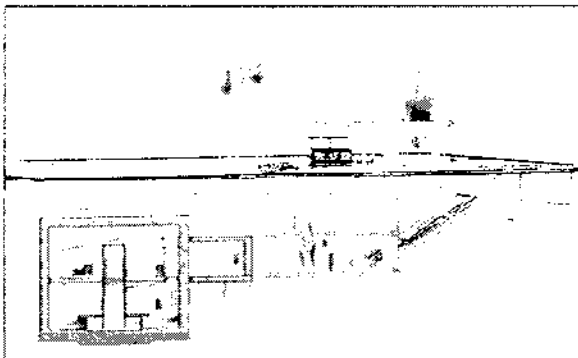


Figure S-5. Typical Subway Station

The Wilshire/La Brea Station will be located in a commercial and residential area and will serve as a key transit connection (Figure S-6). The entrance will either be on the northwest or the southwest corner of the Wilshire Boulevard and La Brea Avenue intersection. The recommendation is to locate the entrance on the northwest corner at the current site of the Metro Customer Service Center. Both the northwest and southwest corners will be used as construction staging sites. If the LPA is constructed under the Phased Construction Scenario, the Wilshire/La Brea Station will be constructed as part of Phase 1.

The Wilshire/Fairfax Station will offer access to a major cultural and tourism hub, including the

Los Angeles County Museum of Art (LACMA), the Page Museum, the La Brea Tar Pits, and the Petersen Automotive Museum, and it also will provide access to points north of Wilshire Boulevard, including the nearby Farmer's Market, shops along West 3rd Street and Beverly Boulevard, and The Grove (Figure S-7). The entrance will either be immediately west of Johnie's Coffee Shop on the northwest corner of Wilshire Boulevard and Fairfax Avenue, in LACMA West (the former May Company Building) on the northeast corner of Wilshire Boulevard and Fairfax Avenue, or on the southeast corner of Wilshire Boulevard and Orange Grove Avenue. The recommendation is to locate the entrance on the northwest corner, immediately west of Johnie's Coffee Shop. If the LPA is constructed under the Phased Construction Scenario, the Wilshire/Fairfax Station will be constructed as part of Phase 1.

The Wilshire/La Cienega Station will provide access to La Cienega Boulevard's "Restaurant Row" and a mixture of commercial, residential, and restaurant uses (Figure S-8). The entrance will be located on the northeast corner of the intersection of Wilshire and La Cienega Boulevards at the current site of the CitiBank building and the restaurant located immediately to the north. Construction staging and laydown areas will be located at the station entrance site and the northwest corner of Wilshire Boulevard and Gale Drive. If the LPA is constructed under the Phased Construction Scenario, the Wilshire/La Cienega Station will be constructed as part of Phase 1.

The Wilshire/Rodeo Station will serve the Beverly Hills "Golden Triangle," a local and regional commercial office and shopping destination as well as a hub for tourists visiting the famous Rodeo Drive and shops along Wilshire Boulevard, Beverly Drive, and other streets (Figure S-9). The entrance will either be on the southwest corner

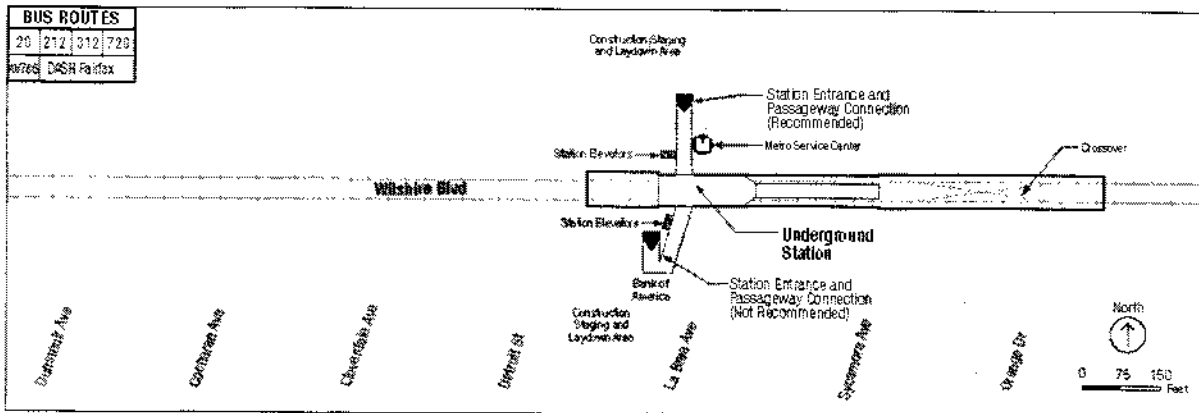


Figure S-6. Wilshire/La Brea Station

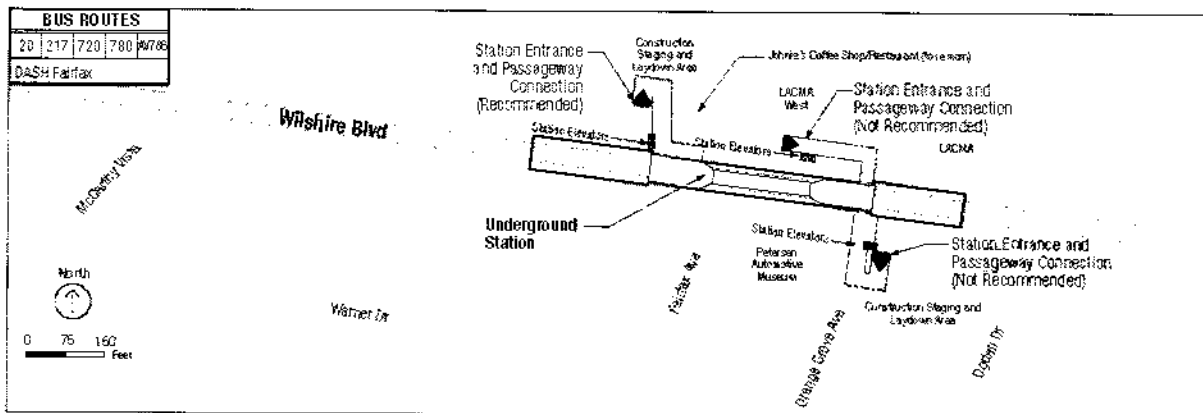


Figure S-7. Wilshire/Fairfax Station

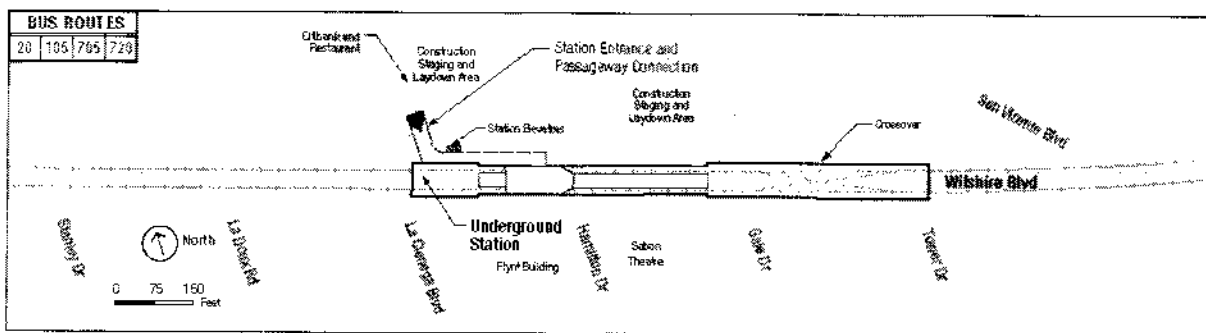


Figure S-8. Wilshire/La Cienega Station

of Wilshire Boulevard and Reeves Drive at the current site of the Ace Gallery, on the northwest corner of Wilshire Boulevard and Beverly Drive (adjacent to the Bank of America building), or on the southeast corner of the Wilshire Boulevard and El Camino Drive intersection at the current site of the Union Bank building parking garage. The

recommendation is to locate the station entrance on the southwest corner of Wilshire Boulevard and Reeves Drive at the current site of the Ace Gallery. Construction staging and laydown will be located on the Ace Gallery site and the northeast corner of Wilshire Boulevard and Canon Drive. If the LPA is constructed under the Phased Construc-

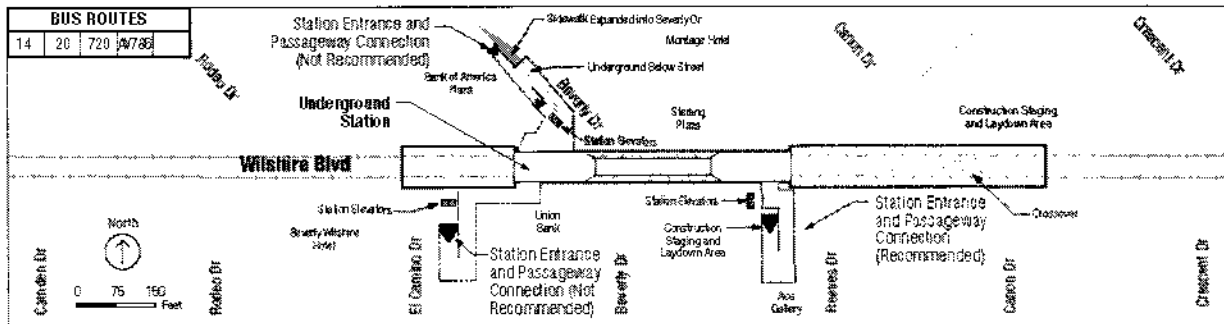


Figure S-9. Wilshire/Rodeo Station

tion Scenario, the Wilshire/Rodeo Station will be constructed as part of Phase 2.

The Century City Station will serve a high-density commercial, employment, and residential center. As part of the LPA selection at the end of the Draft EIS/EIR phase in October 2010, the Metro Board of Directors directed the continued study of two station locations in Century City (Santa Monica Boulevard and Constellation Boulevard). The location of the Century City Station will affect the tunnel alignment to the east and west of the station. The location of the Century City Santa Monica Station evaluated in this Final EIS/EIR (at Century Park East) is located farther east than the location in the Draft EIS/EIR (at Avenue of the Stars). As part of the seismic analysis, conducted during the Final EIS/EIR phase, Metro determined that the location of the Century City Santa Monica Station at Avenue of the Stars is directly above the Santa Monica Fault zone and is not a safe location and thus not considered a viable option for the station. As a result, the Century City Santa Monica Station location was shifted approximately one-third of a mile to the east to Century Park East. Subsequent to shifting the station location, further seismic and geotechnical testing were conducted in Century City, which determined that the Century City Santa Monica Station at Century Park East is located above a northern extension of the Newport-Inglewood Fault zone, and also is not a safe location and thus not considered a viable option for the station.

The recommendation is to locate the Century City Station along Constellation Boulevard based on the evaluation of seismic safety as well as higher ridership projections. If the LPA is constructed under the Phased Construction Scenario, the Century City Station will be constructed as part of Phase 2.

The Century City Santa Monica Station would be located underneath Santa Monica Boulevard from just west of Century Park East to Moreno Drive. A separate crossover box would be located east of Moreno Drive. The entrance would be located on the southwest corner of Santa Monica Boulevard and Century Park East (Figure S-10). Construction staging and laydown would be located at the former Robinson May parking garage and along the median between Santa Monica Boulevard and Little Santa Monica Boulevard. Based on the *Westside Subway Extension Century City Fault Investigation Report* (Metro 2011w), this location is not considered a viable option due to seismic safety issues.

The Century City Constellation Station would be located underneath Constellation Boulevard from west of Avenue of the Stars to just west of Century Park East. The entrance would be located either at the northeast corner of Constellation Boulevard and Avenue of the Stars or at the southwest corner of Constellation Boulevard and Avenue of the Stars near the Century Plaza Hotel (Figure S-11). The recommendation is to locate the entrance on the northeast corner. Construction staging and lay-

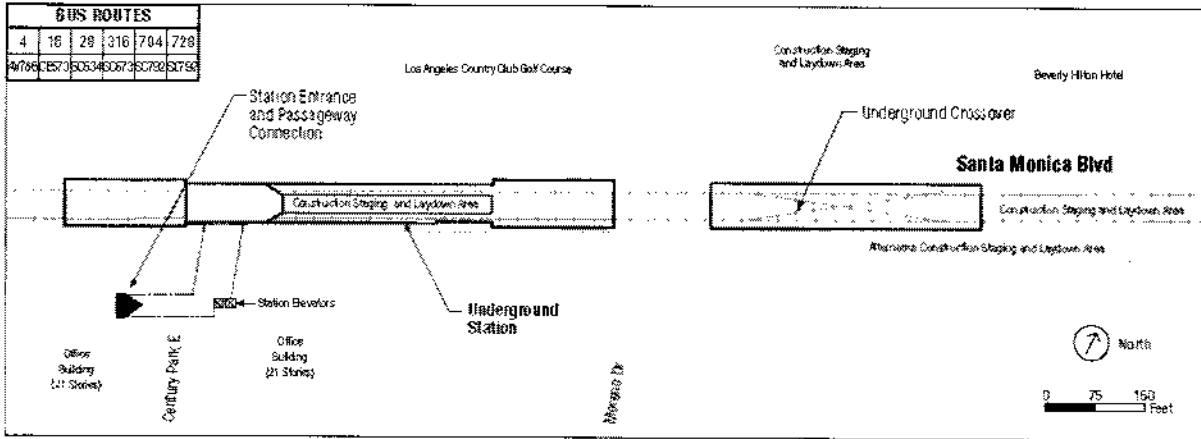


Figure S-10. Century City Santa Monica Boulevard Station (not recommended)

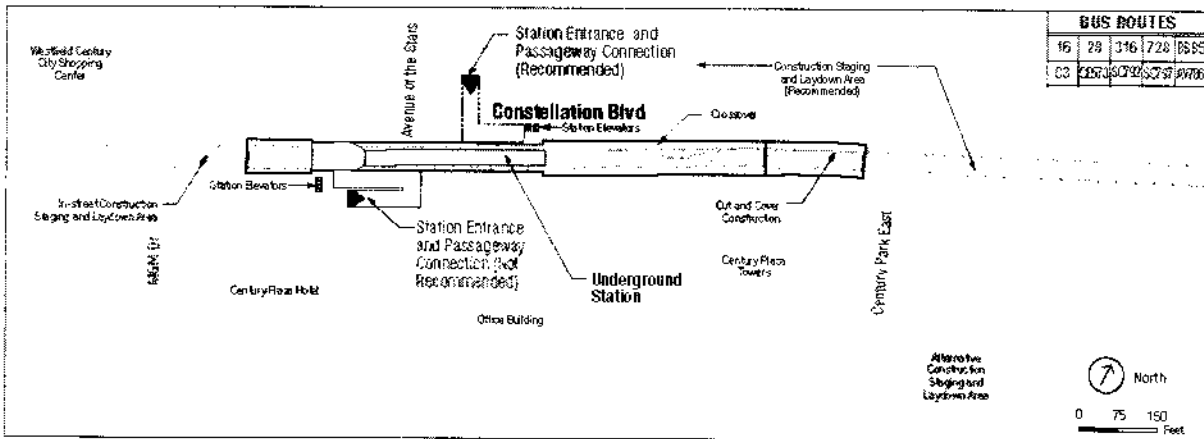


Figure S-11. Century City Constellation Boulevard Station (recommended)

down would be located on the northeast corner of Constellation Boulevard and Avenue of the Stars. In the event that this land is developed prior to construction of the subway, alternative construction staging sites are identified along Century Park East.

The Westwood/UCLA Station will serve as a major hub station for tourists, the University of California, Los Angeles (UCLA), and medical center users, students, professors, and employees in Westwood Village. As part of the LPA selection at the end of the Draft EIS/EIR phase in October 2010, the Metro Board of Directors requested the continued study of two station locations at Westwood/UCLA (Off-Street and On-Street). Two

entrances will be constructed given the high ridership projections at this station. Based on analysis conducted during the Final EIS/EIR phase, the recommendation is to locate the Westwood/UCLA Station On-Street along Wilshire Boulevard and to split the second station entrance between the north and south sides of Wilshire Boulevard. If the LPA is constructed under the Phased Construction Scenario, the Westwood/UCLA Station will be constructed as part of Phase 3.

The Westwood/UCLA Off-Street Station would be located underneath UCLA Lot 36, north of Wilshire Boulevard between Gayley and Veteran Avenues. The entrances would be on the north-

west corner of the Wilshire Boulevard and Gayley Avenue intersection and the northeast corner of the Wilshire Boulevard and Veteran Avenue intersection (Figure S-12). This station site and entrance locations are not the recommended station location for Westwood/UCLA.

The Westwood/UCLA On-Street Station would be located under Wilshire Boulevard, extending just west of Westwood Boulevard to west of Gayley Avenue, almost to Veteran Avenue. Two configurations for the entrance are under consideration. In the first option, both station entrances would be located on the north side of Wilshire Boulevard (the northwest corner of Wilshire Boulevard and Gayley Avenue and the northwest corner of Wilshire Boulevard and Westwood Boulevard). In

the second option, one entrance would be located at the northwest corner of Wilshire Boulevard and Gayley Avenue, but the second entrance at the intersection of Wilshire and Westwood Boulevards would be split between the north and south sides of Wilshire Boulevard (Figure S-13). This is the recommended location for the Westwood/UCLA Station. The recommended entrance configuration is to split the entrance at the intersection of Wilshire and Westwood Boulevards between the north and south sides of Wilshire Boulevard to improve pedestrian access.

The Westwood/VA Hospital Station will serve veterans, visitors, and workers using the VA campus and provide connections to the West Los Angeles, Brentwood, and Santa Monica communities. As

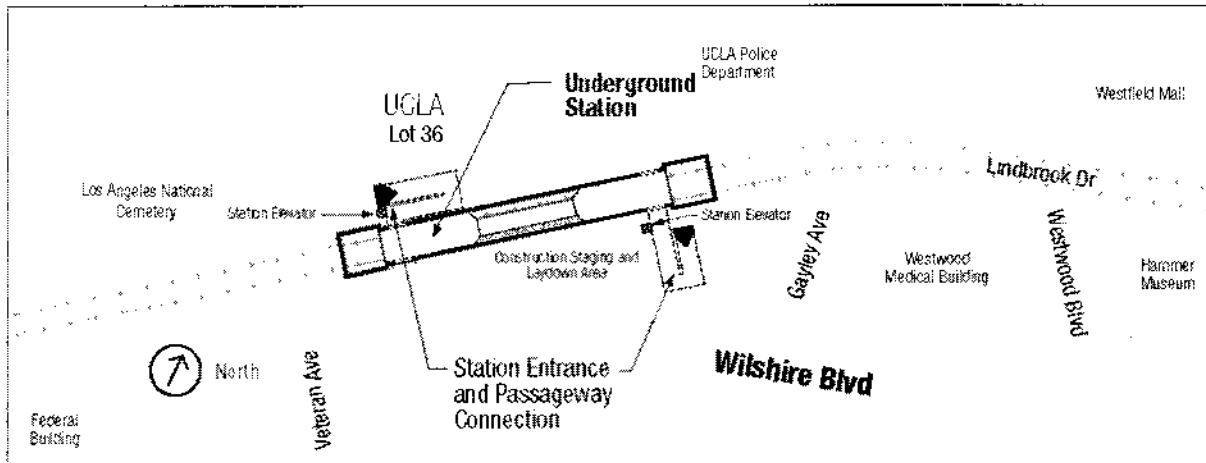


Figure S-12. Westwood/UCLA Off-Street Station (not recommended)

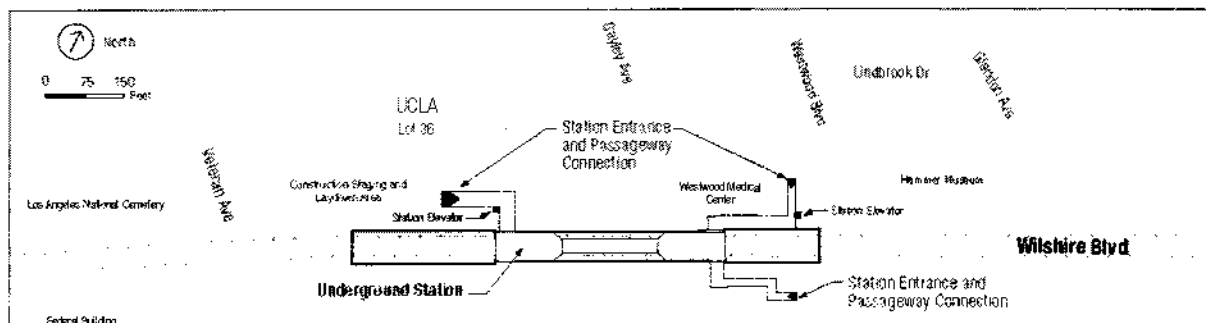


Figure S-13. Westwood/UCLA On-Street Station (recommended)

part of the LPA selection in October 2010, the Metro Board of Directors requested the continued study of two station locations at Westwood/VA Hospital. The recommendation is to locate the Westwood/VA Hospital Station on the south side of Wilshire Boulevard. If the LPA is constructed under the Phased Construction Scenario, the Westwood/VA Hospital Station will be constructed as part of Phase 3.

The Westwood/VA Hospital South Station would be located at the northern edge of the VA Hospital parking lot, adjacent to Wilshire Boulevard (Figure S-14). The entrance would be located on the Bonsall level, beneath the bus drop-off area, to the north of the VA Hospital parking lot. To accommodate the grade separation at this site, additional stairs, escalators, and elevators connecting the Wilshire level and the Bonsall level would be located on both the north and south sides of Wilshire Boulevard. A parking structure providing both permanent and temporary replacement parking would be located in the existing physicians' parking lot, east of the VA Hospital. Based on the analysis conducted during the Final EIS/EIR

phase, this is the recommended station location for the Westwood/VA Hospital Station.

The Westwood/VA Hospital North Station would be located on the north side of Wilshire Boulevard (Figure S-15). The entrance would be located along the north side of Wilshire Boulevard, just west of Bonsall Avenue and south of the station box on the Bonsall level. As with the South Station, to accommodate the grade separation at this site, stairs, escalators, and elevators connecting the Wilshire level and the Bonsall level would be located on both the north and south sides of Wilshire Boulevard. Based on the analysis conducted during the Final EIS/EIR phase, this is not the recommended station location for the Westwood/VA Hospital Station.

History and Background of the Westside Subway Extension Project

Metro's Westside Subway Extension has been an integral element of local, regional, and Federal transportation planning since the early 1980s. Extending westward from the Los Angeles Central Business District, the Westside Subway Extension

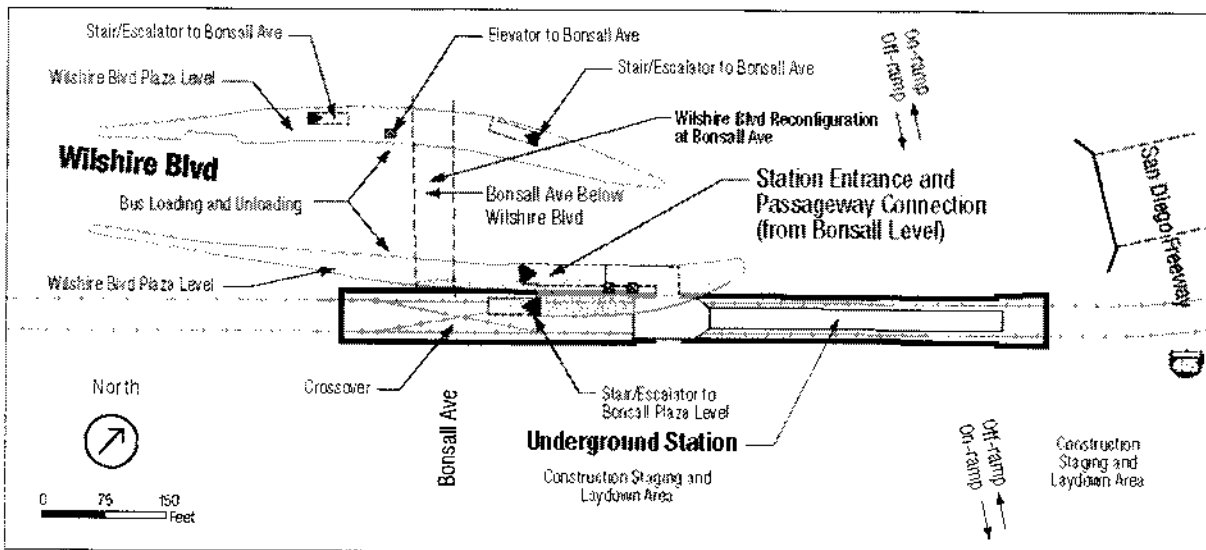


Figure S-14. Westwood/VA Hospital South Station (recommended)

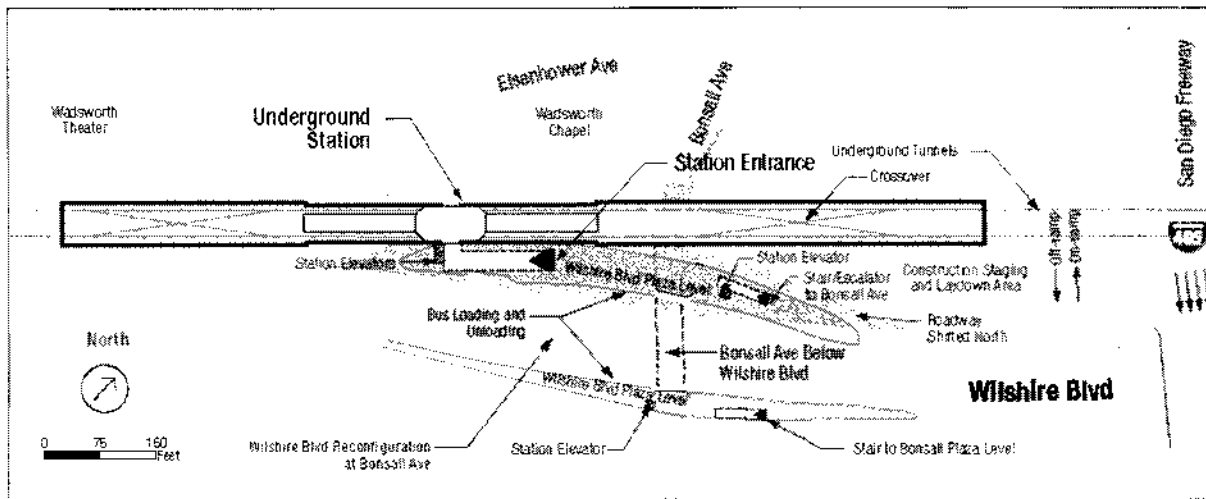


Figure S-15. Westwood/VA Hospital North Station (not recommended)

has been the subject of in-depth technical studies and extensive community involvement during this period. The transit investment has historically been envisioned to extend toward Beverly Hills, Century City, Westwood (UCLA), West Los Angeles, and Santa Monica. Figure S-16 summarizes the history of the Project.

An Alternatives Analysis (AA) Study was initiated in 2007 for all reasonable fixed-guideway alternative alignments and transit technologies. The evaluation of alternatives in the AA Study resulted in the identification of HRT as the preferred technology and the recommendation of two alternative alignments for further consideration in the Draft EIS/EIR. These two alignment alternatives were: (1) Extend the Metro Purple Line Subway via Wilshire Boulevard to Santa Monica, and (2) Extend the Metro Purple Line Subway via Wilshire Boulevard to Santa Monica plus extend a subway from the Metro Red Line Subway Hollywood/Highland Station via Santa Monica Boulevard to connect with the Wilshire line. In January 2009, the Metro Board of Directors approved the AA Study and authorized preparation of the Draft EIS/EIR.

During preparation of the AA Study, the voters of Los Angeles County approved Measure R in November 2008, a one-half cent sales tax that provides funding for several important new transportation projects in Los Angeles County. A total of \$4.2 billion, comprised of local sales tax dollars and Federal matching funds, was identified over a period of 30 years for the Westside Subway Extension.

The FTA and Metro prepared the Draft EIS/EIR for the Westside Subway Extension in 2010. The FTA is the lead agency for the National Environmental Policy Act (NEPA), and Metro is the lead agency for the California Environmental Quality Act (CEQA). The Draft EIS/EIR defined the Purpose and Need of the Project and described and evaluated the alternatives, including a No Build Alternative, a relatively low-cost Transportation System Management (TSM) Alternative, and five heavy rail subway alternatives. The Draft EIS/EIR documented the evaluation of the potential transportation and environmental impacts and benefits, mitigation measures, operating and maintenance and capital costs, and potential funding sources for the alternatives. It also included a comparison of alternatives and a discussion of the public and

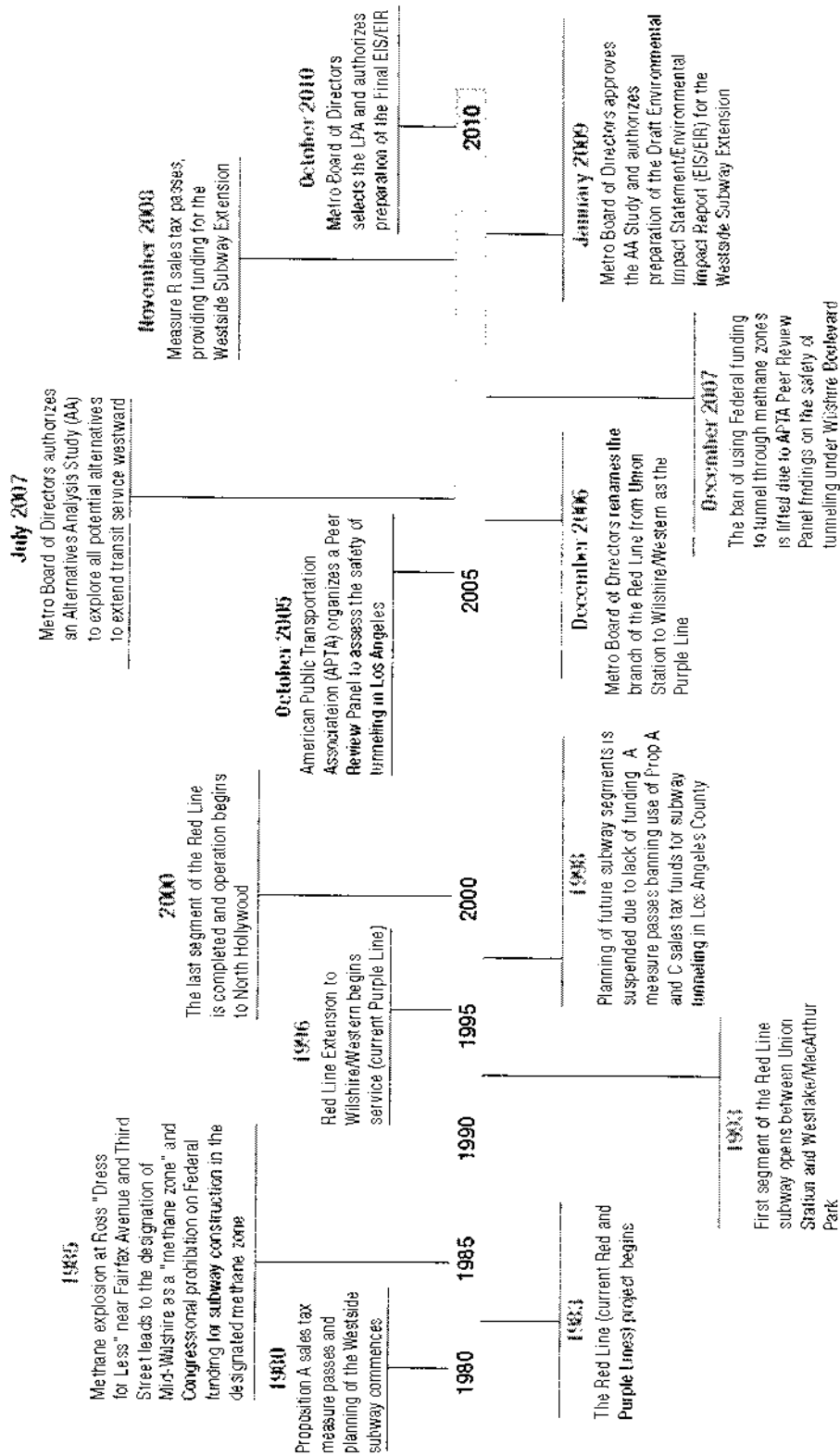


Figure S-16. Westside Subway Extension Timeline

agency outreach. The Draft EIS/EIR was published in September 2010.

The Metro Board of Directors reviewed and considered the findings of the Draft EIS/EIR and the public and agency comments on the Draft EIS/EIR received during the official comment period. On October 28, 2010, after careful deliberation of the benefits and impacts of all the alternatives analyzed and the public comments, the Metro Board of Directors approved the Draft EIS/EIR and identified Alternative 2 (Westwood/VA Hospital Extension) as the LPA.

In January 2011, the FTA granted approval for Metro to enter into the Preliminary Engineering (PE) phase. This step in the FTA project development process allows the Final EIS/EIR to be prepared at the New Starts PE level of engineering

This Final EIS/EIR for the LPA was prepared, with specific direction from the Metro Board of Directors, to further evaluate station and alignment options and rail support facilities. The Final EIS/EIR evaluation includes two station location options for each of the Century City, Westwood/UCLA, and Westwood/VA Hospital Stations, and station entrance options at most of the LPA station locations. The results of these evaluations will be used by the Metro Board of Directors to select the project for implementation.

At the conclusion of the Final EIS/EIR process, a Notice of Determination will be issued by the State and a Record of Decision will be issued by FTA, thereby completing the environmental clearance process. At that time, Metro will apply for entry into the FTA Final Design phase. Once authorized by FTA for Final Design, Metro will be able to acquire right-of-way, relocate utilities, prepare final construction plans and specifications (including construction management plans), construction

cost estimates, and bid documents. The LPA's financial plan will then be completed—which is required for all projects seeking a Full Funding Grant Agreement from the FTA. Once Final Design is complete, Metro will begin construction of the LPA, perform project testing, and then initiate transit service (Figure S-17).

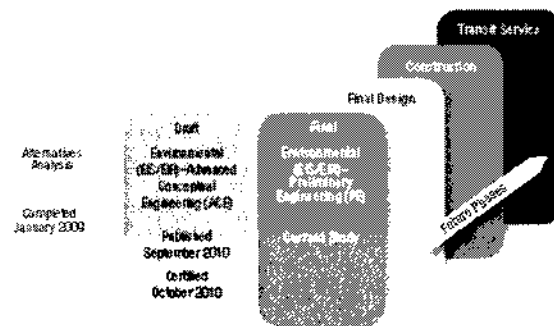


Figure S-17. Steps in the FTA Project Development Process

Purpose and Need for Transit Improvements in the Study Area

The purpose of this Project is to improve transit travel time and provide more reliable transit service to the 286,250 transit riders who travel through the highly congested Study Area today, as well as to future riders who will be attracted to the system. More specifically, the Project's purpose is as follows:

- ▶ Improve Study Area mobility and travel reliability
- ▶ Improve transit services within the Study Area
- ▶ Improve access to major activity and employment centers in the Study Area
- ▶ Improve opportunities for transit-supportive land use policies and conditions
- ▶ Improve transportation equity
- ▶ Provide a fast, reliable, and environmentally sound transit alternative
- ▶ Meet regional transit objectives through the Southern California Association of

Governments' (SCAG's) Performance Indicators of mobility, accessibility, reliability, and safety

The need for the Project, as described in Chapter 1 of this Final EIS/EIR, is based on population and employment growth, the high number of major activity centers served by the Project, high existing transit usage, and severe traffic congestion. The Study Area has 12 large population and employment centers located along the corridor, which are served by extremely congested road networks that will deteriorate further with the projected increase in population and jobs. This anticipated growth will further affect transit travel speeds and reliability, even with a dedicated lane for express bus service on Wilshire Boulevard. The improved capacity that will result from the subway extension is the best solution to improve travel times and reliability and to provide a high-capacity, environmentally sound transit alternative.

Major Activity Centers and Destinations

Los Angeles has been characterized as a collection of urban centers. The City of Los Angeles "Centers Concept" from the 1960s and 1970s identified urban centers of various types throughout the region that represented concentrations of job centers and higher-density housing. Wilshire Center, Hollywood, Miracle Mile, Sunset Strip, Beverly Hills, Westwood, Santa Monica, and others were all designated centers in the plan. The Centers Concept envisioned that these areas would be interconnected by transit infrastructure. The Westside Subway Extension will implement a portion of the plan by linking some of these high-density centers via transit to reduce reliance on automobiles.

The Westwood and Century City business districts each have more jobs than many mid-sized downtowns.

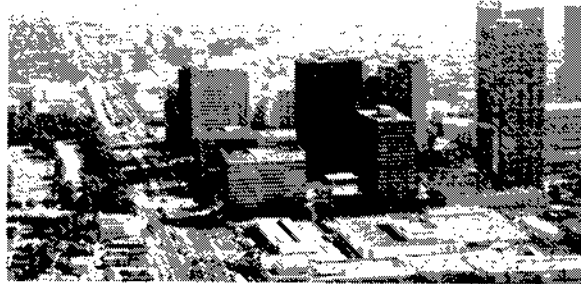


Figure S-18. Century City

The Westside Study Area has the second-highest concentration of employment centers and major attractions in the Southern California region after Downtown Los Angeles. The Study Area is widely recognized as one of the preeminent employment generators in California. The three largest activity centers with the highest density levels are Beverly Hills (26,000 jobs per square mile), Century City (43,000 jobs per square mile) (Figure S-18), and Westwood (42,000 jobs per square mile). Approximately 147,000 jobs were located in these three centers in 2006.

Major activity centers in the Study Area are shown in Figure S-19. Some of Southern California's most well-known entertainment, educational, and cultural activity centers are located within the Study Area along the high-density Wilshire and Santa Monica Boulevard corridors.

Travel Markets, Transit Usage, Congestion, and Mobility in the Study Area

Currently, the transportation network consists of a well-defined grid of arterials and freeways generally following an east/west or north/south orientation. These freeways and streets carry some of the highest traffic volumes in California and throughout the country.

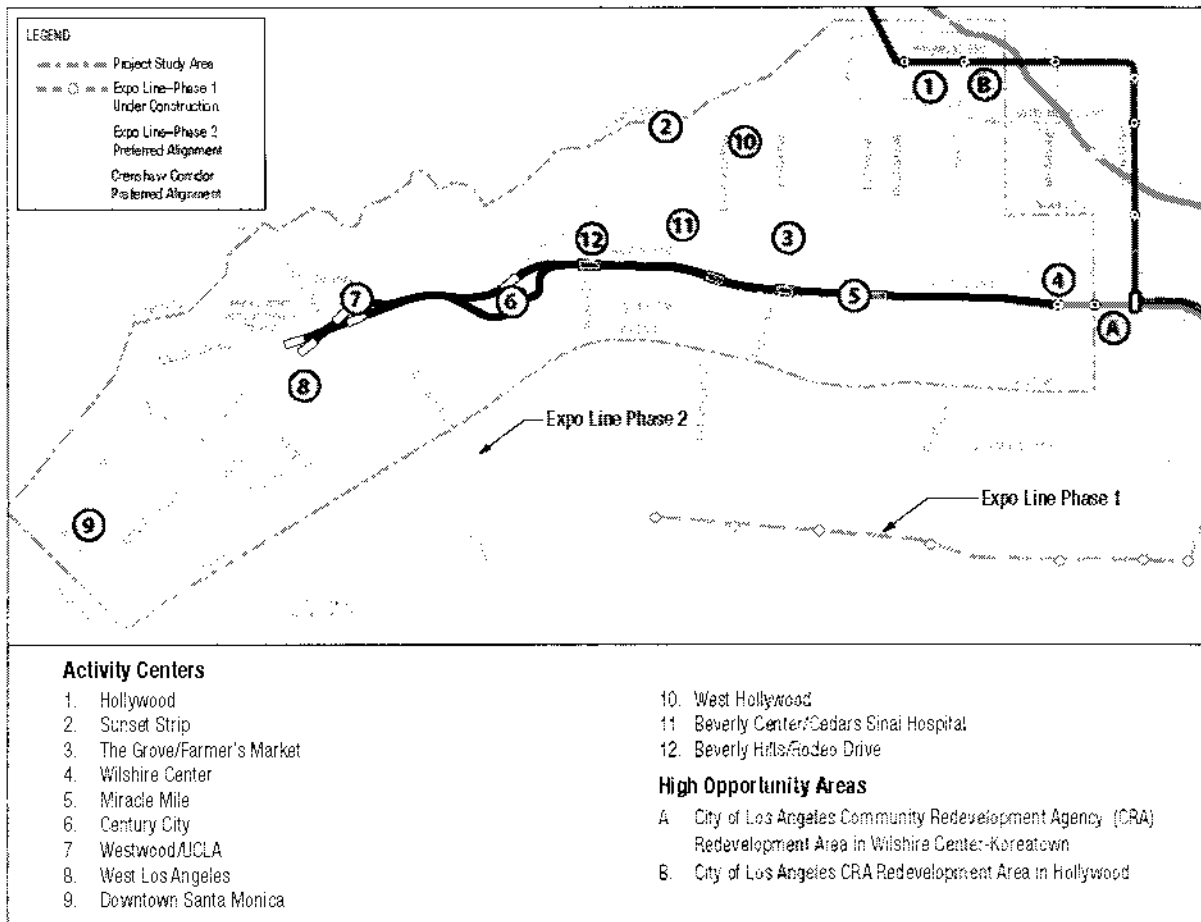


Figure S-19. Activity Centers in the Study Area

Travel Markets

The primary travel markets in the Study Area are the east/west trips occurring within or traveling to and from the Westside. As shown in Figure S-20, on an average weekday, about 301,000 home-based work peak trips enter the Study Area from outside origins, while about 123,000 trips leave the Study Area for outside destinations (i.e., more than twice as many work trips enter the Study Area as leave). There are 102,000 daily home-based work peak trips starting and ending within the Study Area, suggesting that approximately one in four Study Area jobs is filled by local (Study Area) residents. The remaining 75 percent of the jobs were filled by individuals who live outside the Study Area. Pro-

jections suggest that the ratio of home-based work peak trips entering or leaving the Study Area daily will remain about the same through 2035.

Transit

All bus service in the Study Area is currently provided in mixed-flow lanes, which subjects buses to the same high levels of congestion experienced by automobiles. The Wilshire Corridor (Line 20/720) is the most used bus corridor in Southern California with nearly 60,000 daily boardings, surpassing the ridership of most light rail transit (LRT) routes.

Since 1990, Metro has invested heavily in a regional fixed-guideway transit system that consists of

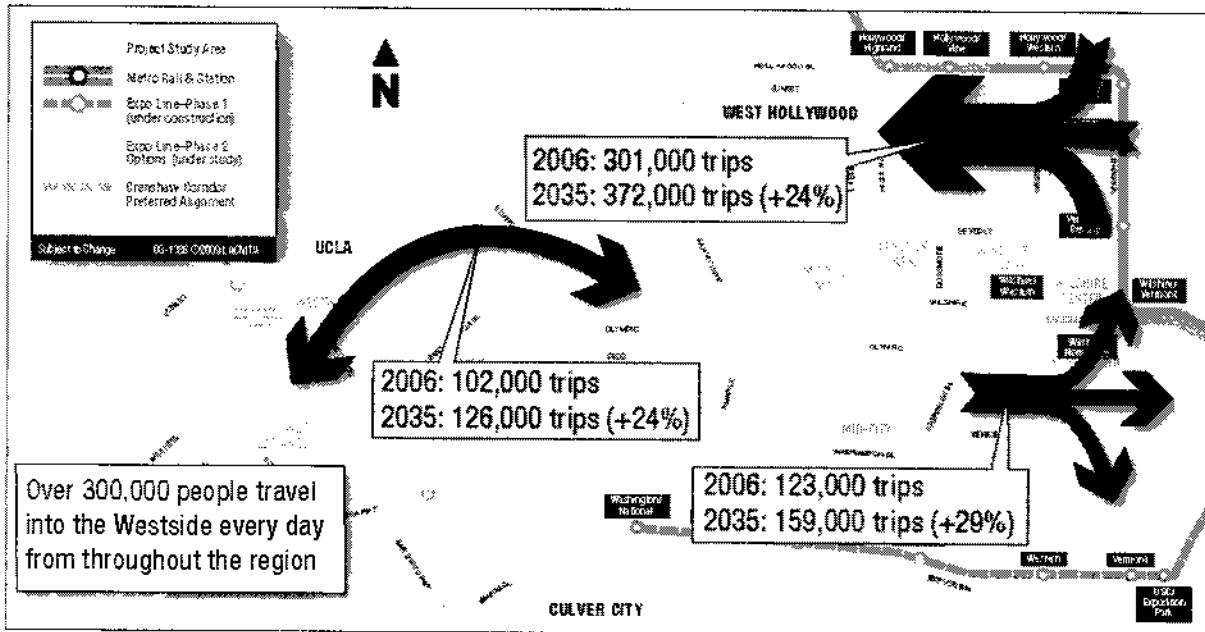


Figure S-20. Home-Based Work Peak Person Trip Comparison: 2006 to 2035

HRT, LRT, bus rapid transit (BRT), and commuter rail. This system currently includes more than 76 miles of Metro Rail service (HRT and LRT) and 14 miles of BRT service. In addition, the Southern California Regional Rail Authority (Metrolink) has opened more than 500 miles of Metrolink commuter rail lines that serve five counties. The existing fixed-guideway transit service in the region is complemented by the transit corridors currently under study or construction. The Westside Subway Extension will directly connect the west side of the county to all elements of the existing Metro system.

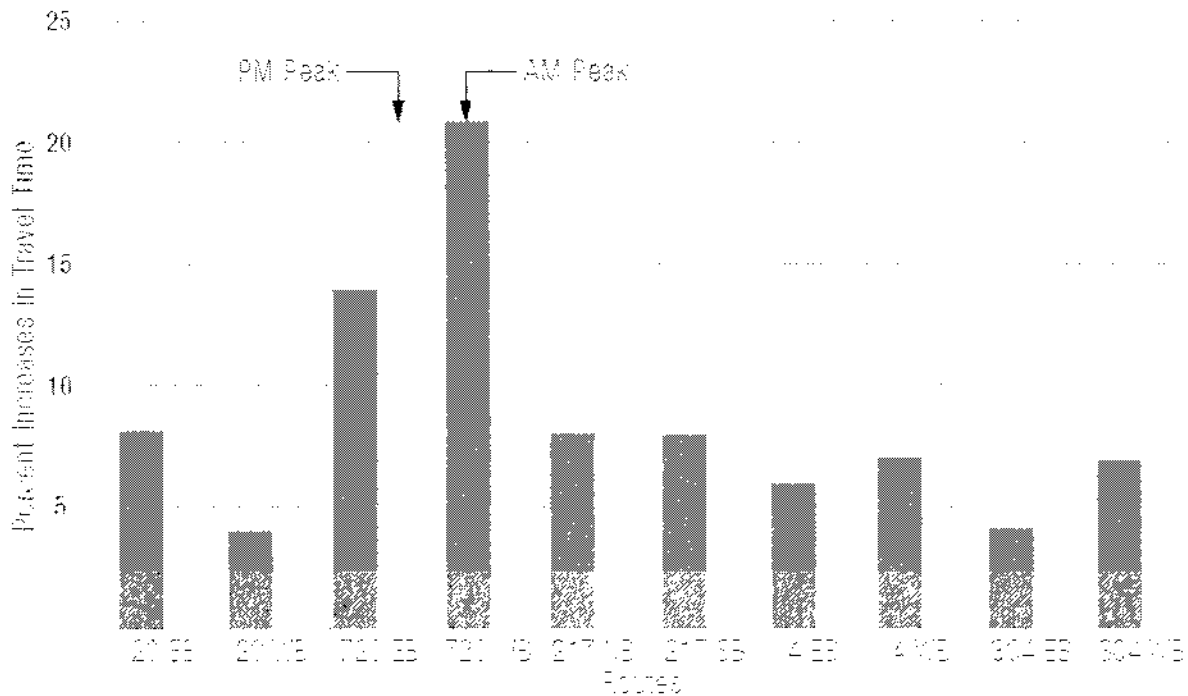
Congestion and Mobility

Between 2006 and 2035, substantial increases are projected in vehicle miles traveled (VMT) and vehicle hours traveled (VHT). Daily VMT within the Study Area will increase by approximately 26 percent, from 4 million in 2006 to more than 5 million in 2035. During the same period, regional VMT are projected to increase from 304.2 million to 504.7 million, or more than 65 percent. VHT in the Study Area are projected to increase from about 165,000 to 247,000, or almost 50 percent.

Regional VHT are projected to increase from 9.5 million to 29.2 million, or about 207 percent between 2006 and 2035.

The Study Area contains some of the most congested arterial streets in the County. Key east/west arterials, such as Wilshire, Santa Monica, Sunset, Hollywood, Olympic, and Pico Boulevards, operate at congested conditions throughout the day. North/south arterials west of Western Avenue include Crenshaw Boulevard, La Brea Avenue, La Cienega Boulevard, Beverly Drive, Westwood Boulevard, Sepulveda Boulevard, Bundy Drive, and Lincoln Boulevard.

Arterials in the Study Area provide access to employment centers as well as local and regional travel. They also are used as alternatives to the Interstate 10 (I-10) and Interstate 405 (I-405) freeways during heavy congestion, accidents, breakdowns, lane closures, and other random events. As a result, the Study Area's roadway capacity is insufficient to handle the traffic volumes, thus



Source: Metro. Note: 214 now operated as 704.

Figure S-21. Degradation in Transit Travel Times due to Road Congestion—Metro Bus Routes in Study Area, 2003 to 2006

reducing travel-time reliability for motorists and transit riders.

Bus speeds are slow and getting slower.

The current average speeds of the Metro Rapid buses traveling through the Study Area ranges between 10 and 15 miles per hour (mph) along Wilshire Boulevard and between 11 and 14 mph along Santa Monica Boulevard. The average speeds of both local buses and the Metro Rapid buses traveling through the Study Area are expected to decrease further as traffic congestion increases on roadways. As a result, transit travel times will get longer, as illustrated in Figure S-21.

The Study Area has substantial traffic congestion, high transit ridership and load factors, and closely spaced bus stops. Combined, these factors result in declining bus operating speeds and reliability,

making transit less competitive with the private automobile. With high passenger loads and congested roads, desirable headways (frequency of service) are difficult to maintain and result in overcrowded buses. As the road and transit systems become more congested, the Study Area becomes a less desirable place for people to live and work and less attractive for planned growth and development.

Regional Objectives

In 2008, the SCAG Regional Council adopted the *Regional Transportation Plan (RTP)* (SCAG 2008a) to establish the goals, objectives, and policies for the transportation system and to establish an implementation plan for transportation investments. The RTP includes regional performance indicators and objectives against which specific transportation investments can be measured. The Study Area is designated as one of the most

Table S-2. Southern California Association of Governments Performance Indicators

Performance Indicator	Measurement	2003 Base Year	2035 Baseline	2035 Objective
Mobility	Average daily speed	30.5 mph	26.8 mph	29.3 mph
	Average daily delay per capita	20.0 minutes	30.7 minutes	25.8 minutes
Accessibility	Percent of PM work trips within 45 minutes of residence	77% of all auto trips	77% of all auto trips	79% of all auto trips
		43% of all transit trips	42% of all transit trips	45% of all transit trips
Reliability	Percent variation in travel time—weekday 5 p.m. to 6 p.m.	28% (2005)	N/A	25%
Safety	Daily accident rate per million persons	28.9 (estimated from graph)	30.2 (estimated from graph)	30.1 (estimated from graph)

Source: SCAG, *Regional Transportation Plan, 2008 Project Purpose (SCAG 2008a)*

congested areas in the five-county region based on the four key performance indicators of mobility, accessibility, reliability, and safety. These performance indicators and their 2003 base year results, 2035 baseline projections, and 2035 objectives are shown in Table S-2. Significant improvement will be needed in these categories to meet the 2035 regional objectives.

Alternatives Considered

The definition of the LPA began with the initial screening of alternatives in AA in 2007 and evaluation continued through the Draft EIS/EIR, ultimately resulting in the selection of the LPA in October 2010 by the Metro Board of Directors. Figure S-22 summarizes the progression of alternatives from the AA to the alternatives in the Draft EIS/EIR to the LPA in this Final EIS/EIR.

Development of Draft EIS/EIR Alternatives

Four technologies were presented and analyzed in the AA Study—HRT, LRT, BRT, and monorail. HRT was identified as the preferred technology for further study because it has the capacity to meet the anticipated ridership demand and limits the

number of transfers. In addition to technologies, variations of alignments along Wilshire Boulevard and Santa Monica Boulevard were analyzed. At the conclusion of the AA Study, two alternatives were recommended for further consideration in the Draft EIS/EIR: (1) Extend the Metro Purple Line Subway via Wilshire Boulevard to Santa Monica, and (2) Extend the Metro Purple Line Subway via Wilshire Boulevard to Santa Monica plus extend a subway from the Metro Red Line Subway Hollywood/Highland Station via Santa Monica Boulevard to connect with the Wilshire line at the Wilshire/La Cienega Station.

At the initiation of the Draft EIS/EIR phase, Metro presented these two alternatives to the public. A series of NEPA/CEQA scoping meetings was held to solicit public input on the alternatives as well as different alignment and station options in the Beverly Hills to Westwood area and along the West Hollywood branch alignment. Based on public input received, Metro developed five Build Alternatives based on the two AA Study alternatives, with different lengths to meet the fiscal constraints and funding timelines identified in Metro's LRTP adopted in October 2009. Metro also considered

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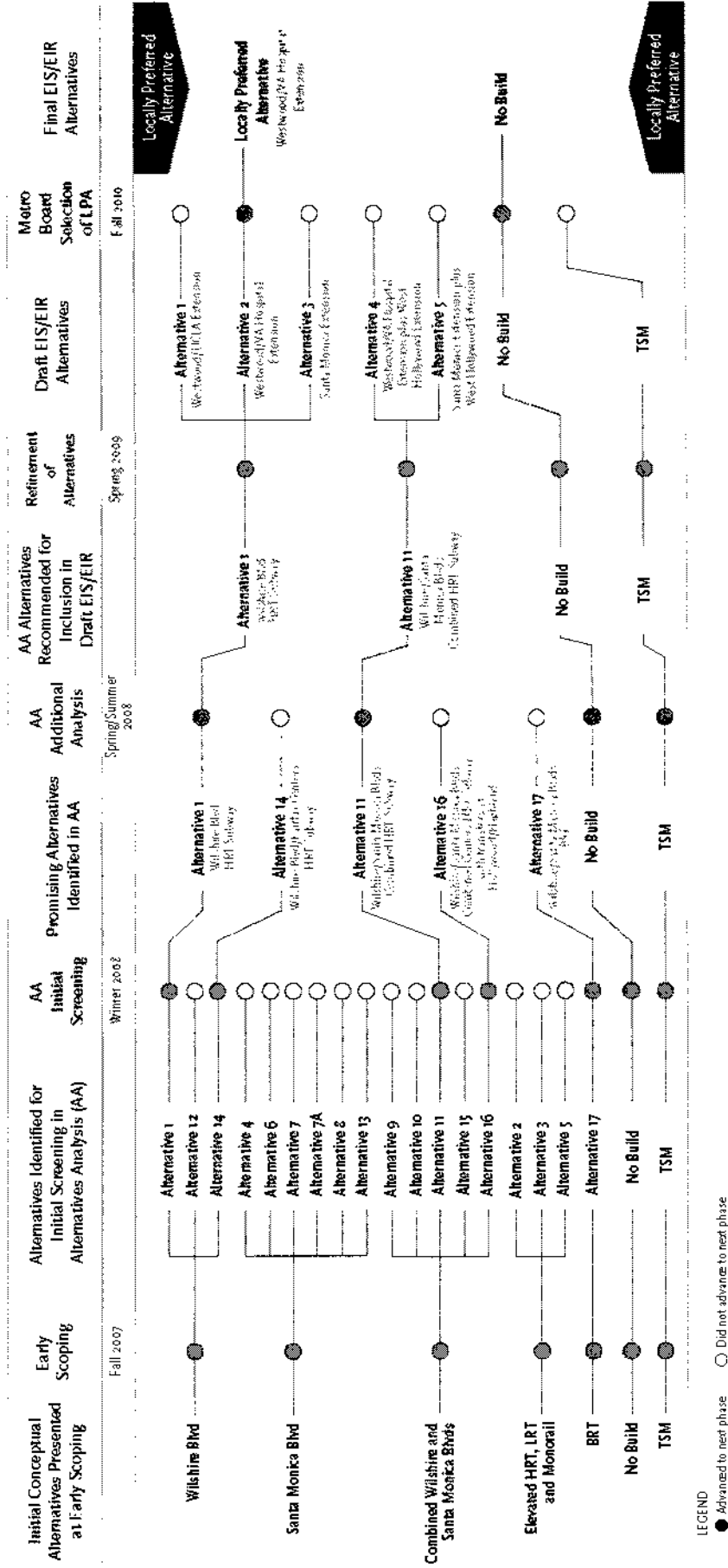


Figure S-22. Alternatives Considered (AA through Final EIS/EIR)

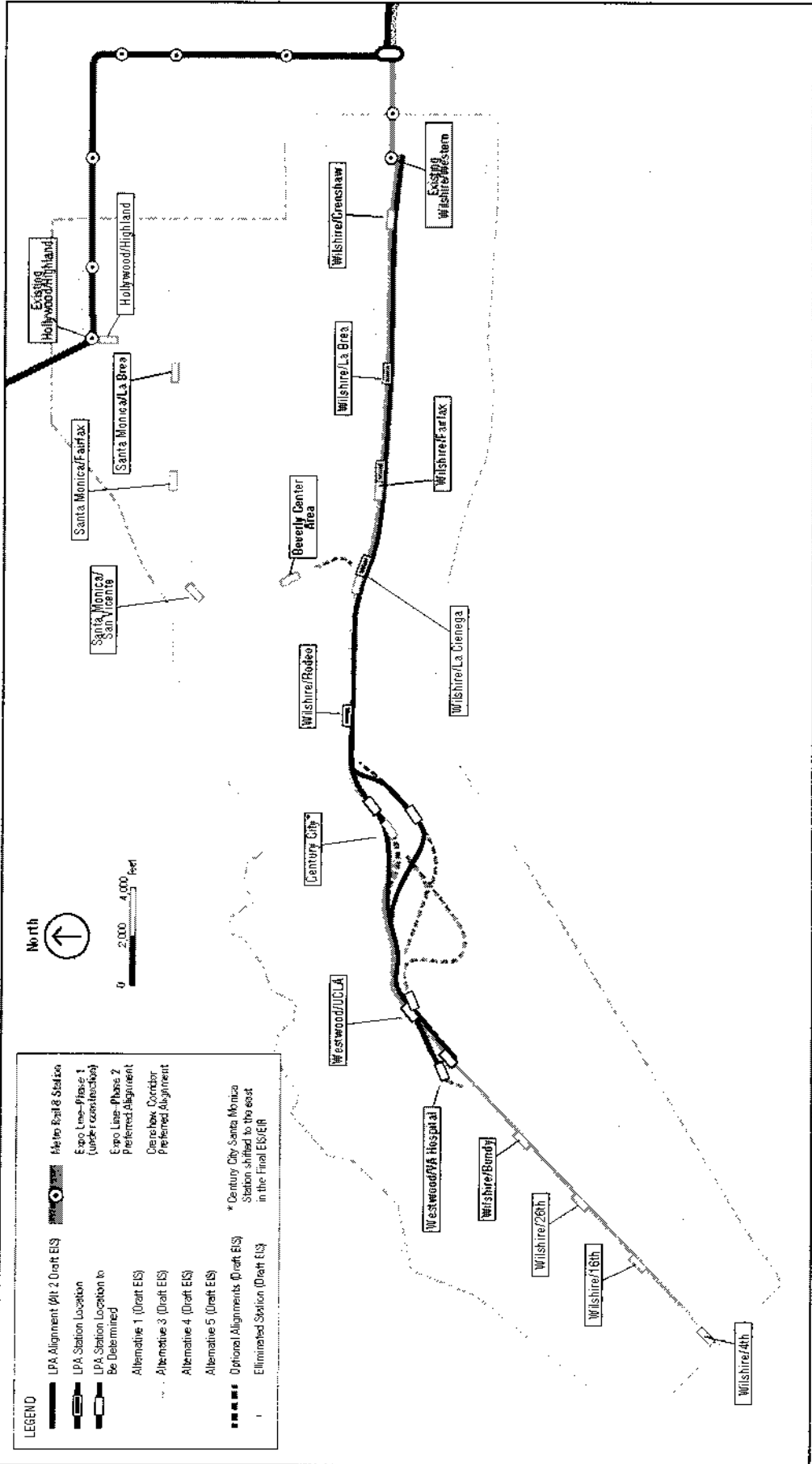


Figure S-2-3 All Build Alternatives

refinements to alignments and station locations, which are detailed in Section 2.3 of this Final EIS/EIR and the *Westside Subway Extension Alternatives Screening and Refinement Following Environment Scoping Report* (Metro 2010y).

The five Draft EIS/EIR Build Alternatives are illustrated in Figure S-23. Alternatives 1, 2, and 3 extend the Metro Purple Line subway from Wilshire/Western down Wilshire Boulevard to a station at either Westwood/UCLA (8.6 miles, seven stations), Westwood/VA Hospital (8.96 miles, eight stations), or Wilshire/4th Street (12.38 miles, 12 stations), respectively. Alternatives 4 and 5 add a West Hollywood branch to Alternative 2 (total of 14.06 miles, 12 stations) and Alternative 3 (total of 17.49 miles, 16 stations), respectively.

The five Draft EIS/EIR Build Alternatives include six station and alignment options that are described more fully in Section 2.4.4 of this Final EIS/EIR. They are as follows:

- ▶ Option 1—Eliminate the Wilshire/Crenshaw Station
- ▶ Option 2—Locate the Wilshire/Fairfax Station farther east
- ▶ Option 3—Locate the Wilshire/La Cienega Station farther west and design it as a transfer station from the West Hollywood branch to the Wilshire branch
- ▶ Option 4—Locate the Century City Station on Constellation Boulevard. Consider alternative alignment routes between Wilshire/Rodeo and Century City (Santa Monica Boulevard, Constellation North, or Constellation South) and Century City and Westwood/UCLA Stations (East, Central, or West)
- ▶ Option 5—Locate the Westwood/UCLA Station On-Street under the center of Wilshire Boulevard
- ▶ Option 6—Locate the Westwood/VA Hospital Station on the north side of Wilshire Boulevard

Evaluation of Alternatives in the Draft EIS/EIR

Chapter 7 of the Draft EIS/EIR documented the comparative evaluation of alternatives and station options as a means of providing the basis for selecting an LPA. The evaluation was based on the goals, objectives, and measures developed in the AA Study, which include mobility improvements, transit-supportive land uses, cost-effectiveness, project feasibility, equity, environmental considerations, and public acceptance.

Table S-3 shows some of the mobility and cost factors used to evaluate the alternatives. Many of the criteria evaluated are linked to the project length, with longer alternatives resulting in greater mobility benefits and public support, but also costing more and resulting in additional environmental impacts.

All Build Alternatives are more effective than the TSM Alternative in enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need. Alternatives 3, 4, and 5 are more effective in improving mobility than Alternatives 1 and 2. All of the Build Alternatives would reduce VMT, pollutant emissions, and energy consumption, with the longer Build Alternatives having the greatest environmental benefit as well as the largest environmental impacts.

Alternatives 1, 2, and 3 have similar cost-effectiveness indices and are all more cost-effective than Alternatives 4 and 5, with Alternative 2 being the most cost-effective.

Based on cost-effectiveness, Alternatives 1 and 2 were identified as being the most competitive for

Table S-3. Evaluation Results for TSM and Build Alternatives in Draft EIS/EIR

Alternative	New Transit Trips (per day in 2035)	Vehicle Miles Traveled (Study Area)	Reduction in Vehicle Miles Traveled Compared to No Build (Study Area)	Total Capital Cost (in million 2009 dollars)	Cost per Hour of Transit-User Benefits Compared to TSM Alternative (FTA Cost Effectiveness Index, or CEI)
No Build	Base	5,056,227	Base	Base	N/A
TSM	2,115	5,055,329	898	\$42	Base
1	24,142	5,032,417	28,982	\$4,036	\$35.98
2	27,615	5,032,719	31,899	\$4,358	\$33.58
3	35,235	5,021,729	37,768	\$6,116	\$36.31
4	31,224	5,023,750	34,786	\$6,985	\$49.50
5	40,123	5,014,584	41,643	\$8,747	\$47.55

New Starts funds. These are also the only Build Alternatives that could be built with available Measure R and other identified funds. Alternatives 3, 4, and 5 were not financially feasible without a new source of revenue.

The results of this evaluation indicate that Alternative 2 is the Build Alternative that best increases transit ridership and provides benefits at reasonable costs within available financial resources.

Agency and Public Comments on Draft EIS/EIR

Section 8.8 of this Final EIS/EIR provides an overview of the comments on the Draft EIS/EIR received from the public and agencies during the official public comment period that extended from September 3, 2010 through October 18, 2010.

Almost 800 comment submissions were received, which were divided into nearly 2,000 unique comments. The most common recurring themes or topics are summarized in Table S-4. Copies of all comments received, and responses to comments, are included in Appendix H of this Final EIS/EIR.

An overwhelming majority of the comments supported the Westside Subway Extension as a means of reducing Westside traffic congestion and providing an alternative mode of transportation. Many individuals wanted to see the Project built as quickly as possible and as far west as possible.

A significant volume of comments were received on the location of the Century City Station. Those who favored the Century City Santa Monica location were primarily concerned with the safety and risks of tunneling under residences and schools in Southwest Beverly Hills that would be necessary if the station were located at Century City Constellation. Those in favor of the Century City Constellation Station stated that the location better served the office and residential core of Century City.

Many commenters expressed concern about safety-related issues in regard to tunneling. These comments discussed the safety of tunneling under residences and schools; noise and vibration impacts; and concern about seismic issues, abandoned oil wells, methane gas, settlement and subsidence, liquefaction, and other geotechnical concerns.

Table S-4. Common Comment Topics on the Draft EIS/EIR

Topics	General Comments	
Length of the Project's Locally Preferred Alternative (LPA)	<ul style="list-style-type: none"> Extend Project as far west as possible Extend west of I-405 Include Santa Monica and West Hollywood alignments 	<ul style="list-style-type: none"> Maintain options for future West Hollywood or Santa Monica alignments if funding becomes available
Century City Station Locations	<ul style="list-style-type: none"> In support of Santa Monica Boulevard, opposed to Constellation In support of Constellation Boulevard, opposed to Santa Monica Constellation Boulevard location most central for employees and residents of Century City 	<ul style="list-style-type: none"> Decision-making process for the Century City Station location and preference for "original" Century City Station location along Santa Monica Boulevard
Alignment between the Wilshire/Rodeo, Century City, and Westwood/UCLA Stations	<ul style="list-style-type: none"> Wilshire/Rodeo to Century City alignment options Century City to Westwood/UCLA alignment options 	<ul style="list-style-type: none"> Potential impacts of tunneling under residences and schools, including Beverly Hills High School and the Good Shepherd School
Geotechnical Concerns	<ul style="list-style-type: none"> Safety of tunneling related to various geotechnical issues under residences and schools Santa Monica Fault Abandoned oil wells Methane gas 	<ul style="list-style-type: none"> Ground settlement/subsidence Liquefaction Seismic differences between Century City Station locations
Westwood/VA Hospital Station Location	<ul style="list-style-type: none"> Station accessibility 	<ul style="list-style-type: none"> Preference for Wilshire/Federal or Wilshire/Barrington as terminus
Other Optional Station Locations	<p>Wilshire/Crenshaw Station:</p> <ul style="list-style-type: none"> Both in favor and opposed to the construction of a Wilshire/Crenshaw Station Provide a connection to the Crenshaw/LAX light rail line <p>Wilshire/Fairfax Station:</p> <ul style="list-style-type: none"> Preference for the East Station location to provide better access to Museum Row 	<p>Wilshire/La Cienega Station:</p> <ul style="list-style-type: none"> Preference for both the East and West Station locations Support to maintain potential for future West Hollywood connection <p>Westwood/UCLA Station:</p> <ul style="list-style-type: none"> Preference for both the On-Street and Off-Street Station locations Connections to the UCLA campus
Project Schedule	<ul style="list-style-type: none"> Build Project as soon as possible 	<ul style="list-style-type: none"> 30/10 Initiative funding
Station Connectivity	<ul style="list-style-type: none"> Connectivity to other Metro rail projects Crenshaw/LAX connection San Fernando Valley (Sepulveda)/I-405 connection Expo connection 	<ul style="list-style-type: none"> Bus, pedestrian, and bicycle connectivity Station design Parking Passenger drop-off and pick-up
Transportation Issues	<ul style="list-style-type: none"> Traffic congestion 	<ul style="list-style-type: none"> Ridership projections
Alternative Mode/TSM Preference	<ul style="list-style-type: none"> Preference for expanded bus service instead of rail 	<ul style="list-style-type: none"> Concerns funding will be shifted away from bus service
Noise and Vibration during Operations	<ul style="list-style-type: none"> Concern about noise and vibration during operations, particularly potential impact to residences in the area and students at Beverly Hills High School 	
Impact on Property Values	<ul style="list-style-type: none"> Concern about potential impact on property values 	
Construction Impacts	<ul style="list-style-type: none"> Traffic congestion Noise and vibration 	<ul style="list-style-type: none"> Staging areas Haul routes

Many of these comments are interrelated as most relate to the safety and impacts of tunneling.

Metro Board of Directors' Decision on Draft EIS/EIR and Initiation of Final EIS/EIR

Subsequent to completion of the Draft EIS/EIR, the Metro Board of Directors reviewed and considered the findings of the document. After careful deliberation of the benefits and impacts of all the alternatives analyzed in the Draft EIS/EIR, and review of the public comments received on the Draft EIS/EIR, the Metro Board of Directors approved the Draft EIS/EIR and selected Alternative 2 as the LPA on October 28, 2010.

All of the five Build Alternatives studied would provide significant countywide benefits as the Project would serve as a primary connector between residential communities throughout the county where people live and the very dense regional job centers on the Westside (Westwood, Century City, and Beverly Hills). However, only Alternatives 1 and 2 are affordable within the adopted LRTP. Between these two alternatives, Alternative 2 provides significantly higher ridership and somewhat improved cost-effectiveness over Alternative 1. Extending the line by one additional station to the Westwood/VA Hospital Station will serve this major regional center and provide an important access point to the regional transit system located west of the I-405 Freeway.

The Metro Board of Directors also made several decisions related to the station options and alignments, as described in Section 2.5. The station and alignment option decisions are as follows:

- ▶ Option 1—Eliminate the Wilshire/Crenshaw Station
- ▶ Option 2—Include the Wilshire/Fairfax East Station and eliminate the Wilshire/Fairfax West Station

- ▶ Option 3—Include the Wilshire/La Cienega East Station without a West Hollywood connection structure and eliminate the Wilshire/La Cienega West Station
- ▶ Option 4—Continue to study both station locations at Century City. Include the Santa Monica Boulevard and Constellation North alignments between Wilshire/Rodeo and Century City and eliminate the Constellation South alignment. Include the East alignment between Century City and Westwood/UCLA and eliminate the Central and West alignments
- ▶ Option 5—Continue to study both station locations at Westwood/UCLA
- ▶ Option 6—Continue to study both station locations at Westwood/VA Hospital

The LPA as selected by the Metro Board of Directors is the subject of this Final EIS/EIR and is described on page S-2 of this Executive Summary and in Section 2.6 of this Final EIS/EIR.

Transportation Analysis, Consequences, and Mitigation during Construction and Operation

Chapter 3 of this Final EIS/EIR consists of a discussion of both the operational and construction transportation impacts of the LPA, which includes an analysis of impacts to public transit, streets and highways, parking, and bicycle and pedestrian networks. Refer to Table S-5 and Table S-6 for a complete list of identified transportation impacts, proposed mitigation measures, and impacts remaining after mitigation.

The LPA will halve the amount of time it takes to reach Westwood from Downtown Los Angeles.

Table S-5. Environmental Impacts and Impacts Remaining after Mitigation

Environmental Criteria	Operational Impacts				Construction Impacts ¹			
	Concurrent Construction Scenario	Phased Construction Scenario			Concurrent Construction Scenario	Phased Construction Scenario		
		Phase 1	Phase 2	Phase 3		Phase 1	Phase 2	Phase 3
Public Transit	○	○	○	○	●	●	●	●
Streets and Highways	● ²	○	● ²	○	●	●	●	●
Parking	▶	▶	▶	▶	●	●	●	●
Bicycle and Pedestrian Network	▶	▶	▶	▶	●	●	●	●
Land Use	○	○	○	○	▶	▶	▶	▶
Socioeconomic Characteristics	○	○	○	○	▶	▶	▶	▶
Visual Quality	○	○	○	○	▶	▶	▶	▶
Air Quality	○	○	○	○	●	●	●	●
Climate Change	○	○	○	○	○	○	○	○
Noise and Vibration	▶	▶	○	○	●	●	●	●
Energy	○	○	○	○	○	○	○	○
Geological Hazards	● ³	▶	● ³	▶	▶	▶	▶	▶
Hazardous Waste and Materials	○	○	○	○	▶	▶	▶	▶
Ecosystems/Biological Resources	○	○	○	○	▶	▶	▶	▶
Water Resources	○	○	○	○	▶	▶	▶	▶
Safety and Security	○	○	○	○	○	○	○	○
Parklands and Community Services and Facilities	○	○	○	○	▶	▶	▶	▶
Historic, Archaeological, and Paleontological Resources	●	○	●	○	●	▶	●	▶
Growth-Inducing Impacts	○	○	○	○	○	○	○	○
Cumulative Impacts	▶	▶	▶	▶	●	●	●	●
Section 4(f) Resources	●	○	●	○	●	○	●	○

● Adverse Effect/Significant Impact Remaining After Mitigation

▶ Adverse Effect/Significant Impact Prior to Mitigation, reduced to less-than-significant levels with mitigation

○ No Adverse Effects/No Significant Impacts

¹All construction impacts are temporary with the exception of impacts to historic resources

²Adverse Effect/Significant Impact anticipated ONLY if Wilshire/Rodeo Station entrance located at Bank of America

³Adverse Effects/Significant impact anticipated ONLY if Century City Station located at Santa Monica Blvd. If the Century City Station is

located at Constellation Blvd., impacts would be reduced to less-than-significant levels with mitigation.

The LPA will provide transit benefits by providing additional transit capacity, shorter travel times, improved reliability, and better connectivity, resulting in an improved travel experience for all transit riders in the Study Area. Public transit ridership in Los Angeles is expected to increase by 27,200 to 30,100 riders per day compared to the No Build Alternative with a total of 46,000 to 49,300 passengers per day boarding at the new Purple Line stations.

If the LPA is constructed under the Phased Construction Scenario, the transit benefits that will be provided by the LPA will be realized later than under the Concurrent Construction Scenario due to an extended construction timeline. For example, since Phase 1 will terminate at the Wilshire/La Cienega Station, transit riders traveling to destinations west of this station will not experience the same benefits as they would under the full LPA to the Westwood/VA Hospital Station. Since the Wilshire/La Cienega and Century City Stations will serve as interim terminus stations during Phase 1 and Phase 2, respectively, each station is expected to have higher boardings while serving as the interim terminus stations than under the full LPA to Westwood/VA Hospital Station.

As a result of the improved transit network and increased transit ridership, the LPA will reduce regional VMT on the highway system, with attendant reductions in roadway congestion, pollutant emissions, and fossil fuel consumption. However, the decrease in VMT is relatively small compared to the total VMT in the Study Area and the region. If the LPA is constructed under the Phased Construction Scenario, the reduction in VMT will occur later than under the Concurrent Construction Scenario since it will take longer for the full transit benefits of the LPA to be realized.

At the local level, the LPA is expected to improve level-of-service at numerous intersections throughout the Study Area. However, the LPA with the Bank of America entrance at the Wilshire/Rodeo Station would result in a significant and unavoidable impact at the intersection of Wilshire Boulevard and Beverly Drive under existing or future conditions. However, the recommended location for the Wilshire/Rodeo Station entrance is at the current site of the Ace Gallery, which would avoid any long-term traffic impacts associated with the entrance on Beverly Drive. If the LPA is constructed under the Phased Construction Scenario, the traffic impact at Wilshire Boulevard and Beverly Drive would occur during Phase 2 if the entrance for the Wilshire/Rodeo Station is constructed at the Bank of America.

The LPA will not result in permanent parking loss at most stations. However, permanent off-street parking loss is anticipated at the Wilshire/Rodeo Station (with the Bank of American or Union Bank Building entrances), Century City Santa Monica Station, and Westwood/UCLA On-Street and Off-Street Stations. Metro will coordinate with affected property owners to best mitigate parking losses.

The LPA also is anticipated to result in some neighborhood spillover parking impacts where on-street parking is not currently restricted. With implementation of the proposed mitigation measures, including residential permit parking districts and consideration of shared parking programs, spillover parking will not remain an adverse impact.

The design of stations will accommodate access by transit and non-motorized modes. Stations and adjacent station area development are anticipated to enhance pedestrian and bicycle circulation patterns and connectivity to maximize ridership. Mitigation measures to ensure a safe pedestrian and bicycle

Table S6. Transportation Environmental Impacts, Mitigation Measures, and Impacts Remaining After Mitigation (continued on next page)

Description of Identified Impacts*	Mitigation*	Impact Before Mitigation	Impact Remaining after Mitigation*
<p>Public Transit—Transit Travel Times</p> <p>Concurrent Construction Scenario</p> <p>The LPA will reduce transit travel times to the Westside from various locations around Los Angeles County. Estimated transit travel times from the Wilshire/Western Purple Line Station to the Westwood/UCLA Station, for example, will be approximately 14 minutes under the LPA as compared to 46 minutes under the No Build Alternative. Given the proximity to the Westwood/UCLA Station, comparable transit travel-time savings will occur for trips to the Westwood/VA Hospital Station. See Figures 3-4 to 3-10, Transit Travel Times from Various Locations, in Chapter 3, Transportation.</p> <p>Phased Construction Scenario</p> <p>As compared to the No Build Alternative, Phase 1 will have reduced transit travel times to the Westside from various locations around Los Angeles County. However, since Phase 1 will terminate at the Wilshire/La Cienega Station, these transit travel-time savings to points west of this station will not be as significant as under the full LPA to the Westwood/VA Hospital Station.</p> <p>As compared to the No Build Alternative, Phase 2 will have reduced transit travel times to the Westside from various locations around Los Angeles County. However, since Phase 2 will terminate at the Century City Station, transit travel-time savings to points west of this station will not be as significant as under the full LPA to the Westwood/VA Hospital Station. For example, transit travel time for trips between Wilshire/Western and Century City under the LPA will be approximately 20 minutes less than under the No Build Alternative.</p> <p>Phase 3 will complete the LPA in its entirety to the Westwood/VA Hospital Station and, therefore, will provide the same transit travel times to the Westside from various locations around Los Angeles County as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario description above and Figures 3-4 to 3-10, Transit Travel Times from Various Locations, in Chapter 3, Transportation. For example, transit travel time for trips between Wilshire/Western and Westwood/UCLA under the LPA will be approximately 30 minutes less than under the No Build Alternative. Given the proximity to the Westwood/UCLA Station, comparable transit travel-time savings will occur for trips to the Westwood/VA Hospital Station.</p>	<p>No mitigation measures will be required since impacts of the subway extension will provide transit benefits.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits CEQA: No Significant Impacts, Transit Benefits</p>	<p>NEPA: No Adverse Impacts, Transit Benefits CEQA: No Significant Impacts, Transit Benefits</p>
<p>Public Transit—Transit Speed and Reliability</p> <p>Concurrent Construction Scenario</p> <p>The number of passenger miles in exclusive fixed guideway operations will be substantially greater under the LPA than the No Build Alternative. The share of passenger miles in exclusive fixed guideway service in the Study Area under the LPA will be approximately 40 percent compared to about 5 percent under the No Build Alternative. Due to the greater extent of exclusive fixed guideway and congestion-free service, transit reliability and transit speeds in the Study Area will improve. See Figure 3-11, Transit Operating Speeds, and Figure 3-12, Extent of Passenger Miles in Exclusive Guideway Service, in Chapter 3, Transportation.</p> <p>Phased Construction Scenario</p> <p>Phase 1 will increase the number of passenger miles in exclusive fixed guideway operations compared to the No Build Alternative. However, since Phase 1 will terminate at the Wilshire/La Cienega Station, the extent of the exclusive fixed guideway will be less than the full LPA to the Westwood/VA Hospital Station. While the Phase 1 exclusive fixed guideway will result in improved transit reliability and transit speeds as compared to the No Build Alternative, points west of this station will not experience the same improved transit reliability and transit speeds as under the full LPA to the Westwood/VA Hospital Station due to a shorter exclusive fixed guideway.</p>	<p>No mitigation measures will be required since impacts of the subway extension will provide transit benefits.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits CEQA: No Significant Impacts, Transit Benefits</p>	<p>NEPA: No Adverse Impacts, Transit Benefits CEQA: No Significant Impacts, Transit Benefits</p>



Table S6. Transportation Environmental Impacts, Mitigation Measures, and Impacts: Remaining After Mitigation (continued from previous page)

Description of Identified Impact ²³	Impact Before Mitigation	Mitigation	Impact Remaining after Mitigation ²⁴
<p>Phase 2</p> <p>Phase 2 will increase the number of passenger miles in exclusive fixed guideway operations compared to the No Build Alternative. However, since Phase 2 will terminate at the Century City Station, the extent of the exclusive fixed guideway will be less than the full LPA to the Westwood/VNA Hospital Station. While the Phase 2 exclusive fixed guideway will result in improved transit reliability and transit speeds as compared to the No Build Alternative, points west of this station will not experience the same improved transit reliability and transit speeds as under the full LPA to the Westwood/VNA Hospital Station due to a shorter exclusive fixed guideway.</p> <p>Phase 3 will complete the LPA in its entirety to the Westwood/VNA Hospital Station and, therefore, will provide the same increase in the number of passenger miles operating in exclusive fixed guideway as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario description above and Figure 3-11, Transit Operating Speeds, and Figure 3-12, Extent of Passenger Miles in Exclusive Guideway Service, in Chapter 3, Transportation.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits</p> <p>CEQA: No Significant Impacts, Transit Benefits</p>	<p>No mitigation measures will be required since impacts of the subway extension will provide transit benefits.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits</p> <p>CEQA: No Significant Impacts, Transit Benefits</p>
<p>Phase 3</p> <p>Public Transit—Transit Ridership</p> <p>Concurrent Construction Scenario</p> <p>Due to the improved transit travel times and reliability, the LPA will increase transit ridership on the Metro rail system. Under the LPA, total boardings at new Purple Line stations west of the existing Wilshire/Western Station are estimated to range from approximately 46,000 to 49,300 passengers per day and, by 2035, approximately 37,000 to 39,700 additional daily riders will be attracted to public transportation in Los Angeles. The Century City Constellation Station is expected to result in higher ridership than the Century City Santa Monica Station due to a higher concentration of employment surrounding the Century City Constellation Station. See Table 3-5, LPA Daily Station Boardings, and Table 3-6, Daily Mode of Access Percentages, in Chapter 3, Transportation.</p> <p>Phased Construction Scenario</p> <p>Phase 1 will increase transit ridership on the Metro rail system and, on the bus and rail system in Los Angeles County. However, since Phase 1 will terminate at the Wilshire/La Cienega Station, the total boardings at new Purple Line stations west of the existing Wilshire/Western Station are estimated to be lower than the full LPA to the Westwood/VNA Hospital Station—19,000 passengers per day. The boardings at the Wilshire/La Cienega Station, the terminus of Phase 1, will be higher than under the full LPA, which extends farther west. See Table 3-5, LPA Daily Station Boardings, and Table 3-6, Daily Mode of Access Percentages, in Chapter 3, Transportation. By 2035, total daily transit demand in Los Angeles County will increase by approximately 14,100 riders under Phase 1.</p> <p>Phase 2 will increase transit ridership on the Metro rail system and on the bus and rail system in Los Angeles County. However, since Phase 2 will terminate at the Century City Station, the total boardings at new Purple Line stations west of the existing Wilshire/Western Station are estimated to be lower than the full LPA to the Westwood/VNA Hospital Station—30,000 to 31,700 passengers per day. The boardings at the Century City Station, the terminus of Phase 2, will be higher than under the full LPA, which extends farther west. The Century City Constellation Station is expected to result in higher ridership than the Century City Santa Monica Station due to a higher concentration of employment surrounding the Century City Constellation Station. See Table 3-5, LPA Daily Station Boardings, and Table 3-6, Daily Mode of Access Percentages, in Chapter 3, Transportation. By 2035, total daily transit demand in Los Angeles County will increase by between 18,700 and 23,700 riders under Phase 2. The lower end of the demand reflects a Century City Santa Monica Station option, and the higher end reflects a Century City Constellation Station option.</p> <p>Phase 3 will complete the LPA in its entirety to the Westwood/VNA Hospital Station and, therefore, transit ridership is estimated to be the same as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario description above and Table 3-5, LPA Daily Station Boardings, and Table 3-6, Daily Mode of Access Percentages, in Chapter 3, Transportation.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits</p> <p>CEQA: No Significant Impacts, Transit Benefits</p>	<p>No mitigation measures will be required since impacts of the subway extension will provide transit benefits.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits</p> <p>CEQA: No Significant Impacts, Transit Benefits</p>

Table S-6. Transportation Environmental Impacts, Mitigation Measures, and Impacts Remaining after Mitigation (continued from previous page)

Description of Identified Impacts ^a	Impact Before Mitigation	Mitigation ^b	Impact Remaining after Mitigation ^c
<p>Public Transit—Impacts on Local Bus Service</p> <p>Concurrent Construction Scenario</p> <p>The LPA will increase rail passenger demand, shifting some bus riders to rail service and decreasing overall bus ridership. The total bus ridership in 2035 ranges from 285,000 to 371,000 boardings per day under the LPA, compared to 282,000 boardings per day under the No-Build Alternative. The Century City Construction Station option will result in a greater reduction in bus ridership due to higher projected rail ridership compared to the Century City Santa Monica Station option. See Figure 3-13, Daily Bus Ridership in Westside, 2035, in Chapter 3, Transportation.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits CEQA: No Significant Impacts, Transit Benefits</p>	<p>No mitigation measures will be required since impacts of the subway extension will provide transit benefits.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits CEQA: No Significant Impacts, Transit Benefits</p>
<p>Phased Construction Scenario</p> <p>Phase 1 will increase rail passenger demand, shifting former bus riders to rail service and decreasing overall bus ridership. However, since Phase 1 will terminate at the Whittier/La Cienega Station, fewer riders will shift from bus to rail compared to the LPA under the Concurrent Construction Scenario. For riders destined to locations west of Whittier/La Cienega, transfers to buses will still be necessary. This will result in higher bus ridership under Phase 1 as compared to the Concurrent Construction Scenario. Thus, ridership on Westside bus routes will be higher under Phase 1 as compared to the full LPA; however, the ridership under Phase 1 will still be lower than under the No-Build Alternative. See Figure 3-13, Daily Bus Ridership in Westside, 2035, in Chapter 3, Transportation.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits CEQA: No Significant Impacts, Transit Benefits</p>	<p>No mitigation measures will be required since impacts of the subway extension will provide transit benefits.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits CEQA: No Significant Impacts, Transit Benefits</p>
<p>Phase 2</p> <p>Phase 2 will increase rail passenger demand, shifting former bus riders to rail service and decreasing overall bus ridership. However, since Phase 2 will terminate at the Century City Station, fewer riders will shift from bus to rail compared to the LPA under the Concurrent Construction Scenario. For riders destined to locations west of Century City, transfers to buses will still be necessary. This will result in higher bus ridership under Phase 2 as compared to the Concurrent Construction Scenario. However, as compared to Phase 1, the number of bus riders will decrease with Phase 2 since trains will serve locations farther west of Whittier/La Cienega. Thus, ridership on Westside bus routes will be higher under Phase 2 as compared to the full LPA; however, the ridership under Phase 2 will still be lower than under the No-Build Alternative. See Figure 3-13, Daily Bus Ridership in Westside, 2035, in Chapter 3 of this Final EIS/EIR.</p>			
<p>Phase 3</p> <p>Phase 3 will complete the LPA in its entirety to the Westwood/JVA Hospital Station and, therefore, reductions in bus ridership are estimated to be the same as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario description above and Figure 3-13, Daily Bus Ridership in Westside, 2035, in Chapter 3, Transportation.</p>			
<p>Public Transit—Expandability</p> <p>Concurrent Construction Scenario</p> <p>Expandability of the LPA will involve added cars and frequency of train service. In addition, HRT service could be extended farther west in the study corridor in the future.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits CEQA: No Significant Impacts, Transit Benefits</p>	<p>No mitigation measures will be required since impacts of the subway extension will provide transit benefits.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits CEQA: No Significant Impacts, Transit Benefits</p>
<p>Phased Construction Scenario</p> <p>Phase 1</p> <p>The expandability of subway service under Phase 1 of the LPA will involve added train cars and increased frequencies using exclusive fixed guideway operations. This expandability will apply to service operating to the Whittier/La Cienega Station and will be less extensive as compared to the full LPA.</p>			
<p>Phase 2</p> <p>The expandability of subway service under Phase 2 of the LPA will involve added train cars and increased frequencies using exclusive fixed guideway operations. This expandability will apply to service operating to the Century City Station and will be less extensive as compared to the full LPA.</p>			
<p>Phase 3</p> <p>The expandability of subway service under Phase 3 of the LPA will involve added train cars and increased frequencies using exclusive fixed guideway operations.</p>			



Table S-6. Transportation Environmental Impacts, Mitigation Measures, and Impacts Remaining after Mitigation (continued from previous page)

Description of Identified Impacts*	Impact Before Mitigation	Mitigation	Impact Remaining after Mitigation*
<p>Public Transit—Passenger Comfort and Convenience</p> <p>Concurrent Construction Scenario</p> <p>The LPA will provide frequent and reliable subway service. This will occur regardless of the traffic conditions on streets in the Study Area due to the exclusive fixed guideway. The LPA will lead to a major reduction in the number of passenger transfers since the LPA will provide a one-seat ride from Downtown Los Angeles and the Wilshire Center areas to Westside destinations.</p> <p>Phased Construction Scenario</p> <p>Phase 1 will provide frequent and reliable subway service to the Wilshire/La Cienega Station. However, since Phase 1 will terminate at the Wilshire/La Cienega Station, improvements to passenger comfort and convenience for passengers traveling west of this station will be less than the full LPA to the Westwood/JVA Hospital Station. Phase 2 will reduce the number of passenger transfers since the LPA will provide a one-seat ride from Downtown Los Angeles and the Wilshire Center areas to the Century City Station. However, Purple Line passengers will still need to transfer to buses to reach destinations west of the Wilshire/La Cienega Station.</p> <p>Phase 2 will provide frequent and reliable subway service to the Century City Station. However, since Phase 2 will terminate at the Century City Station, improvements to passenger comfort and convenience for passengers traveling west of this station will be less than the full LPA to the Westwood/JVA Hospital Station. Phase 3 will reduce the number of passenger transfers since the LPA will provide a one-seat ride from Downtown Los Angeles and the Wilshire Center areas to the Century City Station. However, Purple Line passengers will still need to transfer to buses to reach destinations west of the Century City Station.</p> <p>Phase 3 will complete the LPA in its entirety to the Westwood/JVA Hospital Station and, therefore, improvements to passenger comfort and convenience will be the same as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario description above.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits</p> <p>CEQA: No Significant Impacts, Transit Benefits</p>	<p>No mitigation measures will be required since impacts of the subway extension will provide transit benefits.</p>	<p>NEPA: No Adverse Impacts, Transit Benefits</p> <p>CEQA: No Significant Impacts, Transit Benefits</p>
<p>Streets and Highways—Regional and Study Area Transportation Performance</p> <p>Concurrent Construction Scenario</p> <p>The LPA will have a beneficial effect on the regional transportation network by reducing VMT, VHT, and peak-hour trips in comparison to both future year and existing conditions. The Century City Constellation Station option will result in a greater reduction of VMT, VHT, and peak-period trips than the Century City Santa Monica Station. For example, there will be approximately 24,000 less regional VMTs in 2035 under the LPA (Century City Constellation Option) as compared to the No Build Alternative. See Table 3-9, Performance Measures for Existing Conditions and Alternatives, in Chapter 3, Transportation.</p> <p>Phased Construction Scenario</p> <p>Phase 1 will have a beneficial effect on the regional transportation network by reducing VMT, VHT, and peak-period trips in comparison to both future year and existing conditions. However, since Phase 1 will terminate at the Wilshire/La Cienega Station, reductions to VMT, VHT, and peak-hour trips will be less than the reductions resulting from the full LPA to the Westwood/JVA Hospital Station. For example, there will be approximately 21,000 less regional VMTs in 2035 under the LPA as compared to the No Build Alternative. See Table 3-9, Performance Measures for Existing Conditions and Alternatives, in Chapter 3, Transportation.</p> <p>Phase 2 will have a beneficial effect on the regional transportation network by reducing VMT, VHT, and peak-period trips in comparison to both future year and existing conditions. However, since Phase 2 will terminate at the Century City Station, reductions to VMT, VHT, and peak-hour trips will be less than the reductions resulting from the full LPA to the Westwood/JVA Hospital Station. For example, there will be 394,000 less regional VMTs in 2035 under the LPA (Century City Constellation Option) as compared to the No Build Alternative. See Table 3-9, Performance Measures for Existing Conditions and Alternatives, in Chapter 3, Transportation.</p>	<p>NEPA: No Adverse Impacts, Transportation Benefits</p> <p>CEQA: No Significant Impacts, Transportation Benefits</p>	<p>No mitigation measures will be required since the subway extension will provide regional and Study Area transportation benefits.</p>	<p>NEPA: No Adverse Impacts, Transportation Benefits</p> <p>CEQA: No Significant Impacts, Transportation Benefits</p>

Table S-6. Transportation, Environmental Impacts, Mitigation Measures, and Impacts Remaining after Mitigation (continued from previous page)

Description of Identified Impacts ^a	Impact Before Mitigation	Mitigation ^b	Impact Remaining after Mitigation ^c
<p>Phase 2</p> <p>Streets and Highways—Reduction in Peak Period Auto Trips</p> <p>Concurrent Construction Scenario</p> <p>The LPA is expected to reduce the number of auto trips occurring during peak periods by 12,000 trips. The Century City Constellation Station will result in a higher reduction in peak-period auto trips than the Century City Santa Monica Station. See Figure 3-15, Reduction in Auto Trips under LPA during Seven-hour Peak Period, in Chapter 3, Transportation.</p> <p>Phased Construction Scenario</p> <p>Phase 1</p> <p>Phase 1 is expected to reduce the number of auto trips occurring during peak periods by 6,000 trips. See Figure 3-15, Reduction in Auto Trips under LPA during Seven-hour Peak Period, in Chapter 3, Transportation.</p> <p>Phase 2</p> <p>Phase 2 is expected to reduce the number of auto trips occurring during peak periods by approximately 8,000 trips. The Century City Constellation Station will result in a higher reduction in peak-period auto trips than the Century City Santa Monica Station. See Figure 3-15, Reduction in Auto Trips under LPA during Seven-hour Peak Period, in Chapter 3, Transportation.</p> <p>Phase 3</p> <p>Phase 3 will complete the LPA in its entirety to the Westwood/VA Hospital Station and, therefore, reductions in peak-period auto trips will be the same as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario description above and Figure 3-15, Reduction in Auto Trips under LPA during Seven-hour Peak Period, in Chapter 3, Transportation.</p>	<p>NEPA: No Adverse Impacts, Transportation Benefits</p> <p>CEQA: No Significant Impacts, Transportation Benefits</p>	<p>No mitigation measures will be required since the subway extension will provide regional and Study Area transportation benefits.</p>	<p>NEPA: No Adverse Impacts, Transportation Benefits</p> <p>CEQA: No Significant Impacts, Transportation Benefits</p>
<p>Phase 1</p> <p>Streets and Highways—Transit Mode Share Changes</p> <p>Concurrent Construction Scenario</p> <p>Due to improved transit times, speed, and reliability, the LPA will increase transit mode shares during peak periods, which represents a beneficial effect since a higher transit mode share indicates less traffic on the regional road network. For example, under the LPA, travel between Pasadena and Century City will have a 22 percent transit mode share as compared to 18 percent under the No Build Alternative.</p> <p>Phased Construction Scenario</p> <p>Phase 1</p> <p>Phase 1 will increase transit mode shares, which represents a beneficial effect since a higher transit mode share indicates less traffic on the regional road network. However, since Phase 1 will terminate at the Wilshire/La Cienega Station, increases in transit mode shares will be lower than the increases experienced with the full LPA to the Westwood/VA Hospital Station.</p> <p>Phase 2</p> <p>Phase 2 will increase transit mode shares, which represents a beneficial effect since a higher transit mode share indicates less traffic on the regional road network. However, since Phase 2 will terminate at the Century City Station, increases in transit mode shares will be lower than the increase experienced with the full LPA to the Westwood/VA Hospital Station.</p> <p>Phase 3</p> <p>Phase 3 will complete the LPA in its entirety to the Westwood/VA Hospital Station and, therefore, increases in transit mode share will be the same as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario to description above.</p>	<p>NEPA: No Adverse Impacts, Transportation Benefits</p> <p>CEQA: No Significant Impacts, Transportation Benefits</p>	<p>No mitigation measures will be required since the subway extension will increase the transit mode share.</p>	<p>NEPA: No Adverse Impacts, Transportation Benefits</p> <p>CEQA: No Significant Impacts, Transportation Benefits</p>



Table S-6. Transportation Environmental Impacts, Mitigation Measures, and Impacts Remaining after Mitigation (Continued from previous page)

Description of Identified Impacts*	Impact Before Mitigation	Mitigation	Impact Remaining after Mitigation*
<p>Streets and Highways—Intersection Analysis</p> <p>Concurrent Construction Scenario</p> <p>The LPA will improve level-of-service at several Study Area intersections. In the future (year 2035), the LPA is expected to improve level-of-service at 12 locations in the AM peak hour and at 8 locations in the PM peak hour. Under existing conditions with the LPA, the LPA is expected to improve level-of-service at 9 locations in the AM peak hour and 13 locations in the PM peak hour. See Table 3-11, Number of Locations with Intersection Level-of-service Improvement with LPA, in Chapter 3, Transportation.</p> <p>In general, the intersection level-of-service results indicate that the LPA will not adversely impact any analyzed Study Area intersections compared to existing and future No-Build Alternative conditions. The exception is the Bank of America entrance at the Wilshire/Rodeo Station, which would result in a significant impact at the intersection of Wilshire Boulevard and Beverly Drive under future conditions.</p>	<p>NEPA: No Adverse Impacts with the exception of the Bank of America station entrance at the Wilshire/Rodeo Station</p> <p>CEQA: No Significant Impacts with the exception of the Bank of America station entrance at the Wilshire/Rodeo Station</p>	<p>No mitigation measures will be required for all stations with the exception of the Bank of America entrance at the Wilshire/Rodeo Station.</p> <p>The traffic impact resulting from the Bank of America station entrance at the Wilshire/Rodeo Station cannot be mitigated.</p>	<p>NEPA: No Adverse Impacts with the exception of the Bank of America station entrance at the Wilshire/Rodeo Station, which will result in an adverse impact.</p> <p>CEQA: No Significant Impacts with the exception of the Bank of America station entrance at the Wilshire/Rodeo Station, which will result in a significant unavoidable impact.</p> <p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>
<p>Phased Construction Scenario</p> <p>Phase 1 will improve level-of-service at 6 locations in the AM peak hour and at 6 locations in the PM peak hour compared to future No-Build Alternative conditions. Phase 1 will not adversely impact any analyzed Study Area intersections compared to future No-Build Alternative conditions. See Table 3-11, Number of Locations with Intersection Level-of-service Improvement with LPA, in Chapter 3, Transportation.</p> <p>Phase 2 will improve level-of-service at 10 locations in the AM peak hour and at 7 locations in the PM peak hour compared to future No-Build Alternative conditions. See Table 3-11, Number of Locations with Intersection Level-of-service Improvement with LPA, in Chapter 3, Transportation.</p> <p>In general, the intersection level-of-service results indicate that Phase 2 will not adversely impact any analyzed Study Area intersections compared to existing and future No-Build Alternative conditions. The exception is the Bank of America entrance at the Wilshire/Rodeo Station, which would result in a significant impact at the intersection of Wilshire Boulevard and Beverly Drive under future conditions.</p>	<p>NEPA: No Adverse Impacts with the exception of the Bank of America station entrance at the Wilshire/Rodeo Station</p> <p>CEQA: No Significant Impacts with the exception of the Bank of America station entrance at the Wilshire/Rodeo Station</p>	<p>No mitigation measures will be required for all stations with the exception of the Bank of America entrance at the Wilshire/Rodeo Station.</p> <p>The traffic impact resulting from the Bank of America station entrance at the Wilshire/Rodeo Station cannot be mitigated.</p>	<p>NEPA: No Adverse Impacts with the exception of the Bank of America station entrance at the Wilshire/Rodeo Station, which will result in an adverse impact.</p> <p>CEQA: No Significant Impacts with the exception of the Bank of America station entrance at the Wilshire/Rodeo Station, which will result in a significant unavoidable impact.</p> <p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>
<p>Phase 3</p> <p>Phase 3 will complete the LPA in its entirety to the Westwood/JVA Hospital Station and, therefore, level-of-service improvements and impacts will be the same as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario description above and Table 3-11, Number of Locations with Intersection Level-of-service Improvement with LPA, in Chapter 3, Transportation. The significant impact at the intersection of Wilshire Boulevard and Beverly Drive with the Wilshire/Rodeo Bank of America entrance would occur as part of Phase 2, as described above.</p>	<p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>	<p>No mitigation measures will be required.</p>	<p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>
<p>Streets and Highways—Traffic Due to Parking Spillover</p> <p>Concurrent Construction Scenario</p> <p>With parking mitigation measures T-2 through T-4 in place as described in the parking section below, LPA-related peak-hour traffic entering neighborhoods will be nominal and no impacts are expected to occur.</p> <p>Phased Construction Scenario</p> <p>With parking mitigation measures T-2 through T-4 in place as described in the parking section below, LPA-related peak-hour traffic entering neighborhoods will be nominal and no impacts are expected to occur.</p>	<p>T-2—Parking Monitoring and Community Outreach</p> <p>T-3—Residential Permit Parking Districts</p> <p>T-4—Consideration of Shared Parking Program</p>	<p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>	<p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>

Table S-6. Transportation Environmental Impacts, Mitigation Measures, and Impacts Remaining After Mitigation (continued from previous page)

Description of Identified Impacts ^a	Impact Before Mitigation	Mitigation ^b	Impact Remaining After Mitigation ^c
<p>Phase 2</p> <p>With parking mitigation measures T-2 through T-4 in place as described in the parking section below, LPA-related peak-hour traffic entering neighborhoods will be nominal and no impacts are expected to occur.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>T-2—Parking Monitoring and Community Outreach T-3—Residential Permit Parking Districts T-4—Consideration of Shared Parking Program</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 3</p> <p>With parking mitigation measures T-2 through T-4 in place as described in the parking section below, LPA-related peak-hour traffic entering neighborhoods will be nominal and no impacts are expected to occur.</p>			
<p>Parking—Parking Loss</p>			
<p>Concurrent Construction Scenario</p> <p>The following station locations will result in impacts to parking:</p> <p>Wilshire/Rodeo Station—Loss of off-street parking associated with the entrance options at the Bank of America and Union Bank Buildings. The entrance option at the Bank of America Building also would result in the removal of three metered on-street parking spaces and one on-street loading space from the west side of Beverly Drive and up to 13 on-street spaces from the east side of Beverly Drive.</p> <p>Century City Santa Monica Station—Loss of parking in the nearby underground garage at the southwest corner of Santa Monica Boulevard and Century Park East.</p> <p>Westwood/UCLA On- and Off-Street Stations—Loss of off-street parking at UCLA Lot 36.</p> <p>All other station entrance options would not have an adverse impact to parking.</p>	<p>NEPA: Adverse Impacts CEQA: N/A</p>	<p>T-1—Coordination with Property Owners Metro will coordinate with the appropriate property owners and other relevant parties regarding permanent parking losses. All property owners will be compensated under the Uniform Relocation Assistance and Real Property Acquisition Act as described in mitigation measure CN-1 and will receive compensation for easements as described in mitigation measure CN-3.</p> <p>No mitigation measures will be required.</p>	<p>NEPA: No Adverse Impacts CEQA: N/A</p>
<p>Phased Construction Scenario</p> <p>Phase 1 will not result in permanent parking loss at any stations.</p>	<p>NEPA: No Adverse Impacts CEQA: N/A</p>		
<p>Phase 2</p> <p>The following Phase 2 station locations will result in impacts to parking:</p> <p>Wilshire/Rodeo Station—Loss of off-street parking associated with the entrance options at the Bank of America and Union Bank Buildings. The entrance option at the Bank of America Building also would result in the removal of three metered on-street parking spaces and one on-street loading space from the west side of Beverly Drive and up to 13 on-street spaces from the east side of Beverly Drive.</p> <p>Century City Santa Monica Station—Loss of parking in the nearby underground garage at the southwest corner of Santa Monica Boulevard and Century Park East.</p> <p>All other station entrance options would not have an adverse impact to parking.</p>	<p>NEPA: Adverse Impacts CEQA: N/A</p>	<p>T-1—Coordination with Property Owners Metro will coordinate with the appropriate property owners and other relevant parties regarding permanent parking losses. All property owners will be compensated under the Uniform Relocation Assistance and Real Property Acquisition Act as described in mitigation measure CN-1 and will receive compensation for easements as described in mitigation measure CN-3.</p>	
<p>Phase 3</p> <p>The following Phase 3 station location will result in impacts to parking:</p> <p>Westwood/UCLA On- and Off-Street Stations—Loss of off-street parking at UCLA Lot 36.</p> <p>All other station entrance options would not have an adverse impact to parking.</p>	<p>NEPA: Adverse Impacts CEQA: N/A</p>	<p>T-2—Parking Monitoring and Community Outreach T-3—Residential Permit Parking Districts T-4—Consideration of Shared Parking Program</p>	<p>NEPA: No Adverse Impacts CEQA: N/A</p>
<p>Parking—Neighborhood Spillover Parking</p> <p>Concurrent Construction Scenario</p> <p>The LPA will result in neighborhood spillover parking impacts at the Wilshire/Fairfax, Wilshire/La Cienega, Westwood/UCLA (On-Street and Off-Street), and Westwood/JVA Hospital (South and North) Stations. This will result in adverse impacts at all identified stations if not mitigated. See Table 3-17, Parking Spillover Impact Summary, in Chapter 3, Transportation.</p>	<p>NEPA: Adverse Impacts CEQA: N/A</p>	<p>T-2—Parking Monitoring and Community Outreach T-3—Residential Permit Parking Districts T-4—Consideration of Shared Parking Program</p>	<p>NEPA: No Adverse Impacts CEQA: N/A</p>

Table 56. Transportation Environmental Impacts, Mitigation Measures, and Impacts Remaining after Mitigation (continued from previous page)

Description of Identified Impacts ^a	Impact Before Mitigation	Mitigation ^b	Impact Remaining After Mitigation ^c
<p>Concurrent Construction Scenario</p> <p>All seven LPA stations are expected to conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. See Table 3-18, Effects to the Pedestrian, Bicycle, and Bus Networks, in Chapter 3, Transportation.</p> <p>Phased Construction Scenario</p> <p>The Wilshire/La Brea, Wilshire/Janficac, and Wilshire/La Cienega Stations are expected to conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. See Table 3-18, Effects to the Pedestrian, Bicycle, and Bus Networks, in Chapter 3, Transportation.</p> <p>The Wilshire/Rodeo Station and Century City Station (Constellation and Santa Monica) are expected to conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. See Table 3-18, Effects to the Pedestrian, Bicycle, and Bus Networks, in Chapter 3, Transportation.</p> <p>The Westwood/UCLA Station (On-Street and Off-Street) and Westwood/VA Hospital Station (North and South) are expected to conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. See Table 3-18, Effects to the Pedestrian, Bicycle, and Bus Networks, in Chapter 3, Transportation.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>T-9—Provide consistency with General Plan Designation Sidewalk Width Adjacent to Metro-Controlled Parcels T-10—Provide consistency with General Plan Designation Sidewalk Width Coordination with Jurisdictions T-11—Provide High-Visibility Crosswalk Treatments T-12—Meet Federal, State, and Local Standards for Crossing T-13—Meet Metro Rail Design Criteria Minimums for Bicycle Parking T-14—Study Bicycle Parking Demand and Footprint Configuration T-15—Determine Alternative Sites for Bicycle Parking T-16—Study Bus-Rail Interface</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>CONSTRUCTION RELATED TRANSPORTATION IMPACTS</p> <p>Construction-related Transportation Impacts—Traffic and Circulation</p> <p>Truck Haul Routes</p> <p>Concurrent Construction Scenario</p> <p>Truck traffic volume will increase during construction of the LPA along anticipated haul routes. Roadways proposed as haul routes and estimated daily haul truck trips are shown in Table 3-20, Haul Routes for Construction Activities, and Table 3-21, Estimated Daily Haul Truck Trips, respectively, in Chapter 3, Transportation. Truck volumes will range from 25 daily trips for the emergency exit shaft at the Westwood/VA Hospital Station and the Wilshire/Crenshaw Station construction staging area to between 100 and 140 trips for the tunnel boring machine launch activity at the Westwood/VA Hospital Station.</p> <p>Increased truck traffic volume could cause visual, noise, and vibration impacts along haul routes. These impacts would be felt by residential land uses in particular. Section 3.3.1, Traffic and Circulation Construction-Related Environmental Impacts/Environmental Consequences, identifies potential streets that may be used for haul routes where clusters of residential units are located.</p> <p>Phased Construction Scenario</p> <p>Truck traffic volume will increase during construction of Phase 1 along anticipated haul routes. Roadways proposed as haul routes and estimated daily haul truck trips are shown in Table 3-20, Haul Routes for Construction Activities, and Table 3-21, Estimated Daily Haul Truck Trips, respectively, in Chapter 3, Transportation. Truck volumes will range from 25 daily trips for the Wilshire/Crenshaw Station construction staging area to between 80 and 120 trips for the tunnel boring machine activity and station construction at the Wilshire/La Brea Station.</p> <p>Increased truck traffic volume could cause visual, noise, and vibration impacts along Phase 1 haul routes. These impacts would be felt by residential land uses in particular. Section 3.3.1, Traffic and Circulation Construction-Related Environmental Impacts/Environmental Consequences, identifies potential streets along Phase 1 that may be used for haul routes where clusters of residential units are located.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>TCON-3—Designated Haul Routes</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>

Table S6. Transportation Environmental Impacts, Mitigation Measures, and Impacts Remaining after Mitigation (continued from previous page)

Description of Identified Impacts*	Impact Before Mitigation	Mitigation	Impact Remaining after Mitigation*
<p>Phase 2</p> <p>Truck traffic volume will increase during construction of Phase 2 along anticipated haul routes. Roadways proposed as haul routes and estimated daily haul truck trips are shown in Table 2-20, Haul Routes for Construction Activities, and Table 3-21, Estimated Daily Haul Truck Trips, respectively, in Chapter 3. Transportation. Truck volumes will range between 40 and 60 daily trips for the Wilshire/Rodeo Station construction and between 50 and 150 trips for station construction and tunnel boring machine activity at Century City.</p> <p>Increased truck traffic volume could cause visual, noise, and vibration impacts along Phase 2 haul routes. These impacts would be felt by residential land uses in particular. Section 3.8.1, Traffic and Circulation Construction-Related Environmental Impacts/Environmental Consequences, identifies potential streets along Phase 2 that may be used for haul routes where clusters of residential units are located.</p> <p>Truck traffic volume will increase during construction of Phase 3 along anticipated haul routes. Roadways proposed as haul routes and estimated daily haul truck trips are shown in Table 2-20, Haul Routes for Construction Activities, and Table 3-21, Estimated Daily Haul Truck Trips, respectively, in Chapter 3. Transportation. Truck volumes will range from 35 trips for the emergency exit shaft at the Westwood/VA Hospital Station to between 100 and 140 trips for station construction and tunnel boring machine activity at the Westwood/VA Hospital Station.</p> <p>Increased truck traffic volume could cause visual, noise, and vibration impacts along Phase 3 haul routes. These impacts would be felt by residential land uses in particular. Section 3.8.1, Traffic and Circulation Construction-Related Environmental Impacts/Environmental Consequences, identifies potential streets along Phase 3 that may be used for haul routes where clusters of residential units are located.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>Mitigation</p> <p>TCO#2—Designated Haul Routes</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>
<p>Phase 3</p> <p>Builder Handoff:</p> <p>Concurrent Construction Scenario</p> <p>Traffic impacts associated with PA construction include reduced roadway traffic lanes and temporary street closures that could result in major traffic disruptions and bottlenecks. Additionally, commercial driveways may be subject to reduced access around construction sites.</p> <p>Emergency vehicle access (e.g., police, fire and rescue, and ambulance) in and around construction work sites may be affected by lane closures or temporary street closures.</p> <p>Phased Construction Scenario</p> <p>Traffic impacts associated with Phase 1 construction include reduced roadway traffic lanes and temporary street closures that could result in major traffic disruptions and bottlenecks. Additionally, commercial driveways may be subject to reduced access around construction sites.</p> <p>Emergency vehicle access (e.g., police, fire and rescue, and ambulance) in and around Phase 1 construction work sites may be affected by lane closures or temporary street closures.</p> <p>Traffic impacts associated with Phase 2 construction include reduced roadway traffic lanes and temporary street closures that could result in major traffic disruptions and bottlenecks. Additionally, commercial driveways may be subject to reduced access around construction sites.</p> <p>Emergency vehicle access (e.g., police, fire and rescue, and ambulance) in and around Phase 2 construction work sites may be affected by lane closures or temporary street closures.</p> <p>Traffic impacts associated with Phase 3 construction include reduced roadway traffic lanes and temporary street closures that could result in major traffic disruptions and bottlenecks. Additionally, commercial driveways may be subject to reduced access around construction sites.</p> <p>Emergency vehicle access (e.g., police, fire and rescue, and ambulance) in and around Phase 3 construction work sites may be affected by lane closures or temporary street closures.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>Mitigation</p> <p>TCO#1—Traffic Control Plans TCO#3—Emergency Vehicle Access TCO#4—Transportation Management Plan TCO#5—Coordination with Planned Roadway Improvements</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>

Table 5.6. Transportation Environmental Impacts, Mitigation Measures, and Impacts Remaining after Mitigation (continued from previous page)

Description of Identified Impacts*	Impact Before Mitigation	Mitigation	Impact Remaining after Mitigation
<p>Construction-related Transportation Impacts—Public Transit</p> <p>Concurrent Construction Scenario</p> <p>Bus service will be impacted by temporary street closures, and will require the temporary rerouting of bus lines and bus stop locations. This will result in additional transit travel time for bus riders.</p> <p>Phased Construction Scenario</p> <p>Phase 1 Bus service will be impacted by temporary street closures during Phase 1 construction and will require the temporary rerouting of bus lines and bus stop locations. This will result in additional transit travel time for bus riders.</p> <p>Phase 2 Bus service will be impacted by temporary street closures during Phase 2 construction and will require the temporary rerouting of bus lines and bus stop locations. This will result in additional transit travel time for bus riders.</p> <p>Phase 3 Bus service will be impacted by temporary street closures during Phase 3 construction and will require the temporary rerouting of bus lines and bus stop locations. This will result in additional transit travel time for bus riders.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>TCOIN 6—Temporary Bus Stops and Route Diversions</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>
<p>Construction-related Transportation Impacts—Parking</p> <p>Concurrent Construction Scenario</p> <p>During construction, existing on-street parking and loading zones will be temporarily removed where traffic lanes are closed or eliminated temporarily. In addition, a number of off-street parking spaces will be removed during construction of the Wilshire/La Cienega, Wilshire/Rodeo, Century City Santa Monica, Westwood/UCLA (On-Street and Off-Street), and Westwood/VA Hospital (North and South) Stations.</p> <p>Phased Construction Scenario</p> <p>Phase 1 During Phase 1 construction, existing on-street parking, and loading zones will be temporarily removed where traffic lanes are closed or eliminated temporarily. In addition, a number of off-street parking spaces will be removed during construction of the Wilshire/La Cienega Station.</p> <p>Phase 2 During Phase 2 construction, existing on-street parking, and loading zones will be temporarily removed where traffic lanes are closed or eliminated temporarily. In addition, a number of off-street parking spaces will be removed during construction of the Wilshire/Rodeo and Century City Santa Monica Stations.</p> <p>Phase 3 During Phase 3 construction, existing on-street parking, and loading zones will be temporarily removed where traffic lanes are closed or eliminated temporarily. In addition, a number of off-street parking spaces will be removed during construction of the Westwood/UCLA (On-Street and Off-Street) and Westwood/VA Hospital (North and South) Stations.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>TCOIN 7—Parking Management TCOIN 8—Parking Monitoring and Community Outreach TCOIN 9—Construction Worker Parking</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>



Table S.6. Transportation Environmental Impacts, Mitigation Measures, and Impacts Remaining after Mitigation (continued from previous page)

Description of Identified Impacts*	Impact Before Mitigation	Mitigation?	Impact Remaining after Mitigation?
<p>Construction-related Transportation Impacts—Pedestrian and Bicycle Access</p> <p>Concurrent Construction Scenario</p> <p>During construction, pedestrian and bicycle access in and around construction work sites will be impacted as a result of street and sidewalk closures and disruptions to bike routes.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>TCON-10—Pedestrian Routes and Access TCON-11—Bicycle Paths and Access</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>
<p>Phased Construction Scenario</p> <p>During Phase 1 construction, pedestrian and bicycle access in and around construction work sites will be impacted as a result of street and sidewalk closures and disruptions to bike routes.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>TCON-10—Pedestrian Routes and Access TCON-11—Bicycle Paths and Access</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>
<p>During Phase 2 construction, pedestrian and bicycle access in and around construction work sites will be impacted as a result of street and sidewalk closures and disruptions to bike routes.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>TCON-10—Pedestrian Routes and Access TCON-11—Bicycle Paths and Access</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>
<p>During Phase 3 construction, pedestrian and bicycle access in and around construction work sites will be impacted as a result of street and sidewalk closures and disruptions to bike routes.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>TCON-10—Pedestrian Routes and Access TCON-11—Bicycle Paths and Access</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>

*The only major difference between the Concurrent Construction Scenario and the Phased Construction Scenario is the timing of potential transportation impacts and benefits. Under the Phased Construction Scenario, the potential for transportation impacts and benefits along Phase 2 and Phase 3 would occur later than under the Concurrent Construction Scenario due to an extended construction timeline. The timing for potential transportation impacts and benefits along Phase 1 of the LPA would occur earlier than under the Concurrent Construction Scenario since Phase 1 would open for operation in 2020. Unless otherwise noted, the LPA includes all station, alignment, and station entrance options.

†Refer to Sections 3.4, 3.5, 3.6, 3.7, and 3.8 and Appendix I, Mitigation Monitoring and Reporting Plan, for the full description of all proposed mitigation measures.

environment include crossing deterrents and high-visibility crosswalks, among other measures.

Construction of the LPA will temporarily affect traffic, transit, parking, and non-motorized travel within the Study Area. Truck traffic volumes will increase during construction along haul routes, which could cause increased visual, noise, and vibration impacts for those along the haul routes. To minimize these impacts, designated haul routes along arterial streets will be established in coordination with State and local jurisdictions.

Traffic impacts include reduced roadway traffic lanes and temporary street closures. Traffic impacts will be minimized by the implementation of construction traffic mitigation measures, including the development of traffic control plans and transportation management plans, among others. Temporary street closures also will affect bus service, requiring the temporary rerouting of bus lines and bus stop locations. In addition to temporary street closures, construction will require temporary sidewalk closures, which will impact pedestrian and bicycle networks. Proposed mitigation measures will minimize inconveniences to pedestrians and bicyclists during construction.

During construction, existing on-street parking and loading zones will be temporarily removed where traffic lanes are temporarily closed or eliminated in addition to the off-street parking spaces removed over the short-term. Impacts associated with the removal of temporary parking will be minimized by mitigation measures, including parking management, parking monitoring, and community outreach, among other measures.

With implementation of mitigation measures, construction-related adverse effects on transportation in the Study Area will be reduced for adjacent commercial areas and residential neighborhoods.

However, at major intersections, traffic-related impacts, such as split phases of signals and loss of turn lanes, will remain temporary adverse effects. Although the construction impacts identified for traffic circulation, parking, transit, and other modes (pedestrians and bicycles) will be temporary, impacts and/or residual impacts will remain adverse and unavoidable during construction.

Environmental Analysis, Consequences, and Mitigation during Operation

Chapter 4 of this Final EIS/EIR evaluates the existing conditions and environmental effects of the No Build Alternative and the LPA, and recommends mitigation measures to minimize both operational and construction impacts. Chapter 5 of this Final EIS/EIR, the Section 4(f) Evaluation, describes whether and how the Locally Preferred Alternative (LPA) will use Section 4(f) resources and where there is a direct use a description of avoidance alternatives and measures to minimize harm.

Refer to Table S-5 and Table S-7 for a summary of identified operational environmental impacts, mitigation measures, and impacts remaining after mitigation. Since the LPA is a subway and almost entirely underground, any environmental impacts are expected to occur at stations, where entrances are built on the surface. With implementation of proposed mitigation measures, operation of the LPA will have only one remaining adverse effect under NEPA and a significant effect under CEQA: the demolition of one historic structure—the Ace Gallery at the Wilshire/Rodeo Station. This is also a direct use of a Section 4(f) resource. All other anticipated environmental impacts resulting from operation will be mitigated by the proposed measures.

As discussed in the transportation summary, the LPA is expected to decrease regional VMT, which

will reduce energy consumption and lower emissions of some air pollutants, resulting in beneficial air quality and climate change effects.

The locations of the acquisitions are illustrated and listed in Appendix C, Acquisitions.

The construction of the LPA will require 35 to 57 full acquisitions (four multi-family residences and one mixed-use building containing residences), 3 to 10 permanent easements, 6 to 12 temporary construction easements, and 93 to 137 permanent underground easements (see Section 4.2.2 of this Final EIS/EIR). The actual number will depend on which station option and entrance location are selected at each station. Businesses employing 231 to 279 employees will be displaced (see Section 4.2.3 of this Final EIS/EIR). Some businesses may relocate to other parts of the City, and job losses from displacement will be offset by new construction and operations jobs. Each residence and business displaced as a result of the LPA will be given advance written notice and will be informed of their eligibility for relocation assistance and payments under the Federal Uniform Relocation Assistance and Real Property Acquisition Act and the California Relocation Act. The LPA may require underground easements and construction easements that are partially on or adjacent to Federal facilities. Metro is committed to following risk assessment processes performed by Federal agencies of their sites. Therefore, the acquisition of these properties will not result in adverse impacts.

The LPA will be located within a densely developed urban area and will not extend into undeveloped areas that may induce changes in such areas. Potential indirect growth-inducing effects may result from opportunities the LPA provides for micro-scale growth, including economic growth.

With mitigation, noise and vibration levels during operation will not exceed FTA criteria at any location along the LPA alignment.

Three locations along the LPA are predicted to exceed FTA ground-borne noise criteria due to train operations along tangent track or through crossovers if mitigation measures are not implemented. Mitigation measures incorporated into the design of the LPA include rail fasteners and low impact crossovers, which will reduce ground-borne noise during operation to below FTA criteria.

The LPA is located in a seismically active region. In addition to ground shaking hazards, at least one segment of the active Santa Monica Fault and the West Beverly Hills Lineament, an extension of the Newport-Inglewood Fault zone, cross the LPA in the Century City vicinity (Figure S-24). Subway stations, because they are structures for human occupancy, should not be built on active fault zones due to regulatory codes and the practical difficulty of designing such structures to withstand potential ground rupture and associated deformations. Because surface fault rupturing is generally confined to a relative narrow zone of tens to several hundred feet wide, avoidance is a practical means of avoiding surface fault rupture hazards for stations. However, for linear facilities such as the tunnels, avoidance is not possible. It is possible for tunnels to cross faults in a perpendicular orientation to limit the area of potential damage if the fault ruptures. Depending on the predicted fault off-set and area over which the movement is distributed, distortion can safely be accommodated by the tunnel structure.

The two station locations in Century City differ in terms of their proximity to the fault zones. The area along Santa Monica Boulevard, between about Moreno Drive and Century Park West Avenue is

Table S-7. Environmental Impacts and Mitigation Measures—Operations (continued on next page)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>► LAND USE</p> <p>Concurrent Construction Scenario No significant land use impacts will result from the LPA. The LPA will not conflict with applicable land use plans and policies.</p> <p>Phased Construction Scenario Phase 1: No significant land use impacts will result from Phase 1. Phase 1 will not conflict with applicable land use plans and policies. Phase 2: No significant land use impacts will result from Phase 2. Phase 2 will not conflict with applicable land use plans and policies. Phase 3: No significant land use impacts will result from Phase 3. Phase 3 will not conflict with applicable land use plans and policies.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>► SOCIOECONOMIC CHARACTERISTICS</p> <p>Concurrent Construction Scenario No significant impacts will result from the LPA. The LPA will result in 93 to 177 full acquisitions, 3 to 10 permanent easements, 6 to 12 temporary construction easements, and 93 to 177 permanent underground easements. Of the acquisitions, four residential properties and one mixed-use building with two residences will be acquired. Although the residents will be displaced and relocated, due to the size and scope of the LPA, this impact is not considered substantial. In addition, the residents will be compensated under the Uniform Relocation Assistance and Real Property Acquisition Act as further described in CN-1. It is anticipated that where relocation is required, it will result in the relocation of most jobs that will be displaced.</p> <p>Phased Construction Scenario Phase 1: No significant impacts will result from Phase 1. Phase 1 will result in 30 to 32 full acquisitions, 1 to 2 permanent easements, 1 temporary construction easement, and 1 permanent underground easement. Of the acquisitions, four residential properties and one mixed-use building with two residences will be acquired. Although the residents will be displaced and relocated as part of Phase 1, this impact is not considered substantial. In addition, the residents will be compensated under the Uniform Relocation Assistance and Real Property Acquisition Act as further described in CN-1. It is anticipated that where relocation is required, it will result in the relocation of most jobs that will be displaced. Phase 2: No significant impacts will result from Phase 2. Phase 2 will result in 0 to 25 full acquisitions, 1 to 4 permanent easements, 0 to 4 temporary construction easements, and 6 to 32 permanent underground easements. It is anticipated that where relocation is required, it will result in the relocation of most jobs that will be displaced. Phase 3: No significant impacts will result from Phase 3. Phase 3 will result in 0 full acquisitions, 1 to 4 permanent easements, 5 to 7 temporary construction easements, and 36 to 104 permanent underground easements.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>CN-1—Relocation Assistance and Compensation CN-2—Propose Joint-use Agreements CN-3—Compensation for Easements</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>► ENVIRONMENTAL JUSTICE</p> <p>Concurrent Construction Scenario No disproportionately high and adverse impacts to minorities and low-income communities will occur during construction or operation of the Project. Construction impacts will affect all neighborhoods in construction staging areas, regardless of demographic or socioeconomic character.</p>	<p>NEPA: No Disproportionately High and Adverse Impact CEQA: No Disproportionately High and Adverse Impact</p>	<p>No additional mitigation measures required.</p>	<p>NEPA: No Disproportionately High and Adverse Impact CEQA: No Disproportionately High and Adverse Impact</p>



Table S-2. Environmental Impacts and Mitigation Measures—Operations (continued from previous page)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phased Construction Scenario</p> <p>No disproportionately high and adverse impacts to minorities and low-income communities will occur during construction or operation of the Project. Construction impacts will affect all neighborhoods in construction staging areas, regardless of demographic or socioeconomic character.</p> <p>No disproportionately high and adverse impacts to minorities and low-income communities will occur during construction or operation of the Project. Construction impacts will affect all neighborhoods in construction staging areas, regardless of demographic or socioeconomic character.</p> <p>No disproportionately high and adverse impact to minorities and low-income communities will occur during construction or operation of the Project. Construction impacts will affect all neighborhoods in construction staging areas, regardless of demographic or socioeconomic character.</p>	<p>NEPA: No Disproportionately High and Adverse Impact</p> <p>CEQA: No Disproportionately High and Adverse Impact</p>	<p>No additional mitigation measures required.</p>	<p>NEPA: No Disproportionately High and Adverse Impact</p> <p>CEQA: No Disproportionately High and Adverse Impact</p>
<p>► VISUAL AND AESTHETICS</p> <p>Concurrent Construction Scenario</p> <p>Effects are related to the visibility of station components and tunnel ventilation structures. Combining landscaping and design elements in the LPA and the mitigation measures will ensure that there are no significant impacts.</p> <p>Phased Construction Scenario</p> <p>Effects are related to the visibility of station components for the three Phase 1 stations (Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega) as well as expansion of the Division 20 Storage Yard and Maintenance Facility. An emergency generator also will be constructed along Phase 1 near the Wilshire/La Brea Station. Combining landscaping and design elements in Phase 1 and the mitigation measures will ensure that there are no significant impacts.</p>	<p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>	<p>While there are no significant impacts, the mitigation measures, as listed below, are incorporated into the LPA and will ensure that impacts related to conflicts between scale and visual character, building removal and light-of-way acquisition, removal of mature vegetation, location of ancillary facilities, and introduction of new sources of light and glare, are avoided or minimized.</p> <p>VIS-1—Minimize Visual Clutter</p> <p>VIS-2—Replacement for Tree Removal</p> <p>VIS-3—Source Shielding in Exterior Lighting</p> <p>VIS-4—Integrate Station Designs with Area Redevelopment Plans</p>	<p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>
<p>► AIR QUALITY</p> <p>Concurrent Construction Scenario</p> <p>The LPA will not exceed the National Ambient Air Quality Standards, or the California Ambient Air Quality Standards, or the South Coast Air Quality Management District significance thresholds during operation of the LPA. The LPA is predicted to result in lower emissions of some criteria pollutants due to reductions in VMT.</p> <p>Phased Construction Scenario</p> <p>Phase 1 will not exceed the National Ambient Air Quality Standards, the California Ambient Air Quality Standards, or the South Coast Air Quality Management District significance thresholds during operation of Phase 1 of the LPA. However, since Phase 1 will terminate at the Wilshire/La Cienega Station, reductions to VMT will be less than the reductions resulting from the full LPA, and, therefore, the corresponding decrease in emissions of criteria pollutants and resulting air quality benefits will be less than the emissions reductions and benefits associated with the full LPA to the Westwood/JVA Hospital Station.</p>	<p>NEPA: No Adverse Impacts, Air Quality Benefits</p> <p>CEQA: No Significant Impacts, Air Quality Benefits</p>	<p>No mitigation required since operation of LPA will provide air quality benefits.</p>	<p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>

Table S-7. Environmental Impacts and Mitigation Measures—Operations (continued from previous pages)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phase 2 Phase 3</p> <p>Phase 2 will not exceed the National Ambient Air Quality Standards, the California Ambient Air Quality Standards, or the South Coast Air Quality Management District significance thresholds during operation of Phase 2 of the LPA. However, since Phase 2 will terminate at the Century City Station, reductions to VMT will be less than the reductions resulting from the full LPA, and, therefore, the corresponding decrease in emissions of criteria pollutants and resulting air quality benefits will be less than the emissions reductions and benefits associated with the full LPA to the Westwood/JVA Hospital Station.</p> <p>Phase 3 will complete the LPA in its entirety to the Westwood/JVA Hospital Station and, therefore, reductions in VMT and the corresponding decrease in criteria emissions will be the same as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario description above.</p>	<p>NEPA: No Adverse Impacts, Air Quality Benefits CEQA: No Significant Impacts, Air Quality Benefits</p>	<p>No mitigation required since operation of LPA will provide air quality benefits.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>► CLIMATE CHANGE</p> <p>Concurrent Construction Scenario</p> <p>The LPA is predicted to reduce roadway VMT and, therefore, the greenhouse gases associated with roadway VMT, as compared to the No-Build Alternative.</p> <p>Phase 1 Phase 2</p> <p>Phase 1 is predicted to reduce roadway VMT and, therefore, the greenhouse gases associated with roadway VMT, as compared to the No-Build Alternative. However, since Phase 1 will terminate at the Wilshire/JVA Hospital Station, reductions to VMT will be less than the reductions resulting from the full LPA and, therefore, the corresponding decrease in greenhouse gas emissions will be less than the emissions reductions associated with the full LPA to the Westwood/JVA Hospital Station.</p> <p>Phase 2 is predicted to reduce roadway VMT and, therefore, the greenhouse gases associated with roadway VMT, as compared to the No-Build Alternative. However, since Phase 2 will terminate at the Century City Station, reductions to VMT will be less than the reductions resulting from the full LPA and, therefore, the corresponding decrease in greenhouse gas emissions will be less than the emissions reductions associated with the full LPA to the Westwood/JVA Hospital Station.</p> <p>Phase 3 will complete the LPA in its entirety to the Westwood/JVA Hospital Station and, therefore, reductions in VMT and the corresponding decrease in greenhouse emissions will be the same as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario description above.</p>	<p>NEPA: No Adverse Impacts, Climate Change Benefits CEQA: No Significant Impacts, Climate Change Benefits</p>	<p>The following measures will be implemented to further ensure beneficial impacts: CC-1—Implement Pedestrian and Transit-Oriented Development at Stations CC-2—Energy Conservation CC-3—Promote Transit Ridership CC-4—Green Power</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>► NOISE AND VIBRATION</p> <p>Concurrent Construction Scenario</p> <p>Components of the LPA with the potential to generate noise that will be audible at the surface are the station ventilation system fans and the emergency ventilation system fans, which are subject to periodic testing, and will adhere to Metro design levels and not exceed FTA Noise Impact Criteria. Noise from rail operations, including the interaction of wheels on tracks, motive power, signaling and warning systems, and the traction power substations, will occur well below ground.</p> <p>Ground-borne vibration during operations is not predicted to exceed FTA criteria at any of the vibration-sensitive receivers. The three locations along the LPA where exceedance of the FTA ground-borne noise criteria will occur due to train operations along tangent track or through crossovers, if mitigation measures are not implemented, are the Wilshire Ebell Theatre, apartments on Wilshire Boulevard and South Orange Drive, and the Saban Theatre.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>To mitigate the potential for ground-borne noise impacts to theatre and residential uses above the subway tunnel due to train operation along tangent track and crossover track, the following mitigation measures will be included in the Final Design of the LPA: VIB-1—Use of High Compliance Direct Fixation Resilient Rail Fasteners VIB-2—Use of a Low Impact Crossover</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>



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Table S-7. Environmental Impacts and Mitigation Measures—Operations (Continued from previous page)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phased Construction Scenario</p> <p>Components of Phase 1 with the potential to generate noise that will be audible at the surface are the station ventilation system fans and the emergency ventilation system fans, which are subject to periodic testing, and will adhere to Metro design levels and not exceed FTA Noise Impact Criteria. Noise from rail operations, including the interaction of wheels on tracks, motive power, signaling and warning systems, and the traction power substations, will occur well below ground.</p> <p>Ground-borne vibration during operations is not predicted to exceed FTA criteria at any of the vibration-sensitive receivers along Phase 1. The three locations along Phase 1 where exceedance of the FTA ground-borne noise criteria will occur due to train operations along tangent track or through crossovers, if mitigation measures are not implemented, are the Wilshire Ebell Theatre, apartments on Wilshire Boulevard and South Orange Drive, and the Saban Theatre.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>To mitigate the potential for ground-borne noise impacts to theatre and residential uses above the subway tunnel due to train operation along tangent track and crossover track, the following mitigation measures will be included in the Final Design of the LPA: VIB-1—Use of High Compliance Direct Fixation Resilient Rail Fasteners VIB-2—Use of a Low Impact Crossover</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>Phase 2</p> <p>Components of Phase 2 with the potential to generate noise that will be audible at the surface are the station ventilation system fans and the emergency ventilation system fans, which are subject to periodic testing, and will adhere to Metro design levels and not exceed FTA Noise Impact Criteria. Noise from rail operations, including the interaction of wheels on tracks, motive power, signaling and warning systems, and the traction power substations, will occur well below ground.</p> <p>Ground-borne vibration and ground-borne noise during operations is not predicted to exceed FTA criteria at any of the vibration-sensitive receivers along Phase 2. Therefore, operation of Phase 2 will not result in adverse noise or vibration impacts.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 3</p> <p>Components of Phase 3 with the potential to generate noise that will be audible at the surface are the station ventilation system fans and the emergency ventilation system fans, which are subject to periodic testing, and will adhere to Metro design levels and not exceed FTA Noise Impact Criteria. Noise from rail operations, including the interaction of wheels on tracks, motive power, signaling and warning systems, and the traction power substations, will occur well below ground.</p> <p>Ground-borne vibration and ground-borne noise during operations is not predicted to exceed FTA criteria at any of the vibration-sensitive receivers along Phase 3. Therefore, operation of Phase 3 will not result in adverse noise or vibration impacts.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>► ENERGY</p> <p>Concurrent Construction Scenario</p> <p>No significant impacts. LPA conditions decrease systemwide VMT, which results in less energy consumption as compared to the existing and future No Build conditions.</p> <p>Phased Construction Scenario</p> <p>No significant impacts. Phase 1 conditions decrease systemwide VMT, which results in less energy consumption as compared to the existing and future No Build conditions. However, since Phase 1 will terminate at the Wilshire/Ja Cleriega Station, reductions to VMT will be less than the reductions resulting from the full LPA and, therefore, the corresponding decrease in energy consumption will be less significant than the energy savings anticipated under the full LPA to the Westwood/VA Hospital Station.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 1</p> <p>No significant impacts. Phase 1 conditions decrease systemwide VMT, which results in less energy consumption as compared to the existing and future No Build conditions. However, since Phase 1 will terminate at the Wilshire/Ja Cleriega Station, reductions to VMT will be less than the reductions resulting from the full LPA and, therefore, the corresponding decrease in energy consumption will be less significant than the energy savings anticipated under the full LPA to the Westwood/VA Hospital Station.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 2</p> <p>No significant impacts. Phase 2 conditions decrease systemwide VMT, which results in less energy consumption as compared to the existing conditions. However, since Phase 2 will terminate at the Century City Station, reductions to VMT will be less than the reductions resulting from the full LPA and, therefore, the corresponding decrease in energy consumption will be less significant than the energy savings anticipated under the full LPA to the Westwood/VA Hospital Station.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 3</p> <p>No significant impacts. Phase 3 will complete the LPA in its entirety to the Westwood/VA Hospital Station and, therefore, reductions in VMT and the corresponding decrease in energy consumption will be the same as the LPA under the Concurrent Construction Scenario. See Concurrent Construction Scenario description above.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>

Table S-7. Environmental Impacts and Mitigation Measures—Operations (continued from previous page)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>► GEOLOGIC HAZARDS</p> <p>Geologic Hazards—Seismic Ground Shaking Concurrent Construction Scenario The LPA, as with most sites in Southern California, is susceptible to strong ground shaking generated during earthquakes by nearby faults. Construction and design will be performed in accordance with the latest Federal and State seismic and environmental requirements, as well as State and local building codes. By compliance with these regulations and requirements, potential seismic ground shaking impacts will be minimized.</p> <p>Phased Construction Scenario Phase 1 of the LPA and expansion of the Division 20 Storage Yard and Maintenance Facility are susceptible to strong ground shaking generated during earthquakes on nearby faults. Construction and design will be performed in accordance with the latest Federal and State seismic and environmental requirements, as well as State and local building codes. By compliance with these regulations and requirements, potential seismic ground shaking impacts will be minimized.</p> <p>Phase 2 Phase 2 is susceptible to strong ground shaking generated during earthquakes on nearby faults. Construction and design will be performed in accordance with the latest Federal and State seismic and environmental requirements, as well as State and local building codes. By compliance with these regulations and requirements, potential seismic ground shaking impacts will be minimized.</p> <p>Phase 3 Phase 3 is susceptible to strong ground shaking generated during earthquakes on nearby faults. Construction and design will be performed in accordance with the latest Federal and State seismic and environmental requirements, as well as State and local building codes. By compliance with these regulations and requirements, potential seismic ground shaking impacts will be minimized.</p> <p>Geologic Hazards—Fault Rupture: Tunnel Crossing Concurrent Construction Scenario</p> <p>At least one segment of the Santa Monica Fault and the West Beverly Hills Lineament, a northern extension of the Newport/Inglewood Fault, crosses the LPA tunnel in the vicinity of Century City. In the design for the tunnels in this area, the specific Maximum Design Earthquake and Operating Design Earthquake fault displacements will be calculated using a probabilistic approach during the detailed Final Design, together with further exploration to refine the fault zone locations specific to the selected tunnel alignment. With this design, hazard from surface fault rupture will be minimized.</p> <p>Phased Construction Scenario No known active fault zones cross the Phase 1 alignment or the Division 20 Storage Yard and Maintenance Facility.</p> <p>Phase 2 At least one segment of the Santa Monica Fault and the West Beverly Hills Lineament, a northern extension of the Newport/Inglewood Fault, crosses the LPA tunnel in the vicinity of Century City. In the design for the tunnels in this area, the specific Maximum Design Earthquake and Operating Design Earthquake fault displacements will be calculated using a probabilistic approach during the detailed Final Design, together with further exploration to refine the fault zone locations specific to the selected tunnel alignment. With this design, hazard from surface fault rupture will be minimized.</p> <p>Phase 3 At least one segment of the Santa Monica Fault crosses the LPA tunnel in the vicinity of Century City. In the design for the tunnels in this area, the specific Maximum Design Earthquake and Operating Design Earthquake fault displacements will be calculated using a probabilistic approach during the detailed Final Design, together with further exploration to refine the fault zone locations specific to the selected tunnel alignment. With this design, hazard from surface fault rupture will be minimized.</p>	<p>NEPA: Minimal impacts CEQA: Impacts reduced to less than significant with engineered design and adherence to Metro's operating procedures</p>	<p>NEPA: Minimal impacts CEQA: Impacts reduced to less than significant with engineered design and adherence to Metro's operating procedures</p>	<p>GEO-1—Seismic Ground Shaking GEO-3—Operational Procedures during an Earthquake GEO 7—Tunnel Advisory Panel Design Review</p>
<p>NEPA: Minimal impacts CEQA: Impacts reduced to less than significant with engineered design</p>	<p>GEO-2—Fault Crossing Tunnel, Fault Rupture, Tunnel Crossing GEO 7—Tunnel Advisory Panel Design Review</p>	<p>NEPA: Minimal impacts CEQA: Impacts reduced to less than significant with engineered design</p>	<p>NEPA: Minimal impacts CEQA: Impacts reduced to less than significant with engineered design</p>
<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>GEO-2—Fault Crossing Tunnel, Fault Rupture, Tunnel Crossing GEO 7—Tunnel Advisory Panel Design Review</p>	<p>NEPA: Minimal impacts CEQA: Impacts reduced to less than significant with engineered design</p>	<p>NEPA: Minimal impacts CEQA: Impacts reduced to less than significant with engineered design</p>



Table 5.7. Environmental Impacts and Mitigation Measures—Operations (Continued from previous page)

Detailed Description of Impacts		Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Geologic Hazards—Fault Rupture: Station Location</p> <p>Concurrent Construction Scenario</p> <p>The West Beverly Hills Lineament, a northern extension of the Newport-Inglewood Fault, crosses the LPA in the vicinity of Moreno Drive in the Century City area. If the Century City Stations is located along Santa Monica Boulevard, the West Beverly Hills Lineament will cross the station box. Surface fault rupture poses a substantial hazard for this station location that cannot be mitigated with the available techniques and measures. However, if the Century City Stations is located along Constellation Boulevard, no known faults will cross the station box.</p> <p>Phased Construction Scenario</p> <p>No known active fault zones cross the Phase 1 stations or the Division 20 Storage Yard and Maintenance Facility.</p>	<p>Phase 1</p> <p>The West Beverly Hills Lineament, a northern extension of the Newport-Inglewood Fault, crosses Phase 2 in the vicinity of Moreno Drive in the Century City area. If the Century City Station is located along Santa Monica Boulevard, the West Beverly Hills Lineament will cross the station box. If the Century City Station is located along Constellation Boulevard, no known faults will cross the station box.</p> <p>Phase 2</p> <p>No known active fault zones cross the Phase 3 stations.</p>	<p>NEPA: Major impact (if Century City Station located at Santa Monica)</p> <p>CEQA: Significant impact (if Century City Station located at Santa Monica)</p> <p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>	<p>No feasible mitigation. Surface fault rupture poses a substantial hazard for the Century City Station at the Santa Monica location that cannot be mitigated.</p> <p>No mitigation required.</p> <p>No feasible mitigation. Surface fault rupture poses a substantial hazard for the Century City Station at the Santa Monica location that cannot be mitigated.</p> <p>No mitigation required.</p>	<p>NEPA: Major impact (if Century City Station located at Santa Monica)</p> <p>CEQA: Significant Impact (if Century City Station located at Santa Monica)</p> <p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p>
	<p>Geologic Hazards—Liquefaction and Seismic Settlement</p> <p>Concurrent Construction Scenario</p> <p>Due to the presence of shallow groundwater and young surficial alluvial deposits, there may be potential liquefaction adjacent to the upper portions of some station walls at the Wilshire/La Cienega, Westwood/UCLA, and Westwood/VA Hospital Stations. Lateral spreading is not anticipated in the vicinity of the LPA. Based on the magnitude of evaluated liquefaction, either structural design or ground improvement techniques or deep foundations to minimize these hazards will be selected.</p> <p>Phased Construction Scenario</p> <p>Due to the presence of shallow groundwater and young surficial alluvial deposits, there may be potential liquefaction adjacent to the upper portions of the Wilshire/La Cienega Station. Lateral spreading is not anticipated in the vicinity of Phase 1. Based on the magnitude of evaluated liquefaction, either structural design or ground improvement techniques or deep foundations to minimize these liquefaction hazards will be implemented if liquefaction risks are identified.</p> <p>None of the stations along Phase 2 were identified as prone to liquefaction. Lateral spreading is not anticipated in the vicinity of the Phase 2. However, either structural design or ground improvement techniques or deep foundations to minimize these liquefaction hazards will be implemented if liquefaction risks are identified.</p> <p>Due to the presence of shallow groundwater and young surficial alluvial deposits, there may be potential liquefaction adjacent to the upper portions of some station walls at the Westwood/UCLA and Westwood/VA Hospital Stations. Lateral spreading is not anticipated in the vicinity of the Phase 3. Based on the magnitude of evaluated liquefaction, either structural design or ground improvement techniques or deep foundations to minimize these hazards will be selected.</p>	<p>NEPA: Minimal impact</p> <p>CEQA: Impacts reduced to less than significant with engineered design</p> <p>NEPA: Minimal impact</p> <p>CEQA: Impacts reduced to less than significant with engineered design</p> <p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impacts</p> <p>NEPA: Minimal impact</p> <p>CEQA: Impacts reduced to less than significant with engineered design</p>	<p>CEQ 4—Liquefaction and Seismic Settlement</p> <p>CEQ 7—Tunnel Advisory Panel Design Review</p>	<p>NEPA: Minimal impact</p> <p>CEQA: Impacts reduced to less than significant with engineered design</p> <p>NEPA: Minimal impact</p> <p>CEQA: Impacts reduced to less than significant with engineered design</p> <p>NEPA: No Adverse Impacts</p> <p>CEQA: No Significant Impact</p> <p>NEPA: Minimal impact</p> <p>CEQA: Impacts reduced to less than significant with engineered design</p>
	<p>Geologic Hazards—Hazardous Subsurface Gas</p> <p>Concurrent Construction Scenario</p> <p>Hazardous subsurface gases (methane and hydrogen sulfide) pose a hazard during construction and operation of the LPA and are particularly high in the vicinity of Wilshire Boulevard and Fairfax Avenue, near the La Brea Tar Pits. Tunnels and stations will be designed to provide a redundant protection system against gas intrusion hazard.</p>		<p>NEPA: Minimal impact</p> <p>CEQA: Impacts reduced to less than significant with engineered design and adherence to Metro's operating procedures</p>	<p>CEQ 5—Hazardous Subsurface Gas Operations</p> <p>CEQ 6—Hazardous Subsurface Gas Structural Design</p> <p>CEQ 7—Tunnel Advisory Panel Design Review</p>

Table S-2. Environmental Impacts and Mitigation Measures—Operations (continued from previous page)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phase 1 Phase 2 Phase 3</p> <p>Phased Construction Scenario Hazardous subsurface gases (methane and hydrogen sulfide) pose a hazard during construction and operation of Phase 1 and are particularly high in the vicinity of Wilshire Boulevard and Fairfax Avenue, near the La Brea Tar Pits. Tunnels and stations will be designed to provide a redundant protection system against gas intrusion hazard. Hazardous subsurface gases (methane and hydrogen sulfide) pose a hazard during construction and operation of Phase 2. Tunnels and stations will be designed to provide a redundant protection system against gas intrusion hazard. Hazardous subsurface gases (methane and hydrogen sulfide) pose a hazard during construction and operation of Phase 3. Tunnels and stations will be designed to provide a redundant protection system against gas intrusion hazard.</p>	<p>NEPA: Minimal impact CEQA: Impacts reduced to less than significant with engineered design and adherence to Metro's operating procedures</p>	<p>GEO 5—Hazardous Subsurface Gas Operations GEO 6—Hazardous Subsurface Gas Structural Design GEO 7—Tunnel Advisory Panel Design Review</p>	<p>NEPA: Minimal impact CEQA: Impacts reduced to less than significant with engineered design and adherence to Metro's operating procedures</p>
<p>► HAZARDOUS WASTES AND MATERIALS Concurrent Construction Scenario No significant impacts. The potential exists for hazardous materials/waste spills to occur; however, it is assumed that the storage and disposal of hazardous materials/waste will be conducted in accordance with all Federal and State regulatory requirements that are intended to prevent or manage hazards and that if a spill does occur, it will be remediated accordingly. No long-term hazardous materials impacts are anticipated.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>In addition to the mitigation measures outlined for geologic hazards, measures to further ensure that any impacts are avoided or minimized for the LPA include the following: HAZ-1—Disposal of Groundwater HAZ-2—Emergency Response Procedures</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 1 Phase 2 Phase 3</p> <p>► ECOSYSTEMS/BIOLOGICAL RESOURCES Concurrent Construction Scenario Some removal or pruning of California sycamore trees may occur at the Wilshire/La Brea Station area. Removal and replacement of these trees, if necessary, will be conducted in compliance with applicable regulations and tree protection ordinances of the City of Los Angeles; therefore, no significant impacts will result from the LPA. Phased Construction Scenario During Phase 1 any removal or pruning of California sycamore trees at the Wilshire/La Brea Station area will be in compliance with applicable regulations and tree protection ordinances of the City of Los Angeles; therefore, no significant impacts will result from operation of Phase 1.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>



Table S-3. Environmental Impacts and Mitigation Measures—Operations (continued from previous page)

Description of Idealized Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phase 1: No significant impacts will result from operation of Phase 2 of the LPA.</p> <p>Phase 3: No significant impacts will result from operation of Phase 3 of the LPA.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>► WATER RESOURCES</p> <p>Concurrent Construction Scenario No significant impacts will result from the LPA. Operation of the LPA will comply with Title III and Title IV of the Clean Water Act and National Pollutant Discharge Elimination System standards.</p> <p>Phased Construction Scenario No significant impacts will result from Phase 1 of the LPA. Operation of Phase 1 will comply with Title III and Title IV of the Clean Water Act and National Pollutant Discharge Elimination System standards.</p> <p>Phase 2: No significant impacts will result from Phase 2 of the LPA. Operation of Phase 2 will comply with Title III and Title IV of the Clean Water Act and National Pollutant Discharge Elimination System standards.</p> <p>Phase 3: No significant impacts will result from Phase 3 of the LPA. Operation of Phase 3 will comply with Title III and Title IV of the Clean Water Act and National Pollutant Discharge Elimination System standards.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>In addition to the standard Best Management Practices and other measures required for compliance with Federal, State, and local requirements, the following measures will be implemented to further ensure that there will be no adverse water quality or hydrology impacts: WQ-1—Drainage Control Plan WQ-2—Runoff Treatment, using the most appropriate Best Management Practices as listed below: • BMP1: Infiltration basins/trenches • BMP2: Porous pavement • BMP3: Vegetated filter planters</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>► SAFETY AND SECURITY</p> <p>Concurrent Construction Scenario The LPA will not have a significant effect on safety and security with the incorporation of the measures described in the impacts and mitigation sections.</p> <p>Phased Construction Scenario Phase 1 will not have a significant effect on safety and security with the incorporation of the measures described in the impacts and mitigation sections.</p> <p>Phase 2: Phase 2 will not have a significant effect on safety and security with the incorporation of the measures described in the impacts and mitigation sections.</p> <p>Phase 3: Phase 3 will not have a significant effect on safety and security with the incorporation of the measures described in the impacts and mitigation sections.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>Metro will implement the following to ensure to further ensure there are no adverse impacts in regard to safety and security: SS-1—Passenger Safety I SS-2—Passenger Safety II SS-3—Construction Safety SS-4—Fire Protection and Safety SS-5—Methane and Hydrogen Sulfide Gas Leak Protection SS-6—Security Preventing Criminal Activity SS-7—Security Preventing Terrorist Attacks SS-8—Emergency Response</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>► PARKLANDS AND COMMUNITY FACILITIES</p> <p>Concurrent Construction Scenario No significant impacts will result from the LPA. The LPA will not require the acquisition of parklands. Proposed access to transit could result in beneficial impacts for the community, particularly for the transit-dependent. Enhanced transit access will reduce travel time and increase local and regional connectivity to community facilities and parks.</p> <p>The acquisition of property along the LPA alignment will include the Architecture and Design Museum property for the construction of the Wilshire/Fairfax Station, displacing the museum, a non-profit private institution.</p> <p>The Marmello School of Beauty will be displaced as part of the LPA if the Wilshire/Fairfax Station entrance option at Johnnie's Coffee Shop is selected. Students attending this specific location of the school could be accommodated at other nearby Marmello School of Beauty locations.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>The following measure will be incorporated into the LPA to ensure impacts related to displacements and acquisitions are avoided or further minimized: CN-1—Relocation Assistance and Compensation</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>

Table S-7. Environmental Impacts and Mitigation Measures—Operations (continued from previous page)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phased Construction Scenario</p> <p>No significant impacts will result from Phase 1 of the LPA. Phase 1 will not require the acquisition of parklands. Improved access to transit could result in beneficial impacts for the community, particularly for the transit-dependent. Enhanced transit access will reduce travel time and increase local and regional connectivity to community facilities and parks.</p> <p>The acquisition of property along the Phase 1 alignment will include the Architecture and Design Museum property for the construction of the Wilshire/Fairfax Station, displacing the museum, a non-profit, private institution. The Mantrillo School of Beauty will be displaced as part of Phase 1 if the Wilshire/Fairfax Station entrance option at John's is selected. Students attending this specific location of the school could be accommodated at other nearby Marinello School of Beauty locations.</p> <p>No significant impacts will result from Phase 2 of the LPA. Phase 2 will not require the acquisition of parklands. Improved access to transit could result in beneficial impacts for the community, particularly for the transit-dependent. Enhanced transit access will reduce travel time and increase local and regional connectivity to community facilities and parks.</p> <p>No significant impacts will result from Phase 3 of the LPA. Phase 3 will not require the acquisition of parklands. Improved access to transit could result in beneficial impacts for the community, particularly for the transit-dependent. Enhanced transit access will reduce travel time and increase local and regional connectivity to community facilities and parks.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>The following measure will be incorporated into the LPA to ensure impacts related to displacements and acquisitions are avoided or further minimized: CN-1—Relocation Assistance and Compensation</p> <p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>PHASE 1</p> <p>HISTORIC, ARCHAEOLOGICAL, AND PALEONTOLOGICAL RESOURCES</p> <p>Historic, Archaeological, and Paleontological Resources—Historic Resources Operations</p> <p><i>Concurrent Construction Scenario</i></p> <p>One of the 41 historic properties within the LPA APE has a Determination of Adverse Effect—Ace Gallery, which would be demolished for construction staging. Forty of the historic properties (including two historic districts) have a determination of No Adverse Effect.</p> <p>Subsurface easements will be required for up to nine historic properties depending on the options selected. Ground-borne noise and vibration from construction activity will not adversely affect historic resources.</p> <p>Four historic properties, including the VA Center Historic District, will be altered by either construction staging activities, station entrance options, or tree removal; these properties also have a determination of No Adverse Effect.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>Included in the Memorandum of Agreement (Appendix D—Memorandum of Agreement and Section 106 Correspondence). For the properties that have a determination of No Adverse Effect, implementation of mitigation measure HR-1—Treatment to Avoid Adverse Effects will further ensure avoidance of adverse effects to historic properties. For the Adverse Effect on the Ace Gallery HR-2—Treatment to Resolve Adverse Effect (HARS)/HAER Documentation and Public Website Development. For properties within APE if construction would start beyond 2019, mitigation measure HR-3.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>
<p>PHASE 2</p> <p><i>Phased Construction Scenario</i></p> <p>Of the 41 historic properties identified within the APE, 15 are located along the Phase 1 alignment with an additional 3 located at the Division 20 Storage Yard and Maintenance Facility. Phase 1 of the LPA will have No Adverse Effect on all 18 of these identified properties.</p> <p>None of the 18 properties will require subsurface easements.</p> <p>One historic property in Phase 1 will be altered by a station entrance option and has a determination of No Adverse Effect.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>Included in the Memorandum of Agreement (Appendix D—Memorandum of Agreement and Section 106 Correspondence). For the properties that have a determination of No Adverse Effect, implementation of mitigation measure HR-1—Treatment to Avoid Adverse Effects, will further ensure avoidance of adverse effects to historic properties. For properties within APE if construction would start beyond 2019, mitigation measure HR-3.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>



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Table S-2. Environmental Impacts and Mitigation Measures—Operations (continued from previous page)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phase 2</p> <p>Of the 41 historic properties identified within the APE, 11 are located along the Phase 2 alignment. Of the 11 identified historic properties, Phase 2 will have an adverse effect on one property—the Ace Gallery. Subsurface easements will be required for up to 3 historic properties depending on the options selected. Ground-borne noise and vibration from construction activity will not adversely affect historic resources. Ground-borne noise and vibration from construction activity will not adversely affect historic resources. Two historic properties in Phase 2 will be altered by station entrance options, and they also have a determination of No Adverse Effect.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>Included in the Memorandum of Agreement (Appendix D—Memorandum of Agreement and Section 106 Correspondence). For the properties that have a determination of No Adverse Effect, implementation of mitigation measure HR-1—Treatment to Avoid Adverse Effects, will further ensure avoidance of adverse effects to historic properties. For the Adverse Effect on the Ace Gallery HR-2—Treatment to Resolve Adverse Effect—HAGSH-HER Documentation and Public Website Development. For properties within APE if construction would start beyond 2019, mitigation measure HR-3.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>
<p>Phase 3</p> <p>Of the 41 historic properties identified within the APE, 12 are located along the Phase 3 alignment. Phase 3 of the LPA will result in No Adverse Effect on all 12 of these identified historic resources. Subsurface easements will be required for up to 6 historic properties depending on the options selected. Ground-borne noise and vibration from construction activity will not adversely affect historic resources. One historic property in Phase 3, the VA Center Historic District, will be altered by construction staging activities and tree removal; this property has a determination of No Adverse Effect.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>Included in the Memorandum of Agreement (Appendix D—Memorandum of Agreement and Section 106 Correspondence). For the properties that have a determination of No Adverse Effect, implementation of mitigation measure HR-1—Treatment to Avoid Adverse Effects, will further ensure avoidance of adverse effects to historic properties. For properties within APE if construction would start beyond 2019, mitigation measure HR-3.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Historic, Archeological, and Paleontological Resources—Historic Resources Construction</p>			
<p>Concurrent Construction Scenario</p> <p>The construction of the LPA will result in an adverse effect on one historic property at the Wilshire/Rede Station (the Ace Gallery at 9430 Wilshire Boulevard), which will be demolished. Subsurface easements for the LPA are anticipated under up to nine historic properties. Ground-borne noise and vibration from construction activity will not adversely affect these historic resources. In addition, construction will occur in the vicinity of the contributing landscape elements of the VA Medical Center Historic District.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>HR-4—Geotechnical Pre-Construction Survey and Historic Landscape Protection. Implementation of mitigation measure (HR-2) will reduce impacts to the Ace Gallery.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>
<p>Phase 2</p> <p>The construction of Phase 1 will not result in any adverse effects on historic properties.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>HR-4—Geotechnical Pre-Construction Survey and Historic Landscape Protection.</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>Phase 3</p> <p>The construction of Phase 2 will result in an adverse effect on one historic property at the Wilshire/Rede Station (the Ace Gallery at 9430 Wilshire Boulevard), which will be demolished. Subsurface easements for Phase 2 are anticipated under up to three historic properties. Ground-borne noise and vibration from construction activity will not adversely affect these historic resources.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>HR-4—Geotechnical Pre-Construction Survey and Historic Landscape Protection. Implementation of mitigation measure (HR-2) will reduce impacts to the Ace Gallery.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>
<p>Phase 3</p> <p>The construction of Phase 3 will result in subsurface easements for up to six historic properties. Ground-borne noise and vibration from construction activity will not adversely affect these historic resources. In addition, construction will occur in the vicinity of the contributing landscape elements of the VA Medical Center Historic District.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>HR-4—Geotechnical Pre-Construction Survey and Historic Landscape Protection.</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>

Table S-7. Environmental Impacts and Mitigation Measures—Operations (continued from previous page)

Description of Potential Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Historic, Archaeological, and Paleontological Resources—Archaeological Resources Operations</p> <p>Concurrent Construction Scenario</p> <p>No archaeological resources have been identified within the APE for the LPA stations, alignment, or laydown areas. One CEQA: No Significant Impacts historic-period archaeological site, CA-LAN-0610, has been identified in the APE at the Division 20 Storage Yard and Maintenance Facility. The LPA will avoid this archaeological site and there will be no effect.</p> <p>Phased Construction Scenario</p> <p>No archaeological resources have been identified within the APE for the Phase 1 stations, alignment, or laydown areas. One historic-period archaeological site, CA-LAN-0610, has been identified in the APE at the Division 20 Storage Yard and Maintenance Facility. The LPA will avoid this archaeological site and there will be no effect.</p> <p>Phase 2 Phase 3</p> <p>No archaeological resources have been identified within the APE for the Phase 2 stations, alignment, or laydown areas. The LPA may affect undocumented cultural resources, including intact archaeological deposits.</p> <p>Phase 1 Phase 2 Phase 3</p> <p>No archaeological resources have been identified within the APE for the Phase 3 stations, alignment, or laydown areas. The LPA may affect undocumented cultural resources, including intact archaeological deposits.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p> <p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p> <p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>Implementation of mitigation measure AR-1 will ensure no adverse construction impacts to undocumented archaeological resources, including human remains.</p> <p>Implementation of mitigation measure AR-1 will ensure no adverse construction impacts to undocumented archaeological resources, including human remains.</p> <p>AR-1—Unanticipated Discoveries and consultation with Native American Individuals, Tribes and Organizations and Treatment of Cultural Remains and Artifacts.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p> <p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p> <p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Historic, Archaeological, and Paleontological Resources—Archaeological Resources Construction</p> <p>Concurrent Construction Scenario</p> <p>The construction of the LPA, including construction of the Division 20 Storage Yard and Maintenance Facility, could adversely affect cultural resources pertaining to intact archaeological deposits. Given the historic period nature of the built environment, which often did not disturb more than a few feet of topsoil, there is the likelihood for construction to encounter subsurface prehistoric and/or historic archaeological deposits.</p> <p>Phased Construction Scenario</p> <p>The construction of Phase 1 could adversely affect cultural resources pertaining to intact archaeological deposits. Given the historic period nature of the built environment, which often did not disturb more than a few feet of topsoil, there is the likelihood for encountering subsurface prehistoric and/or historic archaeological deposits during construction.</p> <p>Phase 2 Phase 3</p> <p>The construction of Phase 2 could adversely affect cultural resources pertaining to intact archaeological deposits. Given the historic period nature of the built environment, which often did not disturb more than a few feet of topsoil, there is the likelihood for encountering subsurface prehistoric and/or historic archaeological deposits during construction.</p> <p>Phase 1 Phase 2 Phase 3</p> <p>The construction of Phase 3 could adversely affect cultural resources pertaining to intact archaeological deposits. Given the historic period nature of the built environment, which often did not disturb more than a few feet of topsoil, there is the likelihood for encountering subsurface prehistoric and/or historic archaeological deposits during construction.</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p> <p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p> <p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>AR-1—Unanticipated Discoveries and consultation with Native American Individuals, Tribes and Organizations and Treatment of Cultural Remains and Artifacts.</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p> <p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p> <p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>
<p>Historic, Archaeological, and Paleontological Resources—Paleontological Resources Operations</p> <p>Concurrent Construction Scenario</p> <p>The LPA may encounter fossil localities at all stations; but fossil localities are most likely to be encountered at the Wilshire/La Brea and Wilshire/Fairfax Stations in Phase 1.</p> <p>Phased Construction Scenario</p> <p>Phase 1 may encounter fossil localities at all stations, but fossil localities are most likely to be encountered at the Wilshire/La Brea and Wilshire/Fairfax Stations in Phase 1.</p> <p>Phase 1 Phase 2 Phase 3</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>PA-1—Memorandum of Understanding</p> <p>During construction, implementation of construction mitigation measures PA-2 through PA-7 would further reduce impacts to undocumented paleontological resources.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>



Table S7: Environmental Impacts and Mitigation Measures—Operations (continued from previous page)

Describe the Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phase 2</p> <p>Phase 2 may encounter fossil localities at all stations.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>PA-1—Memorandum of Understanding During construction, implementation of construction mitigation measures PA-2 through PA-7 would further reduce impacts to undocumented paleontological resources.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 3</p> <p>Phase 3 may encounter fossil localities at all stations.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>PA-2—Early Fossil Recovery PA-3—Retain the Services of a Qualified Principal Paleontologist PA-4—Development of a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) PA-5—Required Activities for Recovered Fossils in the PRMMP PA-6—Preparation of a Report on Paleontological Resources Recovered PA-7—Curation of Identified and Prepared Fossils</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>Historic, Archaeological, and Paleontological Resources—Paleontological Resources Construction</p> <p>Concurrent Construction Scenario</p> <p>Construction of the LPA is expected to encounter paleontological resources in asphaltic matrix and around Hancock Park (Rancho La Brea Tar Pits) in an area extending from the existing Wilshire/Western Station to the Wilshire/Fairfax Station. Fossils from non-asphaltic deposits may be recovered along the remainder of the LPA alignment based on known paleontological resources along La Cienega Boulevard, Wilshire Boulevard near Beverly Drive, near Century City and at Wilshire Boulevard and Thayer Avenue.</p> <p>The areas surrounding the Wilshire/Fairfax and Wilshire/La Brea Stations are known to have tar deposits and/or tar sands and possibly paleontological features that may have to be removed under special conditions. Preliminary preparation and excavation in advance of construction could minimize construction delays, if feasible.</p> <p>Phased Construction Scenario</p> <p>Along Phase 1, areas surrounding the Wilshire/Fairfax and Wilshire/La Brea Stations are known to have tar deposits and/or tar sands and possibly paleontological features that may have to be removed under special conditions. Preliminary preparation and excavation in advance of construction could minimize construction delays, if feasible.</p> <p>Fossils from non-asphaltic deposits may be recovered in other areas along the Phase 1 alignment based on known paleontological resources along La Cienega Boulevard.</p> <p>Fossils from non-asphaltic deposits may be recovered in areas along the Phase 2 alignment based on known paleontological resources at Wilshire Boulevard near Beverly Drive and near Century City.</p> <p>Fossils from non-asphaltic deposits may be recovered in areas along the Phase 3 alignment based on known paleontological resources at Wilshire Boulevard and Thayer Avenue.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>► GROWTH INDUCING</p> <p>Concurrent Construction Scenario</p> <p>No significant impacts for the LPA.</p> <p>Phased Construction Scenario</p> <p>No significant impacts for the LPA.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 1</p> <p>No significant impacts for the LPA.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 2</p> <p>No significant impacts for the LPA.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 3</p> <p>No significant impacts for the LPA.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>

Table S-7. Environmental Impacts and Mitigation Measures (Continued from previous page)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>► CUMULATIVE IMPACTS</p> <p>Concurrent Construction Scenario</p> <p>The LPA's parking impact will be cumulatively considerable when considered together with the increased parking demand that could result from a higher population density in LPA station areas, as well as stations at other transit projects and improvements.</p> <p>The LPA will have a beneficial impact on air quality; therefore, there will not be a cumulatively considerable adverse impact on greenhouse gas emissions.</p> <p>When considering the combined effect of reduced roadway VMT and increased power usage for the rail system, the LPA shows no measurable change in greenhouse gas emissions. The LPA will have a beneficial impact on climate change; therefore, there will not be a cumulatively considerable adverse impact on greenhouse gas emissions.</p> <p>The LPA will not make a cumulative considerable contribution to cumulative operational noise and vibration impacts. The LPA is not anticipated to indirectly facilitate development either inconsistent with applicable local land use and community plans or beyond that already anticipated in the regional plans and SCAG regional projections.</p> <p>Phased Construction Scenario</p> <p>Phase 1's parking impact will be cumulatively considerable when considered together with the increased parking demand that could result from a higher population density in Phase 1 station areas, as well as stations of other transit projects and improvements.</p> <p>Phase 1 will have a beneficial impact on air quality; therefore, there will not be a cumulatively considerable adverse impact on greenhouse gas emissions.</p> <p>When considering the combined effect of reduced roadway VMT and increased power usage for the rail system, Phase 1 shows no measurable change in greenhouse gas emissions. Phase 1 will have a beneficial impact on climate change; therefore, there will not be a cumulatively considerable adverse impact on greenhouse gas emissions.</p> <p>Phase 1 will not make a cumulative considerable contribution to cumulative operational noise and vibration impacts.</p> <p>Phase 1 is not anticipated to indirectly facilitate development either inconsistent with applicable local land use and community plans or beyond that already anticipated in the regional plans and SCAG regional projections.</p> <p>Phase 2's parking impact will be cumulatively considerable when considered together with the increased parking demand that could result from a higher population density in Phase 2 station areas, as well as stations of other transit projects and improvements.</p> <p>Phase 2 will have a beneficial impact on air quality; therefore, there will not be a cumulatively considerable adverse impact on greenhouse gas emissions.</p> <p>When considering the combined effect of reduced roadway VMT and increased power usage for the rail system, Phase 2 shows no measurable change in greenhouse gas emissions. Phase 2 will have a beneficial impact on climate change; therefore, there will not be a cumulatively considerable adverse impact on greenhouse gas emissions.</p> <p>Phase 2 will not make a cumulative considerable contribution to cumulative operational noise and vibration impacts.</p> <p>Phase 2 is not anticipated to indirectly facilitate development either inconsistent with applicable local land use and community plans or beyond that already anticipated in the regional plans and SCAG regional projections.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>The following mitigation measures will help reduce the magnitude of parking impacts:</p> <p>T-1—Coordinate with Property Owners</p> <p>T-2—Parking Monitoring and Community Outreach</p> <p>T-3—Residential Permit Parking Districts</p> <p>T-4—Consideration of Shared Parking Program</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Phase 1 will not make a cumulative considerable contribution to cumulative operational noise and vibration impacts.</p> <p>Phase 1 is not anticipated to indirectly facilitate development either inconsistent with applicable local land use and community plans or beyond that already anticipated in the regional plans and SCAG regional projections.</p> <p>Phase 2's parking impact will be cumulatively considerable when considered together with the increased parking demand that could result from a higher population density in Phase 2 station areas, as well as stations of other transit projects and improvements.</p> <p>Phase 2 will have a beneficial impact on air quality; therefore, there will not be a cumulatively considerable adverse impact on greenhouse gas emissions.</p> <p>When considering the combined effect of reduced roadway VMT and increased power usage for the rail system, Phase 2 shows no measurable change in greenhouse gas emissions. Phase 2 will have a beneficial impact on climate change; therefore, there will not be a cumulatively considerable adverse impact on greenhouse gas emissions.</p> <p>Phase 2 will not make a cumulative considerable contribution to cumulative operational noise and vibration impacts.</p> <p>Phase 2 is not anticipated to indirectly facilitate development either inconsistent with applicable local land use and community plans or beyond that already anticipated in the regional plans and SCAG regional projections.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>The following mitigation measures will help reduce the magnitude of parking impacts:</p> <p>T-1—Coordinate with Property Owners</p> <p>T-2—Parking Monitoring and Community Outreach</p> <p>T-3—Residential Permit Parking Districts</p> <p>T-4—Consideration of Shared Parking Program</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>



Table S7. Environmental Impacts and Mitigation Measures (continued from previous page)

Description of Identified Impacts ¹	Impact Before Mitigation	Mitigation ²	Impact Remaining After Mitigation
<p>Phase 3's parking impact will be cumulatively considerable when considered together with the increased parking demand that could result from a higher population density in Phase 3 station areas, as well as stations of other transit projects and improvements.</p> <p>Phase 3 will have a beneficial impact on air quality; therefore, there will not be a cumulatively considerable adverse impact on greenhouse gas emissions.</p> <p>When considering the combined effect of reduced roadway VMT and increased power usage for the rail system, Phase 3 shows no measurable change in greenhouse gas emissions. Phase 3 will have a beneficial impact on climate change; therefore, there will not be a cumulatively considerable adverse impact on greenhouse gas emissions.</p> <p>Phase 3 will not make a cumulative considerable contribution to cumulative operational noise and vibration impacts.</p> <p>Phase 3 is not anticipated to indirectly facilitate development either inconsistent with applicable local land use and community plans or beyond that already anticipated in the regional plans and SCAG regional projections.</p>	<p>NEPA: Adverse Impacts CEQA: Significant Impacts</p>	<p>The following mitigation measures will help reduce the magnitude of parking impacts:</p> <ul style="list-style-type: none"> T-1—Coordinate with Property Owners T-2—Parking Monitoring and Community Outreach T-3—Residential Permit Parking Districts T-4—Consideration of Shared Parking Program 	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>SECTION 4(f)</p>			
<p>Concurrent Construction Scenario</p>	<p>• Ace Gallery</p>	<p>Direct Uses</p>	<p>Do Minimize</p>
<p>Of the 39 historic properties and two historic districts identified within the APE, four historic properties would be de minimis use. Only one of the 41 total properties would have a direct use, the Ace Gallery. The remaining 36 properties would not have any use.</p> <p>The LPA will not have a direct use of Section 4(f) parks or recreational facilities.</p>	<p>• Ace Gallery</p>	<p>• May Company Wishnie/LACMA West • Union Bank Building • Linde (Westwood) Medical Plaza • Veterans Affairs Medical Center Historic District • May Company Wishnie/LACMA West</p>	<p>• May Company Wishnie/LACMA West • Union Bank Building • Linde (Westwood) Medical Plaza • Veterans Affairs Medical Center Historic District</p>
<p>Phased Construction Scenario</p>	<p>• Ace Gallery</p>		
<p>Phase 1</p>			
<p>Phase 2</p>	<p>• Ace Gallery</p>		
<p>Phase 3</p>			<p>• Linde (Westwood) Medical Plaza • Veterans Affairs Medical Center Historic District</p>

¹Unless otherwise noted, the LPA includes all station, alignment, and station entrance options.

²Refer to Chapter 4, Alternatives Considered, for the full description of all proposed mitigation measures.

Palmdome Resources are not part of Section 106 Consultation.

Executive Summary

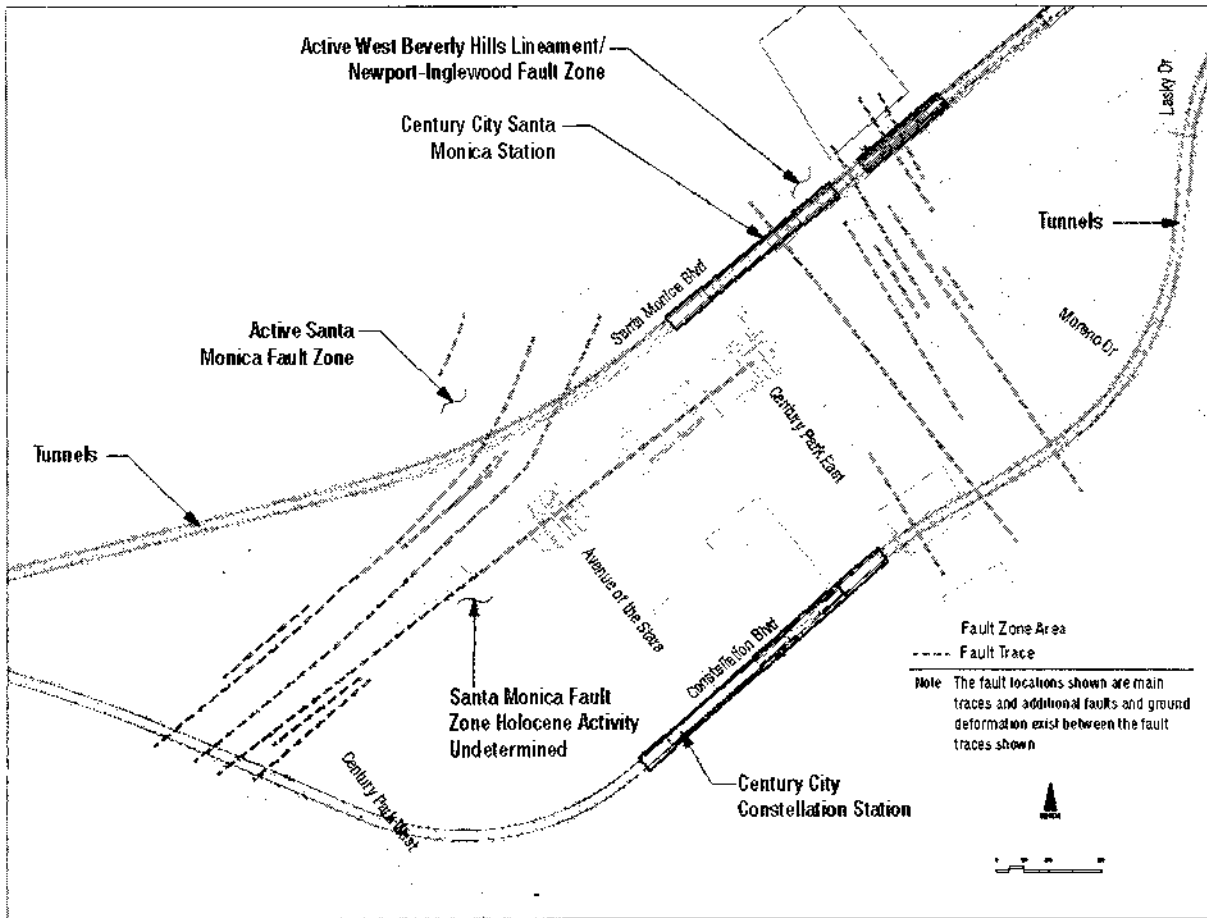


Figure S-24. Fault Zones in Century City Area

crossed by multiple faults, and the Century City Santa Monica Station is within an extension of the Newport-Inglewood Fault zone. The Century City Constellation Station is in an area showing no evidence of faulting. Tunnels approaching either station location would necessarily cross both faults. However, the Constellation alignment crosses the Santa Monica Fault zone at more of a right angle, which is more desirable for safe design because a shorter length of tunnel would be affected. Therefore, it is recommended to locate the Century City Station along Constellation Boulevard to avoid locating the station box within the active Newport-Inglewood Fault zone.

The LPA will pass through or near several active or abandoned oil fields. Soils overlying these oil

fields are known to commonly contain naturally occurring methane and/or hydrogen sulfide gases, which may be encountered near some of the stations. While there is a potential impact, these gases will be managed in accordance with regulatory requirements. Tunnels and stations will be designed to provide a redundant protection system against gas intrusion hazard, and gas monitoring and detection systems with alarms and ventilation equipment will be installed. Implementation of a well-designed system safety and fire/life safety program will result in no adverse operational safety impacts.

Only one of the 41 historic properties within the LPA Area of Potential Effects (APE) has a Determination of Adverse Effect—the Ace Gallery at

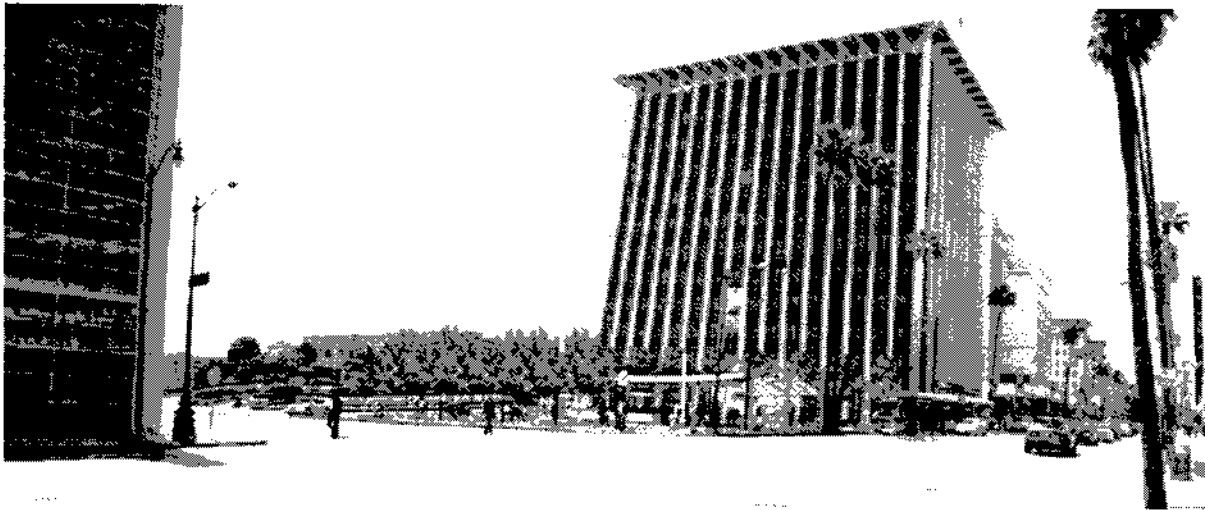


Figure S-25. Simulated Wilshire/Rodeo Station entrance at the current site of Ace Gallery

the Wilshire/Rodeo Station (Figure S-25). To avoid and minimize adverse effects to historic properties that may be affected as part of the LPA, specific mitigation measures are incorporated into the Section 106 Memorandum of Agreement, which is included in Appendix D, Memorandum of Agreement and Historic Properties List.

The LPA may encounter fossils at all stations, particularly at the Wilshire/Fairfax and Wilshire/La Brea Stations, which are located near the La Brea Tar Pits. Metro has a Memorandum of Understanding with the George C. Page Museum of La Brea Discoveries regarding treatment of paleontological resources from asphaltic deposits. Implementation of this mitigation measure, as well as several construction mitigation measures, will substantially reduce impacts to paleontological resources.

Under the Phased Construction Scenario, the potential for environmental impacts in all categories are the same as under the Concurrent Construction Scenario. The only difference between the two scenarios is the timing of when the environmental impacts would occur. Under the Phased Construction Scenario, potential operational impacts along Phase 2 and Phase 3 will occur later than under

the Concurrent Construction Scenario due to an extended construction timeline. The timing for potential operational impacts along Phase 1 of the LPA will occur earlier than under the Concurrent Construction Scenario since Phase 1 will open for operation in 2020. Table S-7 summarizes anticipated impacts and proposed mitigation measures under both the Concurrent Construction Scenario and the Phased Construction Scenario.

Construction Impacts and Mitigation

The LPA could either be constructed as a single phase under the Concurrent Construction Scenario, opening in its entirety to the Westwood/VA Hospital Station in 2022, or as three sequential phases under the Phased Construction Scenario with the entire LPA operational to the Westwood/VA Hospital Station in 2036. The three construction segments would be the same in either construction scenario—Wilshire/Western to Wilshire/La Cienega, Wilshire/La Cienega to Century City, and Century City to Westwood/VA Hospital. Under the Concurrent Construction Scenario, these segments will be constructed and opened for operation concurrently; under the

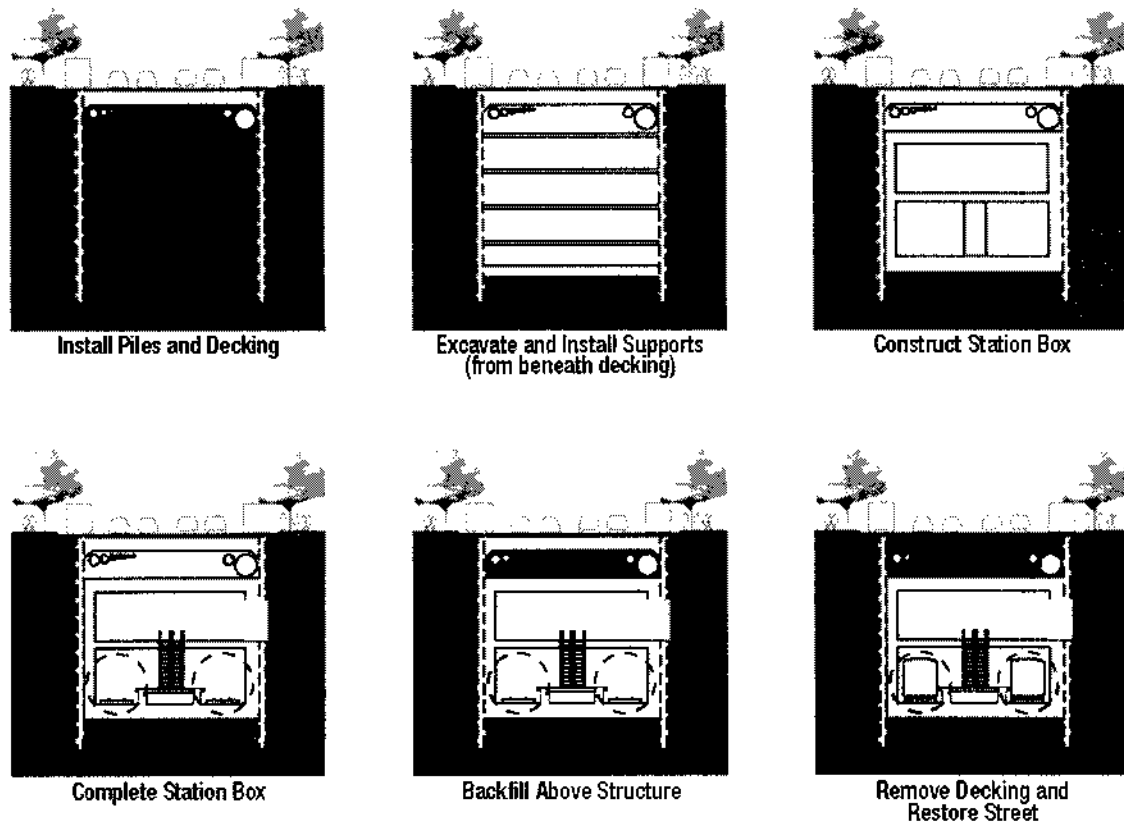


Figure S-26. Station Excavation

Phased Construction Scenario, they will be built and opened sequentially.

Station Construction Methods

Cut-and-cover construction is planned for all stations (Figure S-26). With the exception of the Westwood/VA Station, stations will be constructed within the street right-of-way. Some station entrance points and construction staging areas will be outside the street right-of-way and will require removal of buildings. Underground station construction will take approximately 72 to 84 months from start of excavation to backfilling over the station and street restoration. The typical on-street station construction process involves the following:

- ▶ Relocating utilities as necessary to maintain service

- ▶ Drilling “soldier piles” on station box perimeter at edge of roadway
- ▶ Removing the top 6 to 12 feet of soil below existing roadway
- ▶ Installing decking across the roadway
- ▶ Installing shoring and excavating area beneath the deck to the depth of the station
- ▶ Constructing station box in excavated area
- ▶ Installing station elements and architectural features
- ▶ Backfilling over station box, removing decking, repaving streets, and re-opening streets to traffic

Tunnel Construction Methods

Tunneling is expected to be performed with pressurized-face tunnel boring machines (TBMs) (Figure S-27). A TBM is a large machine that

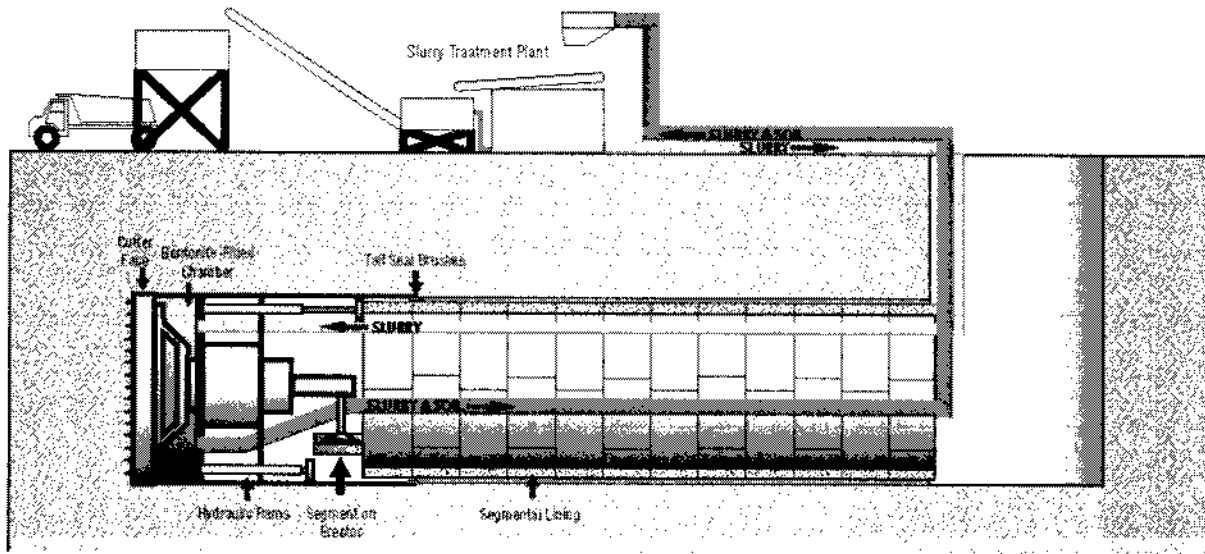


Figure S-27. Tunneling in Gassy Areas with Pressurized-Face TBM

bores a circular tunnel by excavating rock and soil and installing precast concrete segments to support the ground around the tunnel opening. Pressurized-face TBMs allow for better control of ground settlement and the ingress of groundwater and gas into the tunnel. The actual TBMs used will be custom designed for a particular tunnel segment and will reflect varying, site-specific requirements, including geological conditions. For tunnel reaches where hydrocarbons or gases are expected, a slurry-face TBM likely will be required while either a slurry-face or earth-pressure-balance TBM will be used where hydrocarbons or gases are not expected.

The Project will consist of two circular tunnels, approximately 20 to 21 feet in diameter, bored side-by-side and separated by a pillar of ground between. Tunnel excavation generally will range from 8 to 12 months for the typical 1-mile length between stations, but will vary based on conditions. The typical steps for tunneling are as follows:

- ▶ Prepare site and excavate shaft or stations where TBMs are lowered into ground
- ▶ Lower TBMs using cranes

- ▶ Assemble TBMs and tailing equipment
- ▶ Excavate two parallel tunnels (22 feet diameter)
- ▶ Install pre-cast concrete tunnel lining with gasket seals
- ▶ Install rails, electrical, and other systems

Boring can proceed on each tunnel simultaneously; machines can excavate about 40 to 50 feet per day.

Construction Impacts and Mitigation

Construction-related impacts will occur during preparation of, and demolition on, construction staging sites; during construction around station areas and in areas related to system components (e.g., traction power substations and the maintenance and storage facility); and during post-construction from activities related to rehabilitation of streets and construction staging sites. Effects could include dust, noise, and traffic disruption, congestion, and diversion, as well as limited or temporary loss of access to businesses. Construction impacts will be temporary and will be limited in area as construction proceeds along the length of the LPA alignment.

Table S-8. Environmental Impacts and Mitigation Measures—Construction (continued on next page)

Description of Identified Impacts?	Impact Before Mitigation	Mitigation?	Impact Remaining After Mitigation
<p>► LAND USE</p> <p>Concurrent Construction Scenario</p> <p>During construction, access to land uses will be periodically affected due to temporary street and sidewalk closures in the vicinity of the temporary cut-and-cover excavation areas around stations. Pedestrian and vehicle mobility between communities and neighborhoods along the LPA will be reduced during construction due to these closures and traffic detours; however, these impacts will end with the completion of construction. The mitigation measures identified will ensure that traffic and pedestrian circulation and access will be maintained throughout construction.</p> <p>The construction of the LPA will not directly conflict with the identified land use plans, policies, and regulations.</p> <p>The acquisition of property for the LPA will require the demolition of any existing structures on the properties to accommodate planned construction activities. Since approximately 35 percent of these properties are currently vacant/parking, the use of these properties for construction activities will not substantially alter land uses in the station area vicinity.</p> <p>Phased Construction Scenario</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>TCON-1—Traffic Control Plans TCON-10—Pedestrian Routes and Access TCON-11—Bicycle Paths and Access</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>Phase 1</p> <p>During construction of Phase 1, access to land uses will be periodically affected due to temporary street and sidewalk closures in the vicinity of the temporary cut-and-cover excavation areas around stations. Pedestrian and vehicle mobility between communities and neighborhoods along Phase 1 will be reduced during construction due to these closures and traffic detours; however, these impacts will end with the completion of construction. The mitigation measures identified will ensure that traffic and pedestrian circulation and access will be maintained throughout construction.</p> <p>The construction of Phase 1 will not directly conflict with the identified land use plans, policies, and regulations.</p> <p>The acquisition of property for Phase 1 will require the demolition of any existing structures on the properties to accommodate planned construction activities. Since approximately 35 percent of these properties are currently vacant/parking, the use of these properties for construction activities will not substantially alter land uses in the Phase 1 station area vicinity.</p>			
<p>Phase 2</p> <p>During construction of Phase 2, access to land uses will be periodically affected due to temporary street and sidewalk closures in the vicinity of the temporary cut-and-cover excavation areas around stations. Pedestrian and vehicle mobility between communities and neighborhoods along Phase 2 will be reduced during construction due to these closures and traffic detours; however, these impacts will end with the completion of construction. The mitigation measures identified will ensure that traffic and pedestrian circulation and access will be maintained throughout construction.</p> <p>The construction of Phase 2 will not directly conflict with the identified land use plans, policies, and regulations.</p> <p>The acquisition of property for Phase 2 will require the demolition of any existing structures on the properties to accommodate planned construction activities. Since approximately 25 percent of these properties are currently vacant/parking, the use of these properties for construction activities will not substantially alter land uses in the Phase 2 station area vicinity.</p>			
<p>Phase 3</p> <p>During construction of Phase 3, access to land uses will be periodically affected due to temporary street and sidewalk closures in the vicinity of the temporary cut-and-cover excavation areas around stations. Pedestrian and vehicle mobility between communities and neighborhoods along Phase 3 will be reduced during construction due to these closures and traffic detours; however, these impacts will end with the completion of construction. The mitigation measures identified will ensure that traffic and pedestrian circulation and access will be maintained throughout construction.</p> <p>The construction of Phase 3 will not directly conflict with the identified land use plans, policies, and regulations.</p>			



Table S8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Qualified Impacts	Impact Before Mitigation	Mitigation	Impact Remains After Mitigation
<p>► SOCIOECONOMIC CHARACTERISTICS</p> <p>Concurrent Construction Scenario</p> <p>Construction of the LPA could affect neighborhoods for limited durations due to street and sidewalk closures and traffic detours, especially in areas of station construction. Construction and traffic detours will temporarily reduce access to businesses and communities. In addition, noise and emissions from haul trucks and construction equipment could disrupt community activities.</p> <p>Phased Construction Scenario</p> <p>Construction of Phase 1 could affect neighborhoods for limited durations due to street and sidewalk closures and traffic detours, especially in areas of station construction. Construction and traffic detours will temporarily reduce access to businesses and communities. In addition, noise and emissions from haul trucks and construction equipment could disrupt community activities.</p> <p>Construction of Phase 2 could affect neighborhoods for limited durations due to street and sidewalk closures and traffic detours, especially in areas of station construction. Construction and traffic detours will temporarily reduce access to businesses and communities. In addition, noise and emissions from haul trucks and construction equipment could disrupt community activities.</p> <p>Construction of Phase 3 could affect neighborhoods for limited durations due to street and sidewalk closures and traffic detours, especially in areas of station construction. Construction and traffic detours will temporarily reduce access to businesses and communities. In addition, noise and emissions from haul trucks and construction equipment could disrupt community activities.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-1—Signage CON-1—Traffic Control Plans CON-2—Designated Haul Routes CON-3—Emergency Vehicle Access CON-4—Transportation Management Plan CON-7—Parking Management CON-8—Parking Monitoring and Community Outreach CON-10—Pedestrian Routes and Access CON-11—Bicycle Paths and Access</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>► VISUAL AND AESTHETICS</p> <p>Concurrent Construction Scenario</p> <p>The introduction of heavy construction equipment, stockpiled construction-related materials, erosion devices, excavated materials, and the removal of trees in these primarily commercial and residential areas will conflict with the existing visual character and will change visual quality. Additionally, the raised decking at the Wilshire/Fairfax and Wilshire/La Brea Stations (approximately 2 feet above grade) will temporarily increase the visual impacts to adjacent properties at these stations. The lighting of the construction staging areas at night will create a new light source. If not mitigated, this will be a temporary adverse effect.</p> <p>Phased Construction Scenario</p> <p>The introduction of heavy construction equipment, stockpiled construction-related materials, erosion devices, excavated materials, and the removal of trees in these primarily commercial and residential areas of Phase 1 will conflict with the existing visual character and will change visual quality. Additionally, the raised decking at the Wilshire/Fairfax and Wilshire/La Brea Stations (approximately 2 feet above grade) will temporarily increase the visual impacts to adjacent properties at these stations. The lighting of the Phase 1 construction staging areas at night will create a new light source. If not mitigated, this will be a temporary adverse effect.</p> <p>The introduction of heavy construction equipment, stockpiled construction-related materials, erosion devices, excavated materials, and the removal of trees in these primarily commercial and residential areas of Phase 2 will conflict with the existing visual character and will change visual quality. The lighting of the Phase 2 construction staging areas at night will create a new light source. If not mitigated, this will be a temporary adverse effect.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-2—Timely Removal of Erosion-Control Devices CON-3—Location of Construction Materials CON-4—Construction Lighting CON-5—Screening of Construction Staging Areas</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>

Table S.8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Potential Impacts	Impact Deferral Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phase 2</p> <p>The introduction of heavy construction equipment, stockpiled construction-related materials, erosion devices, excavated materials, and the removal of trees in these primarily commercial and residential areas of Phase 3 will conflict with the existing visual character and will change visual quality.</p> <p>The lighting of the Phase 3 construction staging areas at night will create a new light source. If not mitigated, this will be a temporary adverse effect.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-2—Timely Removal of Erosion-Control Devices CON-3—Location of Construction Materials CON-4—Construction Lighting CON-5—Screening of Construction Staging Areas</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>AIR QUALITY</p>			
<p>► Air Quality—Emissions</p>			
<p>Concurrent Construction Scenario</p> <p>SCAQMD thresholds will be exceeded for all pollutants when the total project emissions over the duration of the construction period are accounted for. This is due to the accelerated schedule that has been developed to minimize the disturbances that construction can bring to the residents and businesses within the Study Area. In addition, narrow roads (NOx) thresholds will be exceeded for all construction elements. NOx levels will be elevated due partially to the proposed use of diesel locomotives to extract soil during the tunnel-boring process.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-6—Meet Mine Safety (MSHA) Standards CON-7—Meet SCAQMD Standards CON-8—Monitoring and Recording of Air Quality at Worksites CON-9—No Idling of Heavy Equipment CON-10—Maintenance of Construction Equipment CON-11—Prohibit Tampering of Equipment CON-12—Use of Best Available Emissions Control Technologies CON-13—Placement of Construction Equipment</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>
<p>Phased Construction Scenario</p> <p>SCAQMD thresholds will be exceeded for all pollutants, except for CO in Phase 1, when the total emissions over the duration of the construction period are accounted for. This is due to the magnitude of the project and the schedule that has been developed to minimize the disturbances that construction can bring to the residents and businesses within the LPA area. In addition, NOx thresholds will be exceeded. NOx levels will be elevated due partially to the proposed use of diesel locomotives to extract soil during the tunnel-boring process.</p>			
<p>Phase 1</p> <p>SCAQMD thresholds will be exceeded for all pollutants, except for CO in Phase 1, when the total emissions over the duration of the construction period are accounted for. This is due to the magnitude of the project and the schedule that has been developed to minimize the disturbances that construction can bring to the residents and businesses within the LPA area. In addition, NOx thresholds will be exceeded. NOx levels will be elevated due partially to the proposed use of diesel locomotives to extract soil during the tunnel-boring process.</p>			
<p>Phase 2</p> <p>SCAQMD thresholds will be exceeded for all pollutants in Phase 2 when the total emissions over the duration of the construction period are accounted for. This is due to the magnitude of the project and the schedule that has been developed to minimize the disturbances that construction can bring to the residents and businesses within the LPA area. In addition, NOx thresholds will be exceeded. NOx levels will be elevated due partially to the proposed use of diesel locomotives to extract soil during the tunnel-boring process.</p>			
<p>Phase 3</p> <p>SCAQMD thresholds will be exceeded for all pollutants in Phase 3 when the total emissions over the duration of the construction period are accounted for. This is due to the magnitude of the project and the schedule that has been developed to minimize the disturbances that construction can bring to the residents and businesses within the LPA area. In addition, NOx thresholds will be exceeded. NOx levels will be elevated due partially to the proposed use of diesel locomotives to extract soil during the tunnel-boring process.</p>			



Table S-8. Environmental Impacts and Mitigation Measures—Construction (continued from previous pages)

Description of Identified Impacts Air Quality—Particulate Matter	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Concurrent Construction Scenario</p> <p>The South Coast Air Quality Management District (SCAQMD) thresholds for PM₁₀ for the LPA will be exceeded if not mitigated at locations with tunnel boring machine (tunnel boring machine) entry and exit sites due to dirt handling, demolition, grading, stockpiling, and hauling soil will contribute to particulate matter emissions.</p> <p>Phased Construction Scenario</p> <p>The SCAQMD thresholds for PM₁₀ for Phase 1 will be exceeded if not mitigated at locations with tunnel boring machine entry and exit sites due to dirt handling, demolition, grading, stockpiling, and hauling soil will contribute to particulate matter emissions.</p> <p>Phase 1</p> <p>Dust could be generated by the slurry treatment plant when the bentonite is mixed; however, the treatment plant includes a "bag house" to collect dust during the mixing process. Bag houses typically filter at least 99 percent of fine particulate matter. As a result, the slurry treatment plant will generate minimal dust emissions.</p> <p>Phase 2</p> <p>The SCAQMD thresholds for PM₁₀ for Phase 2 will be exceeded if not mitigated at locations with tunnel boring machine entry and exit sites due to dirt handling, demolition, grading, stockpiling, and hauling soil will contribute to particulate matter emissions.</p> <p>Dust could be generated by the slurry treatment plant when the bentonite is mixed; however, the treatment plant includes a "bag house" to collect dust during the mixing process. Bag houses typically filter at least 99 percent of fine particulate matter. As a result, the slurry treatment plant will generate minimal dust emissions.</p> <p>Phase 3</p> <p>The SCAQMD thresholds for PM₁₀ for Phase 3 will be exceeded if not mitigated at locations with tunnel boring machine entry and exit sites due to dirt handling, demolition, grading, stockpiling, and hauling soil will contribute to particulate matter emissions.</p> <p>Dust could be generated by the slurry treatment plant when the bentonite is mixed; however, the treatment plant includes a "bag house" to collect dust during the mixing process. Bag houses typically filter at least 99 percent of fine particulate matter. As a result, the slurry treatment plant will generate minimal dust emissions.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-14—Measures to Reduce the Predicted PM₁₀ Levels CON-15—Reduce Street Debris CON-16—Dust Control During Transport CON-17—Fugitive Dust Control CON-18—Street Watering CON-19—Spillage Prevention for Non-Earthmoving Equipment CON-20—Spillage Prevention for Earthmoving Equipment CON-21—Additional Controls to Reduce Emissions</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>Concurrent Construction Scenario</p> <p>Since the Wilshire/Fairfax Station and Wilshire/La Brea Station are located in known ground that contains hydrocarbon deposits, disturbance of the ground will generate varying degrees of toxic or dangerous gases. As such, it is essential that tunnel workers be sufficiently protected. Detection and monitoring equipment will be required.</p> <p>Phased Construction Scenario</p> <p>In Phase 1, since the Wilshire/Fairfax Station and Wilshire/La Brea Station are located in known ground that contains hydrocarbon deposits, disturbance of the ground will generate varying degrees of toxic or dangerous gases. As such, it is essential that tunnel workers be sufficiently protected. Detection and monitoring equipment will be required.</p> <p>Phase 2</p> <p>There are no known hydrocarbon deposits along Phase 2. With implementation of the construction methods and mitigation measures described, there will be no air quality impacts related to naturally occurring gases during construction of Phase 2.</p> <p>Phase 3</p> <p>There are no known hydrocarbon deposits along Phase 3. With implementation of the construction methods and mitigation measures described, there will be no air quality impacts related to naturally occurring gases during construction of Phase 3.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-8—Monitoring and Recording of Air Quality at Worksites CON-51—Techniques to Lower the Risk of Exposure to Hydrogen Sulfide CON-52—Measures to Reduce Gas Inflows</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>

Table S-8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Potential Impact	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Air Quality—Odor</p> <p>Concurrent Construction Scenario</p> <p>There is known hydrogen sulfide gas located in the vicinity of the Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega Stations. Hydrogen sulfide odors also could be released from groundwater containing hydrogen sulfide. As a result, aside from odors from vehicle exhaust, the LPA could result in odors from hydrogen sulfide.</p> <p>Phased Construction Scenario</p> <p>In Phase 1, there is known hydrogen sulfide gas located in the vicinity of the Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega Stations. Hydrogen sulfide odors also could be released from groundwater containing hydrogen sulfide. As a result, aside from odors from vehicle exhaust, Phase 1 could result in odors from hydrogen sulfide.</p> <p>Hydrogen sulfide odors could be released from groundwater containing hydrogen sulfide. As a result, aside from odors from vehicle exhaust, Phase 2 could result in odors from hydrogen sulfide.</p> <p>Hydrogen sulfide odors could be released from groundwater containing hydrogen sulfide. As a result, aside from odors from vehicle exhaust, Phase 3 could result in odors from hydrogen sulfide.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-8—Monitoring and Recording of Air Quality at Worksites CON-9—Techniques to Lower the Risk of Exposure to Hydrogen Sulfide CON-12—Measures to Reduce Gas Inflows</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>CLIMATE CHANGE</p> <p>Concurrent Construction Scenario</p> <p>It is estimated that construction of the LPA will generate approximately 164 metric tons of CO₂e per day, which is approximately 18,000 metric tons of CO₂e over the full 10-year construction duration. This estimate includes the CO₂e generated due to the use of construction equipment, worker trips, delivery trips, and hauling of material. Compared to existing regional CO₂e emissions, construction of the LPA will increase daily CO₂e emissions by less than 0.1 percent, which is not considered a significant impact.</p> <p>Phased Construction Scenario</p> <p>The construction of Phase 1 will generate approximately 102 metric tons of CO₂e per day, which is approximately 65,000 metric tons of CO₂e over the construction duration of Phase 1, which is not considered a significant impact.</p> <p>The construction of Phase 2 will generate approximately 102 metric tons of CO₂e per day, which is approximately 49,000 metric tons of CO₂e over the construction duration of Phase 2, which is not considered a significant impact.</p> <p>The construction of Phase 3 will generate approximately 102 metric tons of CO₂e per day, which is approximately 66,000 metric tons of CO₂e over the construction duration of Phase 3, which is not considered a significant impact.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>CON-6—Meet Mine Safety (MSHA) Standards CON-7—Meet SCAQMD Standards CON-8—Monitoring and Recording of Air Quality at Worksites CON-9—No Idling of Heavy Equipment CON-10—Maintenance of Construction Equipment CON-11—Prohibit Tampering of Equipment CON-12—Use of Best Available Emissions Control Technologies CON-13—Placement of Construction Equipment</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>



Table S-8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Identified Impact	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>► NOISE AND VIBRATION</p> <p>Noise and Vibration—Noise</p> <p>Concurrent Construction Scenario</p> <p>The greatest noise impacts will occur near stations, tunnel access portals, and construction laydown areas where construction activities at the surface are concentrated. The slurry plant, if used, will be located at the Wilshire/La Brea, Century City, and Westwood/JVA Hospital Stations. With the exception of these areas, all other construction will occur completely below-grade.</p> <p>Phased Construction Scenario</p> <p>The greatest noise impacts will occur near stations, tunnel access portals, and construction laydown areas where construction activities at the surface are concentrated. During the construction of Phase 1, these noise impacts will be concentrated in the vicinity of the Wilshire/La Brea, Wilshire/Arfax, and Wilshire/La Cienega Stations, as well as the Wilshire/Western and Wilshire/Crenshaw construction staging areas. Tunneling plans and materials, including a slurry separation system, if used, will be located at these tunnel access shaft sites. The slurry plant, if used, will be located at the Wilshire/La Brea Station. With the exception of these areas, all other construction will occur completely below-grade.</p> <p>The greatest noise impacts will occur near stations, tunnel access portals, and construction laydown areas where construction activities at the surface are concentrated. During construction of Phase 2, the noise impacts will be concentrated in the vicinity of the Wilshire/Rodeo and Century City Stations. The slurry plant, if used, will be located at the Century City Station. With the exception of these areas, all other construction will occur completely below-grade.</p> <p>The greatest noise impacts will occur near stations, tunnel access portals, and construction laydown areas where construction activities at the surface are concentrated. During construction of Phase 3, noise impacts will be concentrated in the vicinity of the Westwood/UCLA and Westwood/JVA Hospital Stations, as well as the CSA crossover. The slurry plant, if used, will be located at the Westwood/JVA Hospital Station. With the exception of these areas, all other construction will occur completely below-grade.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-22—Hire or Retain the Services of an Acoustical Engineer CON-23—Prepare a Noise Control Plan CON-24—Comply with the Provisions of the Nighttime Noise Variance CON-25—Noise Monitoring CON-26—Use of Specific Construction Equipment at Night CON-27—Noise Barrier Walls for Nighttime Construction CON-28—Comply with Local Noise Ordinances CON-29—Signage CON-30—Use of Noise Control Devices CON-31—Use of Fixed Noise-Producing Equipment for Compliance CON-32—Use of Mobile or Fixed Noise-Producing Equipment CON-33—Use of Electrically Powered Equipment CON-34—Use of Temporary Noise Barriers and Sound-Control Curtains CON-35—Distance from Noise-Sensitive Receivers CON-36—Limited Use of Horns, Whistles, Alarms, and Bells CON-37—Requirements on Project Equipment CON-38—Limited Audibility of Project Related Public Addresses or Music CON-39—Use of Haul Routes with the Least Overall Noise Impact CON-40—Designated Parking Areas for Construction-Related Traffic CON-41—Enclosures for Fixed Equipment TCOIN-2—Designated Haul Routes</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>
<p>Noise and Vibration—Vibration</p> <p>Concurrent Construction Scenario</p> <p>During construction of the IPA, impact pile driving at the station boxes will result in adverse vibration impacts. Perceptible vibration levels could be experienced within 200 feet of pile driving operations. Additionally, equipment used for underground construction, such as the tunnel boring machine and mine trains, could generate vibration levels that could result in audible ground-borne noise levels in buildings at the surface, depending on the depth of the tunnel and soil conditions. Operation of the mine trains could contribute to underground construction vibration since they will operate continuously during the excavation, mining, and finishing of the tunnel, tunnel boring machines would be below the surface of a structure for no more than a day or two.</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>	<p>CON-42—Phasing of Ground Impacting Operations CON-43—Alternatives to Impact Pile Driving CON-44—Alternative Demolition Methods CON-45—Restriction on Use of Vibratory Rollers and Packers CON-46—Metro-Ground-Born Noise and Ground-Born Vibration limits</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>

Table S-8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impacts Remaining After Mitigation
<p>Phased Construction Scenario</p> <p>Phase 1 During construction of Phase 1, impact pile driving at the station boxes will result in adverse vibration impacts. Perceptible vibration levels could be experienced within 200 feet of pile-driving operations. Additionally, equipment used for underground construction, such as the tunnel boring machine and mine trains, could generate vibration levels that could result in audible ground-borne noise levels in buildings at the surface, depending on the depth of the tunnel and soil conditions. Operation of the mine trains could contribute to underground construction vibration since they will operate continuously during the excavation, mining, and finishing of the tunnel. Tunnel boring machines would be below the surface of a structure for no more than a day or two.</p> <p>Phase 2 During construction of Phase 2, impact pile driving at the station boxes will result in adverse vibration impacts. Perceptible vibration levels could be experienced within 200 feet of pile-driving operations. Additionally, equipment used for underground construction, such as the tunnel boring machine and mine trains, could generate vibration levels that could result in audible ground-borne noise levels in buildings at the surface, depending on the depth of the tunnel and soil conditions. Operation of the mine trains could contribute to underground construction vibration since they will operate continuously during the excavation, mining, and finishing of the tunnel. Tunnel boring machines would be below the surface of a structure for no more than a day or two.</p> <p>Phase 3 During construction of Phase 3, impact pile driving at the station boxes will result in adverse vibration impacts. Perceptible vibration levels could be experienced within 200 feet of pile-driving operations. Additionally, equipment used for underground construction, such as the tunnel boring machine and mine trains, could generate vibration levels that could result in audible ground-borne noise levels in buildings at the surface, depending on the depth of the tunnel and soil conditions. Operation of the mine trains could contribute to underground construction vibration since they will operate continuously during the excavation, mining, and finishing of the tunnel. Tunnel boring machines would be below the surface of a structure for no more than a day or two.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>Mitigation CON-42—Phasing of Ground Impacting Operations CON-43—Alternatives to Impact Pile Driving CON-44—Alternative Demolition Methods CON-45—Restriction on Use of Vibratory Rollers and Packers CON-46—Metro Ground Bore Noise and Ground Bore Vibration Limits</p>	<p>Impacts Remaining After Mitigation NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>► ENERGY</p> <p>Concurrent Construction Scenario</p> <p>Energy consumption during construction of the LPA will be 2,309 billion British thermal units (BTUs) and 5.1 billion BTUs for the Division 20 Storage Yard and Maintenance Facility. Construction of the LPA will not lead to a wasteful, inefficient, or unnecessary usage.</p> <p>Phased Construction Scenario</p> <p>Phase 1 Energy consumption during construction of Phase 1 will be 93 billion BTUs and 5.1 billion BTUs for the Division 20 Storage Yard and Maintenance Facility. Construction of Phase 1 will not lead to a wasteful, inefficient, or unnecessary usage.</p> <p>Phase 2 Energy consumption during construction of Phase 2 will be 671 billion BTUs. Construction of Phase 2 will not lead to a wasteful, inefficient, or unnecessary usage.</p> <p>Phase 3 Energy consumption during construction of Phase 3 will be 671 billion BTUs. Construction of Phase 3 will not lead to a wasteful, inefficient, or unnecessary usage.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p> <p>No mitigation required.</p>		<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>



Table S.8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Identified Impact	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>► GEOLOGIC HAZARDS</p> <p>Geologic Hazards—Seismic and Liquefaction</p> <p>Concurrent Construction Scenario</p> <p>Construction within the LPA Study Area will be susceptible to surface fault rupture and seismic ground shaking. Construction will be performed in accordance with Metro Design Criteria that includes national standards and codes to protect workers and work under construction considering seismic conditions.</p> <p>Designs to minimize risk of liquefaction-related damage to the excavation support system include increasing the depth of soldier piles to reach non-liquefiable zones or ground improvement to densify the soil prior to installation of the excavation support system; therefore, liquefaction is not a significant impact during construction.</p> <p>Phased Construction Scenario</p> <p>Construction of Phase 1 will be susceptible to seismic ground shaking. Construction will be performed in accordance with Metro Design Criteria that includes national standards and codes to protect workers and work under construction considering seismic conditions.</p> <p>Designs to minimize risk of liquefaction related damage to the excavation support system include increasing the depth of soldier piles to reach non-liquefiable zones or ground improvement to densify the soil prior to installation of the excavation support system; therefore, liquefaction is not a significant impact during construction.</p> <p>Construction of Phase 2 will be susceptible to surface fault rupture and seismic ground shaking. Construction will be performed in accordance with Metro Design Criteria that includes national standards and codes to protect workers and work under construction considering seismic conditions.</p> <p>Designs to minimize risk of liquefaction-related damage to the excavation support system include increasing the depth of soldier piles to reach non-liquefiable zones or ground improvement to densify the soil prior to installation of the excavation support system; therefore, liquefaction is not a significant impact during construction.</p> <p>Construction of Phase 3 will be susceptible to surface fault rupture and seismic ground shaking. Construction will be performed in accordance with Metro Design Criteria that includes national standards and codes to protect workers and work under construction considering seismic conditions.</p> <p>Designs to minimize risk of liquefaction-related damage to the excavation support system include increasing the depth of soldier piles to reach non-liquefiable zones or ground improvement to densify the soil prior to installation of the excavation support system; therefore, liquefaction is not a significant impact during construction.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Geologic Hazards—Subsidence and Settlement due to Tunneling</p> <p>Concurrent Construction Scenario</p> <p>For the LPA, there are no known subsidence problems related to petroleum or groundwater extraction. Tunneling and construction dewatering-induced subsidence poses a potentially adverse effect. Dewatering of the excavation made during construction could result in potentially damaging subsidence adjacent to the construction area. However, much of the soil along the LPA corridor has previously undergone numerous cycles of groundwater fluctuation. Soils have previously experienced settlements associated with lowering of groundwater. As a result, soils are not expected to have significant additional settlement.</p>	<p>NEPA: No Adverse Impacts CEQA: Less-than Significant Impacts</p>	<p>CON-47—Use of Pressurized face TBMs for Tunnel Construction CON-48—Preconstruction Survey, Instrumentation, and Monitoring CON-49—Additional Geotechnical Exploration CON-50—Additional Methods to Reduce Settlement</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>

Table S-8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phased Construction Scenario</p> <p>For Phase 1, there are no known subsidence problems related to petroleum or groundwater extraction. Tunneling and construction dewatering induced subsidence poses a potentially adverse effect. Dewatering of the excavations made during construction could result in potentially damaging subsidence adjacent to the construction area. However, much of the soil along the Phase 1 corridor has previously undergone numerous cycles of groundwater fluctuation. Soils have previously experienced settlements associated with lowering of groundwater. As a result, soils are not expected to have significant additional settlement.</p> <p>For Phase 2, there are no known subsidence problems related to petroleum or groundwater extraction. Tunneling and construction dewatering induced subsidence poses a potentially adverse effect. Dewatering of the excavations made during construction could result in potentially damaging subsidence adjacent to the construction area. However, much of the soil along the Phase 2 corridor has previously undergone numerous cycles of groundwater fluctuation. Soils have previously experienced settlements associated with lowering of groundwater. As a result, soils are not expected to have significant additional settlement.</p> <p>For Phase 3, there are no known subsidence problems related to petroleum or groundwater extraction. Tunneling and construction dewatering induced subsidence poses a potentially adverse effect. Dewatering of the excavations made during construction could result in potentially damaging subsidence adjacent to the construction area. However, much of the soil along the Phase 3 corridor has previously undergone numerous cycles of groundwater fluctuation. Soils have previously experienced settlements associated with lowering of groundwater. As a result, soils are not expected to have significant additional settlement.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON 47—Use of Pressurized Face TBMs for Tunnel Construction Monitoring CON 48—Preconstruction Survey, Instrumentation, and Monitoring CON 49—Additional Geotechnical Exploration CON 50—Additional Methods to Reduce Settlement</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>Geologic Hazards—Hazardous Subsurface Gas Concurrent Construction Scenario</p> <p>Methane and hydrogen sulfide are present in high concentrations along a 1.1-mile stretch of Whishire Boulevard from about Burnside Avenue on the east to about La Jolla Avenue on the west. However, the entire LPA alignment passes through an area characterized by oil and gas fields and lies within the City's Methane Zone. Therefore, the possibility of encountering gaseous subsurface conditions can be expected for any portion of the alignment, and hazardous subsurface gases pose a significant hazard for construction of the LPA.</p> <p>Phased Construction Scenario</p> <p>Phase 1 Methane and hydrogen sulfide are present in high concentrations along Phase 1 of the LPA along Whishire Boulevard from about Burnside Avenue to about La Jolla Avenue. Therefore, the possibility of encountering gaseous subsurface conditions can be expected, and hazardous subsurface gases pose a significant hazard for construction of Phase 1 of the LPA.</p> <p>Phase 2 Phase 2 of the LPA passes through an area characterized by oil and gas fields and lies within the City's Methane Zone. Therefore, the possibility of encountering gaseous subsurface conditions can be expected, and hazardous subsurface gases pose a significant hazard for construction of Phase 2 of the LPA.</p> <p>Phase 3 Phase 3 of the LPA passes through an area characterized by oil and gas fields and lies within the City's Methane Zone. Therefore, the possibility of encountering gaseous subsurface conditions can be expected, and hazardous subsurface gases pose a significant hazard for construction of Phase 3 of the LPA.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON 51—Techniques to Lower the Risk of Exposure to Hydrogen Sulfide CON 52—Measures to Reduce Gas Inflows CON 53—Further Research on Oil Well Locations CON 54—Worker Safety for Gassy Tunnels</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>



Metro

Table S-8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Dusts and Other Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>► HAZARDOUS WASTES AND MATERIALS</p> <p>Concurrent Construction Scenario</p> <p>The LPA is close to areas where underground storage tanks, volatile organic compounds, and oil exploration sites occur. The subway tunnel is expected to be under the lowest point of contaminated soils. Contaminated groundwater may be encountered during construction. Any contaminated groundwater will be treated in accordance with applicable permits prior to discharge or disposal. Preparation of construction staging areas will require demolition of structures. In locations where buildings may be demolished or modified, asbestos and/or lead may be present and will be handled by licensed contractors in accordance with applicable regulations.</p> <p>Phased Construction Scenario</p> <p>Light hazardous waste generators are located along the Phase 1 alignment, and one additional location is located in the vicinity of the Division 20 Storage Yard and Maintenance Facility. The subway tunnel is expected to be under the lowest point of contaminated soils. Contaminated groundwater may be encountered during Phase 1 construction. Any contaminated groundwater will be treated in accordance with applicable permits prior to discharge or disposal. Preparation of Phase 1 construction staging areas will require demolition of structures. In locations where buildings may be demolished or modified, asbestos and/or lead may be present and will be handled by licensed contractors in accordance with applicable regulations.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-55—Site Assessments CON-56—Soil Reuse CON-57—Sampling During Construction CON-58—Soil Testing CON-59—Personal Protection CON-60—Contaminated Groundwater CON-61—Health and Safety Plan CON-62—Storage of Contaminated Materials CON-63—Monitoring the Environment CON-64—Equipment Repair and Maintenance CON-65—Removal of Chemical Residue</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>► ECOSYSTEMS/BIOLOGICAL RESOURCES</p> <p>Concurrent Construction Scenario</p> <p>Construction of the LPA may require the removal or disturbance (including trimming) of mature trees located at the construction sites. An adverse effect could occur if an active migratory bird nest located in any of these trees is disturbed during construction. Because the majority of the Study Area provides only low quality habitat for migratory birds, indirect impacts are not expected to be substantial, as only a small number of migratory birds will be displaced, if any.</p> <p>Phased Construction Scenario</p> <p>Construction of Phase 1 may require the removal or disturbance (including trimming) of mature trees located at the construction sites. An adverse effect could occur if an active migratory bird nest located in any of these trees is disturbed during construction. Because the majority of the Study Area provides only low quality habitat for migratory birds, indirect impacts are not expected to be substantial, as only a small number of migratory birds will be displaced, if any.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-66—Biological Surveys CON-67—Compliance with City Regulations CON-68—Tree Pruning CON-69—Avoidance of Migratory Bird Nesting Season</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>

Table S.8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Potential Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phase 2</p> <p>Construction of Phase 2 may require the removal or disturbance (including trimming) of mature trees located at the construction sites. An adverse effect could occur if an active migratory bird nest located in any of these trees is disturbed during construction. Because the majority of the Study Area provides only low quality habitat for migratory birds, indirect impacts are not expected to be substantial, as only a small number of migratory birds will be displaced, if any.</p> <p>Phase 3</p> <p>Construction of Phase 3 may require the removal or disturbance (including trimming) of mature trees located at the construction sites. An adverse effect could occur if an active migratory bird nest located in any of these trees is disturbed during construction. Because the majority of the Study Area provides only low quality habitat for migratory birds, indirect impacts are not expected to be substantial, as only a small number of migratory birds will be displaced, if any.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>Mitigation CON-66—Biological Surveys CON-67—Compliance with City Regulations CON-68—Tree Pruning CON-69—Avoidance of Migratory Bird Nesting Season</p>	<p>Impact Remaining After Mitigation NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>► HYDROLOGY AND WATER RESOURCES</p> <p>Hydrology and Water Resources—Water Supply</p> <p>Concurrent Construction Scenario</p> <p>With the use of the recycled water, the tunnel boring machine and related equipment will not affect the municipal water supply, even accounting for evaporation. It is anticipated that construction water use will be approved during design and that the Los Angeles Department of Water and Power has the capacity to supply the water. Therefore, the LPA construction will not adversely affect the municipal water supply.</p> <p>Phased Construction Scenario</p> <p>With the use of the recycled water, the tunnel boring machine and related equipment will not affect the municipal water supply, even accounting for evaporation. It is anticipated that construction water use will be approved during design and that the Los Angeles Department of Water and Power has the capacity to supply the water. Therefore, Phase 1 construction will not adversely affect the municipal water supply.</p> <p>With the use of the recycled water, the tunnel boring machine and related equipment will not affect the municipal water supply, even accounting for evaporation. It is anticipated that construction water use will be approved during design and that the Los Angeles Department of Water and Power has the capacity to supply the water. Therefore, Phase 2 construction will not adversely affect the municipal water supply.</p> <p>With the use of the recycled water, the tunnel boring machine and related equipment will not affect the municipal water supply, even accounting for evaporation. It is anticipated that construction water use will be approved during design and that the Los Angeles Department of Water and Power has the capacity to supply the water. Therefore, Phase 3 construction will not adversely affect the municipal water supply.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts CEQA: No Significant Impacts</p>
<p>Hydrology and Water Resources—Groundwater</p> <p>Concurrent Construction Scenario</p> <p>Constructing the LPA will involve tunneling that will likely occur at or below groundwater levels. Since dewatering is anticipated, a dewatering permit from the Los Angeles Regional Water Quality Control Board (LARWQCB) is required. Uncontaminated groundwater collected during dewatering will be treated and pumped back into groundwater basins, pumped to the sewer or storm drain system, or used for dust control. If contaminated groundwater is encountered, it will be managed in compliance with applicable permits and regulations. The LARWQCB will have to grant permission to pump groundwater back into the groundwater basins or discharge it into the storm drain system.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>In addition to the measures identified for geologic hazards and hazardous wastes and materials, the following measures are recommended to avoid and minimize impacts to water resources and water quality as they relate to groundwater: CON-70—Methods to Control Contaminated Groundwater CON-71—Plan if Contaminated Groundwater is Encountered</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>

Table S.8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Identified Impact	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>Phased Construction Scenario</p> <p>Constructing Phase 1 will involve tunneling that will likely occur at or below groundwater levels. Since dewatering is anticipated, a LARWQCB dewatering permit is required. Uncontaminated groundwater collected during dewatering will be treated and pumped back into groundwater basins, pumped to the sewer or storm drain system, or used for dust control. If contaminated groundwater is encountered, it will be managed in compliance with applicable permits and regulations. The LARWQCB will have to grant permission to pump groundwater back into the groundwater basins or discharge it into the storm drain system.</p> <p>Constructing Phase 2 will involve tunneling that will likely occur at or below groundwater levels. Since dewatering is anticipated, a LARWQCB dewatering permit is required. Uncontaminated groundwater collected during dewatering will be treated and pumped back into groundwater basins, pumped to the sewer or storm drain system, or used for dust control. If contaminated groundwater is encountered, it will be managed in compliance with applicable permits and regulations. The LARWQCB will have to grant permission to pump groundwater back into the groundwater basins or discharge it into the storm drain system.</p> <p>Constructing Phase 3 will involve tunneling that will likely occur at or below groundwater levels. Since dewatering is anticipated, a LARWQCB dewatering permit is required. Uncontaminated groundwater collected during dewatering will be treated and pumped back into groundwater basins, pumped to the sewer or storm drain system, or used for dust control. If contaminated groundwater is encountered, it will be managed in compliance with applicable permits and regulations. The LARWQCB will have to grant permission to pump groundwater back into the groundwater basins or discharge it into the storm drain system.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>Mitigation</p> <p>In addition to the measures identified for geologic hazards and hazardous wastes and materials, the following measures are recommended to avoid and minimize impacts to water resources and water quality as they relate to groundwater:</p> <p>CON-70—Methods to Control Contaminated Groundwater CON-71—Plan if Contaminated Groundwater is Encountered</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>Hydrology and Water Resources—Drainage</p> <p>Construction Scenario</p> <p>The construction of seven stations will affect existing drainage structures. The affected drainage structures will be resized or relocated to maintain drainage requirements and prevent flooding or ponding.</p> <p>Phased Construction Scenario</p> <p>The construction of three stations during Phase 1 will affect existing drainage structures. The affected drainage structures will be resized or relocated to maintain drainage requirements and prevent flooding or ponding.</p> <p>The construction of two stations during Phase 2 will affect existing drainage structures. The affected drainage structures will be resized or relocated to maintain drainage requirements and prevent flooding or ponding.</p> <p>The construction of two stations during Phase 3 will affect existing drainage structures. The affected drainage structures will be resized or relocated to maintain drainage requirements and prevent flooding or ponding.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>In addition to the measures identified for geologic hazards and hazardous wastes and materials, the following measures are recommended to avoid and minimize impacts to water resources and water quality as they relate to drainage:</p> <p>CON-72—Erosion and Sediment Control Plan CON-73—Landscape and Construction Debris CON-74—Use of Non-Toxic Herbicides or Fertilizers CON-75—Use of Temporary Detention Basins CON-76—Water Quality Monitoring CON-77—Use of Stormwater Runoff BMPs CON-78—Measures to Reduce the Tracking of Sediment and Debris CON-79—Cleaning of Equipment CON-80—Construction Site Water Collection CON-81—Soil and Building Material Storage</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>

Table S-8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Quantity of Affected Resources	Impact Before Mitigation	Mitigation	Impact After Mitigation
<p>Hydrology and Water Resources—Water Quality</p> <p>Concurrent Construction Scenario</p> <p>The LDA does not cross any surface water and is not near surface water. Construction will be conducted in accordance with applicable regulatory requirements and permits. No adverse effects to surface-water hydrology are anticipated.</p> <p>Disposal will be in compliance with applicable municipal National Pollution Discharge Elimination System permits and waste discharge requirements. As a result, the handling and disposal of wastewater will not result in adverse impacts to water quality.</p> <p>Trenching and tunneling could expose contaminated groundwater and create preferential pathways for the underground spread of contaminated groundwater. Using impermeable material for underground structures will reduce contaminant migration.</p> <p>Phased Construction Scenario</p> <p>Phase 1 does not cross any surface water and are not near surface water. Construction will be conducted in accordance with applicable regulatory requirements and permits. No adverse effects to surface-water hydrology are anticipated.</p> <p>Disposal of water used during construction activities associated with Phase 1 will be in compliance with applicable municipal National Pollution Discharge Elimination System permits and waste discharge requirements. As a result, the handling and disposal of wastewater will not result in adverse impacts to water quality.</p> <p>Trenching and tunneling could expose contaminated groundwater and create preferential pathways for the underground spread of contaminated groundwater. Using impermeable material for underground structures will reduce contaminant migration during the construction of Phase 1.</p> <p>Phase 2 does not cross any surface water and are not near surface water. Construction will be conducted in accordance with applicable regulatory requirements and permits. No adverse effects to surface-water hydrology are anticipated.</p> <p>Disposal of water used during construction activities associated with Phase 2 will be in compliance with applicable municipal National Pollution Discharge Elimination System permits and waste discharge requirements. As a result, the handling and disposal of wastewater will not result in adverse impacts to water quality.</p> <p>Trenching and tunneling could expose contaminated groundwater and create preferential pathways for the underground spread of contaminated groundwater. Using impermeable material for underground structures will reduce contaminant migration during the construction of Phase 2.</p> <p>Phase 3 does not cross any surface water and are not near surface water. Construction will be conducted in accordance with applicable regulatory requirements and permits. No adverse effects to surface-water hydrology are anticipated.</p> <p>Disposal of water used during construction activities associated with Phase 3 will be in compliance with applicable municipal National Pollution Discharge Elimination System permits and waste discharge requirements. As a result, the handling and disposal of wastewater will not result in adverse impacts to water quality.</p> <p>Trenching and tunneling could expose contaminated groundwater and create preferential pathways for the underground spread of contaminated groundwater. Using impermeable material for underground structures will reduce contaminant migration during the construction of Phase 3.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>In addition to the measures identified for geologic hazards and hazardous wastes and materials, the following measures are recommended to avoid and minimize impacts to water quality:</p> <p>CON-72—Erosion and Sediment Control Plan CON-73—Landscape and Construction Debris CON-74—Use of Non-Toxic Herbicides or Fertilizers CON-75—Use of Temporary Detention Basins CON-76—Water Quality Monitoring CON-77—Use of Stormwater Runoff BMPs CON-78—Measures to Reduce the Tracking of Sediment and Debris CON-79—Cleaning of Equipment CON-80—Construction Site Water Collection CON-81—Soil and Building Material Storage</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>



Table S-3. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description/Identified Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>► PARKLANDS AND COMMUNITY FACILITIES</p> <p>Concurrent Construction Scenario</p> <p>Construction of the LPA could affect parklands and community facilities for limited durations due to street and sidewalk closures and traffic detours, especially in areas of station construction. Construction and traffic detours will temporarily reduce access to businesses and communities. In addition, noise and emissions from haul trucks and construction equipment could disrupt community activities. Access to parks, recreation centers, and museums will be maintained during construction. Police and fire emergency response routes to businesses and residences could be disrupted within the vicinity of construction areas. However, to minimize disruptions, the Beverly Hills Police Department (BHPD) and the Los Angeles Police Department (LAPD) will be informed of all lane closures and detours prior to construction so that emergency routes can be adjusted accordingly.</p> <p>Phased Construction Scenario</p> <p>Construction of Phase 1 could affect parklands and community facilities for limited durations due to street and sidewalk closures and traffic detours, especially in areas of station construction. Construction and traffic detours will temporarily reduce access to businesses and communities. In addition, noise and emissions from haul trucks and construction equipment could disrupt community activities. Access to parks, recreation centers, and museums will be maintained during construction. Police and fire emergency response routes to businesses and residences in Phase 1 could be disrupted within the vicinity of construction areas. However, to minimize disruptions, the BHPD and the LAPD will be informed of all lane closures and detours prior to construction so that emergency routes can be adjusted accordingly.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>In addition to the measures for communities and neighborhoods, the following measures will avoid and minimize impacts to parks and community facilities:</p> <p>CON-82—Communication with Schools CON-83—Work with Transportation, Police, Public Works, and Community Service Departments CON-84—Instructional Rail Safety Program for Schools CON-85—Informational Program to Enhance Safety CON-86—Traffic Control CON-87—Designation of Safe Emergency Vehicle Routes</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>Phase 2</p> <p>Construction of Phase 2 could affect parklands and community facilities for limited durations due to street and sidewalk closures and traffic detours, especially in areas of station construction. Construction and traffic detours will temporarily reduce access to businesses and communities. In addition, noise and emissions from haul trucks and construction equipment could disrupt community activities. Access to parks, recreation centers, and museums will be maintained during construction. Police and fire emergency response routes to businesses and residences in Phase 2 could be disrupted within the vicinity of construction areas. However, to minimize disruptions, the BHPD and the LAPD will be informed of all lane closures and detours prior to construction so that emergency routes can be adjusted accordingly.</p>			
<p>Phase 3</p> <p>Construction of Phase 3 could affect parklands and community facilities for limited durations due to street and sidewalk closures and traffic detours, especially in areas of station construction. Construction and traffic detours will temporarily reduce access to businesses and communities. In addition, noise and emissions from haul trucks and construction equipment could disrupt community activities. Access to parks, recreation centers, and museums will be maintained during construction. Police and fire emergency response routes to businesses and residences in Phase 3 could be disrupted within the vicinity of construction areas. However, to minimize disruptions, the BHPD and the LAPD will be informed of all lane closures and detours prior to construction so that emergency routes can be adjusted accordingly.</p>			

Table S-8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Potential Impacts	Impact Before Mitigation	Mitigation	Impact Remaining After Mitigation
<p>ECONOMIC AND FISCAL</p> <p>Economic and Fiscal—Construction-related Economic Losses</p> <p>Concurrent Construction Scenario</p> <p>Construction of the LPA will have temporary impacts on businesses, particularly those near or adjacent to construction sites. Construction impacts will include traffic disruption, increased noise, vibration, and dust; modified vehicular and pedestrian traffic patterns; and utility disruptions. Sidewalks could be temporarily obstructed for station and tunnel construction, thereby reducing business access. However, at least one access point will be maintained at all times. The selection of some station entrances will result in a temporary loss of parking during construction. Business impacts could also include reduced visibility of commercial signs and business locations. These construction impacts could result in adverse economic impacts to businesses.</p>	<p>NEPA: Temporary Adverse Impacts CEQA: Temporary Significant Impacts</p>	<p>CON-18—Minimize Disruption of Access to Businesses CON-19—Signage TCO-1—Traffic Control Plans TCO-4—Transportation Management Plan TCO-7—Parking Management TCO-8—Parking Monitoring and Community Outreach TCO-10—Pedestrian Routes and Access TCO-11—Bicycle Paths and Access</p>	<p>NEPA: No Adverse Impacts CEQA: Less than Significant Impacts</p>
<p>Phase of Construction Scenario</p> <p>Construction of Phase 1 will have temporary impacts on businesses, particularly those near or adjacent to construction sites. Construction impacts will include traffic disruption, increased noise, vibration, and dust; modified vehicular and pedestrian traffic patterns; and utility disruptions. Sidewalks could be temporarily obstructed for station and tunnel construction, thereby reducing business access. However, at least one access point will be maintained at all times. The selection of some station entrances will result in a temporary loss of parking during construction. Business impacts could also include reduced visibility of commercial signs and business locations. These construction impacts could result in adverse economic impacts to businesses.</p>			
<p>Construction of Phase 2 will have temporary impacts on businesses, particularly those near or adjacent to construction sites. Construction impacts will include traffic disruption, increased noise, vibration, and dust; modified vehicular and pedestrian traffic patterns; and utility disruptions. Sidewalks could be temporarily obstructed for station and tunnel construction, thereby reducing business access. However, at least one access point will be maintained at all times. The selection of some station entrances will result in a temporary loss of parking during construction. Business impacts could also include reduced visibility of commercial signs and business locations. These construction impacts could result in adverse economic impacts to businesses.</p>			
<p>Construction of Phase 3 will have temporary impacts on businesses, particularly those near or adjacent to construction sites. Construction impacts will include traffic disruption, increased noise, vibration, and dust; modified vehicular and pedestrian traffic patterns; and utility disruptions. Sidewalks could be temporarily obstructed for station and tunnel construction, thereby reducing business access. However, at least one access point will be maintained at all times. The selection of some station entrances will result in a temporary loss of parking during construction. Business impacts could also include reduced visibility of commercial signs and business locations. These construction impacts could result in adverse economic impacts to businesses.</p>			
<p>Economic and Fiscal—Construction-related Employment</p> <p>Concurrent Construction Scenario</p> <p>The LPA will result in beneficial direct and indirect employment impacts. New direct jobs (jobs and services purchased to build the LPA) could be approximately 35,999, and indirect employment (secondary demand for goods and services) could be approximately 27,667 for the LPA. Construction-related employment is directly proportional to the magnitude of capital expenditures, with higher cost construction alternatives generating more construction-related employment.</p>	<p>NEPA: No Adverse Impacts, Construction-related Employment Benefits CEQA: No Significant Impacts, Construction-related Employment Benefits</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts, Construction-related Employment Benefits CEQA: No Significant Impacts, Construction-related Employment Benefits</p>



Table S.8. Environmental Impacts and Mitigation Measures—Construction (continued from previous page)

Description of Identified Impacts ¹	Impact Before Mitigation	Mitigation ²	Impact Remaining After Mitigation
<p>Phased Construction Scenario</p> <p>The construction of Phase 1 will result in beneficial direct and indirect employment impacts.</p> <p>The construction of Phase 2 will result in beneficial direct and indirect employment impacts.</p> <p>The construction of Phase 3 will result in beneficial direct and indirect employment impacts.</p>	<p>NEPA: No Adverse Impacts, Construction-related Employment Benefits</p> <p>CEQA: No Significant Impacts, Construction-related Employment Benefits</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts, Construction-related Employment Benefits</p> <p>CEQA: No Significant Impacts, Construction-related Employment Benefits</p>
<p>Economic and Fiscal—Construction Spending on the Regional Economy</p> <p>Concurrent Construction Scenario</p> <p>The jobs created as a result of construction spending on the LPA will result in both direct and indirect economic impacts on the Los Angeles region. The overall output generated for the LPA as a result of construction spending is estimated to be \$4.74 billion direct output and \$5,369 million indirect/induced output, for a total of \$10.11 billion in 2016 dollars. Approximately 47% of the projected output is directly related to construction of the LPA, while the remaining is expected to result from indirect and induced spending.</p> <p>Phased Construction Scenario</p> <p>The jobs created as a result of construction spending on Phase 1 will result in both direct and indirect economic impacts on the Los Angeles region. However, since Phase 1 terminates at Wilshire/La Cienega, construction spending will be lower than the full LPA and, therefore, the economic benefits resulting from construction will be a portion of the full LPA to the Westwood/VVA Hospital Station.</p> <p>The jobs created as a result of construction spending on Phase 2 will result in both direct and indirect economic impacts on the Los Angeles region. However, since Phase 2 terminates at Century City, construction spending will be lower than the full LPA and, therefore, the economic benefits resulting from construction will be a portion of the full LPA to the Westwood/VVA Hospital Station.</p> <p>The jobs created as a result of construction spending on Phase 3 will result in both direct and indirect economic impacts on the Los Angeles region. The construction spending as part of Phase 3 will be lower than the full LPA and, therefore, the economic benefits resulting from construction will be a portion of the full LPA to the Westwood/VVA Hospital Station.</p>	<p>NEPA: No Adverse Impacts, Construction-related Employment Benefits</p> <p>CEQA: No Significant Impacts, Construction-related Employment Benefits</p>	<p>No mitigation required.</p>	<p>NEPA: No Adverse Impacts, Construction-related Employment Benefits</p> <p>CEQA: No Significant Impacts, Construction-related Employment Benefits</p>

¹Refer to Section 4.15 of this Final EIR/EIS for the full description of all proposed mitigation measures. Unless otherwise noted, the LPA includes all station, alignment, and station entrance options.

Refer to Table S-5 and Table S-8 for a list of environmental impacts anticipated during construction, mitigation measures, and impacts remaining after mitigation. Section 4.15 of this Final EIS/EIR provides a detailed discussion of all anticipated impacts and mitigation measures. Transportation-related construction impacts and mitigation measures are summarized above on page S-26. Impacts related to air quality, noise, and historic resources will remain adverse and unavoidable during the construction period, even with implementation of mitigation measures. However, all construction impacts will be temporary in duration.

Under the Concurrent Construction Scenario and the Phased Construction Scenario, overall construction impacts resulting from construction of the LPA will be very similar because the necessary construction activities will generally be the same. The major difference between the two scenarios is the timing of construction activities and, therefore, the duration of the construction impacts. Under the Phased Construction Scenario, construction activities will be spaced over a longer period of time—from 2013 to 2036, which will result in a longer overall duration for any construction impact. Under the Concurrent Construction Scenario, all construction activities will occur between 2013 and 2022. For some resource areas, such as air quality, the phased construction approach will reduce the intensity of impacts at a given point in time as construction activities will not occur concurrently. However, most resource areas discussed will not see a substantial difference in overall impacts during construction of the LPA, whether or not it is constructed in phases.

Cost and Financial Plan

The basis of the financial analysis, including the capital and operating and maintenance (O&M) cost estimates, is the *Westside Subway Extension Accelerated Financial Plan* (Metro 2011ae) (Concurrent Construction Schedule) and the *Westside Subway*

Extension Alternative Financial Plan (Metro 2011af) (Phased Construction Schedule).

Depending on the station and alignment location where options are still under consideration, the capital costs estimate for the LPA ranges from \$4,323 million to \$4,468 million (in 2011 dollars), an overall spread of \$145 million (Table S-9).

America Fast Forward 30/10 Initiative

The concept of the America Fast Forward 30/10 Initiative is to use long-term revenue from the Measure R sales tax as collateral for long-term bonds and a Federal loan that will allow Metro to build 12 key mass transit projects, including the Westside Project, in 10 years rather than 30. Metro has estimated that accelerating the construction of these 12 key Metro projects will result in cost savings.

Table S-10 compares project costs in 2011 dollars and YOE dollars with the Concurrent Construction Scenario and the Phased Construction Scenario. With finance charges and capital cost escalation, the LPA capital cost in Year of Expenditure dollars is \$5,662 million under the Concurrent Construction Scenario and \$6,290 million under the Phased Construction Scenario. The differences in costs of the two funding plans are described more fully in Chapter 6 of this Final EIS/EIR; however, the differences described above illustrate that the LPA under the Concurrent Construction Scenario can be delivered at lower overall costs than the LPA under the Phased Construction Scenario, primarily because of lower costs for escalation and financing.

The funding sources that have been identified in the *Westside Subway Extension Accelerated Financial Plan* (Metro 2011ae) and the *Westside Subway Extension Alternative Financial Plan* (Metro 2011af) include Federal Section 5309 New Starts funds,

Table S-9. Comparison of Station and Alignment Option Combinations

Station Combination			Configuration Number	Transit Run Times			Permanent Underground Easements				Capital Cost (\$ 2011 millions)
				Length (miles)	Total Run Time (eastbound)	Total Run Time (westbound)	Residential Properties ¹	Schools, Religious, and Other Community Facilities	Other Non-residential Properties	Total Properties	
Century City Santa Monica	Westwood/ UCLA	Westwood/VA Hospital South	1	8.57	14:19	14:26	78	0	17	95	\$4,348 - \$4,435
	On-Street	Westwood/VA Hospital North	2	8.73	14:21	14:28	78	0	14	92	\$4,382 - \$4,468
Century City	Westwood/ UCLA Off-Street	Westwood/VA Hospital South	3	8.60	14:45	14:52	82	1	25	108	\$4,323 - \$4,410
		Westwood/VA Hospital North	4	8.74	14:50	14:58	82	1	21	104	\$4,357 - \$4,444
Century City Constellation	Westwood/ UCLA	Westwood/VA Hospital South	5	8.80	14:44	14:49	86	1	38	125	\$4,368 - \$4,409
	On-Street	Westwood/VA Hospital North	6	8.95	14:45	14:52	86	1	34	121	\$4,402 - \$4,442
Century City	Westwood/ UCLA Off-Street	Westwood/VA Hospital South	7	8.83	15:11	15:16	90	2	46	138	\$4,344 - \$4,384
		Westwood/VA Hospital North	8	8.97	15:17	15:21	90	2	42	134	\$4,377 - \$4,417

Source: Westside Subway Extension Accelerated Financial Plan (Metro 2011a); Westside Subway Extension Alternative Financial Plan (Metro 2011f); Westside Subway Extension Acquisitions and Displacement Supplemental Technical Report (Metro 2011c)

¹Condominium units in the same building counted as a single property.
Recommended station and alignment locations

Local Measure R sales tax funds, reimbursements to Metro from the State for Letters of No Prejudice agreements, and local agency funds. Under the Concurrent Construction Scenario, it is estimated that Measure R funds will fund approximately 53 percent of capital costs and New Starts Funds will cover approximately 42 percent of capital costs, with the remainder funded by local and State transit funds. Under the Phased Construction

Scenario, it is estimated that Measure R will fund approximately 46 percent of capital costs and New Starts and other Federal funds will cover approximately 50 percent of capital costs, with the remainder funded by local and State transit funds.

The incremental O&M costs for the LPA are estimated to be \$180 million in YOE dollars for the Concurrent Construction Scenario and \$51 million for the

Table S-10. Comparison of Project Costs under Concurrent Construction Scenario versus Phased Construction Scenario

	Capital Cost (\$2011 millions) ¹	Capital Cost (\$YOE millions)
Concurrent Construction Scenario		
Single Phase (2022)	\$4,407	\$5,662
Phased Construction Scenario		
Phase 1 (2020)	N/A	\$2,606
Phase 2 (2026)	N/A	\$1,584
Phase 3 (2036)	N/A	\$2,100
Total	\$4,367	\$6,290

¹Base-year cost estimates (\$2011 millions) do not include capital cost escalation or financing costs.

Phased Construction Scenario in 2035 (only Phase 1 and Phase 2 operational). Metro will use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs.

Comparative Benefits and Costs

Chapter 7 of this Final EIS/EIR evaluates the LPA, the station location options at Century City, Westwood/UCLA, and Westwood/VA Hospital, and the potential station entrance locations. The evaluation criteria are the same as those used in the Draft EIS/EIR to compare the five Build Alternatives. They include mobility improvements, transit-sup-

portive land use policies, cost-effectiveness, project feasibility, equity, environmental considerations, and public acceptance.

The technical evaluation and input received from interested stakeholders provide the basis for a recommendation, which appears at the end of this section. The Metro Board of Directors will decide on the final station and entrance locations following the circulation and public availability of this Final EIS/EIR.

Evaluation of No Build Alternative and Locally Preferred Alternative

This section compares the LPA to Westwood/VA Hospital with the No Build Alternative, summarizing the LPA's benefits, costs, and impacts. Table S-11 summarizes some of the mobility and cost factors used to evaluate the alternatives.

Mobility Improvements

With the LPA, transit will operate on its own exclusive guideway and will not be affected by roadway conditions. A substantial reduction in transit travel times and improved service reliability are expected compared to the No Build Alternative. Figure S-28 compares the transit travel times from various locations around Los Angeles County to the Westwood/UCLA Station for the No Build Alternative and the LPA. These reduced transit travel

Table S-11. Evaluation Results for LPA Compared to No Build Alternative

Evaluation Criteria	LPA
New Transit Trips (per day in 2035)	27,200 to 30,100
Reduction in Vehicle Miles Traveled Compared to No Build (2035 Study Area)	318,000 to 581,000
Total Capital Cost (in million YOE dollars)*	\$5,662
Cost per Hour of Transit-User Benefits Compared to TSM Alternative (FTA Cost Effectiveness Index, or CEI)	\$31.77

Source: Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives (Metro 2010a), Westside Subway Extension Accelerated Financial Plan (Metro 2010a); Westside Subway Extension Alternative Financial Plan (Metro 2010f)

* Capital Costs under the Concurrent Construction Scenario

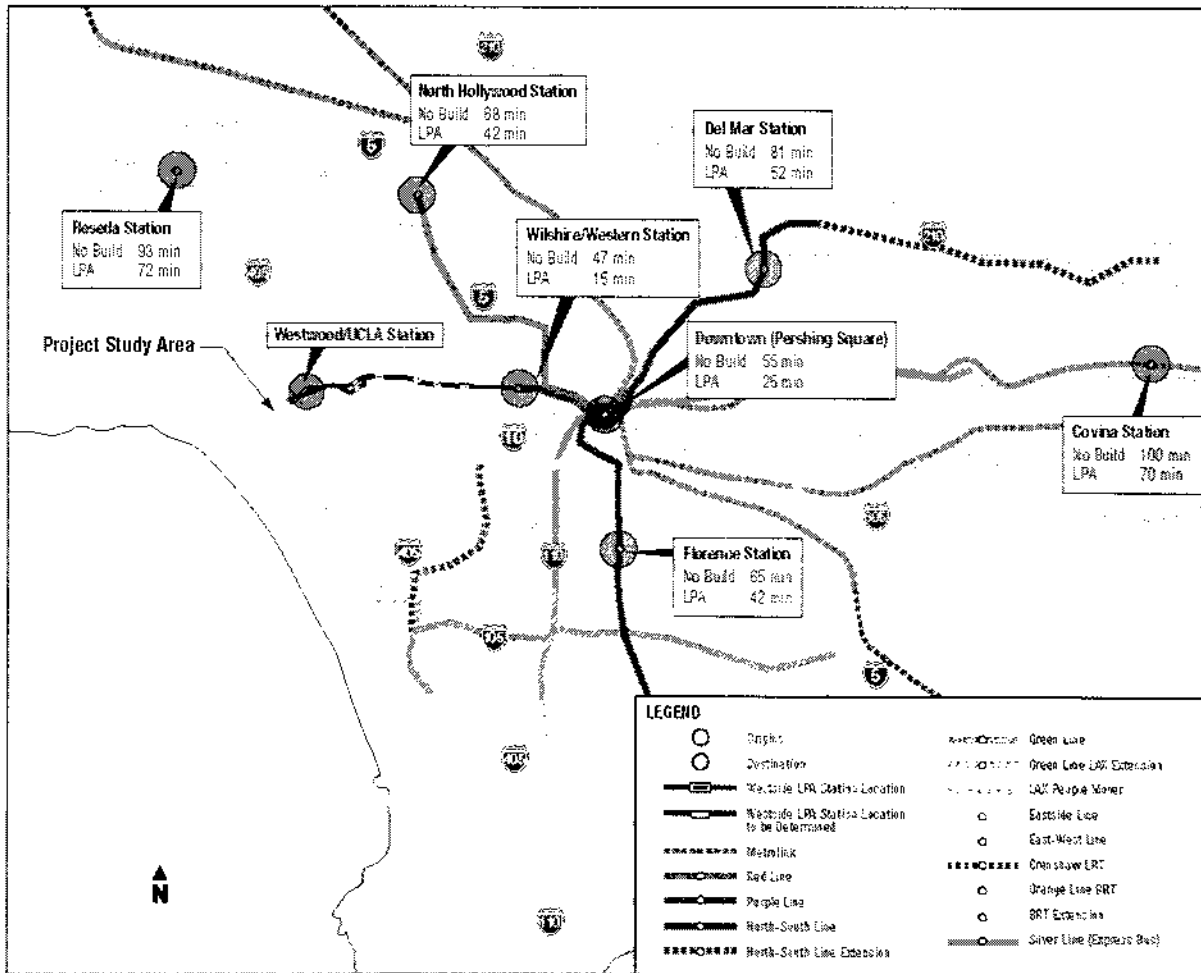


Figure S-28. Transit Travel Times to Westwood/UCLA Station

times for the LPA directly reflect expected major increases in transit operating speeds as compared to the No Build Alternative. During peak periods, rail operating speeds are faster than speeds for a comparable automobile trip.

With improved transit speeds and reliability, the LPA will attract more travelers to transit. Section 3.4.2 of this Final EIS/EIR explains that the LPA is expected to attract 27,000 to 30,000 new transit trips per day in 2035. These are trips that would have been made by another mode. Another 20,000 riders are expected to switch from bus to rail each day to take advantage of the subway's greater speed and reliability. In total, transit riders

using the LPA will receive more than 38,000 hours of user benefits per day in 2035.

The LPA also will significantly reduce the number of transfers as riders from the Study Area will be able to access Metrolink and Amtrak with just one transfer at Union Station. For transit riders who stand, subway service will provide increased comfort and safety compared to frequent stop-and-go travel that occurs on buses operating in mixed traffic or uneven road surfaces. Because station platforms will be at the same level as subway vehicles, they will accommodate quick and easy boardings for all passengers.

Transit-Supportive Land Use Policies and Conditions

The extent to which the LPA meets land use goals can be measured by the number of high-density, mixed-use activity centers within one-half mile of the alignment and by the number of high opportunity areas for redevelopment within one-half mile of the alignment. The LPA will provide subway service to seven of the activity centers in the Study Area and one high opportunity area.

Transit-supportive land use is also a critical aspect of the FTA's rating of projects that are seeking discretionary New Starts funds. Forty percent of the project justification rating is a function of transit-oriented land use. The FTA has given the LPA a medium-high rating on this criterion.

Cost-effectiveness

Cost-effectiveness analysis compares a project's transportation benefits, measured in terms of user benefit hours, with its capital and O&M costs. FTA currently assigns a low cost-effectiveness rating to projects with a Cost-Effectiveness Index (CEI) exceeding \$31.50 per hour of user benefit. With a CEI of \$31.77, the LPA received a low rating in FTA's *Annual Report on Funding Recommendations, Fiscal Year 2012*, submitted to Congress in February 2011. Under current rules, FTA will only recommend New Starts funding if the LPA performs very well under other project justification criteria, such as transit-supportive land use and economic development, as the LPA does.

Cost-Effectiveness Index

The cost-effectiveness measure used in this evaluation is used by FTA in its rating of projects seeking New Starts funds. It is derived by annualizing the LPA's capital cost, adding the annual operating and maintenance costs, and dividing the sum by the alternative's annual transit system user benefits. User benefits refer primarily to travel-time savings.

Project Feasibility

The financial feasibility of the LPA depends on how well the LPA competes for New Starts funding and whether the local share of project funding is affordable under Measure R. Considering both land use and cost-effectiveness, the FTA has given the LPA a medium rating for project justification, making it eligible for a New Starts funding recommendation. The local funds needed to build the LPA are guaranteed by Measure R, indicating that the LPA is financially feasible, and FTA has assigned a medium rating to Metro's financial plan.

Equity

More than one-sixth of residents within one-half mile of the alignment are low income, and nearly half are minority. The LPA will provide better mobility to a large number of low-income and minority people. Furthermore, short-term construction impacts will not disproportionately affect low-income and minority residents.

Environmental Considerations

The LPA will require the acquisition of properties to construct station entrances and provide for construction staging, as well as the acquisition of easements where the alignment or station boxes are beneath private property. Businesses employing 231 to 279 employees will be displaced (the actual number will depend on which entrance location is selected at each station). Some businesses may relocate to other parts of the City, and job losses from displacement (if any) will be offset by construction and operations jobs. The LPA will reduce VMT on the highway system, with attendant reductions in roadway congestion, pollutant emissions, and fossil fuel consumption. The decrease is small in relation to total VMT in the Study Area.

The LPA will result in temporary impacts during construction. As discussed in Sections 3.8 and 4.15 of this Final EIS/EIR, temporary construction

impacts will include traffic and access disruptions near station sites, construction noise and emissions (NO_x and PM_{10}), temporary removal of parking, visual effects, and haul trucks removing material excavated from the tunnel and station boxes. Metro will mitigate these temporary construction impacts, as identified in Table S-6 and Table S-8.

Evaluation of Station and Alignment Options

This section focuses on the western portion of the LPA where decisions remain to be made on the location of the three westernmost stations—Century City, Westwood/UCLA, and Westwood/VA Hospital—and the alignment between them. It addresses those objectives and measures considered to be most relevant to decisions on each of the remaining station and alignment options. Table S-9 compares the station location combinations as they relate to transit run times, subsurface easements, and capital costs.

Century City Station Options

Two station locations at Century City are considered in this Final EIS/EIR: Century City Constellation and Century City Santa Monica. Key differences are noted in Table S-12. The recommendation is to locate the Century City Station along Constellation Boulevard as this location would provide better pedestrian access to the jobs and residences in Century City and would avoid the Newport-Inglewood Fault zone.

Mobility Improvements

If the Century City Station is located on Constellation Boulevard, the ridership model predicts more than 3,000 additional daily boardings at Century City and at the seven new Purple Line stations west of Wilshire/Western. Despite the longer alignment and slight increase in travel time, a station on Constellation Boulevard would be more centrally located within Century City,

making it more convenient for potential transit riders. As noted in Table S-12, a Constellation Boulevard Station would be within one-quarter mile of more than 20,000 jobs and within 600 feet of more than 10,000 jobs, twice the number of jobs within those distances from the Santa Monica Boulevard Station site.

Capital Cost

As shown in Table S-9, the cost of the combinations with the Century City Station at Constellation Boulevard would not be significantly different than the combinations with the Century City Station at Santa Monica Boulevard.

Environmental Considerations

The two station location options differ in terms of their proximity to the Santa Monica and Newport-Inglewood Fault zones. As described in Section 4.8 of this Final EIS/EIR, Santa Monica Boulevard between about Moreno Drive and Century Park West Avenue is crossed by multiple faults. A station on Santa Monica Boulevard at Century City Park East would lie within an extension of the Newport-Inglewood Fault zone. Subway stations, because they are structures for human occupancy, should not be built on active fault/deformation zones due to the regulatory code and the difficulty designing such structures to withstand potential ground rupture and associated deformations. The Constellation Station site is in an area showing no evidence of faulting. Tunnels approaching either station location would necessarily cross both faults. However, the alignment associated with a Constellation Station would cross the fault zone at more of a right angle, which is more desirable for safe design.

The two Century City Station location options also differ in terms of the number of property acquisitions. The Century City Santa Monica Station could require more property for station construction sites than the Century City Con-

Table S-12. Comparison of Station Location Options at Century City

Relevant Goals, Objectives, and Criteria	Century City Constellation Station	Century City Santa Monica Station
Mobility Improvements		
Number of existing residents within one-quarter mile	210	180
Number of existing jobs within one-quarter mile	20,170	10,310
Number of existing jobs within 600 feet	10,260	4,820
Daily boardings at in 2035	8,566	5,492
Total daily boardings at Westside Subway Extension Stations in 2035	49,340	45,989
Environmental Considerations		
Acquisitions and easements (varies depending on construction laydown locations)	Between 1 and 4 full takes; 5 temporary construction easements	Between 2 and 21 full takes; 2 temporary construction easements; 2 permanent easements
Permanent underground easements	122 to 137	93 to 108
Cultural resources adversely affected	None	None
Geotechnical conditions	Station box is located outside zones of active faulting	Station box within an extension of the Newport-Inglewood Fault Zone—an active fault zone
Traffic impacts during construction	Lower	Higher
Noise and vibration	Within FTA Criteria	Within FTA Criteria

Source: Westside Subway Extension Century City Station Location Report (Metra 2012e)

stellation Station depending on the location of construction staging.

The two Century City Station options have generated significant public discussion regarding subsurface easements beneath residences in Beverly Hills and Westwood, and Beverly Hills High School. The Santa Monica Boulevard option at Century City would require fewer residential and non-residential subsurface easements than the Constellation Boulevard option. The noise and vibration analysis summarized in Section 4.6 of this Final EIS/EIR concludes that ground-borne noise impacts will not exceed FTA criteria with

mitigation for all station and alignment locations under consideration.

Both options would require temporary roadway lane closures during construction. With existing conditions, Constellation Boulevard carries one-fifth the traffic volume of Santa Monica Boulevard and operates at a better level-of-service. Therefore, traffic impacts during construction would be less with the Constellation Boulevard Station option.

Westwood/UCLA Station Options

Two station location options are under consideration for the Westwood/UCLA Station: Westwood/UCLA On-Street and Westwood/UCLA Off-Street.

Table S-13. Comparison of Station Location Options at Westwood/UCLA

Relevant Goals, Objectives, and Criteria	Westwood/UCLA On-Street Station	Westwood/UCLA Off-Street Station
Mobility Improvements		
Number of residents within one-quarter mile of entrance	1,280	1,260
Number of jobs within one-quarter mile of entrance	10,310	10,360
Pedestrian access	Entrances on both north and south sides of Wilshire Boulevard and closer to Westwood Boulevard/Westwood Village	Entrances on the north side of Wilshire Boulevard and to the west of Westwood Boulevard/Westwood Village
Environmental Considerations		
Acquisitions and easements	2 to 3 permanent easements; 1 temporary construction easement	1 permanent easement; 1 temporary construction easement
Permanent underground easements	93 to 124	106 to 137
Cultural resources adversely affected	Station entrance retrofitted into the historic Linde Medical Plaza, but would have no adverse effect	None
Traffic impacts during construction	More impacts because decking is required above station construction in Wilshire Boulevard	Lower impacts because most construction is off street

Source: Westside Subway Extension Westwood/UCLA Station and Westwood/VIA Hospital Station Locations Report. (Metro 2011)

Table S-13 highlights the similarities and differences between these station location options. The recommendation is to locate the Westwood/UCLA Station On-Street as this location would accommodate entrances on the north and south sides of Wilshire Boulevard at the Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

Mobility Improvements

The Westwood/UCLA Off-Street Station option would require a deeper station and tunnels in order to clear the underside of foundations for a future hotel on Gayley Avenue. The Off-Street Station would be approximately 40 feet deeper than the On-Street Station. Deeper tunnel and stations

are riskier to construct and require more time for transit riders to travel between the platform and the entrance. At the margin, this may affect transit travel times and ridership.

The number of residents and jobs within one-quarter mile of the entrances for both station locations is almost identical. However, the Westwood/UCLA On-Street Station would include an entrance at the Westwood Boulevard intersection, providing better access to bus connections along Westwood Boulevard and would be slightly closer to major office buildings and Westwood Village. Furthermore, one of the station entrance options for the Westwood/UCLA On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard. This entrance configuration would provide

access to both sides of Wilshire Boulevard, which has four traffic lanes in each direction with double left-turn lanes at this location—a significant barrier to easy pedestrian flow across the street.

Capital Cost

As shown in Table S-9, the combinations that include a Westwood/UCLA On-Street Station would cost more than the combinations with a Westwood/UCLA Off-Street Station.

Environmental Considerations

The Westwood/UCLA On-Street Station option is expected to have more impacts on traffic during construction. Three lanes would be provided in each direction on Wilshire Boulevard between Veteran Avenue and Glendon Avenue, resulting in a 25 percent reduction in roadway capacity in each direction for approximately six weeks. In addition, it is expected that Wilshire Boulevard would be closed to traffic between Veteran Avenue and Westwood Boulevard during 12 to 16 weekends to install decking and again for decking removal. Even with the planned mitigation, traffic impacts would be significant during some phases of construction.

The Westwood/UCLA On-Street Station option would require approximately 13 fewer residential and non-residential permanent underground easements than the Off-Street Station option, regardless of the location of the Westwood/VA Hospital and Century City Stations.

Westwood/VA Hospital Station Options

Two station location options are under consideration for the Westwood/VA Hospital Station: Westwood/VA Hospital North and Westwood/VA Hospital South. Table S-14 highlights the similarities and differences between the station location options at Westwood/VA Hospital. The recommendation is to locate the Westwood/VA Hospital Station on the south side of Wilshire Boulevard

as this location would provide better pedestrian access to the VA Medical Center and would more easily accommodate a future westward extension of the subway.

Mobility Improvements

While both options are within one-quarter mile of the VA Hospital, the Westwood/VA Hospital South Station site is 500 feet from the hospital and on the same side of Wilshire Boulevard, but the Westwood/VA Hospital North Station site is 1,200 feet away and on the other side of Wilshire Boulevard. Thus, the South Option offers better pedestrian access to the VA Hospital for employees, patients, and visitors. The South Option's vertical alignment also would be shallower than the North Option's alignment, reducing the time it takes transit users to reach the platform from the entrance.

The North Option could be problematic in the event of a future extension to Santa Monica due to the tight radius curve that would be required to extend west. A north alignment west of San Vicente Boulevard also would have to pass below a significant number of residential and commercial properties, requiring the acquisition of subsurface rights, which would not be necessary with the South Option.

Capital Cost

As shown in Table S-9, those combinations with a Westwood/VA North Station would cost more than those combinations with a Westwood/VA Hospital South Station.

Environmental Considerations

Construction of the South Option would result in more impacts to traffic circulation during construction, including temporary ramp closures at the I-405 interchange as described in Section 3.8 of this Final EIS/EIR. Mitigation measures will be put in place to manage traffic during these

Table S-14. Comparison of Station Location Options at Westwood/VA Hospital Station

Relevant Goals, Objectives, and Criteria	Westwood/VA Hospital North Station	Westwood/VA Hospital South Station
Mobility Improvements		
Number of residents within one-quarter mile of entrance	None	25
Number of jobs within one-quarter mile of entrance	3,500	3,500
Future extensions of the line	Because of the curvature of Wilshire Boulevard as it passes through the VA property, any future extension of the subway to the west would be forced to run beneath many properties west of San Vicente Boulevard and north of Wilshire Boulevard. This would preclude a station at Barrington and require a deeper, more costly future alignment.	No design challenges
Pedestrian access distance to the VA Hospital	1,200 feet and on opposite side of Wilshire Boulevard	500 feet and on same side of Wilshire Boulevard
Environmental Considerations		
Number of cultural resources adversely affected	Los Angeles VA Medical Center Historic District (including historic landscape) will be protected from project impacts. No adverse effect.	Los Angeles VA Medical Center Historic District (including historic landscape). Ficus trees near the theater and the palm garden will be removed during construction and then replaced in their original spaces. No adverse effect.
Traffic impacts during construction	No impact on I-405 on- and off-ramps. Full closures of Wilshire Boulevard on- and off-ramps to Bonsall Avenue	Partial and full closures of I-405 on- and off-ramps required. Full closures of Bonsall Avenue required. Full and partial closures of Wilshire Boulevard on- and off-ramps to Bonsall Avenue

Source: Westside Subway Extension Westwood/UCLA Station and Westwood/VA Hospital Station Locations Report (Metro 2011)

closures. The North Option at Westwood/VA Hospital would require slightly fewer subsurface easements from non-residential properties than the South Option.

Evaluation of Station Entrances and Refinements to Stations

Several stations have one or more entrance location options. The choice of station entrance locations helps to establish the convenience of the station to potential riders. Other considerations in selecting the best location for an entrance include right-of-way availability, construction complexities, impact issues, and community input provided by a Station Area Advisory Group composed of

stakeholders in each station area (see Chapter 8 of this Final EIS/EIR). Table S-15 lists the entrance location options and highlights their significant differences. Further details on how the options were identified and on Metro's evaluation of the options are provided in Chapter 7 of this Final EIS/EIR and in the *Westside Subway Extension Station Entrance Location Report and Recommendations* (Metro 2011u).

Recommendations for Refinements to the Locally Preferred Alternative

Considering all of the various factors discussed above, as well as input received from the community, recommendations for station location

Table S-15. Comparison of Station Entrance Options (continued on next page)

Station and Entrance Options		Recommended Station Entrance
Wilshire/La Brea Station		
<i>Northwest corner of Wilshire Boulevard and La Brea Avenue</i>		●
Right-of-Way	Primarily on Metro-owned property (Metro Customer Service Center).	
Construction Complexities/ Construction Impacts	Construction staging will occur on this site. Location of entrance would not create any further impacts beyond those that are required for construction staging.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Direct north-south bus transfer connections. Joint-development opportunities. Stronger visual and commercial linkages to West Hollywood activity centers on North La Brea Avenue.	
<i>Southwest corner of Wilshire Boulevard and La Brea Avenue</i>		○
Right-of-Way	Within construction laydown and staging site to be acquired by Metro.	
Construction Complexities/ Construction Impacts	Construction staging will occur on this site. Location of entrance would not create any further impacts beyond those that are required for construction staging.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Adjacent to major bus connections. Joint-development opportunities.	

● Recommended ○ Not Recommended

Table S-15. Comparison of Station Entrance Options (continued from previous page)

Station and Entrance Options		Recommended Station Entrance
Wilshire/Fairfax Station		
<i>Northwest corner of Wilshire Boulevard and Fairfax Avenue (Johnie's Coffee Shop)</i>		●
Right-of-Way	On private property (Johnie's Coffee Shop and Marinello Beauty School).	
Construction Complexities/ Construction Impacts	Marinello Beauty School would be demolished and the business would require relocation. No impact on Johnie's Coffee Shop, but parking at Johnie's Coffee Shop would require replacement. Requires realignment of alley serving the 99-Cents Only Store.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Provides direct north-south bus connections and close to intersection of Wilshire Boulevard and Fairfax Avenue.	
<i>Northeast corner of Wilshire Boulevard and Fairfax Avenue (LACMA)</i>		○
Right-of-Way	Requires an easement within existing LACMA building. This easement may not be available due to the planned use of the building for the Academy of Motion Pictures Arts and Sciences Film Museum.	
Construction Complexities/ Construction Impacts	Requires modifications to ground floor and basement of historic building; greater costs and schedule risk due to uncertainties of constructing within existing building. Construction of entrance would require temporary lane closures on westbound Wilshire Boulevard and northbound Fairfax Avenue.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Provides direct north-south bus connections and close to intersection of Wilshire Boulevard and Fairfax Avenue.	
<i>South side of Wilshire Boulevard between Ogden Drive and Orange Grove Avenue</i>		○
Right-of-Way	Within construction laydown and staging site to be acquired by Metro.	
Construction Complexities/ Construction Impacts	Entrance lies beneath the northbound lanes of Orange Grove Avenue. Construction would require decking or extended lane closures.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	The site provides good access to LACMA and the other museums and cultural facilities located east of Fairfax Avenue. The site is less convenient than the Johnie's site and LACMA West site for transit riders seeking to make rail-to-bus transfers to points farther west and to points north and south on Fairfax Avenue. This would be offset, however, by the high number of transit users who would be traveling to LACMA and other cultural institutions east of Fairfax Avenue.	
		● Recommended ○ Not Recommended

Table S-15. Comparison of Station Entrance Options (continued from previous page)

Station and Entrance Options		Recommended Station Entrance
Wilshire/La Cienega Station		
<i>Northeast corner of Wilshire Boulevard and La Cienega Boulevard</i>		●
Right-of-Way	Within construction laydown and staging site to be acquired by Metro.	
Construction Complexities/ Construction Impacts	Construction staging will occur on this site. Location of entrance would not create any further impacts beyond those that are required for construction staging.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Direct connection to north-south bus connections and to Restaurant Row. Joint-development opportunities.	
Wilshire/Rodeo Station		
<i>Southwest corner of Wilshire Boulevard and Reeves Drive (Ace Gallery)</i>		●
Right-of-Way	Within construction laydown and staging area to be acquired by Metro	
Construction Complexities/ Construction Impacts	Ace Gallery site to be used for construction laydown and staging. Its use as station entrance site would have no additional impact.	
Long-term Impacts	Permanent loss of historic property/resource.	
Urban Design Considerations	Joint-development opportunities. Located farthest east from activity centers and attractions at and around Rodeo Drive.	
<i>Northwest corner of Wilshire Boulevard and Beverly Drive (Bank of America)</i>		○
Right-of-Way	Within existing sidewalk that includes both public right-of-way and private property.	
Construction Complexities/ Construction Impacts	Difficult due to lack of laydown next to work area. Structural modifications to existing underground parking structure required. Traffic and parking impacts. Businesses fronting Beverly Drive would be next to construction site.	
Long-term Impacts	Requires widening existing sidewalk and eliminating right-turn lane on Beverly Drive, which would result in long-term traffic impacts. Permanent loss of 40 parking spaces.	
Urban Design Considerations	No joint-development opportunities. Located on north side of Wilshire Boulevard, which has majority of businesses and activity in area. Adjacent to major office buildings and Montage Hotel.	

● Recommended ○ Not Recommended

Table S-15. Comparison of Station Entrance Options (continued from previous page)

Station and Entrance Options		Recommended Station Entrance
<i>Southeast corner of Wilshire Boulevard and El Camino Drive (Union Bank)</i>		○
Right-of-Way	Within Union Bank parking structure and existing one-story building. One-story building would be used for the at-grade entrance.	
Construction Complexities/ Construction Impacts	Parking garage deck slabs would require partial demolition and reconstruction. Lane closures on El Camino Drive may impact entrances to Beverly Wilshire Hotel. Underground parking structure would be temporarily closed to reconstruct ramps.	
Long-term Impacts	Existing business would need to be moved out of ground-floor office to be used as entrance. A reduction in capacity of the underground parking garage would impact businesses in the building that remain. Permanent loss of 30 parking spaces.	
Urban Design Considerations	No joint-development opportunities. Close to activity centers and attractions at and around Rodeo Drive, but on south side of Wilshire Boulevard.	
Century City Santa Monica Boulevard Station		
<i>Southwest corner of Santa Monica Boulevard and Century Park East</i>		○
Right-of-Way	Requires an easement on private property.	{station location not recommended}
Construction Complexities/ Construction Impacts	Partially within underground garage. Impacts to underground parking for existing structures. Temporary street closures during construction.	
Long-term Impacts	Possible reduction of parking capacity in underground structure.	
Urban Design Considerations	Close to Westfield Mall and bus connections along Santa Monica Boulevard but poorer pedestrian connections to employment center of Century City than the Constellation Boulevard location.	
Century City Constellation Boulevard Station		
<i>Northeast corner of Constellation Boulevard and Avenue of the Stars</i>		●
Right-of-Way	Within currently vacant site that is planned for construction laydown and staging site.	
Construction Complexities/ Construction Impacts	Site to be used for construction laydown and staging. Its use as station entrance site would have no additional impact.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Close to Avenue of the Stars' main pedestrian circulation.	

● Recommended ○ Not Recommended

Executive Summary

Table S-15. Comparison of Station Entrance Options (continued from previous page)

Station and Entrance Options		Recommended Station Entrance
<i>Southwest corner of Constellation Boulevard and Avenue of the Stars</i>		○
Right-of-Way	Within Century Plaza Hotel property.	
Construction Complexities/ Construction Impacts	Partially within underground garage. Would necessitate additional decked area in Constellation Boulevard and Avenue of the Stars, causing temporary traffic impact.	
Long-term Impacts	Possible reduction of parking capacity in Century Plaza Hotel parking garage.	
Urban Design Considerations	Close to Avenue of the Stars' main pedestrian circulation. This site could be reconsidered if northeast corner is not available due to redevelopment of that site prior to construction of the subway.	
Westwood/UCLA Off-Street Station		
<i>Lot 36 (UCLA Parking Lot)</i>		○
Right-of-Way	Within planned construction laydown and staging area.	(Off-Street station location not recommended, but station entrance location recommended for On-Street station location, see below)
Construction Complexities/ Construction Impacts	Requires mining below existing storm drain. Site to be used for construction laydown and staging. Its use as station entrance site would have no additional impact.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Direct connection to UCLA shuttle bus on Lot 36. Site could be developed around subway entrances by UCLA.	
<i>Northeast corner of Wilshire Boulevard and Veteran Avenue</i>		○
Right-of-Way	Within planned construction laydown and staging area.	(station location not recommended)
Construction Complexities/ Construction Impacts	Site to be used for construction laydown and staging. Its use as station entrance site would have no additional impact.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Direct connection to UCLA shuttle bus on Lot 36. Joint-development opportunity. West of north-south connections along Westwood Boulevard and Westwood Village.	
		● Recommended ○ Not Recommended

Table S-15. Comparison of Station Entrance Options (continued from previous page)

Station and Entrance Options		Recommended Station Entrance
Westwood/UCLA On-Street Station		
<i>Lot 36 (UCLA Parking Lot)</i>		●
Right-of-Way	Within planned construction laydown and staging area.	
Construction Complexities/ Construction Impacts	Requires mining below existing storm drain. Site to be used for construction laydown and staging. Its use as station entrance site would have no additional impact.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Direct connection to UCLA shuttle bus on Lot 36. Site could be developed around subway entrances by UCLA.	
<i>Northwest corner of Wilshire Boulevard and Westwood Boulevard</i>		● (half entrance)
Right-of-Way	Within historically significant building (Linde Medical Plaza), although entrance will not result in an adverse effect.	
Construction Complexities/ Construction Impacts	Requires piling within basement with low headroom. Building foundations require underpinning and may have to be partially demolished. Access to street-level businesses in Linde Medical Plaza would be through work site. Disruptions to businesses in the Linde Medical Plaza basement to point where businesses may be unable to operate during construction. Extended lane closures would be required on both Wilshire and Westwood Boulevards during construction. Pedestrian detours around construction zone would be required for some periods of construction.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Provides direct north-south bus connections and direct connections to Westwood Village along Westwood Boulevard.	
<i>Southwest corner of Wilshire Boulevard and Westwood Boulevard</i>		● (half entrance)
Right-of-Way	Between public right-of-way and building set back.	
Construction Complexities/ Construction Impacts	Requires decking of the eastbound lanes of Wilshire Boulevard and modifications to stairs, planters, driveway, and underground garage vent structure. Extended lane closure on south side of Wilshire Boulevard for construction.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Direct north-south bus connections along Westwood Boulevard. Direct pedestrian connections to south side of Wilshire Boulevard.	
		● Recommended ○ Not Recommended

Table S-15. Comparison of Station Entrance Options (continued from previous page)

Station and Entrance Options		Recommended Station Entrance
Westwood/VA Hospital South Station		
<i>South side of Wilshire Boulevard, to the east of Bonsall Avenue</i>		●
Right-of-Way	Requires an easement on VA property.	
Construction Complexities/ Construction Impacts	Construction of subway station would require temporary closure of surface streets. Temporary detours would be required at the following locations: <ul style="list-style-type: none"> • I-405 on- and off-ramps • Bonsall Avenue • Access roads from Wilshire Boulevard to Bonsall Avenue Loss of parking during construction would be mitigated by prior construction of a parking garage for use by VA Hospital.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Maintains existing bus circulation patterns along Wilshire Boulevard and enhances existing pedestrian connections to buses. Provides better pedestrian access to VA Hospital.	
Westwood/VA Hospital North Station		
<i>North side of Wilshire Boulevard, to the west of Bonsall Avenue</i>		○
Right-of-Way	Requires an easement on VA property.	(station location not recommended)
Construction Complexities/ Construction Impacts	Construction of subway station would require temporary closure of surface streets. Temporary detours would be required at the following locations: <ul style="list-style-type: none"> • Bonsall Avenue • Access roads from Wilshire Boulevard to Bonsall Avenue No impact to I-405 on- and off-ramps.	
Long-term Impacts	None beyond those that would occur during construction.	
Urban Design Considerations	Opposite side of Wilshire Boulevard from VA Hospital. Maintains existing bus circulation patterns along Wilshire Boulevard and enhances existing pedestrian connections to buses.	

● Recommended ○ Not Recommended

Table S-16. Recommended Station and Entrance Locations

Station	Recommended Station Location	Recommended Entrance Location
Wilshire/La Brea	Wilshire Boulevard and La Brea Avenue	Northwest corner of Wilshire Boulevard and La Brea Avenue
Wilshire/Fairfax	Wilshire Boulevard and Fairfax Avenue	Northwest corner of Wilshire Boulevard and Fairfax Avenue (west of Johnie's Coffee Shop)
Wilshire/La Cienega	Wilshire Boulevard and La Cienega Boulevard	Northeast corner of Wilshire and La Cienega Boulevards
Wilshire/Rodeo	Wilshire Boulevard and Beverly Drive	Southwest corner of Wilshire Boulevard and Reeves Drive (Ace Gallery)
Century City	Constellation—Constellation Boulevard and Avenue of the Stars	Northeast corner of Constellation Boulevard and Avenue of the Stars
Westwood/UCLA	On-Street—Wilshire Boulevard and Westwood Boulevard	North and south of Wilshire Boulevard, with one entrance between Gayley Avenue and Veteran Avenue (Lot 36), a second "half entrance" at the northwest corner of Wilshire and Westwood Boulevards, and another "half entrance" at the southwest corner of Wilshire and Westwood Boulevards
Westwood/VA Hospital	South—Wilshire Boulevard and Bonsall Avenue	Southeast corner of Wilshire Boulevard and Bonsall Avenue

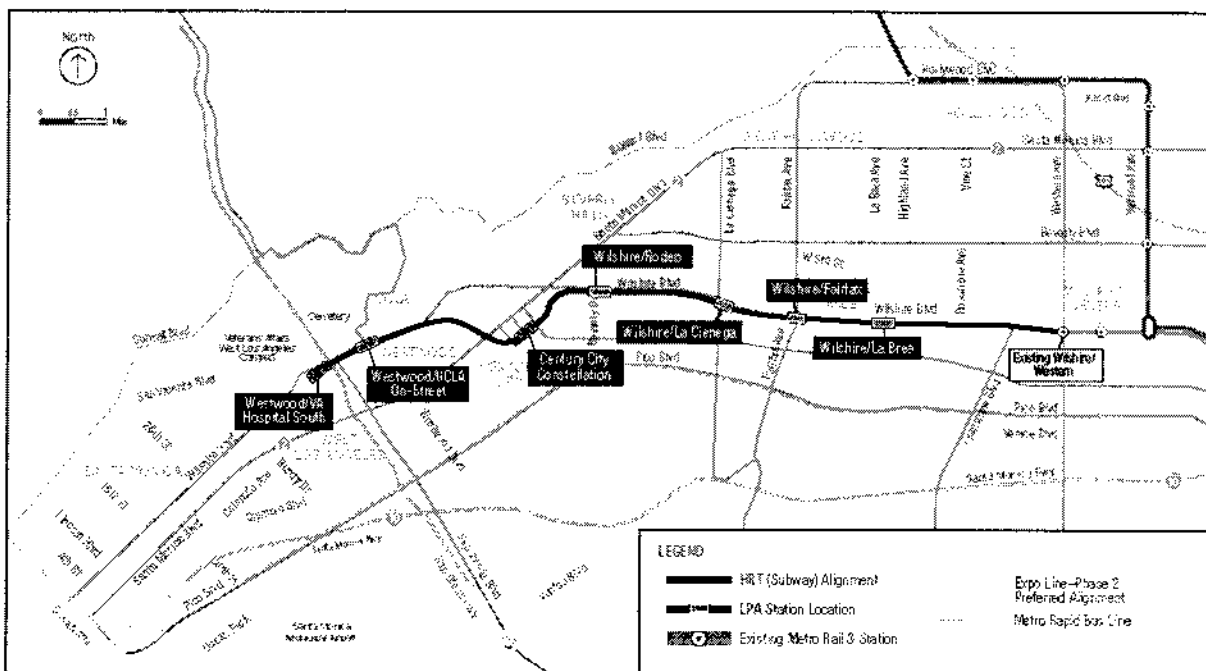


Figure S-29. Recommended Station and Alignment Locations

and entrance locations are presented in Table S-16 and illustrated in Figure S-29. The recommendation is to locate the Century City Station along Constellation Boulevard as this location would provide better pedestrian access to the jobs and residences in Century City and would avoid the Newport-Inglewood Fault zone. For the Westwood/UCLA Station, the recommendation is to locate the station On-Street because this location would accommodate an entrance on the north and south sides of Wilshire Boulevard at the Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard. Finally, for the Westwood/VA Hospital Station, the recommendation is the south side of Wilshire Boulevard as this location would provide better pedestrian access to the VA Medical Center and would more easily accommodate a future westward extension of the subway. Final decisions will be made by the Metro Board of Directors following the public availability period of this Final EIS/EIR.

In general, the Project benefits of improved mobility and beneficial environmental effects could be delivered up to 15 years sooner under the Concurrent Construction Scenario than if the Project is delivered under the Phased Construction Scenario. For these reasons, the Concurrent Construction Scenario is recommended for implementation should funding be identified by the time that action is taken to approve the Project.

Public and Agency Outreach and Comments on Draft EIS/EIR

Metro used a wide ranging public outreach program for the LPA, employing a comprehensive set of strategies to actively engage stakeholders. From the beginning of the AA phase through the release of this Final EIS/EIR, the program continually expanded and adapted to improve opportunities for input and participation. Chapter 8 of this Final

EIS/EIR presents the public participation process and activities for public and agency review and comment from the AA early scoping period (October 1 to November 7, 2007) through the release of this Final EIS/EIR.

The AA phase incorporated a public participation process that included scoping meetings, community update meetings, key stakeholder meetings, and briefings of elected officials, as well as development and dissemination of informational materials, a project website, a project information line, social networking, and media relations.

The Draft and Final EIS/EIR phases of the Project built upon and enhanced the public engagement efforts developed during the AA phase, re-engaging existing stakeholders while identifying and involving potential new stakeholders. The intent of the public involvement process during this phase was to work cooperatively with the community toward the development of an LPA that meets the Purpose and Need of the Project.

Notice of Determination

Notice of Determination

Appendix D

TO:
 Office of Planning and Research
For U.S. Mail: *Street Address:*
P.O. Box Box 3044 1400 Tenth Street
Sacramento, CA 95812-3044 Sacramento, CA 95814

County Clerk
County of: Los Angeles
Address: 12400 Imperial Highway
Norwalk, California 90650

FROM:
Public Agency: LACMTA
Address: One Gateway Plaza
Los Angeles, CA 90012
Contact: David Mieger
Phone: 213.922.3040
Lead Agency (if different from above):
Address: _____
Contact: _____
Phone: _____

SUBJECT: *Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.*

State Clearinghouse Number (if submitted to State Clearinghouse): 2009031083

Project Title: Westside Subway Extension Transit Corridor

Project Location (include county): Los Angeles

Project Description: Westside Subway Extension Project proposes to provide a 3.8-mile extension of the existing Metro Purple Line from its current terminus at the Wilshire/Western Station west along Wilshire Boulevard to a Wilshire/La Cienega Station that will include three new stations. These stations are spaced in approximately 1-mile intervals, see attached map.

This is to advise that the Los Angeles County Metropolitan Transportation Authority has approved the above described project on April 26, 2012 and has made the following determinations regarding the above described project:
(Date)
(Lead Agency or Responsible Agency)

1. The project [will will not] have a significant effect on the environment.
2. An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
 A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures [were were not] made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan [was was not] adopted for this project.
5. A statement of Overriding Considerations [was was not] adopted for this project.
6. Findings [were were not] made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the Negative Declaration, is available to the General Public at:

Los Angeles County Metropolitan Transportation Authority, One Gateway Plaza, Los Angeles CA 90012
Signature (Public Agency) _____ Title: _____
Date: _____ Date Received for filing at OPR: _____

Authority cited: Section 21083, Public Resources Code.
Reference: Sections 21000-21174, Public Resources Code.

From: Jack Cheng [<mailto:jcheng@aqmd.gov>]

Sent: Tuesday, December 5, 2017 3:46 PM

To: Peter Burgis <pburgis@ceo.lacounty.gov>

Subject: Draft Environmental Impact Report (DEIR) for the Proposed LACMA Building for the Permanent Collection

Dear Mr. Burgis,

Attached are the SCAQMD staff comments on the Draft Environmental Impact Report (DEIR) for the proposed LACMA Building for the Permanent Collection (SCAQMD Control Number: LAC171026-03). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. SCAQMD staff comments are meant as guidance for the Lead Agency and should be reviewed for incorporation into the Final EIR. Please contact me if you have any questions regarding these comments.

Jack Cheng - Air Quality Specialist

jcheng@aqmd.gov

(909) 396-2448

South Coast Air Quality Management District

21865 Copley Dr., Diamond Bar, CA 91765



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

December 5, 2017

pburgis@ceo.lacounty.gov

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012

Draft Environmental Impact Report (Draft EIR) for the Proposed LACMA Building for the Permanent Collection

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD Staff's Summary of Project Description and Air Quality Analysis

The Lead Agency proposes to replace the Museum Building and construct a new parking facility. The proposed 387,500-square-foot Museum Building would replace four current buildings, totaling 392,871 square feet (Proposed Project). Implementation of the Proposed Project would result in a net decrease in the square footage of the museum buildings. In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. Based on the analyses, the Lead Agency found that the Proposed Project's NOx emissions during construction would be significant and unavoidable after incorporating Mitigation Measure (MM) B-1 through MM B-5¹, and that the Proposed Project's operational air quality impact would be less than significant.

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP² is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent reduction in NOx emissions beyond 2031 levels for ozone attainment.

Achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable, and the Proposed Project plays an important role in supporting SCAQMD's commitment. As such, SCAQMD staff recommends changes to the existing mitigation measure B-1 and an additional recommended mitigation measure to further reduce emissions, particularly NOx emissions. Please see the attachment for more information.

¹ Draft EIR, Section IV.B – Air Quality.

² South Coast Air Quality Management District, March 3, 2017. *2016 Air Quality Management Plan*. Available at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

Pursuant to Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR. Further, when the Lead Agency makes the finding that the recommended mitigation measures are infeasible, the Lead Agency shall describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

LAC171026-03

Control Number

ATTACHMENT

Mitigation Measures

1. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce the significant construction emissions, particular from NO_x, SCAQMD staff recommends the following mitigation measures that the Lead Agency should include in the Final EIR. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website³.

Recommended Changes to the Existing Mitigation Measure B-1

2. **Mitigation Measure B-1:** During plan check, the Project representative shall make available to the lead agency ~~and the South Coast Air Quality Management District~~ a comprehensive inventory for all off-road construction equipment, equal to or greater than 50 horsepower, that will be used ~~an aggregate of 40 or more hours~~ during any portion of the Project. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available 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 Tier specification and operating permit. Off-road diesel powered equipment within the construction inventory list described shall meet ~~the~~ **or exceed Tier 3-4 CARB/U.S. EPA standards where commercially available. In the event that all construction equipment cannot meet the Tier 4 engine certification, the Project representative must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.**

Additional Recommended Mitigation Measure to Further Reduce Construction Emissions

3. **Mitigation Measure B-6:** Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the Lead Agency determines that 2010 model year or newer diesel haul trucks cannot be obtained, the Lead Agency shall use trucks that meet EPA 2007 model year NO_x emissions requirements, at a minimum.

³ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

November 27, 2017

Peter Burgis, Analyst
County of Los Angeles Chief Executive Office
Capital Projects
500 West Temple Street
Los Angeles, CA 90012

Dear Mr. Burgis:

NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT, "LACMA BUILDING FOR THE PERMANENT COLLECTION," PROPOSES THE CONSTRUCTION OF THE MUSEUM BUILDING ON LACMA EAST AND THE SPAULDING LOT, AND THE OGDEN PARKING STRUCTURE WITHIN THE OGDEN LOT, THIS WILL REQUIRE THE CURRENTLY OCCUPIED FIVE BUILDINGS TO BE DEMOLISHED AS A PART OF THE PROJECT, 5905 WILSHIRE BOULEVARD, LOS ANGELES, FFER 201700130

The Notice of Completion and Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

The subject property is entirely within the City of Los Angeles, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this department.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA HABRA	LYNWOOD	PICO RIVERA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA MIRADA	MALIBU	POMONA	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LAKELWOOD	NORWALK	ROLLING HILLS	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	WALNUT
BELL GARDENS	COMMERCE	GLENDALE	IRWINDALE	LAWNDALE	PALOS VERDES ESTATES	ROSEMead	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LOMITA	PARAMOUNT	SAN DIMAS	WESTLAKE VILLAGE
						SANTA CLARITA	WHITTIER

Peter Burgis, Analyst
November 27, 2017
Page 2

Any questions regarding the information provided above may be directed to the Planning Division at (323) 881-2404.

LAND DEVELOPMENT UNIT:

The Fire Prevention Division, Land Development Unit, has no additional comments regarding the Draft EIR for this project.

Should any questions arise regarding the above comment, please contact Juan Padilla of the Land Development Unit at (323) 890-4243 or Juan.Padilla@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

HEALTH HAZARDOUS MATERIALS DIVISION:

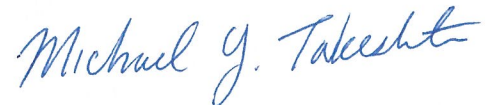
The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department is the Certified Unified Program Agency (CUPA) that issues permits to inspect commercial/industrial businesses that handle hazardous materials and/or generate hazardous waste. There are no CUPA permits issued for environmental site assessment or remediation oversight services. It is the HHMD Site Mitigation Unit (SMU) that oversees the assessment and cleanup of contaminated sites on a voluntary (cost recovery) basis after a property owner and/or responsible party (RP) has entered into a "Remedial Action Agreement" with SMU. The RP also has the option to pursue voluntary environmental oversight with the Cal-EPA Department of Toxic Substances Control or the Los Angeles Regional Water Quality Control Board. SMU oversight is typically not applicable for sites under current oversight by the Cal-EPA or other agencies.

If you have any questions regarding SMU voluntary environmental oversight, please email perla.garcia@fire.lacounty.gov. Please reference #FFER201700130 in your email.

If you have any additional questions, please contact this office at (323) 890-4330.

Peter Burgis, Analyst
November 27, 2017
Page 3

Very truly yours,

A handwritten signature in blue ink that reads "Michael Y. Takeshita". The signature is written in a cursive style with a large initial 'M' and a long, sweeping underline.

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

BOARD OF PUBLIC WORKS MEMBERS

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CHIEF OPERATING OFFICER

LISA B. MOWERY
CHIEF FINANCIAL OFFICER

ADEL H. HAGEKHALIL
ALEXANDER E. HELOU
MAS DOJIRI
ASSISTANT DIRECTORS

—
TIMEYIN DAFETA
HYPERION EXECUTIVE PLANT MANAGER

—
WASTEWATER ENGINEERING SERVICES DIVISION
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
FAX: (323) 342-6210
WWW.LACITYSAN.ORG

December 6, 2017

Mr. Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012

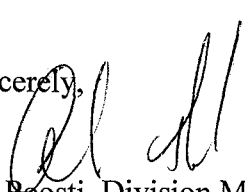
LACMA BUILDING FOR THE PERMANENT COLLECTION – NOTICE OF COMPLETION AND AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT

This is in response to your October 26, 2017 Notice of Completion and Availability of a Draft Environmental Impact Report for the proposed mixed- use project located at 5905 Wilshire Boulevard, Los Angeles, California 90036. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification.

Upon review of the most recent submission, it has been determined that no additional hydraulic analysis is necessary due to no changes in either the project description or the scope that affects the wastewater conveyance system. As such, the previous response dated August 29, 2016 is still valid. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

Sincerely,


Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation

CD/AP:ra

c: Kosta Kaporis, LASAN
Abdulsamad Danishwar, LASAN
Christopher DeMonbrun, LASAN

zero waste • one water

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

File Location: CEQA Review\FINAL CEQA Response LTRs\FINAL DRAFT\LACMA Building for the Permanent Collection –
NOC of a dEIR.doc

Recyclable and made from recycled waste





DEPARTMENT OF PUBLIC WORKS
BUREAU OF SANITATION
WASTEWATER ENGINEERING SERVICES DIVISION
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065

Mr. Peter Burgis
Capital Projects
County of L.A., Chief Executive Office
500 W. Temple Street room 754
LA, CA 90012

From: Jim [mailto:jamesos@aol.com]
Sent: Friday, December 15, 2017 1:43 PM
To: Peter Burgis; david.ryu@lacity.org; sarah.dusseault@lacity.org
Cc: julia.duncan@lacity.org; jamesos@aol.com
Subject: FIX THE CITY comment letter on LACMA DEIR

Dear Mr. Burgis

Please confirm receipt of this comment letter on the new LACMA Museum. I would appreciate someone from the Council office confirming also.

Thank You.

Jim

James O'Sullivan
213-840-0246 - Cell

December 15, 2017

Fix The City
James O'Sullivan
907 Masselin Avenue
Los Angeles, CA 90036
213-840-0246
Email: jamesos@aol.com

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012
Fax: (213) 626-7827
Via E-Mail: pburgis@ceo.lacounty.gov

**Re: SCH No. 2016081014, LACMA Building for the Permanent Collection
5905 Wilshire Blvd. LA CA 90036**

Dear Mr. Burgis

The community's concerns for this project are the same as they are for any large project seeking approvals within the Wilshire Community Plan, the Wilshire Scenic Corridor and the CDO. The EIR provides no substantial evidence of exemption from the General Plan of the City of Los Angeles. Fix the City's (FTC) concerns are noise, traffic, parking, infrastructure, and public services and substantial non-compliance with the General Plan Framework, Community Plan and CDO. Also of concern is that due process take place – that the people have a voice in a process that will have a huge impact on their neighborhood. Ordinance 159,748 and/or Ordinance 173,268:

“Planning Commission may approve a use permitted by the zoning of the lot if it finds that the proposed use at the proposed location will be proper in relation to adjacent uses, desirable to the public convenience or welfare and that the use and location will be consistent with the objectives of the various elements of the General Plan. In making a determination of consistency, the City Planning Commission shall consider whether the density, intensity, (*i.e.*, floor area), height and use of the proposed development are permitted by and compatible with the designated use, density, intensity, height (or range of uses, densities, intensities or heights) set forth for adjacent and surrounding properties on the land use map

of the applicable community or district plan and as those designations are further explained by any footnotes on the map and the text of the plan.”

The legal status of Museum Associates is as a developer/builder. No substantial evidence has been provided to prove that Museum Associates is exempt from the City General Plan because County funds support the project. The City Planning Commission may approve a use permitted by the zoning of the lot if it finds that the proposed use at the proposed location will be proper in relation to adjacent uses, desirable to the public convenience or welfare and that the use and location will be consistent with the objectives of the various elements of the General Plan. In making a determination of consistency, the City Planning Commission shall consider whether the density, intensity, (*i.e.*, floor area), height and use of the proposed development are permitted by and compatible with the designated use, density, intensity, height (or range of uses, densities, intensities or heights) set forth for adjacent and surrounding properties on the land use map of the applicable community or district plan and as those designations are further explained by any footnotes on the map and the text of the plan.

The Spaulding site includes R-zoned property which would require a zone change and General Plan Amendment. This would be inconsistent under Ordinance 159,748 and/or Ordinance 173,268.

However, at this point due process appears to be in severe jeopardy with the announcement by the County of Los Angeles (as the lead agency for the EIR) that the Los Angeles Municipal Code, the Los Angeles Framework Element, the Wilshire Community Plan and the Miracle Mile Community Design Overlay (CDO) will not be the standards that apply to the development of the new Museum. Further, the DEIR states that the Los Angeles County General Plan has no jurisdiction over the project because it is only for the unincorporated parts of LA County.

This means that a project that has the ability to forever change the face of the Miracle Mile will not fall under the same City rules and regulations that defined the Miracle Mile throughout the years.

However the County has supplied no substantive evidence demonstrating that the project is exempt from Los Angeles City regulations as reflected by the following statement on page 11-13 (DESCRIPTION) in the DEIR: *Museum Associates manages, operates and maintains the LACMA buildings under authority from the County. As such, development of the Museum Building within LACMA East and the Spaulding Lot is not subject to the City of Los Angeles zoning or building regulations (although City zoning information for these properties is provided below for informational purposes).*

We believe that all sites associated with this project fall under the jurisdiction of the City of Los Angeles, a Charter City. We believe this project must comply with the Framework Element and all other elements of the Los Angeles General plan, including the Wilshire Community Plan which represents the LAND USE component of the general plan in this area. The Wilshire Community Plan contains multiple policies that this project must be compatible with as well as with the Framework Element. Within the Wilshire Community plan is the Miracle Mile Community Design Overlay District (CDO) which this project must comply with.

Further, we would like to bring your attention to details noted in the approval of the proposed east campus replacement building project financing concept and funding for preliminary design and planning activities, approved by the Board of Supervisors on November 5, 2014. As noted in that document (EXHIBIT A), the lease/leaseback component that much of this EIR is premised upon is not operational at this time and would only be proposed to the Board of Supervisors following the Certification of the EIR.

“Pursuant to a proposed lease-leaseback agreement with the County, which would be recommended to the Board following certification of an Environmental Impact Report (EIR) for the proposed Project, Museum Associates would lease the east campus site from the County and contract directly for the further design and for construction of the proposed building and other proposed improvements. The completed improvements would be leased back to the County for the term of the underlying financing bonds. Upon full redemption of the bonds, title to the East Campus Replacement Building would revert to the County.”

Also that document concludes that the “actions contemplated herein only approve the recommended pre-implementation feasibility and planning activities. Any future recommendations on proposed development at the site remain subject to the board's sole discretion to disapprove or modify the proposed project and to consider feasible project mitigation and alternatives. Nothing precludes the county from denying any future development project proposed at the site or from weighing the benefits of the proposed project against any unavoidable environmental risks when determining in the future whether to approve a project at the site. We will return to the board for consideration of appropriate environmental findings and to recommend certification of an EIR if and when approval of activity, which constitutes a project under CEQA and/or other environmental laws is recommended.”

As such, the lease/leaseback provisions will not happen until the EIR is approved.

This course of action is extremely provocative and needlessly inserts controversy where none should exist. It proclaims that the land the new Museum will sit upon is sovereign and does not have to follow either County or City rules.

This contemplated process removes the motivation and ability of people of good will who may disagree with aspects of the project to come together to find common ground. It says that the rules do not matter, the people do not matter. We are already hearing people say that it's useless to comment because the County wants the museum and wealthy donors are lining up to make it happen. That the City appears to have abdicated its responsibility under its Charter, so why bother to express their concerns?

If this was the intent of the County and Museum Associates then the course of action is clear for all concerned. If it is not then this DEIR must be recirculated with the City of Los Angeles as the lead Agency.

There must also be a clear statement from the County that the project must comply with the LAMC, Framework Element, Wilshire Community plan and Miracle Mile CDO.

We believe it is always important to comment on each project in the Miracle Mile and will do so while believing it should be recirculated with the City of LA as the lead agency.

FOUR (4) NEW MUSEUM PARTS:

NORTH OF WILSHIRE BOULEVARD

5801-5905 Wilshire (APN) 5508016901 had its zone changed in 1996 to PF-1-D as a result of CPC 95-0148 GPC. As such, we believe it clearly falls under LAMC SEC. 12.04.09. "PF" PUBLIC FACILITIES ZONE.

The PF zone was a City of Los Angeles Planning Commission initiated change in order to approve General Plan / Zoning Consistency Program Plan amends & zone changes (Public Utilities, Open Space II & Clean Up) - Central City North, Hollywood, Silver Lake - Echo Park & Wilshire (Metro Cities).

The results can be found in Council File: 95-1904-S2 (EXHIBIT B) and ORDINANCE 171043 (EXHIBIT C). Prior to that time this property went through another change of

zoning as part of AB 283. So this parcel is steeped in the City of Los Angeles zoning history.

Also the DEIR states that the County of Los Angeles Department of Public Works, Building and Safety Division will be the go-to department for this parcel. That is strange given that a check of the LA County Building and Safety website shows that the jurisdiction for this parcel is the City of Los Angeles (EXHIBIT D). Also the City of Los Angeles Department of Building and Safety (LADBS) has been the agency providing permit approval and clearance for many years regarding this parcel (EXHIBIT E).

BRIDGE OVER WILSHIRE

That part of the new Museum bridging Wilshire needing entitlements and approvals.

The Wilshire Community Plan states that Wilshire Boulevard between La Brea and Fairfax is one of four Scenic Highway's described in the Wilshire Community plan.

The Plan Area includes four Designated Scenic Highways:

- 1.) Highland Avenue, north-south from Rosewood Avenue to Wilshire Boulevard
- 2.) Wilshire Boulevard, east-west from La Brea Avenue to Fairfax Avenue
- 3.) Burton Way, east-west from La Cienega Boulevard to Oakhurst Drive (City of Los Angeles boundary)
- 4.) San Vicente Boulevard, southeast-northwest from Pico Boulevard to La Cienega Boulevard.

Designated Scenic Highways merit special controls and/or visual enhancement programs in order to protect scenic resources. The land contiguous to a scenic highway is known as a Scenic Corridor. It is appropriate that protective land use controls be established for these corridors, particularly with respect to signage and billboards.

While this section of Wilshire Blvd does not have a "corridor plan" like other scenic highways, we have the Miracle Mile CDO (EXHIBIT G), which discusses the historic context of Wilshire Boulevard and took great pains to address it in various ways. The CDO Community Advisory Committee was careful not only to address building standards for the corridor but the relationship of buildings to Wilshire Boulevard.

LACMA was an integral part of that process and had a member on the Committee. It is unfortunate that they have either forgotten the stellar work they contributed to the process or for the sake of expediency have chosen to ignore it.

The staff report for the CDO stated the following:

The proposed ordinance would protect the community from potentially irreversible adverse impacts to commercial areas and the surrounding residential communities that have been the cause of numerous problems. For example, the elimination of primary entrances and windows along Wilshire Boulevard has led to a proliferation of graffiti in the Miracle Mile since few people pass by to discourage this type of activity and owners are unable to see what is happening just outside their buildings. The proposed [Q] conditions were written in concert with the Miracle Mile CDO Citizen Advisory Committee, which was formed specifically to develop design guidelines and standards for the Miracle Mile CDO. This advisory committee is comprised of residents, business and property owners, who were charged with making Wilshire Boulevard a more pleasant and attractive street.

These restrictions are also necessary to ensure the effectiveness of the proposed Miracle Mile CDO, which is intended to address urban design, land use compatibility, and quality of life issues. Based upon the above findings, the establishment of the proposed Miracle Mile Community Design Overlay District (CDO) boundaries, design guidelines and standards, and the adoption of the proposed zone changes with permanent [Q] conditions, are deemed consistent with public necessity, convenience, general welfare, and good zoning practice.

The Bridge across Wilshire is not consistent with the Miracle Mile CDO and should be replaced with either Alternative 2 or 4. If Alternative 2, then the building on Spaulding should contain office space and affordable/work force units.

We would also like to mention that it appears that the “bridge building” would require the removal of mature palm trees from the median. This would be an unnecessary loss for the community and neither Alternative 2 or 4 would require this loss.

SPAULDING LOT

The northern portion of the Spaulding Lot is zoned [Q]C4-2-CDO (Qualified Condition, Commercial, Height District 2, Community Design Overlay), and the smaller southern edge of the Spaulding Lot is zoned R3-1 (Multiple Dwelling zone, Height District 1) under the LAMC. The entire lot is clearly under the jurisdiction of the City of Los Angeles and must comply with (EXHIBIT F) the Wilshire Community Plan and the Miracle Mile CDO (EXHIBIT G).

Also see Ordinance 176,332 (EXHIBIT H), which describes the conditions associated with the permanent [Q] condition on the Spaulding lot. Of particular interest would be Site Planning and Architecture. This is in addition to the other requirements of the CDO.

Additionally, there is no mention that the CDO is a supplemental use district that must comply with LAMC Section 13.08.

While the DEIR makes the claim that the Spaulding lot is not subject to the Framework Element, Wilshire Community Plan and Miracle Mile CDO we disagree and reserve our right to challenge this assertion.

There is also the question of how the parcels (C4-2 and R3-1) will be combined. One map in the DEIR shows the entire lot depicted as Regional Center Commercial. It would seem in order to do that a general plan amendment would be required.

OGDEN LOT

It has been acknowledged that the Ogden lot falls under the Framework Element, Wilshire Community Plan and Miracle Mile CDO. That means it also must comply with LAMC Section 13.08.

The DEIR states that the Ogden Parking structure would be consistent with Goal 15 from the Wilshire Community plan. This parking structure is simply a replacement for the Spaulding lot and does nothing to provide for parking that will be necessary for a successful Museum. No code parking has been identified to replace Historical Parking for the Museum. See photo (EXHIBIT I) and minutes from 4/11/61 to provide parking and other site requirements (EXHIBIT J). These minutes are only one example of required parking mentioned in minutes throughout the years.

While there are no sketches that I can find in the DEIR of the Ogden Parking structure it does not seem to comply with the CDO. Please see below from the CDO:

B. Parking Structures

Guideline 2: Integrate a parking structure into the overall design of a development through compatible materials, color and architectural defining features.

Standard 2a: Parking should be located underground where possible.

Standard 2b: Parking structures should be compatible with the main building through a consistency in building material, color and design.

B. Building Continuity

Guideline 2: Maintain building openings that enhance building design and continuity, as well as the pedestrian experience.

Standard 2: Buildings should generally be designed to maintain a continuous street wall along the length of a block except to accommodate building articulation pursuant to Guideline 1.

Additional questions and comments:

- Please analyze the impacts of the project on the Wilshire Scenic Highway and disclose that the project is inconsistent with provisions of the Scenic Highway.
- Please analyze under Section IX Land Use of CEQA Appendix G, the impacts of the proposed project on policies and plans adopted to protect the adjacent community, including but not limited to the Scenic Corridor and the CDO.
- Please analyze significant land use conflicts using the City's CEQA Threshold Guide.
- What impact will the proposed project have on the operation and boundaries of the Page Museum?
- Please analyze the impacts of the proposed project on the General Plan Framework of Los Angeles, particularly the GPF's FEIR mitigations for Police and Fire including Policy 3.3.2. Provide substantial evidence the Police and Fire Resources are adequate and not threatened by providing response times within 90% of the time, using for Fire service the performance standard used by LAFD (NFPA 1710) and not average response time, which is not the metric used to determine the adequacy of response time.
- Please provide plotted elevations with sections showing the bridge/building crossing Wilshire. Please also provide Surveyed and Benchmarked drawings in elevation and sections for the entire length and width of the structure. Sidewalk to sidewalk.
- Please provide drawings or renderings showing the building crossing Wilshire. Views should be from Wilshire and Curson looking West, from Fairfax and Wilshire looking East, from 8th and Spaulding looking North in order for the public to and decision makers to properly judge the impact on the Wilshire Scenic Highway and also the Miracle Mile CDO.

- Please provide any and all documents from the County (minutes, letters, etc.) showing that required parking for the LACMA East campus was no longer required or needed.
- Please provide any and all documents that add to, expand or in any way change the December 9, 1958 and March 4, 1960 contracts between the County of Los Angeles and Museum Associates to regulate and control the management, operation and maintenance of the Los Angeles County Museum of Art.
- Is the applicant Museum Associates? If so, what legal authority exempts Museum Associates from the Los Angeles General Plan? The lines between Museum Associates and the County appear confusing and a shell game. Please clarify who the applicant is, not who is funding it or in the future possibly leasing it.
- The Spaulding Property is not owned by the County. To include this property into the Museum requires several undisclosed discretionary approvals: A Specific Plan Exception or Amendment for the CDO, a zone change for the residentially-zoned property south of Wilshire, a General Plan Amendment to permit additional height, and the bridge. Please also clarify whether there is FAR on the bridge and if it is included in the FAR total.

Sincerely:



James O'Sullivan

Vice President, Fix The City

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EXHIBIT J	Minutes regarding parking



WILLIAM T FUJIOKA
Chief Executive Officer

County of Los Angeles CHIEF EXECUTIVE OFFICE

Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
<http://ceo.lacounty.gov>

"To Enrich Lives Through Effective And Caring Service"

Board of Supervisors
GLORIA MOLINA
First District

MARK RIDLEY-THOMAS
Second District

ZEV YAROSLAVSKY
Third District

DON KNABE
Fourth District

MICHAEL D. ANTONOVICH
Fifth District

November 05, 2014

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

Dear Supervisors:

**MUSEUM OF ART:
PROPOSED EAST CAMPUS REPLACEMENT BUILDING PROJECT
APPROVAL OF FINANCING CONCEPT AND FUNDING FOR PRELIMINARY DESIGN AND
PLANNING ACTIVITIES
(SECOND AND THIRD DISTRICTS)
(3 VOTES)**

SUBJECT

Approval of the recommended action will find the majority of recommended actions not subject to the California Environmental Quality Act, find preliminary testing at the proposed Project site exempt from California Environmental Quality Act, and facilitate funding and planning of the proposed replacement of four aging and deteriorating County buildings on the east campus of the Los Angeles County Museum of Art.

IT IS RECOMMENDED THAT THE BOARD:

1. Find that approval of the funding concept of County bond financing and contributions from Museum Associates for the proposed East Campus Replacement Building Project, as well as authorization of an advance County contribution to Museum Associates for design, feasibility, and planning activities, do not constitute a project pursuant to Sections 15061(b) and 15378(b) of the California Environmental Quality Act Guidelines, and also find that preliminary site testing related to design and planning for the proposed East Campus Replacement Building Project is exempt under Sections 15262 and 15306 of the California Environmental Quality Act Guidelines.
2. Approve the concept of County bond financing and contributions from Museum Associates in the approximate aggregate amount of \$600,000,000 to build a proposed approximately 400,000 square-

foot museum building to replace four existing County-owned museum buildings on the east campus of the Los Angeles County Museum of Art (East Campus Replacement Building).

3. Authorize the issuance of \$7.5 million in commercial paper notes to provide funding to Museum Associates for feasibility and planning studies, including environmental studies and design activities on the proposed East Campus Replacement Building.

4. Delegate the authority to the Chief Executive Officer to execute a funding agreement with Museum Associates and to instruct the commercial paper trustee to transfer the \$7.5 million in commercial paper note proceeds to Museum Associates and provide for their repayment by Museum Associates.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Approval of the recommended actions related to the East Campus Replacement Building Project (Project) being proposed by Museum Associates will:

1. Find approval of the funding concept for the proposed Project, as well as authorization of an advance contribution to Museum Associates for design, feasibility, and planning activities, are not a project under the California Environmental Quality Act (CEQA);
2. Find the advance contribution of funds to Museum Associates for preliminary site testing for the proposed Project is statutorily and categorically exempt from CEQA;
3. Provide conceptual approval of a financing plan for the proposed replacement of four deteriorating County-owned buildings on the Los Angeles County Museum of Art's (LACMA) east campus; and
4. Authorize the issuance of commercial paper note proceeds for use by Museum Associates on feasibility and planning studies, including environmental studies and design activities for the proposed Project.

Existing Conditions

Three of the four buildings: the Ahmanson Building, Hammer Building, and Bing Center, were constructed in 1965. The fourth, the Art of the Americas Building, was completed in 1985. All four buildings are located on LACMA's east campus. According to a building evaluation study prepared by Owen Group for the Department of Public Works (Public Works) in September 2014, the buildings have experienced extensive water intrusion damage and are compromised by deteriorating and failing building and mechanical systems that have exceeded their expected useful life. The Owen Group's report estimated the cost of needed refurbishment at \$246 million and recommended replacement of the existing buildings.

Proposed East Campus Replacement Building

Museum Associates has proposed demolishing the four existing buildings and replacing them with the East Campus Replacement Building, a single, 400,000 square-foot, two-level horizontal elevated gallery that would cover much of LACMA's east campus and **span across Wilshire Boulevard**. The proposed Project cost is preliminarily estimated at \$600 million, based upon a conceptual design. The preliminary cost estimate reflects approximately \$240 million in development, design, and preconstruction costs, and \$360 million in construction costs. It is anticipated that construction would

commence in Fiscal Year 2019 and be completed in Fiscal Year 2023.

Pursuant to a proposed lease-leaseback agreement with the County, which would be recommended to the Board following certification of an Environmental Impact Report (EIR) for the proposed Project, Museum Associates would lease the east campus site from the County and contract directly for the further design and for construction of the proposed building and other proposed improvements. The completed improvements would be leased back to the County for the term of the underlying financing bonds. Upon full redemption of the bonds, title to the East Campus Replacement Building would revert to the County.

Financing Plan Concept

The conceptual financing plan combines \$475 million in private donations and a proposed County contribution of \$125 million. It is anticipated that approximately \$175 million in pledged donations would be collected within the next five years. The remaining \$300 million in pledged donations would be collected over the following 15 years.

To provide adequate and timely funding for the proposed Project during its eight year delivery schedule, including the County's contribution, it would be necessary for the County to issue \$425 million in leasehold revenue bonds through two separate bond issues. The first series of bonds (Phase I Bonds) would fund the County's contribution of \$125 million. The bonds would be issued following final approval of the proposed Project and certification of the EIR by the Board. The Phase I Bonds would have a final maturity of 15 years and be secured by a leasehold lien on the following Museum Associates and other assets:

- a. Broad Contemporary Art Museum
- b. Resnick Pavilion
- c. Additional specified land currently owned by Museum Associates
- d. Pavilion for Japanese Art (owned by the County)
- e. Pritzker Parking Garage
- f. Spaulding Parking Lot

The debt service on the Phase I Bonds would be repaid solely by the County and is currently estimated to average \$9.5 million per year, or \$142.9 million over the proposed 15-year term.

The second series of bonds (Phase II Bonds) would be issued by the County following the collection of \$175 million in private donations by Museum Associates and their restriction by Museum Associates for Project costs. The Phase II Bonds would provide funding for the final \$300 million in Project expenditures and have a final maturity of 30 years. The annual debt service of the Phase II Bonds, which is estimated at \$18 million, would be fully repaid by Museum Associates from private donations under a separate funding agreement with the County. The Phase II Bonds would be secured by a leasehold lien on the East Campus Replacement Building.

Museum Associates repayment obligation for the Phase II Bonds would be subordinate to Museum Associates' currently outstanding Series 2013 Bonds and a related 2008 interest rate swap agreement, as the same may be refinanced. To raise the Phase II Bond obligation, on a practical basis, to a parity level with that of the 2013 Bonds and the 2008 swap, Museum Associates would deposit the debt service payment on the Phase II Bonds due in any fiscal year with the bond trustee in June of the preceding fiscal year.

We will return to the Board with final recommendations for the financing plan and bond issuance at

such time as certification of an EIR and approval of a proposed Project is recommended.

Advance Funding Request

In order to allow Museum Associates to initiate environmental studies and design activities on the East Campus Replacement Building, authorization is requested to provide immediate financing in the amount of \$7.5 million. Upon approval by the Board, the \$7.5 million will be made available to Museum Associates through the issuance of commercial paper notes to be sold under the direction of the Treasurer and Tax Collector.

The notes will be issued by the Los Angeles County Capital Asset Leasing Corporation and secured by the County General Fund. The recommended Funding Agreement between the County and Museum Associates will provide instruction for the transfer of note proceeds to Museum Associates. All principal and interest payments due on the notes will be subject to reimbursement by Museum Associates through the recommended Funding Agreement, which will be negotiated by the Chief Executive Office (CEO) and Museum Associates. To the extent that the Board agrees to provide long-term bond financing for the construction of the proposed East Campus Replacement Building, the principal and interest due on the commercial paper notes will be redeemed from the proceeds of the Phase I Bonds.

It is important to emphasize that the requested funding advance will not increase the amount of the County's contribution under the Phase I Bonds. Museum Associates will deposit the commercial paper note proceeds into a separate project account and will provide monthly statements to the County detailing disbursements from and other activities in the account.

FISCAL IMPACT/FINANCING

The recommended actions commit the Board to provide \$7.5 million in commercial paper funding to initiate environmental studies and design activities for the proposed Project. Approval of the recommended actions will not commit the Board, however, to further financing obligations on behalf of Museum Associates or the proposed Project, at this time. The CEO and Treasurer Tax Collector will return to the Board with final financing recommendations for the proposed Project, including the Phase I and Phase II Bond issues, following the Board's approval of the proposed Project and certification of the Final EIR.

Under the proposed financing plan, the Phase I Bonds will provide \$125 million in project funds and will be secured by leasehold lien held by the County on the Museum Associates' and County assets specified above, which have a combined market value of \$176 million and an annual fair rental value of \$11.1 million. The County will be responsible for annual debt service payments currently estimated at approximately \$9.5 million over a 15-year term.

In order to allow Museum Associates to initiate environmental studies and design activities, advance funding of \$7.5 million is being recommended. The advance will be funded through the issuance of commercial paper and will be repaid by Museum Associates pursuant to a Funding Agreement that, upon the Board's delegation, will be finalized and executed by the CEO. The advance will represent a portion of the Phase I Bond allocation and will not increase the amount of the Phase I Bonds.

The Phase II Bonds will provide \$300 million in Project funds and will be secured by a leasehold lien held by the County on the completed East Campus Replacement Building, which will have a market value of approximately \$600 million. Museum Associates will be responsible for repayment of annual

debt service payments of approximately \$18 million over a 30-year term pursuant to a separate funding agreement with the County.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

Not Applicable.

ENVIRONMENTAL DOCUMENTATION

Approval of the recommended actions, including approval of the concept of County bond financing and contributions from Museum Associates for the proposed Project, as well as authorization of an advance contribution to Museum Associates for design, feasibility, and planning activities, is not a project under CEQA because it is an activity that is excluded from the definition of a project by Section 15378(b) of the State CEQA Guidelines. The proposed actions involve an administrative activity of government, which will not result in direct or indirect physical changes to the environment. Additionally, the proposed actions would create a conceptual government funding mechanism that does not involve any commitment to a specific project, which may result in a potentially significant physical impact on the environment.

Approval of preliminary site testing related to design and planning for the proposed Project is exempt from CEQA. The activities are statutorily exempt under Section 15262 of the State CEQA Guidelines because they include only feasibility and planning studies for possible future actions, which the Board has not approved, adopted, or funded for which environmental factors have been considered. Further, the activities are categorically exempt as they are within a class of projects determined not to have a significant effect on the environment and they meet criteria set forth in Section 15306 of the State CEQA Guidelines, as well as Class 6 of the County's Environmental Document Reporting Procedures and Guidelines, Appendix G. The activities involve basic data collection, research, and resource evaluation for information gathering purposes and as part of a study leading to an action, which the Board has not approved, adopted, or funded and which would not result in a serious or major disturbance to an environmental resource. Any site testing activities would not take place in a sensitive environment and there are no cumulative impacts, unusual circumstances, or other limiting factors that would make the exemption inapplicable based on the record of the proposed activities.

Upon the Board's approval of the recommended actions, CEO will file a Notice of Exemption with the Registrar-Recorder/County Clerk in accordance with Section 15062 of the State CEQA Guidelines.

The County, as lead agency for the proposed Project, will work with Museum Associates to commence the EIR process.

The actions contemplated herein only approve the recommended pre-implementation feasibility and planning activities. Any future recommendations on proposed development at the site remain subject to the Board's sole discretion to disapprove or modify the proposed Project and to consider feasible project mitigation and alternatives. Nothing precludes the County from denying any future development project proposed at the site or from weighing the benefits of the proposed project against any unavoidable environmental risks when determining in the future whether to approve a project at the site. We will return to the Board for consideration of appropriate environmental findings and to recommend certification of an EIR if and when approval of activity, which constitutes a project under CEQA and/or other environmental laws is recommended.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

Not Applicable.

CONCLUSION

Please return one adopted copy of this Board letter to the Chief Executive Office, Facilities and Asset Management Division; Museum of Art; Department of Public Works; County Counsel; and Treasurer and Tax Collector.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'WTF', followed by a large, stylized flourish that resembles a heart or a large 'M' shape, and then a horizontal line extending to the right.

WILLIAM T FUJIOKA
Chief Executive Officer

WTF:SHK
DJT:zu

c: Executive Office, Board of Supervisors
County Counsel
Museum of Art
Public Works
Treasurer Tax Collector

Council File: 95-1904-S2



Title

CPC 95-0148 GPC

ORDINANCE 171043

Subject

CPC 95-0148 GPC - Req Ccl approve General Plan / Zoning Consistency Program Plan amends & zone changes (Public Utilities, Open Space II & Clean Up) - Central City North, Hollywood, Silver Lake - Echo Park & Wilshire (Metro Cities)

Date Received / Introduced

10/16/1995

Last Changed Date

07/23/1996

Council District

1,4,5,9,10,13,14

Initiated by

Department of City Planning

File History

10-16-95 - For ref

10-18-95 - Ref to P&LUM Comt

10-19-95 - File to P&LUM Comt Clk per req

10-20-95 - File to CD's 1, 4, 5, 9, 10, 13 & 14 per P&LUM Comt Clk request

3-19-96 - File to P&LUM Comt Clk for rept

3-21-96 - Set for P&LUM Comt on 4-9-96

4-9-96 - P&LUM Comt Disposition - OK - Scheduled for Ccl on 4-17-96

4-17-96 - P&LUM Comt rept ADOPTED to ADOPT accompanying Resol as recommended by the Mayor, the City Planning Commission, the Director of Planning and General Plan Advisory Board, APPROVING the proposed Council initiated General Plan / Zoning Consistency Program Plan amendments (Public Facilities, Open Space II and Clean Up) for the Central City North, Hollywood, Silver Lake - Echo Park and Wilshire communities.

PRESENT AND ADOPT the accompanying Ords, approved by the Director of Planning:

A. Central City North Public Facilities Ord, including zone and height district changes.

B. Central City North Open Space and Clean Up Ord, including zone and height district changes.

C. Hollywood Public Facilities Ord, including zone and height district changes.

D. Hollywood Open Space and Clean Up Ord, including zone and height district changes.

E. Silver Lake - Echo Park Public Facilities Ord, including zone and height district changes.

F. Silver Lake Echo Park Open Space and Clean Up Ord, including zone and height district changes.

G. Wilshire Public Facilities Ord, including zone and height district changes.

H. Wilshire Open Space and Clean Up Ord, including zone and height district changes.

Said rezoning shall be subj to "D" Development Limitation as stated in report.

TRANSMIT a copy of this City Council action to the Periodic Plan Review Section to update the General Plan and appropriate maps - Neg Dec & Findings ADOPTED

4-23-96 - File to Mayor for signature

5-7-96 - File to P&LUM Comt Clk OK

5-9-96 - File in files

6-19-96 - For Ccl - Planning Dept - Correction Ord for Hollywood Community, Public Facilities and Open Space II - General Plan / Zoning Consistency Program

6-19-96 - File to Cal Clk per request

6-26-96 - Ord withheld - over one week to 7-3-96

7-3-96 - Ord & Findings ADOPTED correcting errors in zoning for various properties to correlate to the property ownership (OS and PF Zones for publicly owned open space and public facilities, and A1 Zone for privately owned open space).

7-9-96 - File to Mayor for signature

7-22-96 - File to P&LUM Comt Clk OK

7-23-96 - File in files

POSTED

ORDINANCE NO. 171043

An ordinance amending Section 12.04 of the Los Angeles
Municipal Code by amending the zoning map.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS
FOLLOWS:

Section 1. Section 12.04 of the Los Angeles Municipal Code
is hereby amended by changing the zones and zone boundaries shown
upon a portion of the zone map attached thereto and made a part of
Article 2, Chapter 1 of the Los Angeles Municipal Code, so that such
portion of the zoning map shall be as follows.

WILSHIRE PUBLIC FACILITIES ORDINANCE

TABLE I - ZONE AND HEIGHT DISTRICT CHANGES

SUB AREA	EXISTING ZONE	NEW ZONE	PROPERTY DESCRIPTIONS
10	R1-1-O	[Q]PF-1-XL-O	Lots 1-26, Block 11, Tract 6072; all as shown on Cadastral Map 141-B-173.
20	R3-1	[Q]PF-1-XL	Lots 28-33, Tract 6044; and, Lot 57 and Frac. Lots 56 and 61, I.A. Weid's Subdivision of the S.E. 1/4 Sec 14. T1S. R14W.S.B.M.; all as shown on Cadastral Map 141-B-189.
30	R3-1	[Q]PF-1-XL	Lots 43-51, Tract 3125; all as shown on Cadastral Maps 138-B-197 and 141-B-197.
40	R3-1	[Q]PF-1-XL	Lot A, Tract 8734; all as shown on Cadastral Maps 138-B-197 and 141-B-197.
50	Various	PF-1-XL	S'yly of Melrose Ave. and W'yly of Hoover St., Hollywood Freeway Rte 101; all as shown on Cadastral Maps 139.5-A-201, 141-A-201 and 141-B-197.
60	R3-1	[Q]PF-1-XL	Lots 4-8, Block E, Dayton Heights Tract; all as shown on Cadastral Map 141-B-197.
70	R3-1	[Q]PF-1-XL	Lots 4-21, Block D, Dayton Heights Tract; all as shown on Cadastral Map 141-B-197.

1				
2	80	R3-1	PF-1-XL	Lots 4-19, Block A, Dayton Heights Tract; all as
3				shown on Cadastral Maps 141-A-201 and 142.5-A-
4				201.
5				
6	90	RD1.5-1-O	PF-1-XL-O	That portion of Part of Lot 12 (C E 122-120 and C E
7				174-104), Tract 215, lying N'ly of Colgate Ave. and
8				bounded by Fairfax Ave. on the west and Ogden Dr.
9				on the east; all as shown on Cadastral Maps 135-B-
10				177 and 138-B-177.
11				
12	95	RD6-1-O	PF-1-XL-O	That portion of Rancho La Brea, PAT 1-289/290,
13				lying 410' S'ly of Beverly Blvd., and E'ly 345' of the
14				Former City Boundary Line (ORD 88656); all as
15				shown on Cadastral Map 138-B-177.
16				
17	100	R1-1-O	[Q]PF-1-XL-O	Lots 410-416, Tract 7372; all as shown on Cadastral
18				Map 138-B-177.
19				
20	110	C2-1-VL	PF-1-XL	Lots 9-12 and Frac. Lots 13-15, Tract 5207; all as
21				shown on Cadastral Map 135-B-181.
22				
23	120	RE11-1	[Q]PF-1-XL	That portion of Part of Lots 8-9, Tract 215, lying
24				N'ly of 3rd St., S'ly of 2nd St., E'ly of June St., and
25				W'ly of Las Palmas Ave.; all as shown on Cadastral
26				Maps 135-B-185 and 138-B-185.
27				
28	130	R3-1	[Q]PF-1-XL	Lots 13-15, and the S'ly 12' of Lot 16, Western

1				Place Tract; all as shown on Cadastral Maps 135-B-
2				193 and 138-B-193.
3				
4	140	R3-1	[Q]PF-1-XL	Lots 97, 119, and Lot 96, excluding the S'yly 2'
5				thereof, Norwood Terrace Extension Tract; and, Lots
6				1-3, Amended Map of Part of Block 3, and all of
7				Block 4 Normandie Square Tract; all as shown on
8				Cadastral Maps 135-B-193 and 138-B-193.
9				
10	150	C2-1	PF-1-XL	Lot 1, Tract 23716; all as shown on Cadastral Map
11				138-B-197.
12				
13	160	R1-1	[Q]PF-1-XL	Lots 1-6, Frac. Lots 22-28, Tract 722; all as shown
14				on Cadastral Map 136.5-A-201.
15				
16	170	R1-1	[Q]PF-1-XL	Lot B, Tract 5542; all as shown on Cadastral Map
17				132-B-173.
18				
19	180	RE15-1	PF-1-D	Refer to Wilshire Map.
20				
21	190	RE15-1	[Q]PF-1-XL	Frac. Lot 14, and that portion of Part Lot 15, Tract
22				215, lying W'yly of and adjacent to Lot 131, Tract
23				6388; all as shown on Cadastral Map 135-B-185.
24				
25	200	R1-1	[Q]PF-1-XL	Parcel A, P.M. 3330; all as shown on Cadastral Map
26				132-B-181.
27				
28	210	R2-1-O	PF-1-XL-O	Lot A, Tract 6467; all as shown on Cadastral Map

1				132-B-185.
2				
3	220	R1-1	[Q]PF-1-XL	Lots 46-55, and Frac. Lots 56-66, West Seventh
4				Street Tract; all as shown on Cadastral Map 132-B-
5				189.
6				
7	230	R3-1; C2-1	PF-1-XL	Lots 5-13, that portion lying W'ly 28.4' of S'ly ½ of
8				Lot 2, that portion lying W'ly 28.4' of Lot 3, and
9				that portion lying W'ly 31.4' of N'ly ½ and W'ly
10				38.4' of S'ly ½ of Lot 4, Block 13, Electric Railway
11				Homestead Association; Lots 1-11 and the S'ly ½ of
12				Lot 12, Block A; and, Lots 2-13, 18-23, and the S'ly
13				14' of Lot 17, Block B, Pellissier Tract; all as shown
14				on Cadastral Maps 129-B-193 and 132-B-193.
15				
16	240	R4-1	PF-1-XL	Lots 1-9, Harrington Tract; Frac. Lot 4, Holst Tract;
17				and, Lots 2-12, and Frac. Lot 1, Stassforth Tract; all
18				as shown on Cadastral Map 132-A-201.
19				
20	250	R4-1	[Q]PF-1-XL	Lot 1, Tract 23866; Lots 14-26, Electric Railway
21				Homestead Association; all as shown on Cadastral
22				Map 129-B-197.
23				
24	260	R1-1-O	[Q]PF-1-XL-O	Refer to Wilshire Map.
25				
26	270	R1-1	[Q]PF-1-XL	Lot 1, Tract 25508; all as shown on Cadastral Maps
27				126-B-173 and 129-B-173.
28				

1 WILSHIRE PUBLIC FACILITIES ORDINANCE

2 TABLE FOR SECTION II

3 SUB AREA NO.	4 NEW ZONE	5 CONDITIONS AND LIMITATIONS
6		Q CONDITIONS :
7 10	[Q]PF-1-XL-O	1. Uses shall be limited to those specified in Section 12.04.09 B 1, 3, 5, 6, 8, 9 and 10 of the Los Angeles Municipal Code. 2. No new building or structure shall be constructed within 5 feet of a lot zoned A or R, or have a front yard setback less than that which is required in the most restrictive zone of the lot(s) adjoining on either side of the subject property. No front yard is required if there is no adjoining lot.
8 20	[Q]PF-1-XL	
9 30	[Q]PF-1-XL	
10 40	[Q]PF-1-XL	
11 60	[Q]PF-1-XL	
12 70	[Q]PF-1-XL	
13 130	[Q]PF-1-XL	
14 140	[Q]PF-1-XL	
15 160	[Q]PF-1-XL	
16 250	[Q]PF-1-XL	
17 260	[Q]PF-1-XL-O	1. Uses shall be limited to those specified in Section 12.04.09 B 1, 5, 8, 9 and 10 of the Los Angeles Municipal Code. 2. No new building or structure shall be constructed within 5 feet of a lot zoned A or R, or have a front yard setback less than that which is required in the most restrictive zone of the lot(s) adjoining on either side of the subject property. No front yard is required if there is no adjoining lot.
18 280	[Q]PF-1-XL-O	
19 310	[Q]PF-1-XL-O	
20 100	[Q]PF-1-XL-O	
21 120	[Q]PF-1-XL	
22 170	[Q]PF-1-XL	
23 190	[Q]PF-1-XL	
24 200	[Q]PF-1-XL	
25 220	[Q]PF-1-XL	The subject property shall be subject to all conditions imposed under City Plan Case No. 23144.
26 270	[Q]PF-1-XL	
27 300	[Q]PF-1-XL-O	
28		

1	280	RD2-1-O	[Q]PF-1-XL-O	Lot 1, Tract 27868; all as shown on Cadastral Map
2				129-B-177.
3				
4	290	R3-1-O	PF-1-XL-O	Frac. Lots 654-659, Tract 4604; all as shown on
5				Cadastral Map 129-B-181.
6				
7	300	C2-1-O; R4-1-O	[Q]PF-1-XL-O	Lot 1, Tract 2140; Lots 5-7 and Frac. Lots 8-12,
8				Tract 1740; and, that Sw'ly portion of Francisca
9				Abila Wife of Theodore Rimpau 5.35 Arces, Rancho
10				La Cienega, lying N'ly of Venice Blvd.; all as shown
11				on Cadastral Map 129-B-181.
12				
13	310	R1-1-O; RD1.5-O	[Q]PF-1-XL-O	Lot 6, excluding the SE'ly 1', Tract 7001 ; Lot 27
14				and Frac. Lot 28, Subdivision of The Brook-Dale
15				Tract; Lots 22-24, Tract 3460; and, Lots 1-2, Tract
16				21358; all as shown on Cadastral Map 129-B-185.
17				
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1 Section 2. Pursuant to Section 12.32 K of the Los Angeles
2 Municipal Code, and any amendment thereto, the following limitations are
3 hereby imposed upon the use of that property as shown in Section 1
4 hereof which is subject to the Permanent [Q] Qualified classification.
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WILSHIRE PUBLIC FACILITIES ORDINANCE

TABLE FOR SECTION III

SUB AREA NO.	NEW ZONE AND/OR HEIGHT DISTRICT	D LIMITATIONS
180	PF-1-D	Development shall be limited to a Floor Area Ratio (FAR) of 1.5:1.



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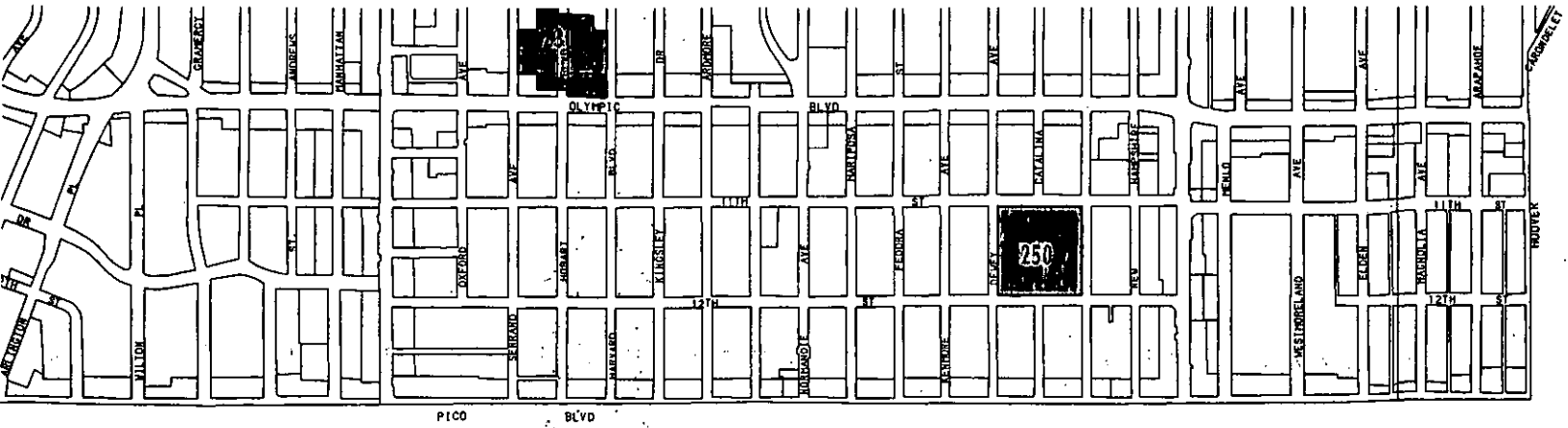
290

200

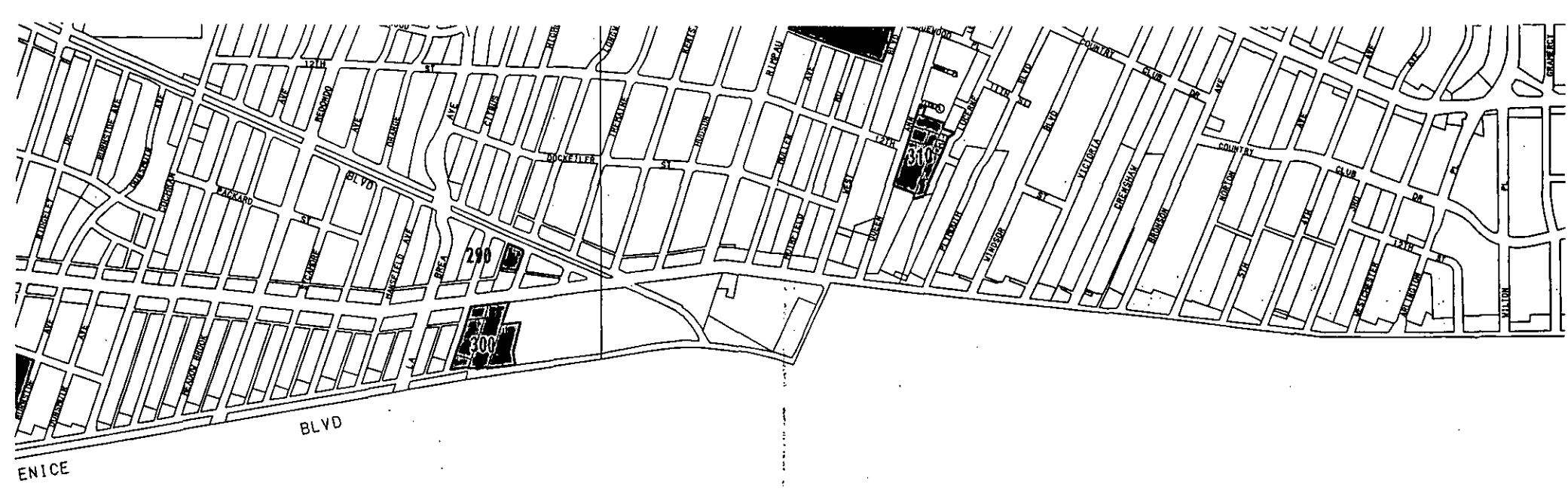
WILSHIRE BLVD

OLYMPIC BLVD

Map labels include: 110, 120, 130, 190, 210, 290, 200, WILSHIRE BLVD, OLYMPIC BLVD, and numerous street names such as BROADWAY, MADISON AVE, PEARSON AVE, and others.

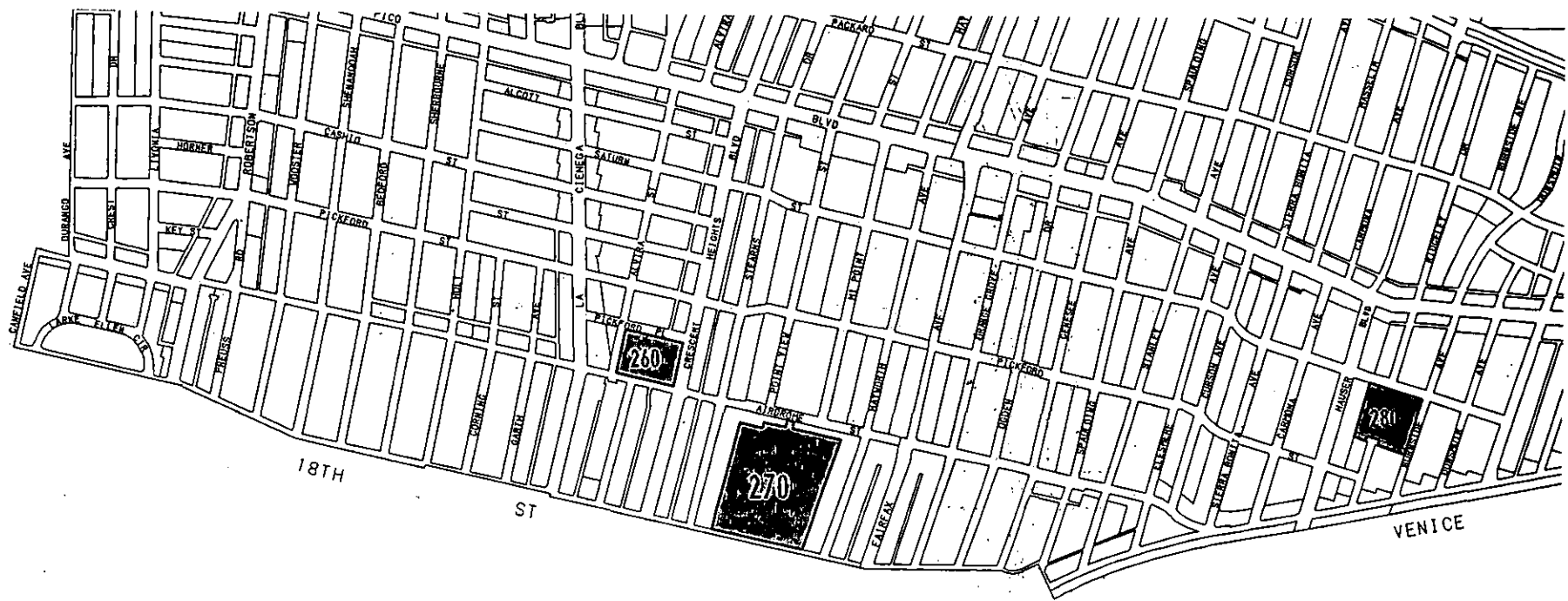


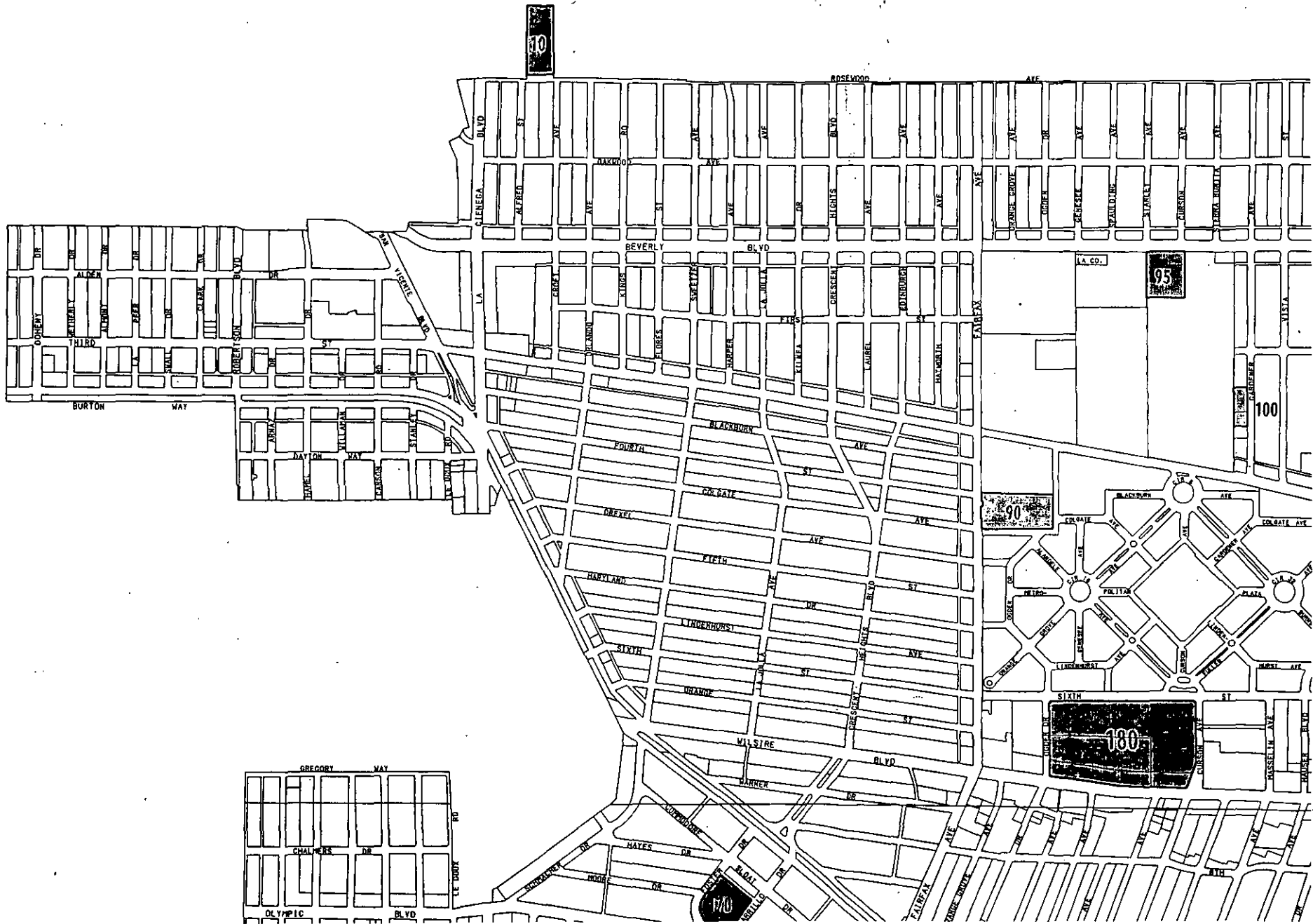
Department of City Planning
Con Howe, Director
Geographic Unit II



1 inch = 500 feet

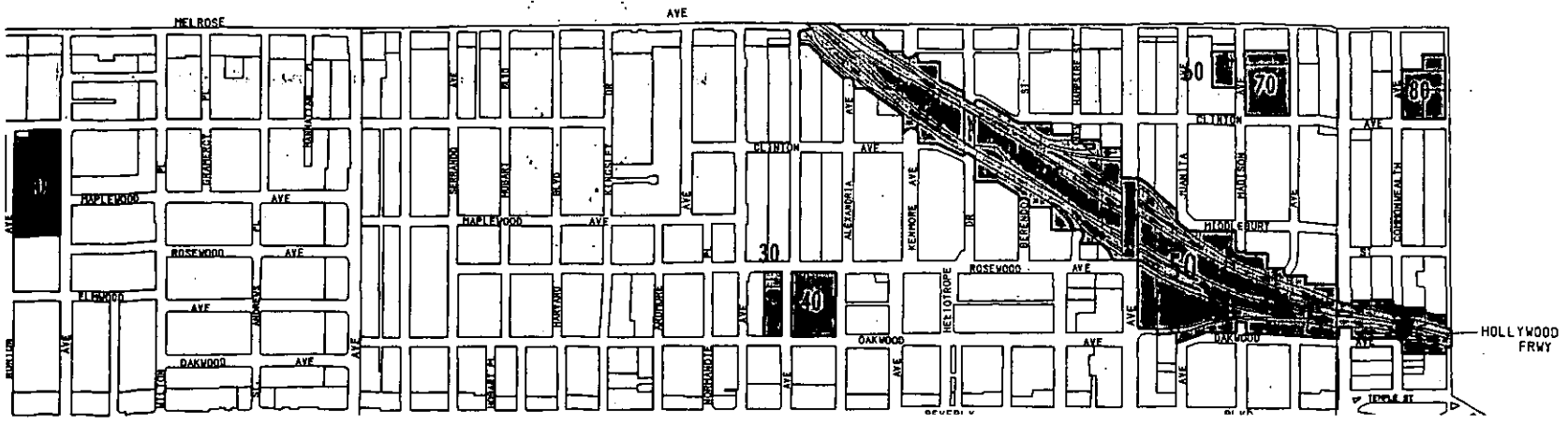






CHANGES FOR SHADED AREAS

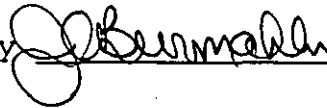
■ PUBLIC FACILITIES CHANGES



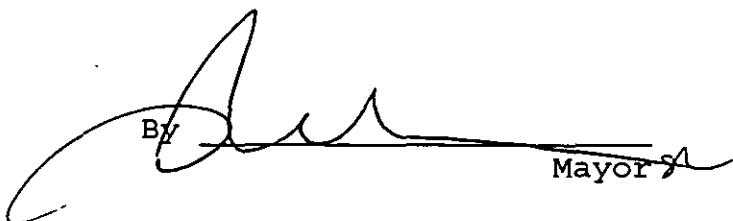
Sec. 3. The City Clerk shall certify to the passage of this ordinance and cause the same to be published by posting for ten days in three public places in the City of Los Angeles, to wit: one copy on the bulletin board located at the Main Street entrance to the City Hall of the City of Los Angeles; one copy on the bulletin board located on the ground level at the Los Angeles Street entrance to the Los Angeles Police Department in said City; and one copy on the bulletin board located at the Temple Street entrance to the Hall of Records in said City.

I hereby certify that the foregoing ordinance was passed by the Council of the City of Los Angeles, at its meeting of APR 17 1996.

ELIAS MARTINEZ, City Clerk

By  Deputy

Approved APR 30 1996

By  Mayor

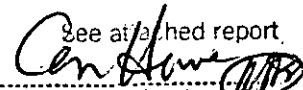
Approved as to form and legality:

JAMES K. HAHN, City Attorney

Pursuant to Sec. 97.8 of the City Charter, approval of this ordinance recommended for the City Planning Commission.

APR 11 1996

By _____

See attached report.

Director of Planning

File No. 95-1904-52

DECLARATION OF POSTING ORDINANCE

I, MARIA C. RICO, state as follows: I am, and was at all times hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and a Deputy City Clerk of the City of Los Angeles, California.

Ordinance No. 171043, entitled: Wilshire Public Facilities, including zone & height district changes a copy of which is hereto attached, was finally adopted by the Council of the City of Los Angeles on April 17, 1996, & under direction of said Council & said City Clerk, pursuant to Section 31 of the Charter of the City of Los Angeles, on May 2, 1996 I posted a true copy of said ordinance at each of three public places located in the City of Los Angeles, California, as follows: one copy on the bulletin board at the Main Street entrance to City Hall of said City, one copy on the bulletin board on the ground level at the Los Angeles Street entrance to the Los Angeles Police Department in said City, & one copy on the bulletin board at the Temple Street entrance to the Hall of Records of the County of Los Angeles in said City.

The copies of said ordinance posted as aforesaid were kept posted continuously & conspicuously for ten days, or more, beginning 5-2-96 to and including 6-11-96.

I declare under penalty of perjury that the foregoing is true & correct.

Signed this 2nd day of May 1996 at Los Angeles, California.



Deputy City Clerk

Effective Date: June 11, 1996

C.F. 95-1904-S2



BSD Home BPV
Application
number/apn/ain

[Download Permit Data](#)

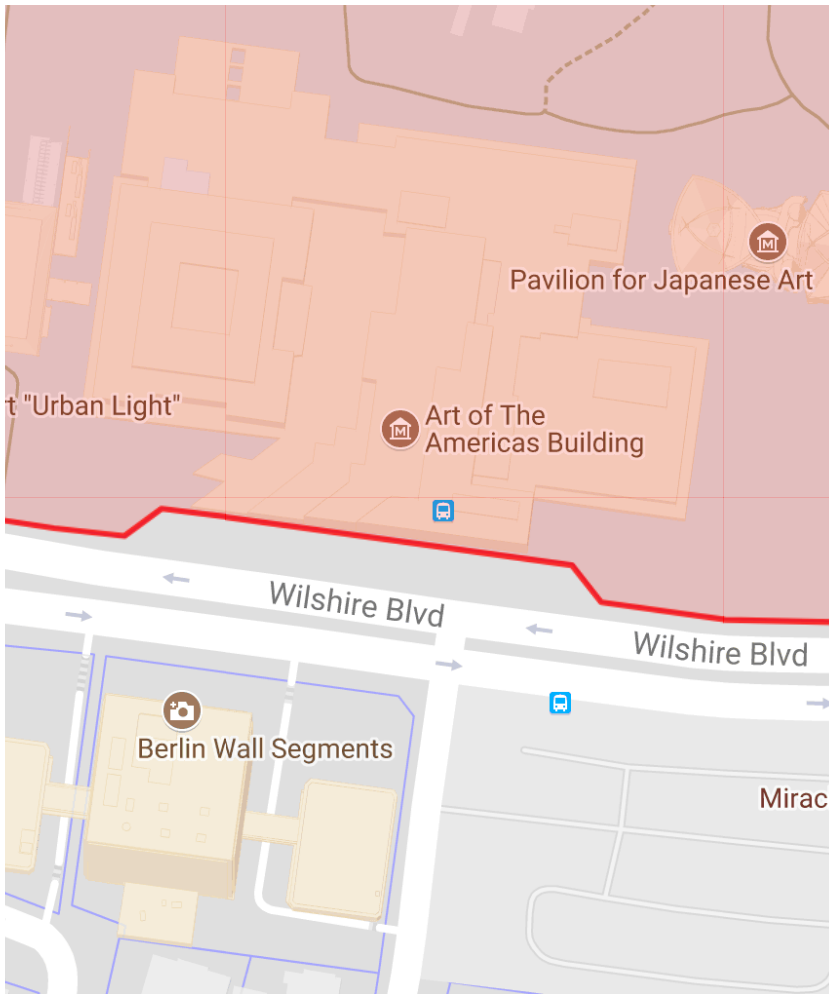
5905 Wilshire Blvd , Los Angeles

Search



Enter address, intersection(street @ street), parcel

Parcel Info Permits + Documents Report a Violation



Google

20 m Map data ©2017 Google

Parcel Info Engineering Info Civic Info

AIN 5508016901

Site Address 5905 WILSHIRE BLVD , LOS ANGELES CA 90036

Last Sale Date

Year Built 0

Land Value \$0

Improvement Value \$0

Square Feet 0

Jurisdiction LOS ANGELES

BSD Rehab

Road Maintenance District N/A





The following information was found based the given Parcel Identification Number (PIN). Expand the sections and select the specific information for further detail.

135B177-424

Parcel Profile Report:

1

Permit Information found:

30

Expand Closed 6000 W 6TH ST 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
05010-10013-06103	B07LA05456	Bldg- Alter/Repair	Permit Finaled 7/30/2008	SUPPLEMENTAL TO 05010-10000-06103 STOREFRONT FOR SUBTERRANEAN PARKING LEVELS ***building under construction***
05010-10018-06103	B07LA08542	Bldg- Alter/Repair	Permit Finaled 6/10/2008	SUPPLEMENTAL TO PERMIT #05010-10000-06103. PROJECT CURRENTLY UNDER CONSTRUCTION. Installation of light posts and exhibits, gallery partitions and curved sculpture walls exhibits ("Band" & "Sequence"). ***see comments***
05010-10012-06103	B07LA03881	Bldg- Alter/Repair	Permit Finaled 1/28/2008	SUPPLEMENTAL TO PERMIT #05010-10000-06103. PROJECT CURRENTLY UNDER CONSTRUCTION. Installation of solar panels and support structure on a new museum entry building
05010-10021-06103	X07LA24748	Bldg- Alter/Repair	Permit Finaled 1/24/2008	SUPPL. PERMIT TO PERMIT #05010-10000-06103 THROUGH #05010-100020-06103 FOR CHANGE OF ADDRESS FROM 6001 W. WILSHIRE BLVD. MUSEUM ENTRY HALL TO 5905 W. WILSHIRE BLVD. (NO CHANGE IN LEGAL DESCRIPTION)

05010-10019-06103	B07LA10165	Bldg- Alter/Repair	Permit Finaled 1/28/2008	steel stairs #1 AND #2 for NEW MUSEUM BUILDING AND ENTRY HALL
05010-10003-06103	B06LA07923	Bldg- Alter/Repair	Permit Finaled 2/6/2008	Change the Entry Hall building into an open, covered, unenclosed structure with new moment frame system; revise parking and plumbing fixtur count; misc. structural change; new structural details for light pole structures.
05010-10002-06103	B06LA07456	Bldg- Alter/Repair	Permit Finaled 1/24/2008	Supplemental to 05010- 10000-06103: revise stairway locations at subterranean parking levels structural revisions, revise parking count.
05010-10020-06103	B07LA11144	Bldg- Alter/Repair	Permit Finaled 1/28/2008	phase III: steel pedestrian walkway cover and spider stairway canopy for NEW MUSEUM BUILDING AND ENTRY HALL WITH 2 LEVELS OF SUBTERRANEAN PARKING STRUCTURE. ***bldg. under construction***
05010-10006-06103	B06LA09998	Bldg- Alter/Repair	Permit Finaled 1/29/2008	Supplemental to 05010- 10000-06103: Vertical Glazing and Exterior Walls for BCAM Gallery.
05010-10004-06103	B06LA09586	Bldg- Alter/Repair	Permit Finaled 1/29/2008	Supplemental to 05010- 10000-06103: BCAM Stone Panel Exterior Cladding.
05010-10005-06103	B06LA09587	Bldg- Alter/Repair	Permit Finaled 1/24/2008	Supplemental to 05010- 10000-06103: GLASS SKYLIGHT CEILING on the East and West Galleries. **project is under construction***
05010-10014-06103	B07LA06514	Bldg- Alter/Repair	Permit Finaled 1/29/2008	SUPPLEMENTAL PERMIT TO 05010-10000-06103: GLAZING FOR ELEVATOR FACADE, GROUND FLOOR, P1 & P2.
05010-10017-06103	B07LA08327	Bldg- Alter/Repair	Permit Finaled 1/25/2008	STRUCTURAL SYSTEM TO SUPPORT THE CEILING IN THE ENTRY HALL. ***BUILDING UNDER CONSTRUCTION*** ORIG PERMIT READS: NEW MUSEUM BUILDING AND ENTRY HALL WITH 2 LEVELS OF SUBTERRANEAN PARKING STRUCTURE.
05010-10016-06103	B07LA07146	Bldg-	Permit	SUPPLEMENTAL TO 05010-

		Alter/Repair	Finald 1/28/2008	10000-06103. ELVATOR LOBBY GLAZING FOR 1ST, 2ND AND 3RD FLOORS.
05010-10007-06103	B06LA12454	Bldg- Alter/Repair	Permit Finald 1/24/2008	Supplemental to 05010- 10000-06103: Post tensioning shop drawings for new LACMA museum. ***project under construction***
05010-10008-06103	B06LA13562	Bldg- Alter/Repair	Permit Finald 1/24/2008	CONSTRUCT PRECAST TREADS AND LANDINGS PER ENGINEERS DESIGN FOR EXTERIOR STAIRS FOR NEW MUSEUM UNDER PERMIT 05010-10000-06103
05010-10022-06103	X11LA04632	Bldg- Alter/Repair	Permit Expired 4/22/2013	***No Fee Department Error*** Supplemental permit to correct the USE CODE: Change designation from "Museum for Profit" to "Museum for Non-profit". All prior work description to remain as is: NEW MUSEUM BUILDING AND ENTRY HALL WITH 2 LEVELS OF SUBTERRANEAN PARKING STRUCTURE.
05010-10010-06103	B06LA13567	Bldg- Alter/Repair	Permit Finald 1/29/2008	Construct guard rails/hand rails for exterior stairs. Project is currently under construction.
05010-10011-06103	B07LA00200	Bldg- Alter/Repair	Permit Finald 1/25/2008	Supplemental permit for 60 tall SCRM Structure mounted to the face of the NEW MUSEUM BUILDING . ****This is NOT a sign permit****
05010-10015-06103	B07LA06515	Bldg- Alter/Repair	Permit Finald 1/25/2008	SUPPLEMENTAL PERMIT TO 05010-10000-06103: SOUTH SIDE OF BUILDING 2ND AND 3RD FLOORS. REPLACE EXISTING PLASTER AND EXTERIOR INSULATION WITH GLAZING.
07014-10000-00459	B07LA00683	Bldg- Alter/Repair	Permit Finald 7/18/2008	supplemental permit to 05010-10000-06103: Construct aluminum roof panels. **** project under construction.****
07016-10000-10192	B07LA05454	Bldg- Alter/Repair	Application Submittal 6/1/2007	No work description available
05010-10009-06103	B06LA13563	Bldg-New	Application Submittal 12/21/2006	CONSTRUCT GUARDRAILS / HANDRAILS FOR EXTERIOR STAIRS PER ENGINEERS DESIGN FOR EXTERIOR STAIRS FOR NEW MUSEUM

				UNDER PERMIT 05010-10000-06103
05010-10000-06103	B05LA16001	Bldg-New	Issued 5/26/2006	NEW MUSEUM BUILDING AND ENTRY HALL WITH 2 LEVELS OF SUBTERRANEAN PARKING STRUCTURE.
05010-10001-06103	B06LA00296	Bldg-New	Permit Finaled 7/14/2009	FOUNDATION ONLY: NEW MUSEUM BUILDING, ENTRY HALL, RETAIL & RESTAURANT AND SUBTERRANEAN PARKING STRUCTURE. (see permit 05010-10000-06103)
06041-10001-05749	E07LA02440	Electrical	Application Withdrawn 6/12/2008	Methane wiring plans. Addition to previously approved plans, new methane detection panel and devices in new offices area.
06041-10000-01064	E06LA00078	Electrical	Permit Finaled 3/7/2008	ELECTRICAL WORK FOR UNDERGROUND PARKING GARAGE FOR NEW LACMA MUSEUM BLDG. FILED VARIANCE TO SEPARATE FIRE ALARM AND SEISMIC CALCULATIONS.
06041-10000-05749	E06LA00410	Electrical	Application Withdrawn 6/12/2008	Methane wiring plans, Subtrain. parking structure and BCAM basement. The address was copied from 05010-10001-06103 permit
06041-10001-01064	E07LA01095	Electrical	Permit Finaled 6/18/2008	CHANGES MADE TO PREVIOUS APPROVED SET; 3000A SERVICE ADDED FOR FUTURE MUSEUM ON UPPER LEVEL, FEEDERS & PANEL ADJUSTED. ** PARKING STRUCTURE**
07046-10001-00262	X07LA16775	Elevator	Permit Finaled 1/22/2008	SUPPLEMENTAL TO PERMIT # 07046-10000-00262 TO CHANGE THE ADDRESS FROM 5905 W WILSHIRE BLVD TO 6000 W 6TH ST.
06043-10000-03522	M06LA03625	Fire Sprinkler	Permit Finaled 3/11/2008	Sprinkler System for new two level below grade parking structure.
07043-10001-00671	X07LA10801	Fire Sprinkler	Permit Finaled 3/11/2008	Change of contractor. Departmental Error.
07043-10000-00671	M07LA00847	Fire Sprinkler	Permit Finaled 3/11/2008	Plan check and permit for underground of parking structure.
09043-10000-01824	M09LA02586	Fire Sprinkler	Permit Finaled 12/8/2009	MODIFY P1 LEVEL (SYSTEM 1 & 2) FIRE SPRINKLER LINES & HEDAS TO ACCOMODATE

				OBSTRUCTIONS FROM NEW CHILLED WATER LINES. ADD & RELOCATED TOTAL 147 HEADS.
06042-10000-22205	M06LA03583	Plumbing	PC Approved 10/4/2006	RECHECK APPROVED PLAN WITH REVISIONS AND CHECK SITE PLANS FOR INSTALLATION OF STORM WATER FILTRATION UNITS.
06042-10000-16266	X06LA13336	Plumbing	Permit Finaled 11/13/2007	DRY SEWER ONLY. ENG # TO COME. PER INSPECTOR ITO.
06042-10000-22848	M06LA03679	Plumbing	PC Approved 10/6/2006	RECHECK APPROVED PLAN FOR REVISIONS.

Expand Closed 6000 W 6TH ST PARKING 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
06042-10000-01081	M06LA00156	Plumbing	Permit Finaled 2/28/2008	INSTALL STORM DRAINS, SUMP PUMPS, AND SEWAGE EJECTOR SYSTEMS IN THE NEW PARKING STRUCTURE OF LA COUNTY MUSEUM OF ART, PARKING
07042-10000-25561	M07LA04697	Plumbing	PC Info Complete 12/10/2007	INSTALL SUMP PUMP SYSTEM IN THE OPEN STAIR WELL OF THE PARKING STRUCTURE IN THE LOS ANGELES COUNTY MUSEUM.

Expand Closed 5801 W WILSHIRE BLVD 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
98041-20000-06184	--	Electrical	Permit Closed 2/20/1999	"BARNEY FOOTPRINT" 4-8-98
02041-20000-22086	--	Electrical	Permit Expired 11/14/2002	PAGE MUSEUM - 10-5-02
08041-10000-17872	X08LA13758	Electrical	Permit Expired 12/13/2011	TEMPORARY GENERATOR FOR SPECIAL EVENT ON 8/8/08. READY FOR INSPECTION @ 1PM. SITE CONTACT: MARCEL JOHNSON 323)864-3283
09041-10000-17516	X09LA15006	Electrical	Permit Closed 1/27/2010	TEMPORARY POWER FOR STAGE AND VENDORS BOOTH

10041-10000-17524	X10LA14057	Electrical	Permit Finaled 9/16/2010	INSTALLATION OF (3) TEMP. GENERATORS FOR SPECIAL EVENT. (SEPT. 12, 2010)
11041-40000-18922	X11SP02537	Electrical	Permit Closed 9/12/2011	TEMPORARY GENERATOR FOR BRAZILIAN DAY. INSPECTION FOR 9/9/11, CONTACT EVAN CRAWFORD @ (310) 292-0974.
12041-90000-22566	--	Electrical	Permit Closed 9/24/2012	Temp. portable power for special event on 9/22. Customer is Launch Productions. Contact is James 323-899-1363. READY FOR INSPECTION 11:15 TO 12:30.
12041-40000-20991	X12SP02360	Electrical	Permit Closed 9/11/2012	TEMP POWER FOR SPECIAL EVENT, 9/07/2012-9/08/2012
13041-40000-23921	X13SP02595	Electrical	Permit Closed 9/9/2013	TEMPORARY POWER FOR SPECIAL EVENT
13041-90000-26101	--	Electrical	Permit Closed 9/23/2013	temp. portable power for special event on 9/21. customer is Launch Prod.
14041-30000-25713	X14WL04865	Electrical	Permit Closed 6/2/2015	1 TEMP GENERATOR
14041-10000-16564	X14LA11186	Electrical	Permit Closed 6/23/2014	TEMPORARY GENERATOR AND POWER DISTRIBUTION FOR SPECIAL EVENT AT THE PAGE MUSEUM 6/20/14-6/21/14. READY FOR INSPECTION 6/20 AFTERNOON. SITE CONTACT OZ JONES (323) 228-9662.
16041-10000-19093	X16LA08942	Electrical	Permit Closed 6/6/2016	TEMP. GENERATOR & POWER DISTRIBUTION FOR SPECIAL EVENT AT LA BREA TAR PITS 6/3/16-6/4/16. READY FOR INSPECTION 6/3 AFTERNOON SITE CONTACT IS JOSE CASTILLO, 562-618-6729
08042-90000-11528	--	Plumbing	Permit Expired 11/22/2011	Replace urinals

Expand Closed 5801 W WILSHIRE BLVD TEMP 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
08041-20000-17252	X08VN12087	Electrical	Permit Finaled 8/22/2008	TEMP POWER FOR "UNDERWEAR AFFAIR 2008" 08/01/08 - 08/02/08
08041-20000-17251	X08VN12086	Electrical	Application	TEMP POWER FOR

Submittal 7/30/2008	"UNDERWEAR AFFAIR 2008" 08/01/08 - 08/02/08
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Expand Closed 5905 W WILSHIRE BLVD #1 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
06041-10001-25841	X06LA24072	Electrical	Permit Finaled 3/6/2008	SUPPL. PERMIT TO PERMIT #06041-10000-25841 FOR CHANGE OF ADDRESS FROM 606 S 6TH AVE TO 5905 W. WILSHIRE BLVD. #1.

Expand Closed 5905 W WILSHIRE BLVD 106 & 107 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
17041-10000-16611	E17LA02198	Electrical	Permit Closed 6/1/2017	PC FOR ENERGY. TENANT IMPROVEMENT TO SUITE BCAM AND INSTALLATION OF TEMPORARY ART EXHIBITION IN EXISTING GALLERY SPACE , TOTAL CONNECTED LOAD < 40 AMP. TOTAL AREA 670 SQ FT. B# 17016-10000-08009
17044-20000-05314	X17VN09323	HVAC	Permit Finaled 6/19/2017	New installed duct and air handler

Expand Closed 5905 W WILSHIRE BLVD 1ST FLOOR 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
17041-10000-29806	X17LA14522	Electrical	Issued 8/22/2017	FIRE ALARM SYSTEM ADDITION (RESNICK PAVILLION) (WU BIN GALLERY)

Expand Closed 5905 W WILSHIRE BLVD 1ST FLR 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
13041-10000-06405	X13LA04309	Electrical	Permit Finaled 5/16/2013	FIRE ALARM NOTIFICATION DEVICE SYSTEM ADD.
14041-10000-31700	X14LA21140	Electrical	Permit Finaled	FIRE ALARM SYSTEM ADDITION. RESNIK BLDG WES

			11/19/2014	GALLERY 1ST FLOOR
98044-30000-10870	--	HVAC	Permit Finaled 6/2/1999	DUCT WORK , T.I.

Expand Closed 5905 W WILSHIRE BLVD 1st Floor 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
15042-90000-16666	--	Plumbing	Permit Finaled 10/28/2015	Install Fixtures (LACMA #29582)

Expand Closed 5905 W WILSHIRE BLVD 2nd flr 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
16016-10000-24430	B16LA15737	Bldg- Alter/Repair	Permit Finaled 11/30/2016	Install temporary partitions for musem exhibition on 2n floor.

Expand Closed 5905 W WILSHIRE BLVD 3rd floor 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
15016-10000-27557	B15LA17423	Bldg- Alter/Repair	Permit Finaled 4/12/2016	TEMPORARY PARITIONS UP TO 15' HIGH FOR MUSEUM EXHIBITION AND RE-WORK PORTION OF CEILING FOR SPECIAL EXHIBITS.

Expand Closed 5905 W WILSHIRE BLVD 5th floor 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
99043-20000-00313	--	Fire Sprinkler	Permit Closed 3/2/1999	install heads in type 1 grease duct and dry pendant heads in cooler change out existing painted heads with new heads la country museum of art 5th floor

Expand Closed 5905 W WILSHIRE BLVD 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
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97016-40000-23051	--	Bldg- Alter/Repair	Permit Closed 3/1/2000	T/O(E) & REROOF W/BLT U - 213SQS Monument ZI 145-1002- This is not the monument, and construction on this buildin near the monument will no affect the historic & cultura resource. LdeLay
99016-10000-04329	--	Bldg- Alter/Repair	Permit Withdrawn 7/13/1999	TEAR OFF ROOF APPLY HICKMAN APPROVED TORCH ON SYSTEM EQ SHUTOFF VALVE REQUIRED
99016-10000-04326	--	Bldg- Alter/Repair	Permit Withdrawn 7/13/1999	TEAR OFF ROOF INSTALL HICKMAN APPROVED B.U.R SYSTEM. EARTH QUAKE VALVE REQUIRED
99016-10000-04327	--	Bldg- Alter/Repair	Permit Withdrawn 7/13/1999	TEAR OFF ROOF, INSTALL HICKMAN APPROVAL SYSTEM B.U.R. AHMANSON BLDG.
05010-10021-06103	X07LA24748	Bldg- Alter/Repair	Permit Finaled 1/24/2008	SUPL. PERMIT TO PERMIT #05010-10000-06103 THROUGH #05010-100020 06103 FOR CHANGE OF ADDRESS FROM 6001 W. WILSHIRE BLVD. MUSEUM ENTRY HALL TO 5905 W. WILSHIRE BLVD. (NO CHANGE IN LEGAL DESCRIPTION)
06016-10000-07804	B06LA04341	Bldg- Alter/Repair	Permit Expired 9/29/2008	CHANGE OF USE FROM RETAIL TO MUSEUM ART STORAGE ON THE 1ST, MEZZANINE, AND 3RD FLOORS. (NO CONSTRUCTION WORK)
06016-40000-24183	X06SP04379	Bldg- Alter/Repair	Permit Expired 2/23/2009	GO OVER EXISTING EPDM W/BALLEAT STONE ON CONCRETE DECK/METAL DECK. REMOVE BALLAET & INSTALL "SANAFIL" 60 MIL PVC SINGLE PLY ROOF SYSTEM, THEN REINSTALL BALLAET. (LARR#24852) (50 SQUARES)
08016-10001-11850	B10LA00081	Bldg- Alter/Repair	Reviewed by Supervisor 2/17/2010	Review plans for complianc to current zoning and disabled access requirements. Refer to (B08LA06447) 08016- 10000-11850 for clearance and issuance of permit.
08016-10000-11850	B08LA06447	Bldg- Alter/Repair	PC Info Complete 4/27/2009	TENANT IMPROVEMENT ON ALL FLOORS OF (E) 5- STORY W/ MEZZANINE & 1 LEVEL BASEMENT MUSEUM/OFFICE BLDG. PROPOSED USES WILL BE

				OFFICES, EXHIBIT GALLERIES, ASSEMBLY AND RETAIL. EXTERIOR WORK INCLUDES THE CLEANING, REPAIR, AND REHAB OF THE EXISTING STONE CLADDING AND WINDOWS VOLUNTARY STRUCTURAL UPGRADE INCLUDES ADDING SHOTCRETE NEXT TO (E) CONCRETE WALLS. SEE COMMENTS.
09016-10000-07036	B09LA04456	Bldg- Alter/Repair	Permit Finaled 6/2/2009	T.I. - PROPOSED INTERIOR PARTITION WALLS IN THE GALLERY ON THE 2ND FLOOR
09016-10000-20515	B09LA11992	Bldg- Alter/Repair	Permit Finaled 3/22/2010	CONSTRUCTION OF HANDRAILS ON EXISTING SERVICE PLATFORM PER THE ENGINEERS DESIGN REFERENCED. SERVICE PLATFORM WAS APPROVED ON PERMIT # 08010-10000-01363. THIS WORK WAS APPROVED ARCHITECTURALLY AND DEFERRED FOR THE STRUCTURAL PORTION.
11016-10000-12017	B11LA06838	Bldg- Alter/Repair	Corrections Issued 6/27/2011	RELOCATE CHAIN LINK FENCE, CLEAN FLOORING, PAINT WALLS, CEILING, PATCH FLOOR, OPEN VENT ON ENTRY DOOR.
15016-10001-13597	B16LA02401	Bldg- Alter/Repair	Permit Finaled 5/27/2016	SUPPLEMENTAL PERMIT TO 15016-10000-13597 TO EXTEND THE APPROVED RAIN ROOM ART EXHIBITION APPROVED UNDER 15016-10000-1359 FOR ADDITIONAL 180 DAYS.
15016-10000-19779	B15LA12934	Bldg- Alter/Repair	Permit Finaled 10/15/2015	TEMPORARY PARTITION FOR MUSEUM EXHIBITION
15016-10000-17304	B15LA11468	Bldg- Alter/Repair	Permit Finaled 10/8/2015	TEMPORARY PARTITIONS FOR MUSEUM EXHIBITION AND ART STORAGE (90 DAYS)
15016-10000-17873	B15LA11848	Bldg- Alter/Repair	Permit Finaled 11/10/2015	TEMPORARY PARTITIONS FOR MUSEUM EXHIBITION ON 3RD FLOOR.
15016-10000-13597	B15LA08981	Bldg- Alter/Repair	Permit Finaled 11/5/2015	PROPOSED RAIN ROOM WITH ELEVATED FLOOR GRATING SYSTEM FOR TEMPORARY 120 DAYS ART EXHIBITION IN (E) GALLERY SPACE.
15016-10000-12682	B15LA08402	Bldg-	Permit	TEMPORARY PARTITIONS UP

		Alter/Repair	Finalized 8/20/2015	TO 20' HIGH FOR MUSEUM EXHIBITION AND RE-WORK PORTION OF CEILING FOR SPECIAL EXHIBITS.
15016-10002-13597	B16LA10932	Bldg- Alter/Repair	Permit Finalized 9/23/2016	SUPPLEMENTAL PERMIT TO 15016-10001-13597 TO EXTEND THE APPROVED RAIN ROOM ART EXHIBITION APPROVED UNDER 15016-10000-1359 FOR AN ADDITIONAL 180 DAYS.
16016-10000-10809	B16LA06893	Bldg- Alter/Repair	Issued 5/19/2016	Install temporary partitions for museum exhibition
16016-10001-19500	B16LA14494	Bldg- Alter/Repair	Application Submittal 9/20/2016	No work description available
16016-10000-29500	B16LA19332	Bldg- Alter/Repair	Permit Finalized 2/27/2017	Installation of temporary partitions for museum exhibition.
16016-10000-19500	B16LA12685	Bldg- Alter/Repair	Issued 9/16/2016	Install temporary partitions for museum exhibition
16016-10000-07366	B16LA04752	Bldg- Alter/Repair	Issued 4/6/2016	Temporary partitions for museum exhibition
17016-10000-17889	B17LA11551	Bldg- Alter/Repair	Permit Finalized 8/18/2017	Interior TI in existing art museum to fur existing partitions. See comments.
17016-10000-08009	B17LA05132	Bldg- Alter/Repair	Permit Finalized 6/23/2017	TENANT IMPROVEMENT AND INSTALLATION OF TEMPORARY ART EXHIBITION IN EXISTING GALLERY SPACE 106 AND 107
08010-10000-00375	B08LA01587	Bldg-New	Application Withdrawn 7/22/2008	TEMPORARY TICKETING KIOSK FOR 6-MONTH DURATION. (see modifications) good till 1/1/2009.
08010-10000-00376	B08LA01587	Bldg-New	Application Withdrawn 7/22/2008	TEMPORARY TICKETING KIOSK FOR 6-MONTH DURATION. (see modifications) Good till 1/1/2009
08010-10001-01363	B08LA04866	Bldg-New	Permit Finalized 4/14/2009	foundation only for New museum
99041-20000-21314	--	Electrical	Permit Finalized 11/24/2004	LOW VOLTAGE CABLING FOR VOICE/DATA. 20 LOCATIONS
99041-10000-00700	--	Electrical	Permit Closed 2/24/1999	TEMPORARY POWER INSPECT 1-14-99
99041-10000-03352	--	Electrical	Permit	TEMPORARY POWER HOOK

			Closed 2/25/1999	UP TO PORTABLE GENERATOR WITH 100 AM PANEL.
99041-10000-22000	--	Electrical	Permit Finaled 11/15/1999	CARNIVAL
05041-10000-13698	--	Electrical	Permit Closed 1/27/2006	TEMP. POWER FOR EVENT- "KING TUT" READY FOR INSP. 6-15-05 (NOON)
06041-10000-26673	E06LA02331	Electrical	Permit Finaled 3/6/2008	TEMPORARY POWER FOR THE CONSTRUCTION OF THE MUSEUM OF ARTS
06041-10000-23547	X06LA17705	Electrical	Permit Finaled 3/6/2008	TEMP. POWER.
06041-10000-26193	X06LA19812	Electrical	Permit Finaled 10/27/2006	Install building automation system for HVAC control and CO sensors.
07041-10000-05258	X07LA04272	Electrical	Permit Finaled 6/17/2008	HOOK UP PORTABLE GENERATOR FOR EVENT ON 3-6-07. INSPECTION CONTACT JIM @ 818-299- 4221.
08041-20000-26736	E08VN01558	Electrical	PC Approved 5/27/2009	TENANT IMPROVEMENT ON ALL FLOORS OF (E) 5- STORY W/ MEZZANINE & 1 LEVEL BASEMENT MUSEUM/OFFICE BLDG. PROPOSED USES WILL BE OFFICES, EXHIBIT GALLERIES, ASSEMBLY AND RETAIL. EXTERIOR WORK INCLUDES THE CLEANING, REPAIR, AND REHAB OF THE EXISTING STONE CLADDING AND WINDOWS
08041-10000-26510	X08LA21251	Electrical	Permit Finaled 12/22/2008	RELOCATE (E) DISCONNEC SWITCH & CUSTOMER SUB METER SECTION (NON- UTILITY).
08041-90000-01477	--	Electrical	Permit Finaled 2/5/2008	Providing temporary power for special event 2/4/08 using 1 generator to provide power for HVAC in tent.
08041-10000-01775	X08LA01389	Electrical	Permit Closed 2/11/2008	TEMPORARY POWER FOR SPECIAL EVENT VIA 2- 125KW GENERATOR & 1-60 KW GENERATOR. READY FOR INSPECTION FEBRUAR 8, 2008 AT 12:00 P.M.-4:0 PM. CONTACT IS NATHAN AT 714-392-4982. (LA COUNTY MUSEUM OF ART)
09041-90000-10816	--	Electrical	Permit Closed	Temporary power generato and transformer for special

			6/16/2009	event at LACMA. Show day 6/16 set up 6/15 at 1pm, ready for inspection 2pm - 4pm. Site contact: Brian 714 231-9887
09041-10000-13529	E09LA01302	Electrical	Permit Finaled 5/13/2010	Install a new fire alarm system for LACMA, Phase 2 Gallery Building.
10041-10000-17451	X10LA13982	Electrical	Permit Closed 2/16/2011	TEMP. GENERATORS AND POWER DISTRIBUTION FOR SPECIAL EVENTS AT LACMA 9/10 - 10/3 2010. CONTACT ON SITE IS NATHAN JONES 714-392-4982. READY FOR 1ST INSPECTION 9/16/10 11AM-3PM. 2ND INSPECTION 9/20/10.
10041-90000-19174	--	Electrical	Permit Closed 2/16/2011	Temporary power for a special event on 9/27/10 ready for inspection 9/27. this is in addition to permit # 10041-10000-17451. Site contact: Nathan Jones 714 392-4982
10041-90000-19113	--	Electrical	Permit Closed 9/29/2010	3 walk-in refrigeration units for temporary kitchen.
10041-90000-18644	--	Electrical	Permit Closed 9/23/2010	Providing Temporary power for HVAC units in Tent. Power is being provided from shore power qty-4 40 amp breakers.
10041-10000-17298	E10LA01488	Electrical	Permit Finaled 2/11/2011	Ti in LA County Museum. Plan check for power and energy.
10041-10000-15840	E10LA01369	Electrical	Permit Finaled 2/16/2011	revisions to lighting system for ticket kiosk/storage area at the LA County Museum of Art. Original permit obtained on 10041-10000-08990 PLAN CHK IS FOR TITLE 24
10041-20000-14712	X10VN11389	Electrical	Permit Finaled 8/11/2010	RELOCATE LOW VOLTAGE CONTROL SWITCHES AND SENSORS (TEMP)
10041-10000-08990	E10LA00810	Electrical	Permit Finaled 10/5/2010	NEW TICKET KIOSK PLAN CHK IS FOR TITLE 24
10041-10000-17508	X10LA14042	Electrical	Permit Finaled 10/5/2010	Permit for inspection prior to plan check approval per approved modification. This permit is for a one time inspection only.
10041-10000-24571	X10LA19411	Electrical	Permit Finaled 2/11/2011	INSTALL/ADD FIRE ALARM DEVICES FOR T.I. (3) HEAVY SYSTEMS AND A/V

10041-90000-22384	--	Electrical	Permit Closed 11/10/2010	Electrical underground conduit installations
10041-90000-18960	--	Electrical	Permit Closed 9/29/2010	Providing Power to 3 reefer for special event from Temporary Stand up panel.
11041-90000-25504	--	Electrical	Permit Closed 5/23/2012	Temporary geanerator and power distribution for special event at LACMA 12/1/11 - 12/3/11. Ready for inspection on 12/1 between 11am-1pm. Contact on site is Oz Jones (323) 228-9662.
11041-90000-00729	--	Electrical	Permit Finaled 2/11/2011	Install 12 voice and data outlet locations and 6 camera locations
11041-10000-13129	X11LA09628	Electrical	Permit Closed 11/27/2012	940 CIRCUITS. COLD STORAGE, 1 1/2HP CONDENSING UNIT, 2HP CONDENSING UNIT, 120V FLY FAN & LIGHT & REC CCTS 120V.
11041-90000-25788	--	Electrical	Permit Finaled 3/27/2012	Install 3 electrical car chargers
11041-90000-22165	--	Electrical	Permit Closed 11/2/2011	Temporary power generato and power distibution for a special event at LACMA. Ready for inspection 11/2/11 9am - 2pm. Site contact: Osrice Jones 323 228-9662
12041-10000-09421	X12LA06818	Electrical	Permit Finaled 5/22/2012	INSTALL A 50-AMP FEED TO SUMP PUMP & A 120V 20-AMP SECURITY CIRCUIT.
12041-10000-24011	X12LA16804	Electrical	Permit Closed 10/29/2012	TEMP GENERATORS & POWER DISTRIBUTION FOR SPECIAL EVENT AT LACMA 10/12/12-10/29/12. READY FOR INSPECTION ON 10/25/12 8AM-12PM. SITE CONTACT IS OZ JONES (323) 228-9662.
13041-10000-08299	X13LA05488	Electrical	Permit Closed 3/25/2014	TEMPORARY GENERATOR AND POWER DISTRIBUTION FOR SPECIAL EVENT AT LACMA 4/1/2013 - 4/11/2013. READY FOR INSPECTION 4/5/2013 - AFTERNOON. PM SITE CONTACT IS SHAWN RICHARDSON 407-342-9289.
13041-90000-09150	--	Electrical	Permit Closed 3/25/2014	Installing Generator for heaters for patio area . Off of 6th street.

13041-90000-12154	--	Electrical	Permit Finaled 5/16/2013	Original Electrical Permit # 13041-1000-03030 was issued covering (2) temporary exhibit halls at LACMA (BCAM and Ganzfeld). LADBS Electrical Inspector (RSABEL) issued violation # 13AH104628 citing a need to obtain separate permits; this permit will apply to BCAM 2nd floor areas
13041-10000-03030	X13LA02279	Electrical	Permit Finaled 5/14/2013	TEMPORARY POWER FOR MUSEUM EXHIBIT.
13041-10000-28159	X13LA18268	Electrical	Permit Finaled 11/5/2013	TEMPORARY GENERATOR AND HVAC EQUIPMENT FOR SPECIAL EVENT AT LACMA 10/15/13 - 11/13/13. WILL CALL FOR INSPECTION WHEN READY. SITE CONTRACT IS OZ JONES 323-228-9662.
13041-10000-03273	X13LA02463	Electrical	Permit Finaled 5/16/2013	FIRE ALARM SYSTEM ADDITION. BCAM BUILDING.
13041-10000-03271	X13LA02462	Electrical	Permit Finaled 4/2/2013	FIRE ALARM SYSTEM ADDITION
14041-90000-07437	--	Electrical	Permit Finaled 4/29/2014	Install like for like parking equipment and adding two circuits
14041-10000-28314	X14LA18851	Electrical	Permit Closed 11/4/2014	TEMP GENERATORS & POWER DISTRIBUTION FOR SPECIAL EVENT AT LACMA 10/15/14-12/02/14. READY FOR INSPECTION ON 10/31/14 AFTERNOON. SITE CONTACT IS BARRY THOMAS (562) 824-6586.
15041-20000-08144	X15VN05268	Electrical	Permit Finaled 3/24/2015	INSTALLING LOW VOTAGE FOR NETWORK/DATA CABLES.
15041-10000-10631	X15LA06387	Electrical	Permit Finaled 4/17/2015	TEMP GENERATOR & POWER DISTRIBUTION FOR SPECIAL EVENT AT LACMA 4/13/15-4/19/15. READY FOR INSPECTION 4/16/15 AFTERNOON. SITE CONTACT IS ERIC WENZEL 714-612-9423.
15041-10000-22658	E15LA02558	Electrical	Permit Finaled 10/23/2015	Energy plan check for an equipment (pump) room located in the museum. Scope include new lighting and receptacles. Total area is 381-SQ feet.

15041-10000-35410	X15LA19787	Electrical	Permit Closed 11/5/2015	TEMP GENERATORS & POWER DISTRIBUTION FOR SPECIAL EVENT AT LACMA 10/22/15-11/8/15. READY FOR INSPECTION ON 11/4, MORNING. SITE CONTACT IS BARRY THOMAS 562-824-6586.
15041-10000-39287	E15LA04274	Electrical	Issued 12/16/2015	PLAN CHECK FOR ENERGY ONLY FOR DEMO AND RELOCATE OUTDOOR BOLLARDS AND REDIRECTING EGRESS PATH.
16041-10000-36381	X16LA16621	Electrical	Permit Closed 10/18/2016	TEMP GENERATORS AND POWER DISTRIBUTION FOR SPECIAL EVENT 10/16/16-10/17/16 AT LACMA. READ FOR INSPECTION 10/17 MORNING. SITE CONTACT IS CHARLIE GRAFF, 310-483-5537.
16041-90000-12923	--	Electrical	Permit Closed 4/18/2016	Temp Power for event on 4/15/16. Inspection ready 4/15/16 by 10am Onsite contact: Matt 805 616-369
16041-90000-13238	--	Electrical	Permit Finaled 4/29/2016	Install (2) rooftop AC units
17041-10000-11439	X17LA05821	Electrical	Permit Finaled 6/2/2017	FIRE ALARM SYSTEM ADDITION 1st floor Virtual Reality
17041-10000-38131	X17LA18415	Electrical	Permit Closed 11/6/2017	TEMP GENERATORS AND POWER DISTRIBUTION FOR A SPECIAL EVENT AT LACMA 10/24/2017-11/16/17. INSPECTION REQUEST WILL BE DONE ONLINE. SITE CONTACT IS TODD MIKLOS 310-667-212
05046-91000-00193	--	Elevator	Permit Withdrawn 5/20/2008	ELEVATOR MODERNIZATION ON (2) GEARLESS PASSENGER ELEVATORS.
07046-10000-00861	M07LA02628	Elevator	Permit Finaled 2/7/2008	Furnish and install (1) 24,000 # custom elevator. 3 stories.50' travel. 500 psi max. allowed press. (378 psi working press.) 10 buffers with additional support to structure @ 7'-10' above walk-in pit floor.
07046-10001-00861	M08LA00455	Elevator	Re-activate Application 5/21/2008	plan check for revision of previously approved plan. reduced plat form by 75 sq ft & car weight increased.

				for permit see 07046-10000-00861.
07046-10002-00861	M08LA00610	Elevator	Permit Finaled 6/3/2008	Plan check for revision of previously approved plans for a custom-built, 24,000 lb. capacity hydro-electric passenger elevator in LACMA building.
07046-10000-00963	M07LA02915	Elevator	Permit Finaled 2/4/2008	Furnish and install (50)' riser esclator. (Approx. 130' long with 2-supports at 1/3 span (calc'd by struct. engineer) req. story drift 3' (provided=6"))
07046-10000-00600	M07LA01842	Elevator	Application Withdrawn 5/20/2008	CYLINDER REPLACEMENT. ELEVATOR STATE #40576.
07046-10000-00371	M07LA01183	Elevator	Permit Finaled 1/9/2008	hydraulic elevator
07046-91000-00311	X07FX00231	Elevator	Permit Withdrawn 5/20/2008	CYLINDER REPLACEMENT DOUBLE BOTTOM.
07046-10000-00262	M07LA00795	Elevator	Permit Finaled 1/23/2008	two hydraulic elevators
08046-10000-00737	M08LA01705	Elevator	Permit Finaled 5/6/2008	replace plunger for an existing passenger elevator (approx. 40000 Lbs gross weight. Max. allowed pressure=750 Psi)
09046-10000-00038	X09LA00228	Elevator	Permit Closed 5/19/2009	INSTALL DETECTOR EDGE.
10046-90000-00749	--	Elevator	Issued 7/12/2010	FIXTURE REPLACEMENT STATE # 85079
11046-90000-01351	--	Elevator	Permit Finaled 5/21/2012	Modernize power unit, controller, door operator, door operator, fixtures, wiring and hydraulic jack.
12046-90000-01483	--	Elevator	Permit Finaled 12/26/2012	governor rope state#22208
16046-90000-01484	--	Elevator	Permit Finaled 9/28/2016	replaced pump unit and valve
17046-90000-00891	--	Elevator	No Progress 7/18/2017	Repair Heart Beat Display
06043-10000-03735	M06LA03853	Fire Sprinkler	PC Approved 1/8/2007	Plan check for underground piping of fire line for Wilshire Bldg. 01/09/2007 Made a mistake and issued

				the permit for this underground under 07043-10k-00050, as opposed to 06043-10k-03735.
06043-10000-03911	X06LA21159	Fire Sprinkler	Permit Finaled 3/11/2008	WELDING INSPECTION. @ BASEMENT.
06043-10000-02952	M06LA03015	Fire Sprinkler	Permit Finaled 3/12/2008	Permit for a an new wet an pre-action system for 3-story gallery building and spider walkway, canopy an escalator.
06043-10000-03752	X06LA20084	Fire Sprinkler	Permit Finaled 3/11/2008	One time permit for inspection prior to plan check
07043-10002-00050	M07LA02899	Fire Sprinkler	Permit Finaled 7/22/2009	Supplemental permit to permit #07043-10001-00050 to add extra trip.
07043-10001-00050	M07LA02579	Fire Sprinkler	Permit Finaled 7/22/2009	Plan check for new underground portion for the class I standpipes. No outlets on roof sinc there isn't any access
07043-10000-00050	M07LA00062	Fire Sprinkler	Permit Finaled 7/22/2009	Plan check for underground
07043-10003-00050	X09LA11502	Fire Sprinkler	Permit Finaled 7/22/2009	SUPPLEMENTAL TO PERMIT #07043-10000/10001/10002-00050 TO CHANGE ADDRESS TO 5905 W WILSHIRE BLVD.
08043-10002-03849	M09LA01686	Fire Sprinkler	PC Approved 6/2/2009	Plan check for revision. Revising preaction system. 08043-10002-03849.
08043-10000-03849	M08LA05063	Fire Sprinkler	Permit Finaled 6/8/2010	Installation of a grided preaction system for an gallery at LACMA. Single story building. Contractor is tying into previously approved underground sytem (included for reference).
08043-10001-03488	X09LA12435	Fire Sprinkler	Permit Finaled 11/9/2009	Supplemental permit to collect fees for (1) additional inspection. This permit does not authorize any additional work or extend the expiration date of the original permit.
08043-10000-03488	M08LA04504	Fire Sprinkler	Permit Finaled 6/9/2010	Plan check for underground fire line. 6 inch meter with inch backflow prevetner.
09043-90000-01169	--	Fire Sprinkler	Permit Finaled 7/10/2009	Relocate six fire sprinklers

10043-10000-01768	M10LA02183	Fire Sprinkler	Permit Finaled 1/27/2011	Plan check for overhead fire sprinkler system for existing entrance hall. Riser existing being supplied from entrance hall.
10043-10000-01756	M10LA02174	Fire Sprinkler	Permit Finaled 10/27/2010	Re-route of existing 6" underground for dry stand pipe system.
10043-10000-01067	M10LA01322	Fire Sprinkler	Permit Finaled 9/14/2010	Installation of sprinklers within new ticket booth.
10043-90000-01865	--	Fire Sprinkler	Permit Finaled 9/16/2010	Underground repair
13043-10000-00471	M13LA00623	Fire Sprinkler	Permit Finaled 4/19/2013	TI to add 9 new QR sprinkler heads to a new exhibit (light hazard).
14043-90000-04415	--	Fire Sprinkler	Permit Finaled 11/5/2014	RELOCATE 6 HEADS
14043-90000-04549	--	Fire Sprinkler	Permit Finaled 11/5/2014	add 6 upright heads to preaction
16043-90000-01220	--	Fire Sprinkler	Permit Finaled 4/5/2016	BCAM T.I.
16043-90000-01762	--	Fire Sprinkler	Permit Finaled 5/2/2016	Reinstall one Fire Sprinkler Head that was removed during demolition phase of work.
16043-10000-01268	M16LA01414	Fire Sprinkler	PC Approved 3/21/2016	PLAN CHECK ONLY, PERMIT UNDER 16043-90000-01220. TENANT IMPROVEMENT ON BCAM ROOM. ADDITION OF (5) EXTENDED COVERAGE HEADS WITH MAX SPACING OF 20'X20' FOR NEW EXHIBIT DUE TO NEW CEILING. (NEW E.C. HEADS TO MATCH EXISTING UPRIGHT E.C. HEADS)
17043-10000-00605	M17LA00717	Fire Sprinkler	Permit Finaled 2/22/2017	ADDITION OF 2 HEADS TO GALLERY SPACE
17043-10000-02319	M17LA02765	Fire Sprinkler	Permit Finaled 6/12/2017	FIRE SPRINKLER TENANT IMPROVEMENT AT NEW "FLESH AND SAND" EXHIBIT ADJACENT TO "RESNICK" BUILDING.
11030-10000-01371	G11LA00051	Grading	Permit Finaled 6/19/2012	Early excavation to prepare site for construction of 450.0 ft long, 19.0 ft wide and 15.0 ft deep ramp for

				Heizer Rock Exhibition. Cut = 7,204 CY., Fill = 1,687 CY., Export = 5,517 CY., Stockpile = 1,350 + 857 = 2,207 CY.
11030-10001-01371	G11LA00051	Grading	Permit Finaled 6/18/2012	finish grading work for Heizer Rock Exhibition.
11030-10000-01372	B11LA03134	Grading	Application Submittal 3/30/2011	Early excavation to prepare site for construction of 450.0 ft long, 19.0 ft wide and 15.0 ft deep ramp for Heizer Rock Exhibition. *** GPI ONLY ***
00044-30000-00718	--	HVAC	Permit Finaled 5/28/2004	installation of refrigeration equipment
08044-10000-07609	M08LA03007	HVAC	Permit Finaled 5/19/2010	Providing 4 new air handlers for new museum gallery building tapped off of existing central plant. Included is a modification for reducing the required min distance of garage exhaust outlet.
08044-20000-12017	M08VN02060	HVAC	PC Info Complete 6/2/2009	HVAC in historical building renovation. The building has a basement, 5 stories and a mechanical penthouse on the roof. Methane ventilation is provided for the basement level at 1 ac/hr continuously.
10044-90000-05468	--	HVAC	Permit Finaled 9/15/2010	NEW TICKET BOOTH (under Entrance Pavillion) (1)split system FCU-1 / cu-1
10044-10000-09576	M10LA02728	HVAC	Permit Expired 6/22/2015	3 TYPE-I VENTIL (COMBINED IN 2- POLLUTION CONTROL UNITS) AND 2- TYPE-II VENTIL SYSTEMS AND SPLIT V.R.V. SYSTEM FOR RESTAURANT IN LACMA PAVILLION. (U.L. LISTED HOODS TO BE INSTALLED UNDER SEPARATE PERMIT APPLICATION , PLANCHECK TO VERIFY HOODS MATCHING THE APPROVED VENTILATION PLANS).
10044-10000-12038	X10LA19231	HVAC	Permit Expired 6/22/2015	INSTALLATION OF REFRIGERATION EQUIPMENT.
10044-10001-09576	M10LA03535	HVAC	Permit Expired 6/22/2015	SUPPLEMENTAL APPLICATION FOR HOOD INSTALLATION (BY SEPARATE CONTRACTOR), TO ATTATCH TO

				VENTILATION SYSTEM INSTALLED UNDER ORIGINAL PERMIT.
16044-20000-03613	X16VN06763	HVAC	Permit Finaled 4/21/2016	INSTALL 2 DUCTLESS MINI SPLIT SYSTEMS
07042-10000-14521	X07LA12905	Plumbing	Permit Finaled 12/20/2007	INSPECTION FOR BUILDING DRAINS AND CONNECTION TO PUBLIC SEWER. S- PERMIT ENGINEERING NUMBER: S76840083.
08042-10000-14049	M08LA02973	Plumbing	Permit Finaled 5/11/2010	PROVIDE PLUMBING SYSTEM FOR A 1-STORY GALLERY THAT WSILL BE BUILT ABOVE THE EXISTING SUBTERRANEAN PARKING. Existing 3 inch water meter with 3 inch backflow preventer.
08042-10002-14049	M08LA04474	Plumbing	Permit Finaled 12/2/2008	Plan check for site sewer lateral.
08042-90000-20184	--	Plumbing	Permit Expired 1/10/2012	Replace urinals
08042-10000-21813	M08LA04503	Plumbing	Permit Finaled 5/11/2010	Plan check for potable water service. 3 inch water meter with 3 inch backflow preventer.
08042-10003-14049	M09LA00520	Plumbing	Permit Finaled 4/22/2010	ALTERATION TO APPROVED PLANS. DISCHARGING EXISTING SEWAGE EJECTORS AT MECH ROOM TO NEW EJECTORS FOR BATHROOMS VIA A GRAVITY FLOW PIPE & TOP WYE CONNECTOR.(TO AVOID HOLES IN EXISTING METHANE MITIGATION CONDITIONS/NO NEW HOLES IN BASEMENT RET. WALLS)
09042-20000-01384	M09VN00106	Plumbing	Application Submittal 1/27/2009	Plan check for complete plumbing TI - water, waste & vent, med pressure gas and sump pump system. *Historical monument. Clearance already generated.
09042-20000-01612	M09VN00122	Plumbing	PC Approved 7/27/2009	Complete plumbing TI. water system: 93/81 psi, r backflow reqd. Booster pump provided for 3rd floor &above. Pipe sizes per 2.8 psi/ 100ft. Pipe sizes for floors below 3rd floor per 5.9 psi/ 100ft. Medium pressure gas system - tota

				of 13710 cfh @ 5 psi approved per gas co letter.
10042-90000-07303	--	Plumbing	Refund in Progress 5/27/2010	REPLACE 2 URINALS
10042-20000-14921	X10VN13384	Plumbing	Permit Expired 11/30/2012	REPLACE 40 URINALS.
10042-90000-07883	--	Plumbing	Permit Finaled 6/2/2010	REPLACE 1 URINAL
10042-10000-06352	M10LA01031	Plumbing	Corrections Issued 6/7/2010	METHANE GAS CONTROL SYSTEM FOR "LOS ANGELES COUNTY MUSEUM OF ART TICKET KIOSK AND STORAGE AREA".
11042-10000-11598	M11LA02301	Plumbing	Permit Finaled 5/22/2012	DUAL SUMP PUMP SYSTEM SERVING RAMPED WALKWAY BELOW NEW AREA FEATURE.
11042-10002-11598	M11LA03716	Plumbing	Permit Finaled 5/22/2012	NEW SITE RAINWATER DRAINS AT NORTH GARDE AREA.
11042-10003-11598	M12LA01736	Plumbing	PC Approved 5/8/2012	SUPPLEMENTAL APPLICATION FOR PLAN CHECK ONLY FOR ADDED RAINWATER DRAINS AND SUBSURFACE DRAIN AT AREA FEATURE WALKWAY.
11042-10001-11598	X11LA10989	Plumbing	Permit Finaled 5/22/2012	SUPPLEMENTAL PERMIT FOR (5) AREA DRAINS DRAINING INTO A DUAL SUMP PUMP SYSTEM WITH AN 8" GRAVITY DISCHARGE TO AN EXISTING 12" STORM DRAIN.
11042-10004-11598	X12LA08206	Plumbing	Permit Finaled 5/22/2012	Supplemental permit to collect fees for (1) additional inspection. This permit does not authorize any additional work or extend the expiration date of the original permit.
99048-70000-00611	--	Sign	Permit Finaled 11/2/2001	Sign
99048-70000-00631	--	Sign	Permit Finaled 11/2/2001	NEW MONUMENT, NON-ILLUM, SINGLE FACE SIGN 4' x 5.2' for the "LA County Museum of Art"

Expand Closed 5905 W WILSHIRE BLVD B-CAM 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
07041-10000-11087	E07LA00971	Electrical	Permit Finaled 3/6/2008	Install new FA system in B-CAM building for LACMA transformation. Part 1 of 2

Expand Closed 5905 W WILSHIRE BLVD BCAM- 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
07043-10000-00032	X07LA00197	Fire Sprinkler	Permit Finaled 3/11/2008	MISC PERMIT FOR BCAM-BASEMENT, 1ST FLR, 2ND FLR 3RD FLR.

Expand Closed 5905 W WILSHIRE BLVD PAVILLION 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
09041-10000-02577	X09LA02098	Electrical	Permit Finaled 5/13/2010	PRE-ACTION DETECTION.

Expand Closed 5905 W WILSHIRE BLVD Parking 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
07041-10000-11091	E07LA00972	Electrical	Permit Finaled 3/6/2008	Install new FA system in parking structure for LACMA transformation. Part 2 of 2

Expand Closed 5905 W WILSHIRE BLVD Phase 2 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
08041-10000-19776	E08LA01687	Electrical	Permit Finaled 3/18/2010	Phase 2 of a Level V methane detection system for LACMA. An existing control panel from a separate building is serving this building. New devices and controllers.

Expand Closed 5905 W WILSHIRE BLVD SPECIAL-EXHIBIT 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
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#	PC/Job #	Type	Status	Work Description
14016-10000-16196	B14LA10997	Bldg-Alter/Repair	Permit Finaled 9/9/2014	TEMPORARY PARTITIONS FOR MUSEUM EXHIBITION LOCATED AT THE RESNICK BUILDING. NEW PARTITIONS UP TO FULL HEIGHT (20'-0").

Expand Closed 5905 W WILSHIRE BLVD SPECIAL-EXHIBITS 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
11016-10000-13385	B11LA07552	Bldg-Alter/Repair	Permit Finaled 9/2/2011	TEMPORARY PARTITIONS AND PARTITION STRUCTURE FOR ARTWORK EXHIBITIONS.
11016-10000-14054	B11LA07919	Bldg-Alter/Repair	Permit Finaled 10/6/2011	PROPOSED MEZZANINE/CATWALK FOR TEMPORARY EXHIBITION TO EXISTING MUSEUM, APPROXIMATE SIZE OF IRREGULAR U-SHAPE MEZZANINE 57'-10" ON EACH SIDE AND 15'-3" X 34'-4" ACCESS STAIRS/LANDING (1,086 SQ FT). PERMIT EXPIRES ON MAY 31, 2012.
11016-10000-22161	B11LA12222	Bldg-Alter/Repair	Permit Finaled 2/23/2012	TEMPORARY PARTITIONS UP TO 20'-0" HIGH FOR MUSEUM EXHIBITIONS.
11016-10000-20657	B11LA11425	Bldg-Alter/Repair	Permit Finaled 11/9/2011	TEMPORARY SOUND RATED PARTITION WALL AND CEILING FOR EXHIBITION INSTALLATION AT LOS ANGELES COUNTY MUSEUM OF ART.
11016-10000-17561	B11LA09706	Bldg-Alter/Repair	Permit Finaled 10/14/2011	TEMPORARY PARTITIONS UP TO 20'-0" FOR MUSEUM EXHIBITIONS.
12016-10000-13372	B12LA07732	Bldg-Alter/Repair	Permit Finaled 8/16/2012	TEMPORARY PARTITIONS FOR MUSEUM EXHIBITS.
13016-10000-08494	B13LA05261	Bldg-Alter/Repair	Issued 4/30/2013	TEMPORARY PARTITIONS UP TO 20'-0" HIGH FOR MUSEUM EXHIBITION.
13016-10000-01450	B13LA00857	Bldg-Alter/Repair	Permit Finaled 5/14/2013	TEMPORARY PARTITIONS UP TO 20'-0" HIGH AND PLATFORM AND RAMP FOR MUSEUM EXHIBITION.
13016-10000-18234	B13LA10901	Bldg-Alter/Repair	Permit Finaled 10/9/2013	TEMPORARY PARTITIONS UP TO 20'-0" HIGH AND REWORK PORTION OF

				CEILING FOR SPECIAL EXHIBITS.
13016-10000-17398	B13LA10474	Bldg- Alter/Repair	Permit Finaled 9/19/2013	TEMPORARY PARTITIONS UP TO 16'-0" HIGH LOCATED AT THE 3RD FLOOR.
13016-10000-24148	B13LA14581	Bldg- Alter/Repair	Permit Finaled 1/13/2014	TEMPORARY PARTITIONS UP TO 16'-0" HIGH AND DROPPED CEILING SYSTEM AT 3RD FLOOR FOR MUSEUM EXHIBITION.
14016-10000-12610	B14LA08658	Bldg- Alter/Repair	Issued 7/9/2014	PROPOSED TEMPORARY PARTITIONS FOR MUSEUM EXHIBITS LOCATED AT BCAM BUILDING.
14016-10000-21628	B14LA14507	Bldg- Alter/Repair	Permit Finaled 3/18/2015	PROPOSED TEMPORARY PARTITIONS UP TO 20'-0" FOR MUSEUM EXHIBITIONS
14016-10000-19419	B14LA13142	Bldg- Alter/Repair	Permit Finaled 12/3/2014	INTERIOR TEMPORARY PARTITIONS UP TO 20'-0" HIGH FOR MUSEUM EXHIBITION AND PROPOSE TEMPORARY EXTERIOR FENCE WALL AND GATES FOR TEMPORARY EXHIBITIONS.
15016-10000-04728	B15LA03199	Bldg- Alter/Repair	Permit Finaled 4/7/2015	PROPOSED TEMPORARY PARTITIONS FOR MUSEUM EXHIBITS.

Expand Closed 5905 W WILSHIRE BLVD Special Ex-BCAM 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
12016-10000-23512	B12LA13753	Bldg- Alter/Repair	Permit Finaled 5/15/2013	TEMPORARY PARTITIONS UP TO 22'-6" HIGH FOR ART EXHIBITION IN BACM BUILDING.
13043-10000-00392	M13LA00498	Fire Sprinkler	Permit Finaled 5/2/2013	TENANT IMPROVEMENT. FIRE SPRINKLER INSTALLATION. ADD 7 HEADS.

Expand Closed 5905 W WILSHIRE BLVD Special Ex-Resnick 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
12016-10000-23516	B12LA13753	Bldg- Alter/Repair	Permit Finaled 5/15/2013	TEMPORARY PARTITIONS UP TO 23'-0" HIGH AND RAISED PLATFORM AND ARTWORK FOR ART EXHIBITION FOR RESNICK BUILDING.

13043-10000-00393	M13LA00499	Fire Sprinkler	Permit Finaled 4/19/2013	TENANT IMPROVMENT. FIRE SPRINKLER ARTWORK FOR ART EXHIBITION FOR RESNICK BUILDING. ADD 8 HEADS.
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Expand Closed 5905 W WILSHIRE BLVD Special--Exhibits 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
11016-10000-13830	B11LA07785	Bldg- Alter/Repair	Permit Finaled 8/16/2011	TEMPORARY PARTITIONS FOR MUSEUM EXHIBITION

Expand Closed 5905 W WILSHIRE BLVD Special-Exhibits 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
11016-10000-02695	B11LA01425	Bldg- Alter/Repair	Permit Finaled 3/4/2011	TEMPORARY PARTITIONS (UP TO 20'-0") FOR EXHIBITIONS
11016-10000-04622	B11LA02519	Bldg- Alter/Repair	Permit Finaled 5/5/2011	TEMPORARY PARTITIONS (UP TO 20'-0") AND PARTITION STRUCTURE FOR EXHIBITIONS.
11016-10000-03543	B11LA01946	Bldg- Alter/Repair	Permit Finaled 4/21/2011	TEMPORARY PARTITIONS OF UP TO 20'-0" FOR EXHIBITIONS.

Expand Closed 5905 W WILSHIRE BLVD phase 2 90036

Application/Permit #	PC/Job #	Type	Status	Work Description
08041-10001-16887	E09LA02142	Electrical	PC Approved 12/8/2009	Revisions to approved set of plans- type of outside step luminaires, upsized feeders and feeder circuit breakers to AH units , revised Title 24 forms for exterior lighting, and show new voltage drop for feeder to transformer. All changes on the plans are bubbled.
08041-10000-16887	E08LA01419	Electrical	Permit Finaled 5/13/2010	Phase two of LA county museum Electrical plan check is for power and energy.

+ 6001 W WILSHIRE BLVD MAIN BLDG 90036



WILSHIRE

Community Plan

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WILSHIRE

Community

Chapter I INTRODUCTION

COMMUNITY BACKGROUND

PLAN AREA

The majority of the Wilshire Community Plan Area consists of gently sloping plains and includes about 8,954 acres (about 14 square miles), which is approximately 3 percent of the total land in the City of Los Angeles.

The Wilshire Community Plan Area is often spoken of as the Mid-City section of Los Angeles. The eastern edge of the approximately 2.5-mile wide by 6-mile long plan area is about 6 miles west of downtown Los Angeles, while the western edge abuts the City of Beverly Hills.

The plan area is bounded by Melrose Avenue and Rosewood Avenue to the north; 18th Street, Venice Boulevard and Pico Boulevard to the south; Hoover Street to the east; and the Cities of West Hollywood and Beverly Hills to the west.

Wilshire is surrounded by the City of Los Angeles community plan areas of Hollywood to the north; South Central Los Angeles and West Adams-Leimert-Baldwin Hills to the south; Silverlake-Echo Park and Westlake to the east; and West Los Angeles to the west.

The plan area is generally southwest of the Hollywood Freeway (U.S. 101), which is oriented northwest-southeast across the northeast corner of the Plan Area at Vermont and Rosewood Avenues.

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

The Metro Red Line subway also serves the Wilshire Community Plan area, running along portions of Wilshire Boulevard and Vermont Avenue.

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

Existing residential land use totals 4,568 acres, including approximately 116,575 dwelling units. The Wilshire Community Plan designates 4,592 acres for residential land uses, accommodating a projected 134,300 dwelling units.

Existing commercial land uses comprise 1,054 acres. There is approximately 40,004,300 square feet of existing commercial development. Planned commercial land use as designated in the Community Plan totals 1,129 acres, with a projected developed commercial total of 41,833,820 square feet.

Existing industrial land use is 50 acres. There is approximately 1,527,800 square feet of existing industrial development. Planned industrial land use designated in the Community Plan is 38 acres, with a build-out projection equal to current conditions.

There are 191 acres of land designated as open space. This category represents 2.1 percent of total land acreage in the Wilshire Community.

The street pattern in the Wilshire area is primarily a grid. Most of the street network is oriented on primary compass points with few exceptions. Notably, south of Wilshire Boulevard and west of Wilton Place, the street grid shifts uniformly towards a northeast/southwest alignment, while east/west streets shift somewhat to a northwest/southeast orientation.

DEMOGRAPHICS

The 2000 Census recorded a Wilshire Community Plan Area population of 292,101. This includes an ethnic mix of 8.8 percent African American, 23.3 percent Asian, 23.7 percent Caucasian (non-Latino), 41.3 percent Latino, and less than one percent Native American.

The Wilshire area is one of the most ethnically and economically diverse areas in the City of Los Angeles. Population make-up varies dramatically from block to block and historically many neighborhoods are ethnically and racially integrated.

A multitude of cultures, ethnicities, and activities together define this diverse area of Los Angeles. For example, Fairfax Avenue itself runs through a district of Ethiopian restaurants, crosses museum row, then arrives at a thriving Orthodox Jewish. Established high-end residential districts abut first generation immigrant neighborhoods, creating dynamic, intricate, and vibrant social patterns of neighborhood interaction and community.

The Koreatown area loosely overlaps a collection of neighborhoods including many primarily Latino areas in the eastern portion of the plan area. Koreatown is centered around Olympic Boulevard between Western and Vermont Avenues.

The Southern California Association of Governments (SCAG) projects a 2010 population of 337,144 persons, a 25 percent increase over the 1990 Census total of 271,620. The Community Plan provides capacity to meet this projection. Population density in 1990 averaged 30.6 persons per gross acre, the second highest for community plan areas in the City of Los Angeles.

NEIGHBORHOODS AND ACTIVITY CENTERS

RESIDENTIAL

The Wilshire District contains an overwhelming majority of multi-family units (86 percent of total housing units). The remaining single family units comprise 42 percent of the total residential land area, with an average net single family density of eight units per acre.

The Wilshire Community Plan Area includes several neighborhoods that consist almost exclusively of duplexes, most notably areas between La Brea Avenue and Fairfax Avenue from Melrose to Third Street, between Olympic and Pico Boulevards from Rimpau Boulevard to Redondo Boulevard, and along Crescent Heights Boulevard.

A combination of low to mid-rise multi-family units and areas containing a mix of mid to high-rise buildings are concentrated along the Wilshire corridor between Vermont Avenue and Wilton Place, in aggregate forming the area known as Wilshire Center.

Residential areas with a mix of high and medium densities are generally found adjacent to commercial corridors in the area bounded by Third Street on the north and Eighth Street on the south. The remainder of the area is largely low-rise residential homes and apartments.

Scattered mid-rise residential areas are located elsewhere throughout the plan area, with building heights exceeding eight stories in Park La Brea and along Rossmore Avenue. The average net multi-family density is 42 units per acre, one of the highest in the city, with the average net density for all housing types at 25 units per acre.

COMMERCIAL

Wilshire Boulevard between Hoover Street and Western Avenue includes a substantial number of mid-rise buildings, generally with minimal setbacks or setbacks that increase the sidewalk width along the boulevard and some with ground floor shops and services. This highly urbanized section of the boulevard experiences considerable pedestrian activity and is supported by Metro Red Line subway service. The urban character along Wilshire Boulevard moving west from Wilton Place to Highland Avenues changes to predominantly low-rise freestanding buildings with landscaped setbacks and limited ground floor retail use. The Park Mile Specific Plan governs development in this area.

Many fine mid-rise examples of Art Deco architecture line Wilshire Boulevard along the Miracle Mile, from La Brea Avenue to Fairfax Avenue, complemented with a consistent urban streetscape and low-rise commercial storefronts. Mid-rise buildings occur more frequently from Fairfax Avenue to San Vicente Boulevard, similarly interspersed with low-rise buildings. The Wilshire Corridor continues west from San Vicente Boulevard through Beverly Hills.

Low-rise commercial buildings consisting of a mix of building types occur along most of the major arterials except within Hancock Park.

Corridors east of Hancock Park include the following: Pico Boulevard; Olympic Boulevard east of Crenshaw Boulevard; Eighth Street east of Western Avenue which includes higher commercial intensities in

Koreatown; Sixth Street; Third Street; Beverly Boulevard and Melrose Avenue between Hoover Street and Western Avenue; Temple Street, consisting of largely zero-setback blank wall buildings; Vermont Avenue; and Western Avenue.

Corridors west of Hancock Park include the following: Third Street; Beverly Boulevard; Melrose Avenue, Robertson Boulevard, and La Brea Avenue, consisting primarily of one-story pedestrian-oriented streetfronts; and La Cienega and Pico Boulevards which include a mix of building types.

Larchmont Boulevard is a three-block shopping district within Windsor Square of which the southernmost block consists of pedestrian-oriented storefronts; Larchmont Boulevard includes one mid-rise medical tower north of Beverly Boulevard.

INDUSTRIAL

Most of Wilshire's low intensity industrial land uses are located around the intersection of Beverly Boulevard and Virgil Avenue, and along Pico Boulevard between Vermont and Western Avenues. These business park-style developments provide limited employment bases. They consist of small and medium scale automobile repair businesses, wholesale/retail distribution outlets, and storage operations.

COMMUNITY PARTICIPATION

The State of California requires citizen participation in the preparation of the General Plan. Government Code Section 65351 reads, "During the preparation or amendment of the General Plan, the planning agency shall provide opportunities for involvement of citizens, public agencies, public utility companies, and civic, education, and other community groups, through public hearings and any other means the city or county deems appropriate".

In 1997 and 1998, Community participation was initiated through more than 40 focus group meetings. During 1999 and 2000, additional community participation was encouraged during five public workshops and two open houses. In 2001, two open houses followed by public hearings were held. The City Planning Commission reviewed the proposed plan on May 10, 2001 and the plan was approved by the City Council on September 19, 2001.

The public hearing served as a forum for the public review of the Final Environmental Impact Report (EIR), and of the Transportation Improvement and Mitigation Program (TIMP), both of which were prepared for the update of the Wilshire Community Plan.

Community members continue to assist in the identification of major issues and with the formulation of land use policies and objectives in the Wilshire Community Plan Area.

COMMUNITY ISSUES AND OPPORTUNITIES

The following summarizes planning and land use issues and

opportunities identified by residents, property owners, and business owners in the Wilshire Community Plan Area.

RESIDENTIAL

Issues

- ? Need to maintain low density character of single family neighborhoods, avoiding encroachment from other uses, commercial off-street parking, and “spillover” traffic from adjacent development.
- ? Need to preserve the existing character of residential neighborhoods while accommodating more affordable housing and child care facilities.
- ? Improved land use transitions in scale, density and character are needed between multiple family and adjacent single family neighborhoods.
- ? Improved land use transitions are needed between commercial uses and single family and multiple family areas.
- ? Increased off-street parking areas and facilities, open space, and recreational facilities are needed, particularly in multiple family residential areas.
- ? Non-conforming residential units exist in areas zoned and designated for commercial land use.
- ? **New development needs to be coordinated with the availability of public infrastructure.**



Opportunities

- ? The Wilshire Community Plan Area includes large, ethnically diverse neighborhoods which are economically vibrant, and which have unique architectural and historic characteristics.
- ? Proximity to cultural and intellectual resources such as museums, theaters and educational institutions, as well as to recreational and ocean amenities, and to the Los Angeles Airport.
- ? Public transit access to employment centers within the Wilshire Community as well as to Hollywood, Central City, West Los Angeles, Westwood, Century City, and Santa Monica.
- ? Potential for additional mixed-use commercial and residential boulevards, along Beverly, Olympic, Pico, Robertson, and La Cienega Boulevards, and along 3rd Street, Fairfax, Vermont and Western Avenues.

COMMERCIAL


Issues

- ? Need to plan for better cohesiveness, diversity, and continuity of

complementary uses along commercial frontages.

- ? Improved appearance of strip commercial developments is needed, with concise, clear signage, better visual identity, adequate parking, and convenient access.
- ? Out-of-scale, cluttered signs including billboards, very large murals, wall signs, and flashing signs have proliferated. **Signage is perceived by residents as visually blighting.**
- ? Improvements to the appearance of new construction is needed through additional landscaping and more **imaginative architecture** to offset an otherwise severe industrial appearance along some major thoroughfares.
- ? New commercial development needs to be **compatible with existing buildings** in terms of architectural design, bulk and building heights.
- ? Adequate street furniture, lighting, and street trees, as well as extensive repairs to City **sidewalks**, parking strips, curbs and gutters, and driveways, are needed to promote a more pedestrian friendly environment.

Opportunities

- ? Potential for mixed-use development in Wilshire Center, along Beverly, Olympic, Pico, Robertson, and La Cienega Boulevards; and along 3rd Street, Fairfax, La Brea, Vermont and Western Avenues, to encourage pedestrian activity, **reduce traffic circulation and congestion, and invigorate commercial areas.** 
- ? Designated Scenic Highways along Wilshire and San Vicente Boulevards, Highland Avenue, and Burton Way encourage the enhancement of the visual environment, and pedestrian amenities.
- ? Through the Park Mile Specific Plan, potential to establish appropriate neighborhood and pedestrian-oriented land uses, building intensity, lot coverage, setbacks, landscaping, signage controls, and design and parking requirements for Wilshire Boulevard.
- ? Existing Park Mile Specific Plan regulates land uses according to vehicle trip generation rates by land use type, and thereby provides for some traffic mitigation.
- ? Shuttle bus systems which connect major activity centers (e.g., Miracle Mile, Park Mile, Wilshire Center, Koreatown, Beverly Center, Farmer's Market).
- ? Existing neighborhood commercial uses (e.g., furniture and general goods stores, ethnic restaurants, plant nurseries, resident hotels, etc.) need to be preserved and enhanced along Beverly,

Olympic, Pico, Robertson, and La Cienega Boulevards, and along 3rd Street, Fairfax, Vermont and Western Avenues.

INDUSTRIAL

Issues





- ? The need exists to utilize limited industrial and industrial commercial manufacturing designated land for commercial and retail purposes, to provide a larger, more diverse employment base.
- ? Improved buffering and landscaping are needed in industrial areas adjacent to residential development.
- ? Non-conforming residential units need to be discouraged from areas zoned and designated for industrial land uses.
- ? Aesthetic improvements of Major Class II and Secondary Highways (e.g., Beverly and Pico Boulevards and Virgil Avenue) are needed adjacent to industrial designated areas.

Opportunities

- ? Land presently zoned and designated for industrial uses may be convertible to commercial uses to provide additional employment base, while also being more compatible with adjacent multiple family residential uses.
- ? Urban design policies and standards are needed to visually improve converted industrial areas.
- ? Entertainment and related high technology uses need to be encouraged in the converted industrial areas.

TRANSPORTATION



Issues

- ? Severe traffic congestion along most major transportation corridors and intersections, with many streets functioning in excess of full capacity. 
- ? Overflow of traffic from congested commercial corridors negatively impacts the quality of life in residential neighborhoods. 
- ? Inadequate transportation linkages exist between residential areas and commercial, retail and recreation facilities.
- ? Frequent violation of on-street peak-hour parking restrictions which effectively reduces available traffic lanes for automobiles and buses.
- ? Insufficient off-street parking areas and structures, resulting in spillover parking from commercial areas into adjacent residential areas. 
- ? Due to the existing level of traffic congestion, the impact of new 

large projects on traffic circulation will continue to be a major concern in the community.

- ? There is a limited number of north-south Major Class II Highways which provide continuity through the Plan Area (e.g., Crenshaw Boulevard ends at Wilshire Boulevard).
- ? Many Collector Streets are lined with fronting residential land uses (single family homes and duplexes) with high volumes of traffic.
- ? The Plan Area includes some of the most heavily patronized and crowded bus routes in the MTA system.
- ? Many Secondary Highways and Collector Streets have not been built to current design standards and there is limited potential for widening due to existing development patterns.

Opportunities

- The Wilshire Transportation Improvement and Mitigation Program (TIMP), identifies measures to mitigate some impacts of new developments on the transportation system, primarily through measures funded by traditional transportation revenue sources (e.g., Proposition A & C, MTA Call For Projects, gasoline taxes) and coordinated through project phasing.
- The rise of mass-transit alternatives include three MTA Red Line subway stations on Wilshire Boulevard at Vermont, Normandie, and Western Avenues; and a fourth station at Beverly Boulevard and Vermont Avenue. Metro Bus, Metro Rapid, Metro Rail, DASH shuttles, Smart Shuttles, and designated bikeways all provide access from residential areas to major employment and activity centers, and to community schools and recreation areas.
- Expansion of Intelligent Transportation Systems (ITS) strategies such as Automated Traffic Surveillance and Control (ATSAC) and Adaptive Traffic Control Systems (ATCS) on Major Class II and Secondary Highways, may improve traffic flow in some areas.
- Implementation of local area-specific traffic mitigation measures are required for major projects to be completed in the Wilshire Plan Area. 
- Provide high-capacity bus lane corridors along selected Major Class II and Secondary Highway bus routes, with signal priority treatment for buses and enhanced bus stops. A Rapid Bus system is operating currently along Wilshire Boulevard, with further improvements planned.
- Implementation of Neighborhood Traffic Management Plans in residential areas, developed cooperatively between LADOT and residents can lessen the negative effects of pass-through traffic. 

RECREATION AND PUBLIC FACILITIES

Issues

- Severe shortage of public parks and open spaces in reasonable proximity to high-density, multiple family residential neighborhoods.
- Poorly designed or maintained parks and public facilities can become focal points for criminal activity and create negative impacts on surrounding neighborhoods.
- Critical need to provide additional school facilities to meet current and projected enrollment levels.
- Major need for additional recreation and public facilities, including neighborhood, community, and regional parks; branch libraries; and neighborhood community centers.

Opportunities

- Construction of small pocket parks, local neighborhood libraries, community centers or day-care facilities as possible development incentives required in large, mixed-use projects.
- Conversion of small public and private parcels, and streets and alleyways for utilization as pocket parks and open space areas.
- Conversion of alleyways into neighborhood open space as outlined under the City's Nuisance Alley Conversion Project.
- Increased joint-use of public play fields, classrooms, and auditoriums for shared public recreation.

COMMUNITY PROFILE

The community profile provides an overview of population, housing, and socio-demographics for the Wilshire Community Plan Area as compared to the rest of the City. The following tables contain the statistical data for previous census dates and rates of growth.

Chapter II

FUNCTION OF THE COMMUNITY PLAN

A Community Plan is an integral part of the General Plan, the fundamental policy document of the City of Los Angeles. The General Plan defines the framework by which the City's physical and economic resources are to be managed and utilized over time. Decisions by the City are all guided by the plan with regard to the intended use of its land, design and character of buildings and open spaces, conservation of existing housing stock and provision of new housing, provision of supporting infrastructure and public and human services, protection of environmental resources, and protection of residents from natural and human-caused hazards.

The General Plan clarifies and articulates the City's intentions with respect to the rights and expectations of the general public, property owners, prospective investors, and business interests.

STATUTORY REQUIREMENTS

California State law (Government Code Section 65300), and the City of Los Angeles City Charter (Section 554) require that the City prepare and adopt a comprehensive, long-term General Plan for its development.

It must contain seven elements including land use, circulation, housing, conservation, open space, and noise and safety. California State law requires that the land use element be prepared as part of a City's General Plan and that it correlate with the circulation element.

In the City of Los Angeles, 35 Community Plans, including the Wilshire Community Plan, comprise the Land Use Element of the City's General Plan.

The Land Use Element has the broadest scope of the State-required General Plan elements, since it regulates how land is to be utilized. It correlates with many of the issues and policies contained in all other General Plan elements.

Government Code Section 65302(a) requires a land use element which designates the proposed general distribution and general location and extent of the following land uses: housing, business, industry, open space, agriculture, natural resources, recreation and enjoyment of scenic beauty, education, public buildings and grounds, solid waste disposal facilities, and other categories of public and private land uses.

The land use element is also required to include a statement of the standards of population density and building intensity recommended for the various communities and other territory covered by the General Plan.

ROLE OF THE COMMUNITY PLAN

The General Plan is the fundamental planning policy document of the City of Los Angeles. It defines the framework by which the City's physical and economic resources are to be managed and utilized over time.

The General Plan guides the City in the use of public and private land, the design and character of buildings and open spaces, the conservation of existing housing and provision of new housing, commercial development, the provision of supporting infrastructure and public services, the protection of environmental resources and the protection of residents from natural and other known hazards.

The General Plan expresses the City's intentions with respect to the rights and expectations of the general public, property owners, and prospective investors and business interest.

The Community Plans further refine the General Plan, and are intended to promote an arrangement of land uses, streets and services which will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live and work in the community.

The Community Plans are intended to coordinate development among the 35 communities of the City of Los Angeles and among adjacent municipalities for the benefit of all residents.

The Community Plans also guide development by informing the general public of the City's planning goals, policies and development standards with the objective of creating a healthy and pleasant environment.

Planning goals, objectives, policies and programs are created to meet the existing and future needs of the community through the year 2010.

The Community Plan identifies and provides for economic opportunities, and for the maintenance of significant environmental resources within the community. It also seeks to enhance the distinctive community identity and recognize and promote the unique character of neighborhoods within the Community Plan Area.

PURPOSE OF THE WILSHIRE COMMUNITY PLAN

The last comprehensive review of the Wilshire Community Plan was completed in 1976, and revised in 1988 through the General Plan Consistency Program. Since that time, considerable growth and change has occurred and continues to occur in the Wilshire Community Plan Area.

New planning issues, concepts, and policies have arisen along with the emergence of new community objectives and goals regarding the management of development and neighborhood preservation.

Consequently, it is necessary to update the Wilshire Community Plan to not only reflect current conditions, but to accurately synthesize the prevailing visions and objectives of the area's residents, property owners, and business owners.

The Wilshire Community Plan sets forth planning goals and objectives to maintain the community's distinctive character by:

- Enhancing the positive characteristics of residential neighborhoods while providing a variety of housing opportunities.
- Improving the function, design and economic vitality of commercial areas.
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.
- Maximizing development opportunities around existing and future transit systems while minimizing adverse impacts.
- Preserving and strengthening commercial developments to provide a diverse job-producing economic base.
- Improving the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements which enhance the appearance of the community.

ORGANIZATION AND CONTENT OF THE WILSHIRE COMMUNITY PLAN

The Wilshire Community Plan sets forth planning goals, objectives, policies, and programs that pertain to the Wilshire Community. Broader planning issues, goals, objectives and policies are provided by the Citywide General Plan through its Framework Element.

The Wilshire Community Plan is organized and formatted to facilitate periodic updates. The State of California recommends that local land use elements be comprehensively reviewed every five years to reflect new conditions, local issues, and technological advances.

The principal method for the implementation of the Wilshire Community Plan Maps, particularly the land use map, is the City Zoning Code. The City's zoning maps are updated periodically to remain consistent with the adopted land use map.

Together, the City Zoning Code and the City Zoning Maps identify the specific types of land use and development standards applicable to specific areas and parcels of land within the Wilshire Community Plan Area.

RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS

The City of Los Angeles has the responsibility to revise and implement the City's General Plan. Since State law requires that the City's General Plan have internal consistency, the Wilshire Community Plan as a component of the City's Land Use Element must be consistent with the other elements and components of the General Plan.

The General Plan Framework is a long range, citywide comprehensive growth strategy. It is a special element of the General Plan which looks to the future and replaces Concept Los Angeles and the Citywide Plan adopted in 1974.

The Framework provides a citywide context within which local planning takes place. Both the benefits and challenges of growth are shared. Because of its citywide scale, the Framework cannot anticipate the detail of planning at the local community level. Therefore the community plans must be looked to for final determinations as to boundaries, land use categories, intensities and heights that fall within the ranges described by the Framework.

The Citywide General Plan Framework Element neither supersedes nor is subservient to the community plans. It guides the city's long range growth and development policy, establishes citywide standards, goals, policies, and objectives for citywide elements and community plans. The Framework is flexible, suggesting a range of uses within its land use definitions. Precise determinations are made in the community plans.

The General Plan Framework forecasts the following population, housing, and employment levels for the Wilshire Community Plan in the year 2010:

Population (persons):	337,144
Housing (units):	138,330
Employment (jobs):	197,959

These population, employment, and housing numbers are provided as reference during the community plan update. It needs to be recognized, however, that these figures are only best estimates and are derived from regional data disaggregated to the city and community level. Population, jobs and housing may grow at a faster or slower rate than anticipated depending on economic trends.

Regional forecasts do not always reflect the adopted community plan land use capacity or buildout as estimated from planned land use. Plan capacity or buildout is an estimate and depends on specific assumptions about future density of development and household size which may be greater or smaller than that which actually occurs. It should also be noted that the community plan capacity does not include housing in commercial districts nor does it adjust for the current residential vacancy rate.

In addition to the seven state mandated elements, the city's General Plan includes a service system element, a cultural element, a major public

facilities element and an air quality element. All provisions and requirements of these elements apply to the Wilshire Community Plan.

Additional working tools within the Wilshire Community Plan include specific plans, business improvement districts (BIDs), historical preservation overlay zones (HPOZs), community design overlay districts (CDOs), Streetscape programs, Streetscape plans, Neighborhood Traffic Mitigation Plans (NTMP), mixed use (MU) districts, and community redevelopment areas under jurisdiction of the Community Redevelopment Agency (CRA). These districts and zones combine planning policy and specific implementation tools to address detailed issues specific to local neighborhoods.

The community plan also includes appropriate policies generated from mitigation measures relating to the Environmental Impact Report (EIR) and Transportation Improvement and Mitigation Program (TIMP) prepared as part of the plan.



PLAN CONSISTENCY

The City of Los Angeles has the responsibility to maintain and implement the City's General Plan. Since state law requires that the General Plan have internal consistency, the Wilshire Community Plan must be consistent with the other elements and components of the General Plan.

Each plan land use category indicates the corresponding zones permitted by the plan, unless further restricted by the plan text, footnotes, specific plans, or other limitations established by discretionary approval. The plan recognizes that the residential densities and industrial densities depicted on the plan map are theoretical and may not occur due to plan and zone regulations, economic conditions and design limitations.

For each plan category, the plan permits all identified corresponding zones, as well as those zones which are more restrictive as referenced in Section 12.23 of the Los Angeles Municipal Code (LAMC). Any subsequent action that modifies the plan or any monitoring review that results in changes to the plan must make new plan consistency findings at the time of that decision.

City actions on most discretionary projects require a finding that the action is consistent or in conformance with the General Plan. In addition to the required general finding, decision makers acting on certain projects in the Wilshire Community Plan area shall refer to each of the applicable additional findings that the plan identifies as programs, policies, or objectives contained in Chapter III. To further substantiate the consistency findings, decision makers may cite other programs, policies or objectives that would be furthered by the proposed project. In addition, Chapter V of the Plan requires a decision-maker to make a finding of conformance with applicable design standards for discretionary projects.

PLAN MONITORING

In order to accommodate changes in anticipated population growth, The Wilshire Community Plan has a theoretical maximum land use and population capacity greater than the projected development likely to occur during the Community Plan period. The Framework Element of the General Plan commits the Department of City Planning to develop a monitoring system and prepare an annual report on growth and infrastructure, to be submitted to the City Planning Commission, Mayor and City Council.

In the fifth year following plan adoption (and every five years thereafter), the Director of Planning shall report to the commission on the relationship between population, employment, housing growth and plan capacities. If growth has occurred faster than projected, a revised environmental impact analysis will be prepared and appropriate changes recommended to the community plan. These plan and zoning changes shall be submitted to the Planning Commission, Mayor and City Council as specified in the Los Angeles Municipal Code.

Chapter III

LAND USE PLAN POLICIES AND PROGRAMS

Chapter III of the plan text contains goals, objectives, policies, and programs relating to all land use issues including residential, commercial and industrial, as well as public and institutional designations. The Planning Department has responsibility for the goals, objectives, policies, initiation, and implementation of the programs contained in this chapter.

RESIDENTIAL

The quality of life and stability of neighborhoods throughout the Wilshire Community Plan Area critically depend on the adequate provision of infrastructure resources (e.g., transportation, police, fire, water, sewerage, parks, etc.) commensurate with the needs of the population.

If population growth occurs faster than projected, and without needed infrastructure improvements to keep pace with that growth, the quality of life within the Wilshire Community would be adversely affected.

Accordingly, with regard to residential land use planning, the proposed Wilshire Community Plan has three fundamental premises.

- 1) A general limitation of residential densities in various neighborhoods to the prevailing existing density of development within these neighborhoods.
- 2) The monitoring of population growth and infrastructure improvements through the City's Annual Report on Growth and Infrastructure, with a report to the City Planning Commission every five years on the Wilshire Community following Plan adoption.
- 3) If this monitoring finds that population in the Plan area is occurring faster than projected; and that infrastructure resource capacities are threatened in relation to user need, particularly critical ones such as water and sewerage, but also including public schools, police and fire services, and transportation infrastructure; and, that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls would be put into effect for the affected portions of the Wilshire Community until land use designations for the Community Plan and corresponding zoning are revised to more appropriately limit new development.

The Community Plan includes appropriate policies and implementation measures generated from the mitigation measures which are listed in the Environmental Impact Report (EIR) and Transportation Improvement and Mitigation Program (TIMP). In many instances these measures also encompass the policies contained in the General Plan Framework Element.

The following table depicts the reasonable expected population and dwelling unit count for the year 2010, using a mid-point range for the dwelling-units-per-acre category. The mid-point represents a reasonable factor, since new development within each land use category is unlikely

to occur at the extremes of the range, but more likely, throughout the range.

PLAN POPULATION AND DWELLING UNIT CAPACITY

RESIDENTIAL LAND USE CATEGORY	DU'S PER NET ACRE MIDPOINT (RANGE)	NET ACRE	NUMBER OF DWELLING UNITS	PERSONS PER DWELLING UNIT (2010)	REASONABLE EXPECTED POPULATION (2010)
VERY LOW I	2 (1 to 3)	24	48	2.98	143
VERY LOW II	3.5 (3 to 4)	287	1,004	2.98	2,992
LOW I	4.5 (4 to 9)	111	499	2.98	1,487
LOW II	7 (4 to 9)	1,494	10,458	2.98	31,164
LOW MEDIUM I	13.5 (9 to 18)	550	7,425	2.53	18,785
LOW MEDIUM II	23.5 (18 to 29)	291	6,838	2.53	17,300
MEDIUM	42 (29 to 55)	1061	44,562	2.45	109,177
HIGH MEDIUM	82 (55 to 109)	773	63,386	2.45	155,296
TOTALS	----	4,592	134,300	2.51	336,344

GOAL 1

PROVIDE A SAFE, SECURE, AND HIGH QUALITY RESIDENTIAL ENVIRONMENT FOR ALL ECONOMIC, AGE, AND ETHNIC SEGMENTS OF THE WILSHIRE COMMUNITY.

Objective 1-1

Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010.

Policies

1-1.1 Protect existing stable single family and low density residential neighborhoods from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life.

Program: The Community Plan Map identifies lands where only single family residential development is permitted. These areas are protected by designating appropriate densities for each land use category designation and for each corresponding zone, to minimize incompatible uses.

- 1-1.2 Promote neighborhood preservation in all stable residential neighborhoods.

Program: With the implementation of the Wilshire Community Plan, all discretionary actions, Specific Plans, and any community and neighborhood residential projects must be consistent with Wilshire Community Plan recommendations.

Program: The Neighborhood Preservation Program administered by the City's Housing Department provides financial assistance rehabilitating Single Family homes and Multiple Family housing.

Program: Provide loans to owners of small residential buildings (one to four units) to correct code violations through the Homeowners Encouragement Loan Program (HELP), administered by the City's Housing Department.

- 1-1.3 Provide for adequate Multiple Family residential development.

Program: The Community Plan Map, identifies land where Multiple Family residential development is permitted.

- 1-1.4 Provide for housing along mixed-use boulevards where appropriate.

Program: Create Mixed Use Districts along targeted boulevards identified in the General Plan Framework to support the construction of mixed use development

Program: Implement a Mixed Use District in the Wilshire Center Area, including the area generally bounded by Third Street, Hoover Street, Olympic Boulevard, and Western Avenue.

Objective 1-2

Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.

Policies

- 1-2.1 Encourage higher density residential uses near major public transportation centers.

Program: To accommodate the anticipated population increase to the Wilshire Community Plan Area by the year 2010, the Plan designates a number of increased residential density city blocks, in close proximity to the City's highest number of major public transit corridors, major bus route stops, and subway stations.

Objective 1-3

Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.

Policies

- 1-3.1 Promote architectural compatibility and landscaping for new Multiple Family residential development to protect the character and scale of existing residential neighborhoods.

Program: Develop Community Design Overlays (CDO) and companion Streetscape Plans for the Miracle Mile Regional Center (generally from Highland on the east to La Cienega on the west); for Third Street (between Fairfax and La Cienega); for Fairfax Avenue (between Third and Rosewood, and between Olympic and Pico); and Melrose Avenue (between Van Ness and Hoover). Design Guidelines for corresponding Multiple Family Residential Development are listed in Chapter V.

- 1-3.2 Support historic preservation goals in neighborhoods of architectural merit and/or historic significance.

Program: Develop Historic Preservation Overlay (HPOZ) districts for the Windsor Square and Hancock Park neighborhoods, and other neighborhoods as appropriate including the Miracle Mile and Beverly-Fairfax neighborhoods, with community involvement and support.

Program: In recognition of the historic and intended park-like settings of many neighborhoods such as Hancock Park and Windsor Square, facilitate and support application and enforcement of existing regulations that establish minimum setbacks and limit fences, walls and hedges.

- 1-3.3 Promote the preservation and rehabilitation of individual residential buildings of historic significance

Program: Facilitate the declaration of Historic-Cultural Monuments through the Cultural Affairs Department on a building-by-building basis. Raise awareness within the community of this and other public and private resources available to protect and rehabilitate historic structures.

Program: Inventory neighborhoods in the Pico/Normandie area and identify possible candidates for Historic-Cultural Monument status, and neighborhoods for possible inclusion in an Historic Preservation Overlay District as a means to preserve architectural diversity and built history.

- 1-3.4 Monitor the impact of new development on residential streets. Locate access to major development projects so as not to encourage spillover traffic on local residential streets.

Program: Incorporate Neighborhood Traffic Mitigation Plans (NTMP) for major development and provide LADOT assistance to neighborhoods in design of NTMP's.

Objective 1-4

Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.

Policies

- 1-4.1 Promote greater individual choice in type, quality, price and location of housing.

Program: The plan promotes greater individual choice by allocating adequate lands in the Plan Area for a variety of residential densities, and for the promotion of housing in mixed-use projects.

- 1.4-2 Ensure that new housing opportunities minimize displacement of residents.

Program: Decision-makers should adopt displacement findings in any decision relating to the construction of new housing.

- 1.4-3 Encourage multiple family residential and mixed use development in commercial zones.

Program: The community plan identifies areas for mixed use development in commercial zones, as illustrated on the General Plan Framework Map.

Program: Create and implement mixed-use districts along boulevards as designated in the General Plan Framework.

COMMERCIAL

Commercial land uses designated in the Wilshire Community Plan consist of 1,129 acres or 12 percent of the total plan acreage. In 1996, the Wilshire area contained approximately 40,004,300 million square feet of commercial development. Approximately 20,520,100 million square feet (51 percent) was devoted to office use and 19,484,200 million (49 percent) to retail use.

Most of the commercial development can be categorized within four concentrations based on the general orientation of uses: Regional, Community, General, and Neighborhood. The General Plan Framework Element identifies and sets forth criteria of these designations.

REGIONAL COMMERCIAL

Four major areas designated in the Plan as Regional Commercial include:

Wilshire Center Regional Commercial Center; the Miracle Mile Regional Commercial Center; the Beverly Center-Cedars Sinai Regional Commercial Center; and the Koreatown Regional Commercial Center. They total approximately 270 acres.

Wilshire Center Regional Commercial Center

The Wilshire Center Regional Commercial Center is approximately 100 acres in size. It includes a dense collection of high rise office buildings, large hotels, regional shopping complexes, churches, entertainment centers, and both high-rise and low-rise apartment buildings.

The Regional Commercial Center includes Wilshire Boulevard in the eastern central portion of the Plan Area and is generally bounded by 3rd Street on the north, 8th Street on the south, Hoover Street on the east, and Wilton Place on the west.

The Regional Commercial Center includes the Vermont, Normandie, and Western Metro Red Line subway stations along Wilshire Boulevard.

Wilshire Center is designated in both the General Plan Framework Element and on the Community Plan Land Use Diagram as a Regional Commercial Center.

Miracle Mile Regional Commercial Center

The Miracle Mile Regional Commercial Center is approximately 100 acres in size. It is centered around Wilshire Boulevard in the west central portion of the plan area, and is generally bounded by 6th Street on the north; 8th Street on the south; Sycamore Avenue on the east; and San Vicente Boulevard on the west.

Miracle Mile is characterized primarily by numerous high rise office buildings, mid to low rise apartments, single-family areas south of 8th Street, entertainment centers, museums, and regional shopping complexes. Both the General Plan Framework Element and the Community Plan Land Use Diagram designate the Miracle Mile as a Regional Commercial Center.

Beverly Center-Cedars Sinai Regional Commercial Center

The Beverly Center-Cedars Sinai Regional Commercial Center is approximately 60 acres in size. It is centered around Alden Drive and San Vicente Boulevard in the northwestern portion of the Plan Area, and is generally bounded by Beverly Boulevard on the north, 3rd Street on the south, La Cienega Boulevard on the east, and Robertson Boulevard on the west.

The Beverly Center-Cedars Sinai Regional Commercial Center is primarily improved with high-rise medical and office buildings, hotels, apartment towers, entertainment centers and regional shopping complexes.

It is designated in the General Plan Framework Element, and on the Community Plan Land Use Diagram as a Regional Commercial Center.

Koreatown Regional Commercial Center

The Koreatown Regional Commercial Center runs along Olympic Boulevard, directly south of Wilshire Center. The intersection of Western Avenue and Olympic Boulevard is the core of this center. It is in the southwestern portion of the Plan Area, and is generally bounded by Eighth Street on the north, Twelfth Street on the south, Western Avenue on the west, and continues east towards Vermont Avenue.

The Regional Center includes low to mid-rise office and retail uses along Olympic Boulevard, with adjoining multiple family apartment blocks. The

**COMMUNITY
COMMERCIAL**

area is a cultural meeting place and nucleus of Korean American businesses, restaurants, and shops in addition to a wide range of community serving commercial uses and large shopping centers.

There are four main areas designated as Community Commercial Centers in the Wilshire Community Plan.

These include: the Crenshaw Community Center; the Pico Community Center; the Beverly-Fairfax Community Center, and the Vermont Community Center .

Crenshaw Community Commercial Center

The Crenshaw Community Center is approximately 34 acres in size. It is centered around Crenshaw and Olympic Boulevards in the southeastern portion of the Plan Area, and is generally bounded by 9th Street on the north, Country Club Drive on the south, Bronson Avenue on the east, and Victoria Avenue on the west.

The Community Center includes the Crenshaw Shopping Center. The area has been developed with commercial land uses ranging from one and two-story retail uses to high-rise office buildings and large shopping centers.

Olympic Boulevard between Crenshaw Boulevard and Wilton Place is designated as a Mixed Use Boulevard on the Community Plan Land Use Diagram. The majority of this segment is shown as Community Commercial on the Plan Map.

Pico Community Commercial Center

The Pico Community Center is approximately 34 acres in size. It is centered around Pico, San Vicente and Venice Boulevards in the south central portion of the Plan Area, and is generally bounded by Pico Boulevard on the north; Venice Boulevard on the south; West Boulevard on the east; and Mansfield Avenue on the west.

The Community Center includes a supermarket and shopping area, and the Santa Monica-Metro Bus Customer Service Center Station. The area has been developed with commercial land uses ranging from one and two-story retail to high-rise office buildings and large shopping centers. The entire length of Pico Boulevard is designated as a Mixed Use Boulevard on the Community Plan Land Use Diagram. This segment is shown as Community Commercial on the Plan Map.

Beverly-Fairfax Community Commercial Center

The Beverly-Fairfax Community Center is approximately 34 acres in size. It is in the northwestern portion of the Plan Area, and is generally bounded by Beverly Boulevard on the north, 3rd Street on the south, Gardener Avenue on the east, and Fairfax on the west.

The Community Center includes the Farmer's Market shopping complex;

CBS Television City Studios; and the Pan Pacific Regional Park. The area has been developed with commercial land uses ranging from one and two-story retail to high-rise office, multiple apartment towers, wholesale nurseries, and large shopping centers.

Beverly Boulevard and Fairfax Avenue are designated as Mixed Use Boulevards on the Community Plan Land Use Diagram. The majority of these segments are shown as Community Commercial on the Plan Map.

Vermont Community Commercial Center

The Vermont Community Center is approximately 34 acres in size. It is centered around Vermont Avenue and Beverly Boulevard in the northeastern portion of the plan area. It is generally bounded by the Hollywood 101 Freeway to the north; Council and 1st Streets to the south; Hoover Street to the east; and New Hampshire Street to the west.

The Community Center includes the Vermont-Beverly Metro Red Line station. A Station Neighborhood Area Plan (SNAP) for this area as well as along portions of Vermont Avenue and Hollywood Boulevard has been created to regulate development in conjunction with the Metro Red Line subway.

NEIGHBORHOOD DISTRICTS

There are four areas within the Wilshire Community Plan Area that are designated as Neighborhood Districts by the Community Plan Land Use Diagram. The four Neighborhood Districts total approximately 150 acres.

The Larchmont Neighborhood District includes commercial frontage along Larchmont Boulevard from Beverly Boulevard on the north to 1st Street on the south. Uses permitted in this unique neighborhood district are limited by special zoning regulations intended to protect and promote Larchmont Boulevard as a neighborhood-serving shopping district.

Other neighborhood districts include: the Fairfax-Beverly Neighborhood District (Fairfax Avenue frontage from Rosewood Avenue on the north, to Beverly Boulevard on the south); the 3rd Street Neighborhood District (3rd Street frontage from Fairfax Avenue on the east, to La Jolla Avenue on the west); and the Fairfax-Olympic Neighborhood District (Fairfax Avenue frontage from Olympic Boulevard on the north, to Pico Boulevard on the south).

These areas are primarily developed into small commercial village arrangements, with one to four-story retail and office uses, and a mix of residential units.

GENERAL COMMERCIAL

The remaining commercial areas, designated as General Commercial, consist of approximately 325 acres and are located on portions of Wilshire, Pico, and Olympic Boulevards.

Land uses on Pico and Olympic Boulevards include one to three-story retail and office buildings. The south side of Olympic Boulevard is predominantly improved with retail and office uses, but also supports several older low-density apartment buildings, motels and auto-oriented establishments. It is identified as a Mixed Use Boulevard on the

Community Plan Land Use Diagram.

**MIXED USE
BOULEVARDS**

The Mixed Use Boulevard concept encourages cohesive commercial development integrated with housing.

These structures incorporate retail, office and/or parking on the lower floors and residential units on the upper floors. The mixed use concept also accommodates separate commercial and residential structures in the same block.

The intent of mixed use development is to provide housing in close proximity to jobs and services, to reduce vehicular trips, traffic congestion and air pollution, to provide rental housing, and to stimulate vibrancy and activity in pedestrian-oriented areas.

Mixed use development may also provide community facilities such as libraries, meeting rooms, post offices, senior centers, or child day care facilities.

The Wilshire Community Plan aims to encourage well planned and integrated mixed use developments in designated commercial areas which have the potential to benefit from pedestrian oriented development. To that end, the plan calls for the creation of Mixed-Use Districts (MUs) and the policies, incentives, and design standards contained therein.

The plan supports applicable commercially zoned portions of the following as mixed-use boulevards and districts, as shown on the General Plan Framework map:

- 3rd Street (From La Cienega to Fairfax, From Western to Vermont)
- 8th Street (From Western to Vermont)
- Beverly Blvd (From Fairfax to Gardner, From Western to Vermont)
- Fairfax Ave (From Wilshire to Beverly)
- La Brea Ave (From Wilshire to Beverly)
- La Cienega (From 18th to Olympic)
- Larchmont Blvd (From Melrose to Beverly)
- Olympic Blvd (From Crenshaw to Hoover)
- Pico Blvd (From Crest to Hoover)
- Robertson Blvd (From Gregory to 18th)
- Vermont Ave (From Beverly to Pico)
- Western Ave (From Melrose to Pico)
- Wilshire Center (Commercial areas within the area bounded by 6th Street, Vermont Avenue, 8th Street, and Western Avenue)

GOAL 2

ENCOURAGE STRONG AND COMPETITIVE COMMERCIAL SECTORS WHICH PROMOTE ECONOMIC VITALITY AND SERVE THE NEEDS OF THE WILSHIRE COMMUNITY THROUGH WELL-DESIGNED, SAFE AND ACCESSIBLE AREAS, WHILE PRESERVING HISTORIC AND CULTURAL CHARACTER.

Objective 2-1

Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services

within existing commercial areas.

Policies

- 2-1.1 New commercial uses should be located in existing established commercial areas or shopping centers.
- 2-1.2 Protect existing and planned commercially zoned areas, especially in Regional Commercial Centers, from encroachment by stand alone residential development by adhering to the community plan land use designations.
- 2-1.3 Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.

Program: Coordinate with the City Clerk’s Office to assist businesses in obtaining technical and financial assistance for the formation of Business Improvement Districts (BID) and of other programs from the City of Los Angeles.

Objective 2-2

Promote distinctive commercial districts and pedestrian-oriented areas.

Policies

- 2-2.1 Encourage pedestrian-oriented design in designated areas and in new development.

Program: Establish Community Design Overlay Districts (CDOs), and Pedestrian Oriented Districts (PODs), which have design policies in designated areas to ensure the creation of pedestrian-friendly commercial development. Develop a CDO for the Miracle Mile area.

Program: Implement the Design Guidelines in Chapter 5, as they apply to commercial projects and projects located within Neighborhood Districts.

- 2-2.2 Encourage large mixed use projects to incorporate facilities beneficial to the community such as libraries, child care facilities, community meeting rooms, senior centers, police sub-stations, and/or other appropriate human service facilities as part of the project.
- 2-2.3 Encourage the incorporation of retail, restaurant, and other neighborhood serving uses in the first floor street frontage of structures, including mixed use projects located in Neighborhood Districts.

Objective 2-3

Enhance the visual appearance and appeal of commercial districts.

Policies

- 2-3.1 Improve streetscape identity and character through appropriate controls of signs, landscaping, and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.

Program: Prepare Streetscape Plans for commercial corridors to coordinate and improve the public streetscape as funds become available for implementation and construction.

Program: Work with the Wilshire Center BID to formally adopt existing streetscape plans for that portion of Wilshire Boulevard between Western and Hoover Street.

Program: Create a Streetscape Plan for the Miracle Mile, in conjunction with the proposed Community Design Overlay to coordinate and improve the public realm in conjunction with private urban design and facade improvements.

Program: Encourage the application of the Design Standards in Chapter 5 of the Plan by other City Departments, public agencies, and the private sector regarding improvement of public spaces and rights-of-way in commercial areas, especially in Community Commercial and Regional Commercial Centers.

Program: Promote assistance from the City of Los Angeles in the creation and implementation of Business Improvement Districts (BID).

INDUSTRIAL

The Wilshire area includes only minimal light industrial uses. In 1990, there were approximately 1.5 million square feet of industrial development in the Wilshire Community Plan Area, representing 0.05 percent of the total industrial square footage in the City of Los Angeles.

A total of 38 acres, or .43 percent of the total Plan Area is designated for industrial use. The largest such area is located along Beverly Boulevard, from Oakwood Avenue on the north, to Council and 1st Streets on the south, to Hoover Street on the east, to Juanita Avenue on the west, and is occupied by various business park type uses.

The Raleigh Studio site, between Melrose Avenue, Clinton Street, Van Ness Avenue and Bronson Avenue, is also designated as industrial land use in the Plan.

Some of these areas have been developed with two story retail and medium-rise office buildings (two to four stories); however, the majority of the area has been developed with retail/wholesale businesses and light manufacturing uses.

GOAL 3

PROVIDE SUFFICIENT LAND FOR LIGHT INDUSTRIAL USES WITH EMPLOYMENT OPPORTUNITIES THAT ARE SAFE FOR THE ENVIRONMENT AND WORKERS, AND WHICH HAVE MINIMAL ADVERSE IMPACT ON ADJACENT USES.

Objective 3-1

Retain existing industrial uses and promote future development, especially in entertainment and high technology applications, which contribute to job opportunities and minimize environmental impacts.

Policies

3-1.1 Designate and preserve lands for the continuation of existing industry and for the development of new industrial parks, research and development uses, light manufacturing and similar uses.

3-1.2 Encourage compliance with environmental protection standards and health and safety requirements.

Program: Continue to enforce environmental protection standards and health and safety requirements through the appropriate Federal, State, County, and City agencies.

Objective 3-2

Improve the aesthetic quality and design of industrial areas, eliminate blight and detrimental visual impact, and mitigate noise and air quality impacts generated by industrial uses on nearby residential neighborhoods.

Policies

3-2.1 Encourage new industrial development designs to be compatible with adjacent land uses.

Encourage appropriate building orientation and scale, landscaping, buffering and increased setbacks in the development of new industrial properties.

Program: Require new industrial development located adjacent to residential neighborhoods to conform with the Industrial/Residential Design Guidelines in Chapter 5 of this Plan.

Program: Study the creation of a Community Design Overlay District (CDO) to resolve issues of visual blight along Pico and Venice Boulevard industrial areas.

3-2.2 To buffer residential/industrial land uses, promote a transition of industrial uses, from intensive uses to less intensive uses, in those areas in close proximity to residential neighborhoods.

Objective 3-3

Continue to promote light industrial uses and accompanying employment bases in locations which are in close proximity to public transportation facilities and are compatible with surrounding land uses.

Policies

3-3.1 Minimize environmental impacts of industrial uses from other

uses by highways and other physical barriers.

Program: Implement this policy according to the land use designations on the Plan Maps, Map Footnotes, and the corresponding zoning.

RECREATION AND PARK FACILITIES

The Public Recreation Plan of the City of Los Angeles provides an official guide for considering minimum needs of neighborhoods and communities for recreational sites. It sets forth standards for the size, service areas, and types of facilities needed as recreation sites.

The City of Los Angeles Recreation and Parks Department operates 20 public parks and recreational facilities in the Wilshire Community Plan area. Parks are classified as Regional, Community, and Neighborhood. The Wilshire Community Plan designates approximately 191 acres of park land, including about 100 acres of private golf course (Wilshire Country Club). There are 10 Neighborhood Parks and Recreation Centers, 9 Community Parks and Recreation Centers, and one Regional Park.

The public parks and recreational facilities in the Wilshire Community Plan area are seriously inadequate by all Federal, State, and local standards to meet the needs of residents in the Wilshire Community Plan Area.

GOAL 4

PROVIDE ADEQUATE RECREATION AND PARK FACILITIES TO MEET THE NEEDS OF RESIDENTS IN THE WILSHIRE COMMUNITY PLAN AREA.

Objective 4-1

Conserve, maintain and better utilize existing recreation and park facilities which meet the recreational needs of the community.

Policies

4-1.1 Preserve and improve the existing recreational facilities and park spaces.

Program: Maintain all open space designations within the Wilshire Community Plan. Designate open space parkland as acquired by the Department of Recreation and Parks.

4-1.2 Encourage the shared use of other public facilities for recreational purposes.

Program: The Planning Department encourages the Los Angeles Unified School District and the City's Department of Recreation and Parks to continue to develop and implement programs to fully utilize the shared use potential of each of their respective sites.

Objective 4-2

Provide facilities for specialized recreational needs by utilizing existing public lands such as utility easements, Department of Water and Power properties, and unused or underutilized rights-of-way.

Policies

4-2.1 Underutilized public lands should be considered for open space and recreational purposes.

Program: Implement walking and jogging trails within the landscaped median portions of Designated Scenic Highways including San Vicente Boulevard and Highland Avenue, as land and funding become available; and if compatible with use as a transportation corridor.

Objective 4-3

Ensure the accessibility, security and safety of parks by their users, particularly families with children and senior citizens.

Policies

4-3.1 Ensure that parks are adequately policed, monitored, maintained and illuminated for safe use at night, as appropriate.

Program: Continue the management, design, construction and maintenance of public parks, by the Department of Recreation and Parks.

Program: Continue the provision of security and patrols of public parks and recreational facilities by the Los Angeles Police Department.

Objective 4-4

Expand and improve Neighborhood, Community, and Regional Parks, and Recreation Centers and Senior Citizen Centers throughout the Wilshire Community Plan Area on an accelerated basis, as funds and land become available.

Policies

4-4.1 Develop new Neighborhood and Community parks to help offset the Wilshire Community's parkland deficit for both its current population, and for the projected year 2010 population.

Program: Continue the location of development opportunities for new park sites, by the Department of Recreation and Parks, utilizing community input and available funds.

Program: Facilitate the creation of small neighborhood serving pocket parks within highly urbanized areas as potential parcels and funding become available.

Program: Develop City or private funding programs for the

acquisition and construction of new recreation and park facilities.

Program: Establish joint-use agreements with the Los Angeles Unified School District and other public and private entities which could contribute to the availability of recreational opportunities in the community plan area.

Program: Implement the Wilshire Community Plan recommendations for new Pocket Parks and Neighborhood Park expansions along all Boulevards, within public right-of-ways, and on unused and underutilized public properties, particularly as expansions of existing facilities, as land and funding become available; and if compatible with uses as transportation corridors, where applicable.

Program: Encourage the expansion of the Queen Anne Park and Recreation Center, at West Boulevard, 12th Street, and Queen Anne Place, southerly to Pico Boulevard, through joint agency efforts among the Community Redevelopment Agency (CRA), the Metropolitan Transportation Authority (MTA), and the Department of Recreation and Parks.

OPEN SPACE

There are two classifications of open space: publicly-owned and privately-owned.

Open Space is broadly defined as land which is essentially free of structures and buildings or is natural in character, and is categorized by one or more of the following functions:

1. Recreational and educational opportunities.
2. Scenic, cultural, and historic values.
3. Public health and safety.
4. Preservation and creation of community identity.
5. Right-of-ways for utilities and transportation facilities.
6. Preservation of physical resources or ecologically important areas.
7. Preservation of scenic resources including topographic features.

Lands designated as Open Space in the Wilshire Community Plan include the private Wilshire Country Club and Golf Course, as well as all public parklands.

GOAL 5

PROVIDE SUFFICIENT OPEN SPACE IN BALANCE WITH DEVELOPMENT TO SERVE THE RECREATIONAL, ENVIRONMENTAL, HEALTH AND SAFETY NEEDS OF THE WILSHIRE COMMUNITY, AND TO PROTECT ENVIRONMENT AND AESTHETIC RESOURCES.

Objective 5-1

Preserve existing open space resources and where possible develop new open space.

Policies

- 5-1.1 Encourage the retention of passive and visual open space to

provide a balance to urban development.

Program: The land use plan map designates areas to be preserved as open space.

- 5-1.2 Encourage continuous efforts by Federal, State and County agencies to acquire additional vacant land for open space.

Program: Encourage the utilization of the Open Space and parkland purchase programs available through Federal, State and County agencies.

- 5-1.3 Convert and upgrade underutilized publicly-owned property.

Program: Improve available rights-of-way throughout the Wilshire Community Plan area with landscaping, benches, picnic sites, walkways, for low-intensity recreational uses.

Encourage this improvement separately, and in combination with transit center or busway improvements, currently under study by the MTA.

- 5-1.4 Unused or underutilized public lands should be considered for open space and recreational purposes.

Program: Encourage the development of Neighborhood Parks and Pocket Parks along public right-of-ways and vacant public parcels.

SCHOOLS

The Los Angeles Unified School District (LAUSD) administers the planning, location, design, development, and operation of all public schools in the Wilshire Community Plan Area.

There are 21 Public Elementary Schools, three Public Middle Schools, and one Public High School within the Wilshire Community Plan Area, all of which are operating above capacity. Many of the public schools are among the oldest in the City of Los Angeles. They are all in need of substantial repairs and improvements

The Plan encourages shared use of existing public school facilities for the general public after hours, on weekends, and on holidays, as class schedules allow. School grounds should be made available so as to facilitate after school hour recreational uses.

GOAL 6

FACILITATE THE PROVISION OF PUBLIC SCHOOLS AND ADEQUATE SCHOOL FACILITIES TO SERVE EVERY NEIGHBORHOOD IN THE WILSHIRE COMMUNITY PLAN AREA.

Objective 6-1

Locate schools in areas complimentary to existing surrounding land uses with buffering, convenient to local neighborhoods, and with access to recreational opportunities.

Policies

- 6-1.1 Encourage compatibility between school locations, site layouts, architectural designs, and local neighborhood character.

Program: Require decision-makers in discretionary review actions for a proposed public school, to adopt findings which support this policy.

- 6-1.2 Encourage public school design that buffers classrooms from noise sources.

Program: Implement appropriate provisions of the City's Noise Element of the General Plan, specific for application of daytime school use, which requires noise measurements be made over the typical hours of use, instead of a 24-hour measurement.

Program: Incorporate noise mitigation measures to reduce adverse environmental impacts in compliance with California Environmental Quality Act (CEQA) Guidelines.

- 6-1.3 Expansion of existing public school facilities should be considered prior to acquisition of new sites.

Program: Coordinate Wilshire Community Plan Area possible school site locations with the Los Angeles Unified School District (LAUSD), the responsible agency for providing public school facilities.

- 6-1.4 Encourage cooperation between the LAUSD and the Department of Recreation and Parks to provide shared use of schools and recreation facilities for the entire Wilshire Community.

Program: Continue to assist the LAUSD and the Department of Recreation and Parks with the shared-use program where both public schools and parks are utilized for recreational and instructional purposes.

Objective 6-2

Continue to work constructively with the LAUSD to promote the siting and construction of adequate public school facilities phased with anticipated population growth in the Wilshire Community Plan Area.

Policies

- 6-2.1 Explore creative alternatives for providing new public school sites in the Wilshire Community Plan Area, where appropriate.

Program: Develop plans to work to resolve issues of siting and joint use of facilities, especially including strategies for school expansions in close proximity to major public transit routes.

Program: Utilize the City's Annual Report on Growth & Infrastructure for growth and potential new school sites.

Objective 6-3

Maximize the use of public schools for neighborhood use, and of local open space and parks for public school use.

Policies

- 6-3.1 Continue to encourage the siting of neighborhood facilities (e.g., libraries, parks, schools, and auditoriums) together as shared-use facilities.

Program: Formulate and update plans to work to resolve issues relating to siting and the joint use of such neighborhood facilities.

Identify strategies for the expansion of public school facilities including:

- 1) Encourage siting of public schools and other neighborhood facilities within a transit station, center, or mixed-use area to maximize the most efficient use of the land provided for these services.
- 2) Locate public middle schools and public high schools where possible, close to mass transit stations, centers, and mixed-use districts, to allow students to use the transit system to get to and from school.
- 3) Encourage public and private redevelopment of existing public school sites in the immediate vicinity of transit stations and centers, so that the existing low density land use would be replaced by a high-intensity mixed-use development that would incorporate school facilities.

Objective 6-4

Encourage the provision of charter schools, especially in the Wilshire Center area, as an effective method of delivering quality public education facilities at the neighborhood level.

Policies

- 6-4.1 Recognize the ability of charter schools to effectively provide classroom space in impacted urban areas.
- 6-4.2 Encourage the location of charter schools in the Wilshire Center area as a means to alleviate overcrowded school conditions.

Program: Prepare information for distribution at the Department of City Planning public counter outlining the permitting process for charter schools and identifying suitable land use designations and zones.

- 6-4.3 Support the construction of charter schools as being desirable to public convenience and welfare.

LIBRARIES

Public libraries serve as a center of community activity by providing

information, research materials, books, journals, and newspapers, and services for students and meeting places. The Public Libraries Plan of the City of Los Angeles serves as a guide for the construction, maintenance, and operation of public library facilities.

There are six Community Branch Libraries within the Wilshire Community Plan Area: Felipe de Neve, Memorial, Mid-City, Pio Pico-Koreatown, Robertson, and Wilshire.

GOAL 7

ENSURE THAT ADEQUATE LIBRARY FACILITIES ARE PROVIDED FOR THE WILSHIRE COMMUNITY.

Objective 7-1

Encourage the City's Library Department to continue to provide adequate library service to the Wilshire Community Plan Area.

Policies

7-1.1 Support construction of new libraries and rehabilitation and expansion of existing libraries.

Program: Provide for the retention, rehabilitation and expansion of existing library sites.

7-1.2 Encourage flexibility in siting libraries in mixed-use projects, shopping malls, pedestrian-oriented areas, office buildings and similarly accessible facilities.

Program: Continue to support such joint-use opportunities, when the Library Department and decision-makers review and approve new libraries sites.

POLICE PROTECTION

The Los Angeles Police Department (LAPD) provides police protection within the Wilshire Community Plan Area.

LAPD facilities include: the Wilshire Area Police Station, and four additional Police Department Stop-In Sites.

There are no further facilities expansion plans at this time.

GOAL 8

CONTINUE TO PROVIDE THE WILSHIRE COMMUNITY WITH ADEQUATE POLICE FACILITIES AND SERVICES TO PROTECT ITS RESIDENTS FROM CRIMINAL ACTIVITY, REDUCE THE INCIDENCE OF CRIME, AND PROVIDE OTHER NECESSARY LAW ENFORCEMENT SERVICES.

Objective 8-1

Provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands

Policies

8-1.1 Consult with the LAPD in the review of development projects and land use changes to determine law enforcement needs and

requirements.

Objective 8-2

Improve the ability of the community and police department to minimize crime and provide adequate security for all residents.

Policies

8-2.1 Support and encourage community based crime prevention efforts (such as Neighborhood Watch) through regular interaction and coordination with existing policing, foot and bicycle patrols, community watch programs and regular communication with neighborhood and civic organizations.

Program: Continue to support community-oriented law enforcement programs, as administered by the LAPD.

Program: Encourage Business Improvement Districts to supplement patrol services with private services through training and coordination programs administered by the LAPD.

8-2.2 Provide adequate lighting around residential, commercial and industrial buildings, and park, school, and recreational areas to improve security.

Program: Coordinate discretionary land use reviews by the Department of City Planning in consultation with the LAPD, and include implementation of the principles of the City of Los Angeles Crime Prevention Through Environmental Design (CPTED) Guidelines.

8-2.3 Ensure that landscaping around buildings does not impede visibility and provide hidden places which could foster criminal activity.

Program: Continue to apply and require CPTED standards in discretionary land use approvals, in consultation with the LAPD.

FIRE PROTECTION

The City of Los Angeles Fire Department provides fire protection within the Wilshire Community Plan Area.

There are six fire stations within the Wilshire Community Plan Area.

The Fire Protection and Prevention Plan of the City of Los Angeles Fire Department provides an official guide to City Departments, other governmental agencies, developers, and interested citizens for the construction, maintenance, and operation of fire facilities.

It is intended to promote fire prevention by maximizing fire safety education and minimizing loss of life through fire prevention programs. Pursuant to this Plan, it may be necessary to expand or relocate existing facilities as land patterns change.

GOAL 9

PROTECT THE RESIDENTS OF THE WILSHIRE COMMUNITY AREA THROUGH A COMPREHENSIVE FIRE AND LIFE SAFETY PROGRAM.

Objective 9-1

Maintain fire facilities and protective services that are sufficient for the existing and future population and land use.

Policies

- 9-1.1 Coordinate with the City of Los Angeles Fire Department during the review of significant development projects and General Plan amendments affecting land use to determine the impacts on service demands.

Program: Decision-makers should continue to include findings on the impacts on fire service demands of a proposed project or Plan Amendment.



Program: Encourage the continued consultation with the City of Los Angeles Fire Department, which is currently in effect for projects subject to the subdivision process.

- 9-1.2 Assist the City of Los Angeles Fire Department in locating fire service facilities at appropriate locations throughout the Wilshire Community Plan Area.

Program: Identify locations of existing fire service facilities, and assist in the location of future sites, as determined by the City of Los Angeles Fire Department.

TRANSPORTATION

A number of local, state and regional plans and ordinances, prepared by various public agencies, work to implement transportation improvements in the Wilshire Community Plan Area. These include:

The Los Angeles County Congestion Management Program (CMP); the Long Range Plan prepared by the Los Angeles County Metropolitan Transportation Authority (LACMTA); the Regional Transportation Plan (RTP) prepared by the Southern California Association of Governments (SCAG); and the Statewide Transportation Improvement Program (STIP) prepared by the California Department of Transportation (CALTRANS).

LADOT also implements pedestrian-oriented arterials, bikeways, and transit-priority streets.

TRANSPORTATION IMPROVEMENT AND MITIGATION PROGRAM (TIMP)

A Transportation Improvement and Mitigation Program (TIMP) was prepared for the Wilshire Community Plan Area that analyzes land use impacts on transportation, projected to the year 2010.

The TIMP analysis is part of the Environmental Impact Report and is

prepared to analyze the environmental impacts of implementation of the Wilshire Community Plan.

The TIMP establishes a program of specific measures to reduce land use impacts on transportation to be undertaken during the life of the Wilshire Community Plan. It also takes into account and incorporates the local, state and regional programs noted above.

The Wilshire TIMP provides an implementation program for the circulation needs of the Wilshire Community Plan Area, which consist of recommendations as follows:



- A. Street Reclassifications
- B. Transit Improvements
- C. Non-Motorized Transportation
- D. Transportation Demand Management Strategies (TDM)
- E. Transportation Systems Management Strategies (TSM)
- F. Residential Neighborhood Protection Plans
- G. Parking
- H. Capital Improvements

A. STREET RECLASSIFICATIONS

Highway and Street Classifications

Highways and Streets in the Wilshire Community Plan Area are classified as: Major Class II Highways and Divided Major Class II Highways; Secondary Highways and Divided Secondary Highways; Collector Streets and Local Streets.

The following reclassifications are made in this plan:

- | | | |
|---|---------------------|---|
| 1 | Lucerne Bl. | Local Street : From Third St. to Wilshire Bl. |
| 2 | Commonwealth Ave. | Collector Street : From Beverly Bl. to Wilshire Bl. |
| 3 | Wilton Place | Collector Street : From Beverly Bl. to Third St. |
| 4 | Venice Bl. | Major Class II Highway : From West Bl. to Highland Ave. |
| 5 | 8 th St. | Collector Street : From Fairfax Ave. to Crenshaw Bl. |
| 6 | Redondo Bl. | Modified Collector Street : From La Brea Ave. to Venice Bl. |
| 7 | Westmoreland Ave. | Local Street : From Wilshire Bl. to 7 th St. |
| 8 | June St. | Local Street : From Melrose Ave. to 3 rd St. |
| 9 | Rosewood Ave. | Local Street : From Serrano Ave. to Normandie Ave. |

- | | | |
|----|----------------------|---|
| 10 | Stanley Ave. | Collector Street : Beverly Bl. to 3 rd St. |
| 11 | Virgil Ave. | Secondary Highway : From Beverly Bl. to Wilshire Bl. |
| 12 | Edgewood Place | Collector Street : From Redondo Bl. to La Brea Ave. |
| 13 | Crescent Heights Bl. | Modified Secondary Highway from Wilshire Bl. to Rosewood Ave. as shown on Exhibits A & B. |

Alternate Standards

In addition, the Wilshire Community Plan maintains the following alternate standards for the development of certain streets due to environmental and urban design considerations:

- 1 Robertson Blvd.
Minimum Secondary Highway Standard - 80 foot right-of-way, 60 foot roadway
- 2 Highland Ave. (Between Melrose and Wilshire)
Trees to be preserved; no improvements beyond the existing right-of-way.
- 3 Wilshire Blvd.
No widening in excess of existing roadway.
- 4 Beverly Blvd.
No widening of roadway west of Western Avenue.
- 5 Fairfax
Secondary Highway
- 6 Crescent Heights Blvd.
Modified Secondary Highway from Wilshire Bl. to Rosewood Ave.
- Road way restricted to current width along single family, low, and low medium density residential areas as shown in Exhibit A. Permit flaring or other types of improvements at the commercial intersections at the commercial intersections of Wilshire Bl., 3rd St., and Beverly Bl. The City may acquire dedication, 100 feet beyond the alley behind these intersections for improvements only if the adjacent lots are ever developed with commercial, commercial parking or high or medium density multiple family residential uses.

It is the intent of this plan for the Modified Secondary Highway to allow traffic signals and other mitigation measures in order to reduce speeds and increase safety, and to restrict, along the single family areas, the function of the roadway to a collector street for all other purposes.

- 7 Redondo Blvd.
Modified Collector - 70 foot right-of-way, 50 foot roadway to accommodate Class II Bikeway

- 8 Oxford Avenue
Minimum Secondary Highway standard - 80 foot right-of-way, 60 foot roadway

B. TRANSIT IMPROVEMENTS

Opportunities exist within the Wilshire Community Plan Area to increase the use of public transit. While it is anticipated that the private automobile will remain the primary mode of private transportation within the time frame of the Plan (2000-2010), bus service, community bus and van shuttles, and the Red Line subways will provide alternative public transit modes.

Public transit services in Wilshire are currently provided by the Metropolitan Transportation Authority (MTA), the Los Angeles Department of Transportation (LADOT), and by buses from nearby cities.

The City of Los Angeles continues to work with other public agencies in evaluating travel needs and recommending modifications and improvements to existing public transit systems, and additions of new public transit systems.

GOAL 10

DEVELOP ADDITIONAL PUBLIC TRANSIT SERVICES WHICH IMPROVE MOBILITY WITH EFFICIENT, RELIABLE, SAFE, CONVENIENT ALTERNATIVES TO AUTOMOBILE TRAVEL.

Objective 10-1

Continue to encourage improved and additional local and express bus service and neighborhood shuttles throughout the Wilshire Community Plan Area.

Policies

10-1.1 Continue to coordinate with the Metropolitan Transportation Authority (MTA) and the Los Angeles Department of Transportation (LADOT) with plans to improve local and express bus service serving Wilshire.

Program: Increase, expand and implement additional bus service along high travel demand routes, especially east-west along Melrose Avenue, Beverly Boulevard, 3rd Street; Wilshire, Olympic, and Pico Boulevards; and Western and Vermont Avenues; and 3rd Street, La Brea, La Cienega, and Fairfax Avenues.

Program: Enhance and optimize public transit alternatives to the Westside, working with the recommendations made as part of the Westside Transit Restructuring Study, as prepared by the MTA, with support from LADOT.

The Transit Restructuring Study area includes connections between the major activity centers in the Wilshire Community Plan Area and commercial corridors along Wilshire, and Olympic

Boulevards.

Program: Finalize the demonstration project to evaluate the effectiveness of the “Bus Rapid Transit” concept, as proposed by the MTA for the Wilshire Boulevard - East Los Angeles corridor and the Pico/Rimpau - Downtown - East Los Angeles corridor.

LADOT should participate in this evaluation project and seek to identify one or more north-south Rapid Bus corridors in Wilshire. One such corridor that should be investigated is Western Avenue to provide improved access to the MTA Red Line Subway Stations on Wilshire and Hollywood Boulevards.

Program: Continue to provide Smart Shuttles as “feeder” services for public transit among residential areas along Collector Streets and Local Streets; and provide convenient access to bus services, Subway Stations or activity centers, such as, Farmers Market, Beverly Center/Cedars-Sinai, Wilshire Center, the Miracle Mile, and Park La Brea.

These Shuttles, with 20-passenger seating capacity, complement existing bus services in approximately 20-minute full-circle routes in areas not currently served by larger buses.

- 10-1.2 Encourage the expansion, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled people, students, and low-income, transit-dependent populations.

Program: Expand the existing LADOT City Ride Program.

Program: Expand Shuttle routes to supplement other paratransit services for senior citizens, disabled people, students, and low-income, transit-dependent populations.

Objective 10-2

Increase work trips and non-work trips made on public transit.

Policies

- 10-2.1 Develop coordinated intermodal public transit plans to implement linkages to future public transit services.

Program: Continue the implementation of the MTA Preliminary Planning Study recommendations for the Wilshire Boulevard Corridor, connecting the Westside to the Wilshire Community Plan Area.

Program: Encourage development of “Public Transit Transfer Centers”, including public transit stations, located at convenient locations to allow easy transfers to other routes and public services, employment areas, and shopping centers.

- 10-2.2 Implement Transit Priority Treatments (such as signal coordination or replacement, public transit signal priority, queue

jumpers, signing and striping placement and color modification).

Program: Implement Transit Priority Treatment bus speed improvement measures, according to the General Plan Transportation Element, on all Major Class II Highways in the Wilshire Community Plan Area with scheduled bus service.

Program: Provide enhanced amenities at major transit stops including such facilities as widened sidewalks, pedestrian waiting areas, transit shelters, enhanced lighting, improved crosswalks, information kiosks, and advanced fare collection mechanisms.

C. NON-MOTORIZED TRANSPORTATION

The City's Bicycle Plan provides for non-motorized circulation in the Wilshire Community Plan Area, including Bikeway Study Corridors, and two Class II Bikeways. These include one along San Vicente Boulevard, from La Cienega Boulevard to Venice Boulevard; and one along Redondo Boulevard, from San Vicente Boulevard to Venice Boulevard. A Commuter Bikeway is also designated along Pico Boulevard, from San Vicente Boulevard to Hoover Street.

The Transportation Element Non-Motorized Transportation Map also depicts potential areas with a high degree of pedestrian orientation: along Fairfax Avenue from Beverly Boulevard to Rosewood Avenue; along 3rd Street from Fairfax Avenue to San Vicente Boulevard; along Larchmont Boulevard from Beverly Boulevard to 1st Street; in the Vermont Community Commercial Center, and around Beverly Boulevard and Vermont Avenue.

It is the intent of the Wilshire Community Plan to facilitate the development of a Bikeway system which will complement other transportation modes, and encourage the use of bikeways as a commuter option, in accordance with the Transportation Element.

GOAL 11

ENCOURAGE A SYSTEM OF SAFE, EFFICIENT AND ATTRACTIVE BICYCLE AND PEDESTRIAN ROUTES.

Objective 11-1

Promote an adequate system of Bikeways for commuter, school and recreational use.

Policies

11-1.1 Encourage funding and construction of Bikeways to connect residential neighborhoods to schools, open space areas, and employment centers.

Program: The City's Bicycle Plan promotes the expansion of bicycle usage through further development of bikeways and improvement of appropriate support programs.

11-1.2 Provide Bikeways along Major Class II and Secondary highways

in the Wilshire Community Plan Area.

Program: Continue to implement the Citywide Bicycle Plan for the Wilshire Community Plan Area, which includes the following proposed bikeways:

Class II Bikeway along San Vicente Boulevard, from Beverly Boulevard to Venice Boulevard.

Class II Bikeway along Redondo Boulevard.

Commuter Bikeway along Pico Boulevard, from Hoover Street to San Vicente Boulevard.

11-1.3 Assure that local bicycle routes are linked with the routes of neighboring areas of the City.

11-1.4 Support the provision of bicycle facilities in all new development.

Program: Continue to enforce the Los Angeles Municipal Code (LAMC 12.21-A16), which requires the provision of changing rooms, showers and bicycle storage at all new non-residential developments and public places.

Objective 11-2

Promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers.

Policies

11-2.1 Encourage the safe utilization of public utility easements and other public rights-of-way along streets wherever feasible for the use of pedestrians.

Program: Continue implementation of the Citywide Land Use/Transportation Policy (Guide to Decisions on the Design of Public Rights-of-Way) and the City's discretionary project approval process.

11-2.2 Require sidewalks with new roadway construction and substantial reconstruction of existing roadways.

Program: Continue to coordinate with the City's Capital Improvement Program (CIP), Public Works construction projects and the City's discretionary project approval process.

11-2.3 Protect and improve existing pedestrian oriented street segments.

Program: Develop precise guidelines to develop, protect, and foster the pedestrian oriented nature of these areas.

Program: Encourage pedestrian-oriented streetscape design, as part of DOT's Neighborhood Traffic Management program,

especially in regards to mitigating some of negative impacts of secondary highways through residential neighborhoods (including Wilton Place and Crescent Heights Boulevard).

D. TRANSPORTATION DEMAND MANAGEMENT STRATEGIES (TDM)



The estimated increase in vehicle trips which will be generated by future development in the Wilshire Community Plan Area calls for the implementation of a Transportation Demand Management Program (TDM).

TDM measures encourage people to change their travel mode from single-occupancy vehicles (SOV) to other transportation modes, including public transit.

Incentives are given to utilize TDM measures such as all forms of public transit, ridesharing, modified work schedules, van pools, telecommuting; and non-motorized transportation modes, such as bicycles and walking.

Transportation Demand Management (TDM) Program

1. Transportation Management Association Formation/Coordination

Continue to encourage the formation of Transportation Management Associations (TMA's) to assist employers in creating and managing trip reduction programs, particularly in and around Wilshire Regional Commercial Centers, Community Commercial Centers, and along major commercial corridors.

2. TMA Coordinating Council

Establish a coordinating council to coordinate data among various TMAs in the Wilshire Community Plan Area, and within adjacent communities and jurisdictions. This council may also serve to coordinate and publicize alternatives to automobile use.

3. Participation in Regional Transportation Management Programs

Continue to participate in local and regional TDM programs and coordinate the Wilshire TDM program with those of other communities, agencies and adjacent jurisdictions.

4. TDM Ordinance

Continue to implement the Citywide TDM and Trip Reduction Measures Ordinance (LAMC 12.26-J) in the Wilshire Community Plan Area, which require trip reduction.



5. Monitoring

LADOT has the responsibility to monitor the Citywide TDM ordinance.

6. **Bikeways**

Continue to implement the Citywide Bicycle Plan, which includes a future bikeway system in the Wilshire Community Plan Area, as part of an overall Transportation Demand Management Strategy.

7. **Telecommuting**

Encourage large employers to provide teleconferencing facilities.

Encourage large residential developments to incorporate “Local Work Centers” for telecommuting purposes.

GOAL 12

ENCOURAGE ALTERNATIVE MODES OF TRANSPORTATION TO REDUCE SINGLE-OCCUPANCY VEHICULAR TRIPS.

Objective 12-1

Pursue Transportation Demand Management Strategies that maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.

Policies

12-1.1 Encourage non-residential developments to provide employee incentives for using alternatives to the automobile (car pools, van pools, buses, shuttles, subways, bicycles, walking) and provide flexible work schedules.

Program: The Citywide Ordinance on TDM and Trip Reduction Measures should continue to be implemented and monitored by LADOT.

12-1.2 Encourage the use of Multiple-Occupancy Vehicle programs for shopping and other non-work activities to reduce midday, evening, and special event traffic.

Program: Continue to provide park-and-ride shuttle services to activity centers and special events, through LADOT.

Program: Design and implement a public education program to promote ridesharing.

12-1.3 Require that proposals for major non-residential development projects include submission of a TDM Plan to the City.

Program: Decision-makers and LADOT shall require a TDM plan as condition of approval of projects. Such programs should include telecommuting, flexible work schedules, and teleconferencing.

- 12-1.4 Promote the development of transportation facilities and services that encourage higher transit ridership, increased vehicle occupancy, and improved pedestrian and bicycle access.

Program: Pursue measures such as locally-based Transportation Management Organizations, merchant incentives, preferential parking areas, bicycle access and parking, and lighting for pedestrian, vehicular, bicycle, and public transit uses.

E. TRANSPORTATION SYSTEMS MANAGEMENT STRATEGIES (TSM)

Transportation Systems Management (TSM) is the optimization of the transportation system by improving the traffic flow with low capital cost projects and minimal construction, implemented in a short time frame.

TSM strategies include: synchronization of traffic signals; localized intersection improvements; traffic light cameras for enforcement at high-risk intersections; prohibition of on-street parking on Major Class II and Secondary Highways and during peak travel times on Collector Streets; establishment of Preferential Parking Districts; and implementation of rapid bus programs with signal preemption and queue jumping.

TSM improvements also entail the application of new technologies through the use of Intelligent Transportation Systems (ITS) technologies. These include traveler information systems (e.g., changeable message signs, highway advisory radio), traffic management systems (e.g., enhanced signal systems, closed circuit TV for monitoring), incident management, and transit priority systems.

GOAL 13

PROVIDE A WELL-MAINTAINED, SAFE, EFFICIENT FREEWAY, HIGHWAY AND STREET NETWORK.

Objective 13-1

Increase traffic capacity on existing freeways, highways, and streets, through policy changes, and minor physical improvements to existing highways and streets.

Policies

- 13-1.1 Install Automated Traffic Surveillance and Control (ATSAC) equipment at all signalized intersections in the Wilshire Community Plan Area.

LADOT estimates that implementation of this system improves intersection capacity by as much as 7%.

Program: Expand Adaptive Traffic Control Systems (ATCS), which are currently on line along two corridors of signal-controlled intersections, to improve intersection capacity in the Wilshire

Community Plan Area.

- 13-1.2 Install an Adaptive Traffic Control System (ATCS) at all intersections along Major Class II and Secondary Highways, and some Collector Streets to improve intersection capacity by an additional 3%. This upgrade of the existing ATSAC system provides an additional capacity enhancement beyond that of ATSAC.

Program: Install ATCS along all Major Class II and Secondary Highways, and along selected Collector Streets, throughout the Wilshire Community Plan Area.

- 13-1.3 Implement or enhance “Smart Corridors” to coordinate Caltrans’ freeway traffic management system, with the ATSAC/ATCS highway and street traffic signal management system to enhance incident management and motorist information, and thereby reduce traffic delays.

Program: Implement ATSAC along the Hollywood Freeway (I-101) Corridor, along all Major Class II and Secondary Highways, and some Collector Streets to the north and south, (e.g., Beverly Boulevard, and Vermont, Melrose, and Rosewood Avenues) to create a “Smart Corridor” along the Hollywood Freeway Corridor similar to the Santa Monica Freeway.

- 13-1.4 Improve the strict and constant enforcement of all parking restrictions in the Wilshire Community Plan Area, including tow-away responses.

Program: Substantially expand peak- hour parking restrictions for more restrictive days and times along all Major Class II and Secondary Highways, and along all Collector Streets currently operating at a Level of Service (LOS) of “D” or below, to maximize vehicle utilization of all available lanes in all directions.

- 13-1.5 Identify and implement intersection improvements (channelization, turn lanes, signal modifications) on all Major Class II and Secondary Highways, and along some Collector Streets, throughout the Wilshire Community Plan Area.

Program: Study implementation plans within the community to look at off center striping, emphasizing traffic on pairs of arterials, particularly in the north/south direction.

Objective 13-2

Ensure that adequate maintenance of the street system is provided to facilitate the movement of the current and future traffic volumes, as well as emergency services.

Policies

- 13-2.1 Set aside additional funds for the maintenance and rehabilitation of all Highways and Streets.

Program: Continue operating and refining the City's Pavement Management System to develop optimum street maintenance strategies, with an emphasis on full-width resurfacing.

Revise maintenance strategies to ensure that all on-street work is conducted only during non-peak days and hours and that no vehicles, equipment, materials, supplies, etc., are parked or stored on any Major Class II and Secondary Highways during weekdays.

F. RESIDENTIAL NEIGHBORHOOD PROTECTION PLANS

Within the Wilshire Community Plan Area, Residential Neighborhood Protection Plans are developed and implemented by the Department of Transportation.

These Plans include traffic control measures which regulate, warn, and guide movement of pedestrians and vehicular traffic in a safe, efficient and compatible manner.

They include such measures as stop signs and other traffic control signs, speed humps, traffic circles, semi-traffic diverters and right or left turn only lanes. Stronger enforcement of turn restrictions, stop sign adherence and speed limits is also goal of the LAPD traffic enforcement unit.

Acceptable traffic conditions on local residential streets may include elements beyond capacity or local congestion, including speed, safety and the maximum traffic volume that is compatible with a livable neighborhood environment. Response on a case-by-case basis without analyses of the entire regional or neighborhood traffic scenario has been ineffective to minimize such "unwanted traffic" intrusion into the residential neighborhoods.

Furthermore, well-meaning implementation of neighborhood traffic controls on one street can simply cause intruding traffic and spill-over parking to shift to adjacent residential neighborhoods. There is no one solution to these issues.

In order for Residential Neighborhood Protection Plans to be effective, traffic control measures should be clearly understood by motorists and pedestrians. Traffic control measures should convey clear, advanced warning, unambiguous messages, be justified, and should appropriately regulate the traffic for which they are intended.

Effective Residential Neighborhood Protection Plans should be implemented on an area-wide basis, and must involve all affected parties, including Planning staff, LADOT staff, LAPD, City Council Representatives, and neighborhood businesses and residents.

LOCAL STREETS, AND ENCOURAGE COMMUNITY INVOLVEMENT IN DETERMINING NEIGHBORHOOD TRAFFIC AND PARKING CONTROLS.

Objective 14-1

Initiate and continue existing Residential Neighborhood Protection Plans to mitigate traffic and parking impacts throughout the Wilshire Community Plan Area.

Policies

14-1.1 The City Planning Department and LADOT should continue to work closely with the Wilshire Community Plan Area residents to identify existing and anticipated “cut-through” traffic and spillover parking from adjacent commercial areas. Through neighborhood community meetings, traffic calming programs and strategies should be developed for effective Residential Neighborhood Protection Plans.

Program: Implement Residential Neighborhood Protection Plans to include traffic control monitoring programs to accomplish the following:

- ? Installation of proper traffic control devices.
- ? Analysis of effectiveness.
- ? Ensure that undesirable impacts on established residential neighborhoods are minimal.
- ? Examination of the need for additional controls.

14-1.2 Support and research emerging traffic calming techniques as potential traffic mitigation factors in impacted residential neighborhoods.

Program: Create neighborhood streetscape plans to coordinate and implement traffic calming measures, maintaining openness and connectivity while improving safety, appearance, and control.

G. PARKING

The Wilshire Community Plan supports the City’s continuing effort to develop City-owned (off-street) parking facilities so that an adequate supply of parking can be provided to meet demand.

City-owned parking lots and structures should be located in or near all commercial areas, with highest priority given to all Regional and Community Commercial Centers in a phased program, and to Major Class II and Secondary Highways in the Wilshire Community Plan Area.

GOAL 15

PROVIDE A SUFFICIENT SUPPLY OF WELL-DESIGNED AND CONVENIENT OFF-STREET PARKING LOTS AND FACILITIES THROUGHOUT THE PLAN AREA.

Objective 15-1

Provide off-street parking in appropriate locations in accordance with Citywide standards and community needs.

Policies

15-1.1 Minimize the number of ingress and egress points to and from all Major Class II and Secondary Highways in the Wilshire Community Plan Area.

Program: The City Planning Department with LADOT should develop a phased, coordinated parking management strategy to implement this policy.

15-1.2 Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.

Program: Continue to apply the Urban Design Chapter guidelines for parking facilities.

Program: Promote the provision of shared parking facilities in appropriate centers and districts.

15-1.3 Manage the supply of on-street parking to provide convenient parking for customers of commercial land uses and to encourage employees to park in off-street lots or garages or use alternate modes of transportation.

Program: LADOT should periodically review the supply and allocation of on-street parking and adjust time limits, hours of parking restrictions and meter rates to maximize the availability of on-street parking for customers of commercial land uses.

H. CAPITAL IMPROVEMENTS

Highway and Street Improvements

The Plan Area includes four Designated Scenic Highways:

- 1.) Highland Avenue, north-south from Rosewood Avenue to Wilshire Boulevard
- 2.) Wilshire Boulevard, east-west from La Brea Avenue to Fairfax Avenue
- 3.) Burton Way, east-west from La Cienega Boulevard to Oakhurst Drive (City of Los Angeles boundary)
- 4.) San Vicente Boulevard, southeast-northwest from Pico Boulevard to La Cienega Boulevard.

Designated Scenic Highways merit special controls and/or visual enhancement programs in order to protect scenic resources. The land contiguous to a scenic highway is known as a Scenic Corridor.

It is appropriate that protective land use controls be established for these Corridors, particularly with respect to signage and billboards.

San Vicente Boulevard and Burton Way are presently being studied by the Metropolitan Transportation Authority (MTA) to improve the rights-of-way with landscaping of medians and sidewalk areas, and provision of pedestrian amenities.

GOAL 16

PROVIDE A COMMUNITY-WIDE CIRCULATION SYSTEM OF FREEWAYS, HIGHWAYS, AND STREETS WHICH SUPPORTS EXISTING AND PLANNED LAND USES AND ANTICIPATED TRAFFIC FLOW VOLUMES, WHILE MAINTAINING ACCEPTABLE LEVELS OF SERVICE AT ALL INTERSECTIONS.

Objective 16-1

Comply with Citywide performance standards for acceptable Levels of Service (LOS) and ensure that necessary Freeway, Highway and Street access and improvements are provided to accommodate additional traffic anticipated from Wilshire Community Plan land use changes and/or by new development.

Policies

16-1.1 Maintain a satisfactory Level of Service (LOS) above LOS “D” for Class II Major Highways, especially those which serve Regional Commercial Centers and Community Commercial Centers; and above LOS “D” for Secondary Highways and Collector Streets.

Program: Improve to designated standard dimensions substandard segments of Class II Major and Secondary Highways which are expected to experience additional heavy traffic congestion by the year 2010, with special consideration given to environmental issues and pedestrian-oriented street segments.

Program: Construct Stanley Avenue as a Collector Street between Beverly Boulevard and 3rd Street in conjunction with planned development at the adjacent Farmers Market site.

Program: Implement the Capital Improvement Program.

Widen Highways and Streets in those roadway segments listed in the Wilshire Transportation Improvement and Mitigation Plan.

The TIMP identifies the following specific nonstandard roadway segments for capacity improvement consistent with their roadway classification in response to congestion levels projected for the Year 2010:

- **Airdrome Street**, from La Cienega Boulevard to Robertson Boulevard: Widen and reconstruct to be consistent with Collector Street standards (2 lanes).
- **Normandie Avenue**, from Olympic Boulevard to Pico Boulevard: Reconstruct and widen to improve to Secondary

Highway standards (4 lanes).

This improvement would continue and facilitate the provision of consistent Secondary Highway standard lanes, and realign Normandie Avenue at Olympic Boulevard with a larger radius curve to improve traffic flow.

- **Vermont Avenue**, from Beverly Boulevard to Council Street; Improve and widen within existing right of way, to be consistent with Major Class II Highway standards (6 lanes with parking prohibition) and to provide adequate flow of traffic.
- **Vermont Avenue**, from Melrose Avenue to Oakwood Avenue; Improve and widen right of way, to be consistent with Major Class II Highway standards (6 lanes with parking prohibition).

This would improve traffic operations by increasing the capacity for turning movements (additional left-turn lanes) from Vermont Avenue on northbound and southbound 101 Hollywood Freeway on-ramps.

Policies

16-1.2 Highways and Streets should be developed in accordance with standards and criteria contained in the **Transportation Element of the General Plan** and consistent with the City's Standard Street Dimensions.

In some cases exceptions may exist where significant environmental issues and/or sound planning practices may warrant alternate standards, consistent with street performance standards and traffic flow volume capacity requirements.

Program: Implement the Transportation Element.

Roadway widening along not fully improved streets is required under LAMC 12.37.

This method minimizes disruption to neighboring businesses and residents and will improve traffic circulation over the life of the plan as redevelopment occurs.

Objective 16-2

Ensure that the location, intensity and timing of development is consistent with the provision of **adequate transportation infrastructure.**

Policies

16-2.1 **No increase in density shall be effected by zone change, plan amendment, subdivision or any other discretionary action, unless the Decision-makers make the following findings or a statement of overriding considerations:**



The transportation infrastructure serving the project site and surrounding area, specifically the Freeways, Highways, and Streets presently serving the affected area within the Wilshire Community Plan, have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.

Program: Decision-makers shall adopt findings with regard to infrastructure adequacy as part of their action on discretionary approvals of projects which could result in increased density or intensity.



HISTORIC AND CULTURAL RESOURCES

CULTURAL AND HISTORIC MONUMENTS

The Wilshire Community Plan Area has a wealth of City-designated Historic-Cultural Monuments, with over 60 such monuments within the plan area. A complete listing of locations and descriptions can be found on the City website (www.lacity.org) within the Cultural Affairs Department. An appendix of all Historic-Cultural Monuments within the plan area has also been prepared as part of this community plan.

Some of the most notable Historic-Cultural monuments along Wilshire Boulevard include:

The Bullock's Wilshire Building, the I. Magnin & Company Building, the May Company Wilshire Building, the Wilshire Theater, the Farmer's Market, the First Congregational Church, the Wilshire Boulevard Temple, the Wilshire Boulevard Christian Church Building, the Wilshire United Methodist Church, the First Baptist Church of Los Angeles, the Ebell Club of Los Angeles Building, the El Rey Theater, and the Ambassador Hotel.

The Los Angeles Cultural Affairs Department in coordination with the California Institute of the Arts, has also identified Wilshire Boulevard as the Historic Wilshire Neon Corridor, home to LUMENS, a Living Urban Museum of Electric and Neon Signs, the most concentrated area of original Art Deco neon signs in the world, with over 150 recognized (over 40 have been relit), along the Wilshire Corridor.

These groups have produced "Neon at Night, A Guide to Neon Lights Along the Wilshire Corridor".

GOAL 17

PRESERVE AND RESTORE CULTURAL RESOURCES, NEIGHBORHOODS AND LANDMARKS WHICH HAVE HISTORICAL AND/OR CULTURAL SIGNIFICANCE.

Objective 17-1

Ensure that the Wilshire Community's historically significant resources are protected, preserved, and/or enhanced.

Policies

17-1.1 Encourage the preservation, maintenance, enhancement and reuse of existing historic buildings and the restoration of original facades.

Program: Adhere to the City’s Historic Properties Preservation Ordinances and City’s Cultural Heritage Commission requirements for preservation and implementation of design standards.

Program: Seek City Historic and Cultural Monument designation for appropriate sites, including those of Native Americans.

The Plan Maps identify sites designated by the City of Los Angeles as Historic-Cultural Monuments and as Cultural/Historical resources in the Wilshire Community Plan Area.

Program: Maintain and relocate if necessary, all historical street lighting standards. If feasible, restore old standards with newer illumination technology. If so desired, all efforts should be made to accommodate the re-introduction of authentic historic street lights and other fixtures.

Objective 17-2

Preserve and enhance neighborhoods having a distinctive and significant historical character.

Policies

17-2.1 Continue to identify and document Wilshire Community Plan Area Cultural and Historical Monuments.

Program: Continue to apply the City’s zoning regulations which provide for the documentation and establishment of Historic Preservation Overlay Zones (HPOZ).

Program: Encourage the preservation, maintenance, enhancement and return of neon signs, especially on historic buildings and the restoration of original neon sign facades.

Objective 17-3

Encourage private owners of historic resources to maintain and enhance their properties in a manner that will preserve the integrity of such resources.

Policies

17-3.1 Assist private owners of historic resources to maintain and enhance their properties in a manner that will preserve the integrity of such resources.

Program: Continue to implement the Park Mile Specific Plan, and HPOZs at Carthay Circle, South Carthay, and Miracle Mile North.

Program: Support the creation and implementation of Hancock Park, Windsor Square, and other areas of architectural or historical significance as historic districts under the Planning Department's HPOZ program.

Program: Continue to adhere to the City's historic properties preservation ordinances and Cultural Heritage Commission requirements for preservation and implementation of design standards.

Program: Utilize City historic properties restoration programs which provide funding for renovating and/or reusing historic structures.

WILSHIRE

SUMMARY OF LAND USE

CATEGORY	LAND USE	CORRESPONDING ZONES	NET ACRES	%AREA	TOTAL NET ACRES	TOTAL % AREA
RESIDENTIAL						
Single Family					2,077	23.2
	Very Low I	RE20, RA	23	1.1		
	Very Low II	RE15, RE11	347	16.7		
	Low I	RE9	118	5.7		
	Low II	R1, RS, RD6	1,590	76.5		
Multiple					2,788	31.1
	Low Medium I	R2,RD3, RD4,RZ3, RZ4,	571	20.5		
	Low Medium II	RD1.5, RD2, RW2, RZ2.5	305	11.0		
	Medium	R3	1,145	41.1		
	Low Medium	R4	767	27.5		
COMMERCIAL					1,222	13.6
	Limited	CR, C1, C1.5, P	49	4.0		
	General (F)	C1.5, C2, C4, P	347	28.4		
	Neighborhood	C1, C1.5, C2, C4, P	311	25.4		
	Community	CR, C2, C4, P, PB	183	15.0		
	Regional Center	C2, C4, P, PB	279	22.8		
	Regional (F)	CR, C1.5, C2, C4,R3, R4, R5, P, PB	53	4.4		
INDUSTRIAL					40	0.5
	Limited	CM, MR1, M1, P	40	100.0		
OPEN SPACE/PUBLIC FACILITIES					412	4.6
	Open Space	OS, A1	190	46.1		
	Public Facilities	PF	222	53.9		
STREETS					2,421	27.0
	Private Street		38	1.6		
	Public Street		2,384	98.4		
TOTAL					8,961	100.0

CHAPTER IV

COORDINATION OPPORTUNITIES FOR PUBLIC AGENCIES

Chapter IV identifies actions which are recommended to be promoted by the City through the appropriate City Departments and through other agencies including Federal, State and private sector entities to further the goals of the Plan. These are objectives or goals of which the Planning Department does not directly have responsibility, but which involve issues that should be identified in the Wilshire Community Plan. Coordination of public agencies implements, achieves, and reinforces the goals and objectives found in Chapter III.

PUBLIC WORKS

1. Encourage awareness of the importance of streetscape components in the community-wide urban design policies as well as all adopted streetscape plans, among the agencies responsible for construction and maintenance on public property, especially rights-of-way.
2. Encourage cooperation between public works and utility agencies to maximize opportunities for undergrounding utilities.
3. Seek active involvement of those agencies regulating public property, especially rights-of-way, in the preparation of specific plans or overlay district ordinances to implement this Plan.
4. Coordinate a program for locating and phasing public facilities to meet existing and future needs.

CODE ENFORCEMENT

1. Promote more effective enforcement of all applicable government codes regulating the built environment and environmental quality.
2. Assist enforcement agencies in increasing community awareness of existing and proposed building, housing, and zoning regulations.
3. Encourage greater inter-agency cooperation in developing zone code amendments and other zoning tools to better define roles and responsibilities for review and enforcement.
4. Encourage cooperation in updating and disseminating zoning maps and data in a timely matter among regulatory agencies to ensure that regulations are applied consistently. Incorporate intranet and Internet information access models as dissemination tools.
5. Provide inter-departmental training opportunities on an on-going basis to respond to changing enforcement issues.

RECREATION AND PARK FACILITIES

1. Encourage the City Department of Recreation and Parks to continue to work with the Los Angeles Unified School District to develop a program for shared use of school sites for recreation and park sites for education.
2. Encourage continuing efforts by County, State and Federal agencies

to acquire vacant land for publicly-owned open space.

3. Ensure that parks are adequately illuminated and policed for safe use at night, as appropriate.
4. Provide for the supervision of park activities and promote enforcement of codes restricting illegal activities.
5. Coordinate with the Department of Recreation and Parks and the Police Department to ensure adequate police patrols and the utilization of “defensible space” in the design of recreation and park facilities.
6. Improve the utilization and development of recreational facilities at existing parks.
7. Coordinate with City Departments, neighboring cities, and County, State and Federal agencies to interconnect open spaces and utilize existing public lands such as utility easements, vacant land adjoining freeways, and Department of Water and Power properties for such recreational uses as hiking, jogging, and biking.
8. Plan and design the expansion of existing facilities and the acquisition of new sites to minimize the displacement of housing and relocation of residents.
9. Target park and recreation projects for areas with the greatest deficiencies.
10. Pursue resources to clean up and activate land that can be used for public recreation.

SCHOOLS

1. Encourage the siting of new public schools on large vacant parcels as a first alternative, rather than acquiring sites with existing uses which may be displaced.
2. Maximize the accessibility of school facilities to neighborhood organizations.

LIBRARIES

1. Seek additional resources to maintain and expand library services to satisfy service demands.
2. Develop a Citywide policy for locating non-English language permanent collections.

POLICE PROTECTION

1. Ensure that an adequate number of police stations and properly equipped police personnel are maintained by periodically evaluating population growth, level-of-service (response time and staffing) and police service within the Community.
2. Support and encourage community-based crime prevention efforts (such as Neighborhood Watch and Business Improvement District patrols) through coordination with existing community-based

policing, foot and bicycle patrols and watch programs.

3. Identify neighborhoods most in need of police protection facilities.

FIRE PROTECTION

1. Ensure that an adequate number and type of fire stations and properly equipped fire service personnel are maintained by periodically evaluating population growth, level-of-service (response time and staffing) and fire hazards within the Wilshire Community.
2. Prioritize the development of fire station sites in neighborhoods deficient in fire facilities and services.

HISTORIC PRESERVATION

Assist private owners of historic resources to maintain, enhance and conserve their properties.

HOUSING

1. Encourage development of housing for senior citizens, the physically challenged, and low-income persons in close proximity to health and community service facilities, retail services and public transportation.
2. Maintain and preserve the character and integrity of existing neighborhoods and encourage participation in self-help preventive maintenance to promote neighborhood conservation, beautification and rehabilitation.
3. Encourage affordable housing programs in the Wilshire Community Plan Area for low-income persons.
4. Encourage new and alternative housing concepts, building materials and construction methods, which lower construction costs, and are compatible with City codes.

INDUSTRIAL

1. Encourage economic revitalization and reuse of older industrial properties for light manufacturing industrial uses, especially for high technology and entertainment-related industrial manufacturing centers, through available City, State and Federal incentive programs.
2. Assist in the aggregation of smaller, older sites into business park style areas, to facilitate revitalization or reuse, where appropriate.

UTILITIES

1. Install utilities underground, with an emphasis on combined cable Internet communications services, through assessment districts, or other funding mechanisms, when possible.

EMPLOYMENT

1. Encourage businesses to participate in job-training programs for local residents.

2. Develop employment opportunities for a wide range of jobs, skills and wages.

**PUBLIC
TRANSPORTATION**

1. Coordinate with the Los Angeles County Metropolitan Transportation Authority (LACMTA), LADOT, and other local agencies to improve local bus service, including Dash and Smart Shuttle feeder service to and within the Wilshire Community Plan Area.
2. Encourage the expansion of public rapid transit programs, including bus, rail, and , wherever feasible, aimed at enhancing the mobility of senior citizens, physically challenged, and low-income persons, and the transit-dependent population.

**NON-MOTORIZED
TRANSPORTATION**

1. Encourage funding and construction of a bicycle network connecting neighborhoods to schools, parks and open space areas, and to employment and public transit routes, stops, stations, and centers.

CHAPTER V

URBAN DESIGN

The Wilshire Community Plan Area consists of many neighborhoods with distinctive and varied characteristics. The purpose of this chapter is to define general policies and urban design standards for Commercial, Multiple Family Residential, and Limited Industrial development, and for overall community design.

This chapter identifies general Urban Design Standards to be required by Decision-makers when reviewing individual projects throughout the Wilshire Community Plan Area.

These policies establish the minimum level of design required in Commercial, Multiple Family Residential, and Limited Industrial private projects. In addition, the Community Design and Landscaping Guidelines section is directed at the use of streetscape improvements and landscaping in public spaces and rights-of-way.

The policies and standards found in this Chapter are and will be formalized by ordinance, with the establishment of Transit-Oriented Districts, (TODs), Community Design Overlay Districts (CDOs), or Pedestrian-Oriented Districts (PODs), per the Supplemental Use District Section of the Zoning Code LAMC (Section 13.00), and per the Park Mile Specific Plan Design Standards and Procedures, adopted for specified areas within the Park Mile Specific Plan Area.

Transit Oriented Districts

The Vermont/Western Station Neighborhood Area Plan (SNAP) has been developed in conjunction with the opening of the Metro Red Line subway stations along Vermont Avenue and Hollywood Boulevard.

The portion of the SNAP between 3rd and Melrose, along Vermont Avenue, is within the Wilshire Community Plan. The SNAP seeks to integrate recently developed mass transit stations into the local urban fabric while providing guidance for development along the corridor.

The SNAP is a document that describes the community's vision for the local built environment to the year 2020. It includes an ordinance that amends the City's Zoning Code to be consistent with the neighborhood vision, a developed streetscape program, a parking management strategy, and an economic strategy.

As enacted, the SNAP complements the Wilshire Community Plan and makes corresponding plan amendments and zone changes to the Wilshire Community Plan.

Community Design Overlay Districts

Ordinance 172,032, effective June 28, 1998, established the Community Design Overlay District enabling ordinance (CDO). The ordinance was designed to permit Community Design Overlay Districts in areas of the City where it is appropriate and desirable to improve the quality of building and site design, and the functional and aesthetic quality of the community. It is intended to promote a stable and pleasant environment with a desirable character.

A CDO provides visual continuity of the streetscape, creates a pedestrian-oriented environment, and stimulates economic activity. The CDO requires that all new developments or major exterior renovations to existing developments make an aesthetically compatible contribution to the existing built environment.

The CDO is limited to urban design concerns, however, and may not be used to prohibit the type of land uses otherwise allowed by right.

The establishment of a CDO can be initiated by local area property owners, by resolution of the City Planning Commission, or by the City Council. Precise boundaries of the area are required at the time of application or initiation of an individual Community Design Overlay District.

In establishing any individual CDO District, the Director of Planning shall submit Community Design Guidelines and Standards for the overlay area to the City Planning Commission for their approval. Within an adopted CDO area, no building permit shall be issued for any project, unless the project complies with the adopted Guidelines and Standards for the Community Design Overlay District.

GOAL AND PURPOSES

These Design Policies and Guidelines ensure that private Residential, Commercial, and Industrial projects, as well as public spaces and right-of-ways, incorporate specific elements of good design to promote a stable and pleasant environment.

In Commercial areas, the emphasis is on the provision and maintenance of the visual continuity of streetscapes, and the creation of an environment that encourages both pedestrian and economic activity. The intent is to help establish identifiable neighborhoods fostered by commercial settings which contribute to the social life and economic vitality of the Wilshire Community Plan Area

In Multiple-Family Residential areas, the emphasis is on the promotion of architectural design that enhances the quality of life, living conditions, and neighborhood pride of the residents.

In Limited Industrial areas, the emphasis is on compatibility with adjacent, non-industrial uses, and economically viable, industrial development.

These Design Policies and Guidelines will assist the establishment of the Wilshire Community Plan Area as a vibrant and diverse business, residential, cultural and entertainment community.

Overall, they promote pedestrian activity, providing for a more livable

community within a more livable city.

They encourage the principles of sustainable development. They provide some examples of practical design solutions which will help citizens, business owners and design professionals to positively contribute to the quality of commercial and residential neighborhoods in the Wilshire Community Plan Area.

DESIGN POLICIES FOR INDIVIDUAL PROJECTS

A. COMMERCIAL

1. SITE PLANNING

Structures shall be oriented toward the main commercial street where a parcel is located and avoid pedestrian/vehicular conflicts by:

- a. Locate parking areas between commercial and residential uses, to provide a buffer.

Parking must be separated from adjacent residential uses by a solid wall and/or landscaped setback.

- b. Minimize the number of driveways/curb cuts which provide access from Major and Secondary Highways.
- c. Maximize pedestrian oriented retail and commercial service uses along street grade level frontages along commercial boulevards.
- d. Provide front pedestrian entrances for businesses which front on main commercial streets, with building facades and uses designed to promote customer interest, such as outdoor restaurants, and inviting public way extensions.
- e. Prohibit driveway openings, or garage or parking lot entries in exterior frontage walls of buildings, or between frontage buildings, unless the Los Angeles Department of Transportation determines that driveways cannot be practically placed elsewhere.
- f. Encourage pedestrian-only walkway openings, or entries (require at least one ground floor pedestrian entry), in exterior frontage walls of buildings, or between frontage buildings to plazas or courtyards with outdoor dining, seating, water features, kiosks, paseos, open air vending, or craft display areas.
- g. Provide fully landscaped and maintained unused building setback areas, and strips between driveways and walkways which allow safe and inviting pedestrian access to the rear of properties.
- h. Provide speed bumps for driveways which parallel walkways,

or which are longer than 50 linear feet.

- i. Provide underground new utility service, including Internet services.
- j. Screen all mechanical and electrical equipment from public view.
- k. Screen all rooftop equipment and building appurtenances from public view.
- l. Require the enclosure of trash areas behind buildings for all projects.

2. PEDESTRIAN-ORIENTED, BUILDING HEIGHT AND DESIGN

In Regional Commercial Centers, Community Commercial Centers, Neighborhood Districts, and along Mixed-Use Boulevards, the mass, proportion and scale of all new buildings and remodels must encourage pedestrian orientation.

The design of all proposed projects must be articulated to provide variation and visual interest, and must enhance the streetscape and preclude opportunities for criminal activity and graffiti.

Building materials should provide relief to untreated portions of building facades.

The purpose of these provisions is to ensure that a project does not result in large sterile expanses of blank building walls, is harmonious with the surrounding neighborhood, and creates a stable environment with a pleasant and desirable character. This will be achieved by the following policies:

- a. For building frontages, require the use of offset building masses, recessed pedestrian entries, articulations, and surface perforations, or porticoes. Also require transparent windows (non-reflective, non-tinted glass for maximum visibility from sidewalks into building interiors). Also require recessed doors, entryways or courtyards, decorative planters, pedestrian scale murals or public art, mosaic tiles, or other means of creating visual interest, to break up long, flat building facades and free-standing blank walls greater than ten feet wide.
- b. Require each new building to have a pedestrian-oriented ground floor, and maximize the building area devoted to ground level display windows and display cases, store front glass, doors, windows and other transparent elements on front facades to afford pedestrian views into retail, office, and lobby space, and those building surfaces facing rear parking areas.
- c. Require each new building to have building frontage on the floor immediately above the ground floor to be differentiated from the ground floor by recessed windows, balconies, offset

planes, awnings, or other architectural details, but on buildings with pedestrian walkway openings, require continuity of an architectural feature on the facade, to retain continuity of the building wall at the ground floor.

- d. Provide color, lighting, and surface texture accents and complementary building materials to building walls and facades, consistent with neighborhood adjacent architectural themes.
- e. Maximize the applications of architectural features and articulations to building facades.
- f. Locate new structures to form common and semi-continuous building walls along street frontages and sidewalks of Major and Secondary Highways, and Collector Streets.
- g. Locate surface and above grade parking areas to the rear of buildings, with access driveways on side streets, or from rear streets where project buildings cover the majority of block areas.
- h. Integrate landscaping within pedestrian-friendly plazas, green space, pocket parks, and other open space compliments.

3. PARKING STRUCTURES

Parking structures should be integrated with the design of buildings they serve.

- a. Design parking structure exteriors to match the style, materials, texture, and color of the main building(s).
- b. Landscape areas to screen parking structures and areas, which are not otherwise architecturally integrated with the main building(s).
- c. Utilize decorative walls and landscaping to buffer adjacent residential uses from parking structures.

4. SURFACE PARKING LANDSCAPING

- a. Devote 7% of total area of surface parking lots to landscaping.
- b. Provide a landscaped buffer along public streets and/or adjacent residential uses.

5. LIGHT AND GLARE

- a. Install on-site lighting along all pedestrian walkways and vehicular access ways.

- b. Retail shops shall have well-lit entries with directly accessible pedestrian access from the sidewalk, located at frequent intervals, with well-lit exterior frontages.
- c. Shield and direct on-site lighting down onto driveways and walkways, away from adjacent residential uses.

6. MIXED USE

Maximize commercial uses on the ground floor by requiring 10% of commercial development to serve the needs of the residential portion of the building.

B. MULTIPLE RESIDENTIAL

1. SITE PLANNING

Where feasible, Multiple Family Residential development of five or more units should be designed around a landscaped focal point or courtyard to serve as an amenity for residents.

- a. Provide a pedestrian entrance at the front of each project.
- b. Require useable open space for outdoor activities, especially for children.

2. DESIGN

The design of all buildings should be of a quality and character that improves community appearance by avoiding excessive variety or monotonous repetition. Achievement of this can be accomplished via the following:

- a. Encourage the use of articulations, recesses, surface perforations and/or porticoes to break up long, flat building facades.
- b. Utilize complementary building materials on building facades.
- c. Incorporate variation in design to provide definition for each floor.
- d. Integrate building fixtures, awnings, and security fences and gates, into the design of building(s).
- e. Screen all roof-top equipment and building appurtenances from view.
- f. Encourage decorative masonry walls to enclose trash areas.

3. PARKING STRUCTURES

Parking structures should be integrated with the design of buildings they serve.

- a. Design parking structure exteriors to match the style, materials, texture, and color of the main building.
- b. Landscape to screen parking structures not architecturally integrated with the main building(s).
- c. Use decorative walls and/or landscaping to buffer residential uses from parking structures.

C. INDUSTRIAL

1. STRUCTURE

Attractive buffers should be created along street frontages of Limited Industrial sites, to serve such purposes as security, sound attenuation, the separation of functional areas, and the screening of unsightly nuisances or unpleasant odors:

- a. Design the site and building(s) to convey visual interest and to be visually compatible with adjacent uses.
- b. Treat large expanses of blank walls and tilt-up concrete walls visible from the public right-of-ways with contrasting complementary colors, building plane variation, planters, and other landscape elements to create visual interest.
- c. Screen mechanical and electrical equipment from public view.
- d. Screen all rooftop equipment and building appurtenances from public view.
- e. Require the enclosure of trash areas for all projects.
- f. Screen open delivery and storage areas from public view.
- g. Require freestanding walls to use articulations, surface perforations or other elements, and to include plantings of vines or tall shrubs or trees along exterior faces, to relieve long monotonous expanses and to discourage graffiti.
- h. Use landscaping to screen parking and delivery areas from roadways, and to screen storage areas, trash containers and utility equipment from public view.
- i. Locate loading and delivery facilities at the rear of industrial sites, or alternately, in areas where they can function efficiently yet be screened from the street or adjacent non-industrial uses, such as by landscaping.
- j. Provide on-site parking in areas which do not interfere with other site activities, and which are screened from public view by landscaping, berms, fencing and/or walls.

- k. Require on-site parking for new and/or expanded industrial sites, including additional space for trucks awaiting loading or unloading, to prevent the use of public sidewalks and streets for such purposes.

2. LIGHTING

Integrate exterior lighting with site design, directing exterior lighting down and onto the project site and the location of flood lights so as not to impact adjacent residential uses.

D. INDUSTRIAL/ RESIDENTIAL INTERFACE AREAS

In order to mitigate potential negative impacts generated by Limited Industrial uses when they are located adjacent to residentially-zoned neighborhoods, new development should incorporate the following design guidelines.

1. LOADING AREAS

- a. New development of Limited Industrial uses, which will be located across a Local Street, or Collector Street in a residentially-zoned area should be designed in such a manner such that truck deliveries, loading, and unloading will be restricted to the rear portion of the lot, and separated from the street by the building which surrounds the industrial use.
- b. New development adjacent to residentially-zoned areas should be designed to restrict loading, unloading, and storage of materials and products on the project site and on the street frontage farthest from residentially zoned properties.

2. WALLS/LANDSCAPING

- a. Where vehicle parking, loading, or storage for a new Limited Industrial development is located within 50 feet of a public street, which separates the industrial and residential zones, a minimum 3-foot, 6-inch high, solid decorative masonry wall in a front yard; or, a minimum 5-foot, 9-inch high solid decorative masonry wall in a side or rear yard should be provided .

A minimum 5-foot wide landscaped setback buffer with an automatic sprinkler system should be located in front of said wall, along the street frontage.

- b. New industrial development located directly across from a Local Street or a Collector Street in a residentially-zoned neighborhood should have a minimum 5-foot wide landscaped setback along any portion of the frontage not required for driveways, facing the residentially zoned properties.

Said landscaping should contain a minimum of one 24-inch box tree for every 20 linear feet of frontage (with a minimum trunk diameter of 2 inches, at a height of 8 feet, at the time of planting, and installed with an automatic sprinkler system).

- c. On any other interior property line which separates an industrial use from an adjacent residential zone, a minimum 5-foot, 9-inch high solid decorative masonry wall should be provided.

3. ARCHITECTURAL GUIDELINES

- a. New industrial development located directly across a Local Street or a Collector Street, or with a lot line adjoining a residentially-zoned area should have outdoor, on-site lighting designed and installed with shielding, such that the light source is directed down and away from adjacent residentially zoned properties.
- b. New industrial development on Local Streets or Collector Streets which also front onto residentially-zoned areas should be designed with articulated facades facing the residentially-zoned areas (for example, facades that have architectural details, wall breaks, or other architectural features which provide at least 5 linear feet of relief to a minimum depth of 8 inches, every 20 feet of the building wall).
- c. New industrial development adjacent to residentially-zoned properties should be designed with no window openings facing residentially-zoned properties, and with a minimum 5-foot, 9-inch high, solid decorative masonry wall adjacent to these properties if no such wall exists. There should be no window openings higher than the adjacent wall.
- d. All exhaust fans and exterior or rooftop mechanical equipment should be enclosed, and sound-absorbing materials and shielding provisions should be incorporated in the design of the project. Such equipment should be setback as far as possible from adjacent residentially-zoned property lines.

COMMUNITY DESIGN AND LANDSCAPING GUIDELINES

In addition to the establishment of Design Standards for individual projects, improvements to the streetscape and landscaping of public spaces, roadway medians, and other rights-of-way plays create an attractive and orderly public realm and contribute to the overall urban aesthetic of a community. It is the intent of this section to establish a set of guidelines that will serve to improve the environment, both aesthetically and physically, as opportunities in the Wilshire Community Plan Area occur which involve public improvements or other public and/or private projects that affect public spaces and right-of-ways.

A sense of entry and identity should be created for the Wilshire Community, and for individual commercial areas and neighborhoods

within the Wilshire Community Plan Area, particularly where individual commercial areas and neighborhoods include distinctive cultural, historical origins, or ethnic characteristics or themes.

The Wilshire Community and the individual commercial areas and neighborhoods should be featured as unique and distinguishable from adjacent communities.

Cohesive visual identities should be developed for individual commercial areas at entry points at major intersections along Major Class II and Secondary Highways.

The presence of street trees is an important ingredient in the aesthetic quality of an area. Consistent use of appropriate street trees, which soften aspects of solid urban design and development, and which provide shade during hot summer months, emphasizes sidewalk activity by separating vehicle and pedestrian traffic, and by creating an area-wide identity, which distinguishes the individual commercial areas and neighborhoods from each other.

The following improvements are recommended:

A. ENTRYWAY IMPROVEMENTS

1. Provide improvements along Major Class II and Secondary Highways, at major identified intersections and edges which clearly distinguish these as major entries to the individual commercial areas of the Wilshire Community. Such improvements should include elements such as signage, monuments, archways, landscaping, vertical pylons and other distinctive treatments.
2. Establish primary entry and individual commercial area identity improvements at the following locations:
 - a. **“Wilshire Center”**
On Wilshire Boulevard and Hoover Street at the eastern entry, and at Wilton Place at the western entry.
 - b. **“Miracle Mile”**
On Wilshire Boulevard and San Vicente Boulevard at the western entry, and at La Brea Avenue at the eastern entry.
 - c. **“Museum Row”**
On Wilshire Boulevard and Fairfax Avenue at the western entry, and at Burnside Avenue at the eastern entry.
 - d. **“Koreatown”**
On Olympic Boulevard and Vermont Avenue at the eastern entry; and at Western Avenue at the western entry.
 - e. **“Park Mile”**
On Wilshire Boulevard and Wilton Place at the eastern entry, and at Highland Avenue at the western entry.

- f. **“Beverly-Fairfax”**
On Fairfax Avenue and Rosewood Avenue at the northern entry, and at Wilshire Boulevard at the southern entry.
 - g. **“Cedars Sinai-Beverly Center”**
On San Vicente Boulevard and Burton Way at the southern entry, and at Beverly Boulevard at the northern entry.
 - h. **“Farmer’s Market”**
On Fairfax Avenue and Third Street at the southern entry, and at Beverly Boulevard at the northern entry.
 - i. **“Larchmont Village”**
On Larchmont Boulevard and First Street at the southern entry, and at Melrose Avenue at the northern entry.
 - j. **“Vermont-Beverly”**
On Vermont Avenue and Melrose Avenue at the northern entry, and at Third Street at the southern entry.
3. Similarly, establish primary entry and individual neighborhood identity improvements, primarily with signage compatible with residential areas, at locations throughout the Wilshire Community Plan Area, in consultation with local neighborhood and homeowner associations, as appropriate.

B. STREETScape

- 1. Provide for a coordinated streetscape design at identified entries to the Wilshire Community Plan Area, Regional and Community Commercial Centers, and to Neighborhood Districts to include: street lighting, street furniture, and sidewalk and crosswalk improvements in the public right-of-way.
- 2. Establish a comprehensive streetscape and landscape improvement program for identified corridors and districts that will set standards and priorities for the selection and installation of the following:
 - a. Street trees
 - b. Street lighting
 - c. Streetscape elements
(sidewalk/crosswalk paving, street furniture)
 - d. Public signage
- 3. Identify locations for, and develop landscaped median strips on commercial streets provided there is adequate roadway, non-congested traffic flow, site access and the appropriate street cross-section.

C. STREET TREES

1. Select types of trees which:
 - a. Enhance the pedestrian character and convey a distinctive high quality visual image for the streets.
 - b. Are drought and smog tolerant, and fire resistant.
 - c. Complement the existing trees.
 - d. Do not have invasive root systems, do not require frequent maintenance and pruning, are not shallow-rooted and prone to lose limbs or topple, and do not create major amounts of leaf and seed litter.

2. Establish a hierarchy for street trees which include:
 - a. Major Accent Trees. These trees should be located at entry locations, intersections, and activity centers.
 - b. Street Trees. Select specific species to be the common tree for street frontages.

A single flowering species may be selected for all residential neighborhoods and commercial districts or different species selected to distinguish one neighborhood, district, or street from another.

In residential neighborhoods, the trees should be full, to provide shade and color.

In commercial districts, the trees should provide shade, but be more transparent to promote views of store fronts and signs.

- c. Ornamental or Special Plantings. At special areas along the street frontages, such as linkages to pedestrian walkways and plazas and outdoor dining areas, ornamental trees providing shade and color should be utilized to emphasize and focus attention to those places.
3. Provide for the installation of street trees along public sidewalks defining the types and spacing.

D. STREET FURNITURE

Install street furniture that encourages pedestrian activity or physical and visual access to buildings and which is aesthetically pleasing, functional and comfortable, including such elements as bus and pedestrian benches, newspaper racks, bicycle racks, bus shelters, trash receptacles, kiosks, public telephones, landscaped planters, drinking fountains, and bollards. Priority should be given to pedestrian oriented areas.

E. STREET LIGHTING

1. Install new street lights in commercial districts, which are shielded, down directed, and pedestrian-oriented, attractively designed, compatible in design with facades and other street furniture, and provide adequate visibility, security, and a festive night-time environment.
2. Establish a consistent street lighting type utilizing a light standard that is compatible with the overall street furniture and graphics/signage program.
3. Any new street lighting or pedestrian lighting system built in the public right-of-way must be designed to currently adopted City standards. Equipment must be tested and approved by the Bureau of Street Lighting. If so desired, all efforts should be made to accommodate the re-introduction of authentic historic street lights and other fixtures.
4. New lighting systems should be designed to minimize glare and "light trespass".
5. No new or replacement street tree should be planted closer than 20 feet from an existing or proposed streetlight. Exceptions will be considered by the Bureau of Street Lighting after reviewing mature tree characteristics.
6. All new or replacement lighting systems require due process. Street lighting is installed through the formation of Special Assessment Districts. Where any increase in special assessment is anticipated, public hearings are required.
7. Ornamental or historic poles cannot be removed without the prior approval of the City's Cultural Affairs Commission.

F. SIDEWALKS/PAVING

1. Re-pave existing sidewalks in pedestrian-oriented areas, with brick pavers, concrete, or other safe, non-slip materials to create a distinctive pedestrian environment.
2. Along some Collector Streets or Local Streets, develop sidewalk pull-out areas near intersections, where they do not adversely impact traffic flow, bus service or safety, by extending the sidewalk out to the width of a parking stall, to accommodate additional limited landscaping and street furniture and reduce the crosswalk width.

G. SIGNAGE

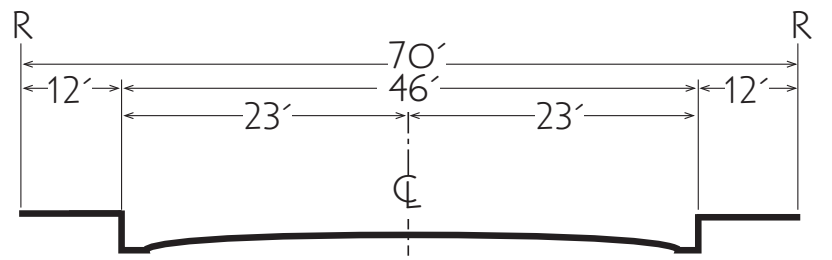
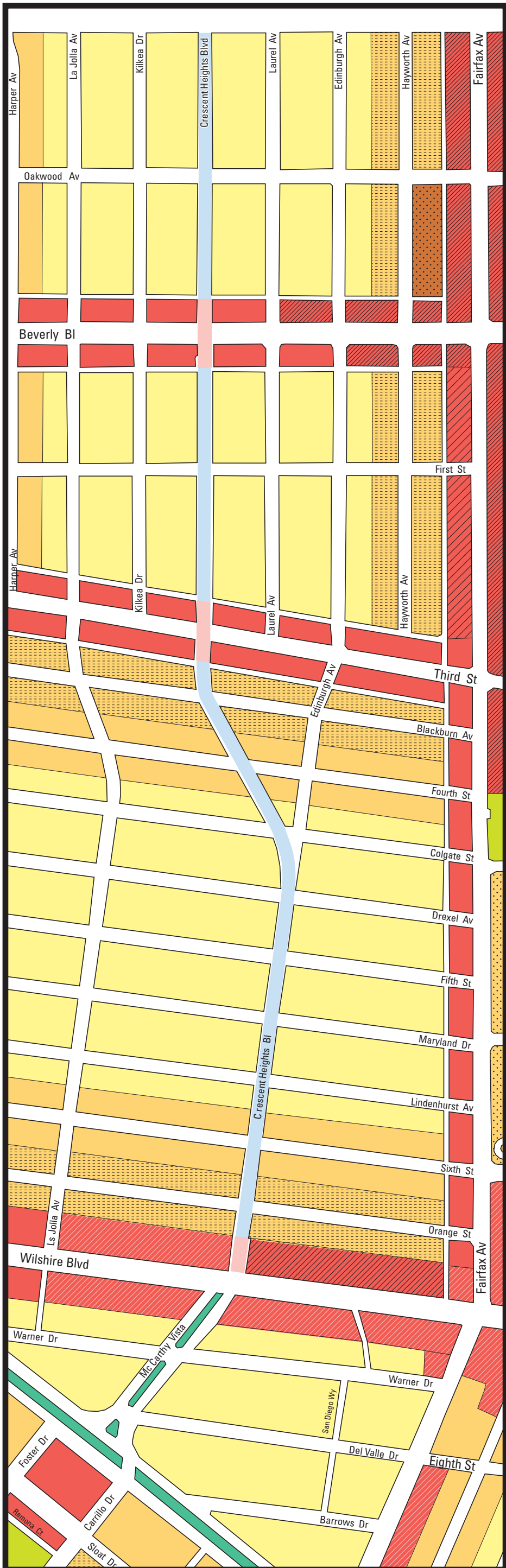
1. Throughout Commercial areas in the Wilshire Community Plan Area, require consistent design for all commercial signage, which prescribes numbers, sizes, and locations of signs on buildings, fixture types, lettering, colors, symbols, lighting, motion elements, and logos designed for specific areas or pathways. Require all signs to relate harmoniously to the building they reference.

2. Provide distinctive signage which identifies principal entries to unique neighborhoods, cultural centers, ethnically identifiable areas, historic structures and districts, and public buildings and parks.
3. Ensure that public signage complements, and does not detract from adjacent commercial and residential uses
4. Require signage which uniquely identifies and enhances designated historic sites and districts.
5. Require principle identification signs to be in English, or alternatively to include additional informational sub-titles in English.

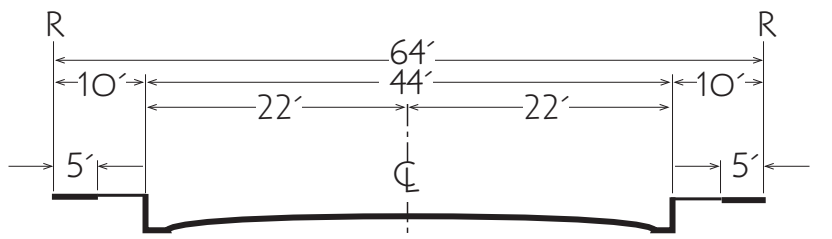
H. PUBLIC OPEN SPACE AND PLAZAS

Establish public open space standards that will guide the design of new public plazas and open spaces. These standards should include the following:

1. The siting of open space to maximize pedestrian accessibility and circulation.
2. Solar exposure or protection.
3. Adjacent to pedestrian routes and other open spaces.
4. Appropriate landscape materials.



Crescent Heights Boulevard
Typical Existing



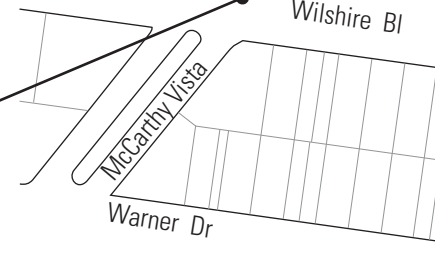
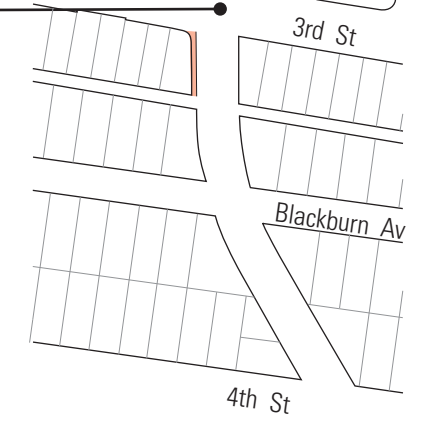
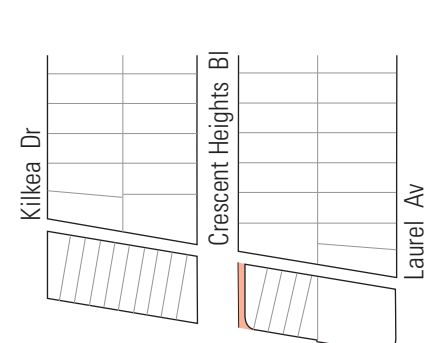
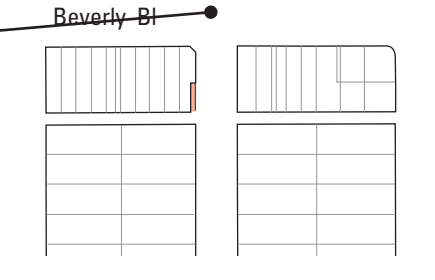
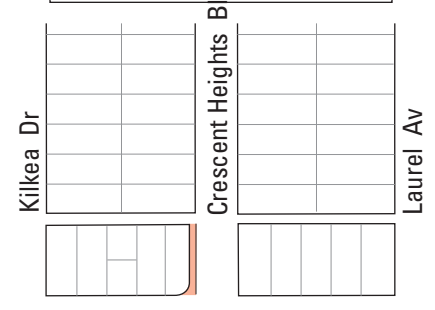
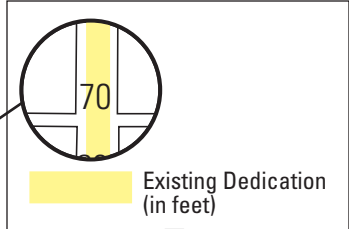
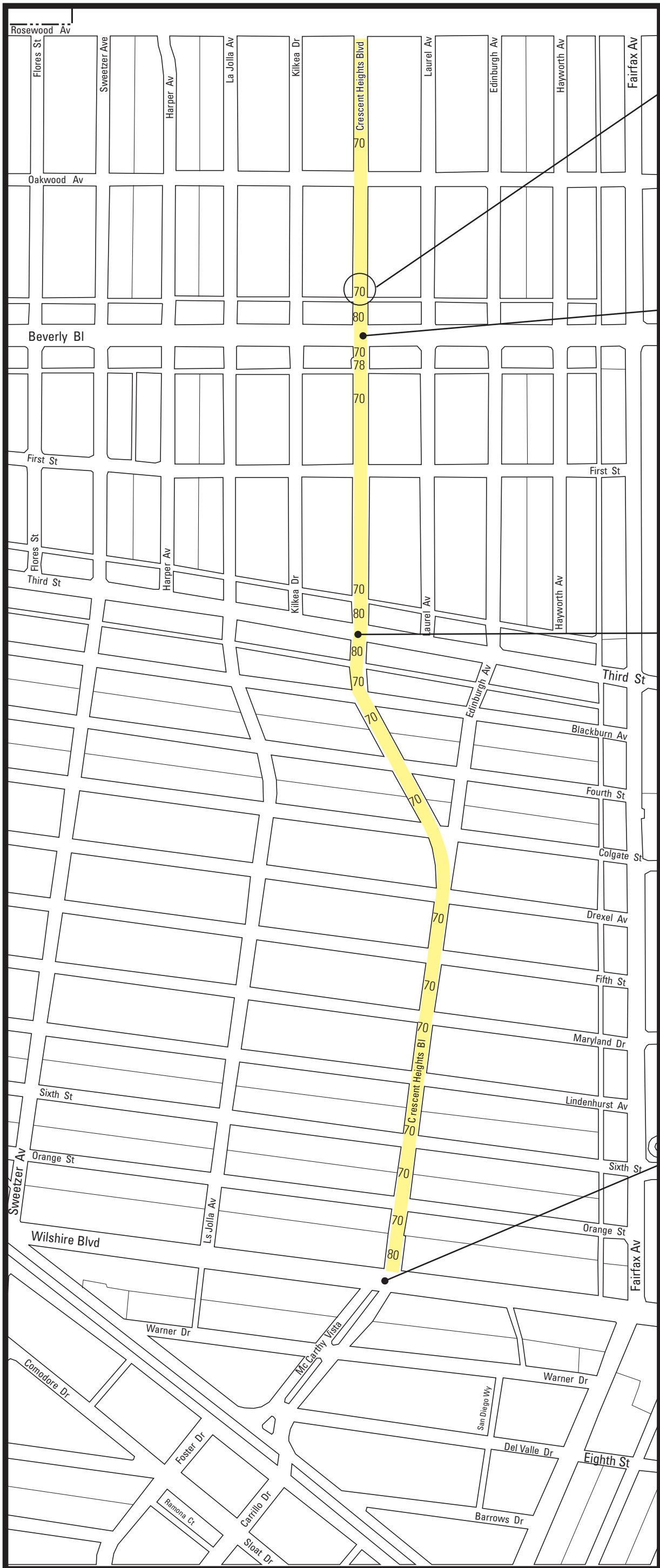
Collector Street
For use in quarter mile streets and school areas

Legend:

- Crescent Heights Boulevard**
 - Residential Area
 - Commercial Area
- Residential**
 - Low II
 - Low Medium I
 - Low Medium II
 - Medium
 - High Medium
- Commercial**
 - General
 - Neighborhood & Office
 - Community
 - Regional Center
- Open Space, Public/Quasi-Public**
 - Open Space
 - Public Facility

Exhibit A

PROPOSED MODIFIED SECONDARY HIGHWAY & EXISTING LAND USE Crescent Heights Boulevard



Already Aquired Dedication

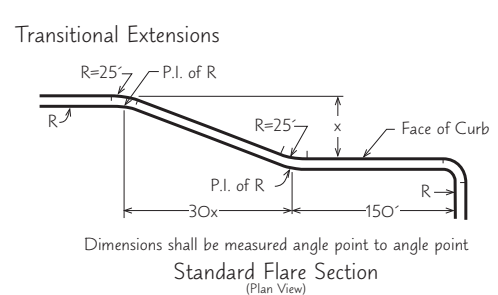
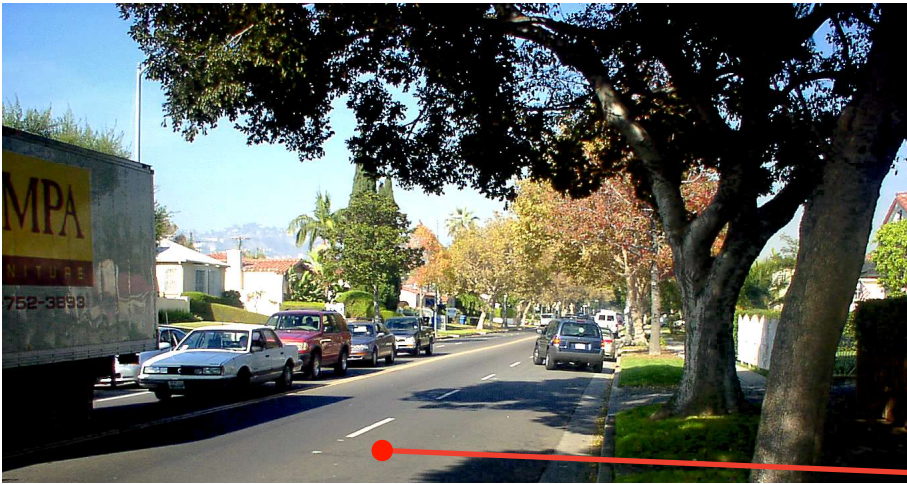


Exhibit B EXISTING DEDICATION Crescent Heights Boulevard



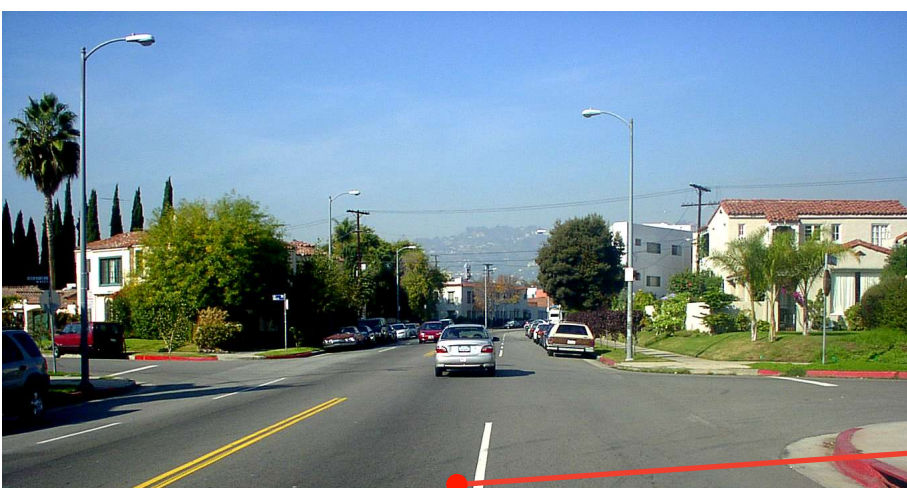
Adjacent Residential Area



Crescent Heights Boulevard looking North



Crescent Heights Boulevard looking South



Crescent Heights Boulevard between Wilshire & 3rd

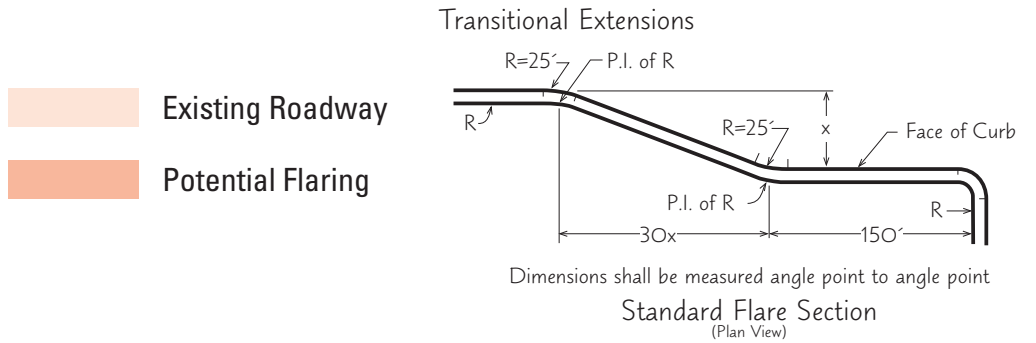
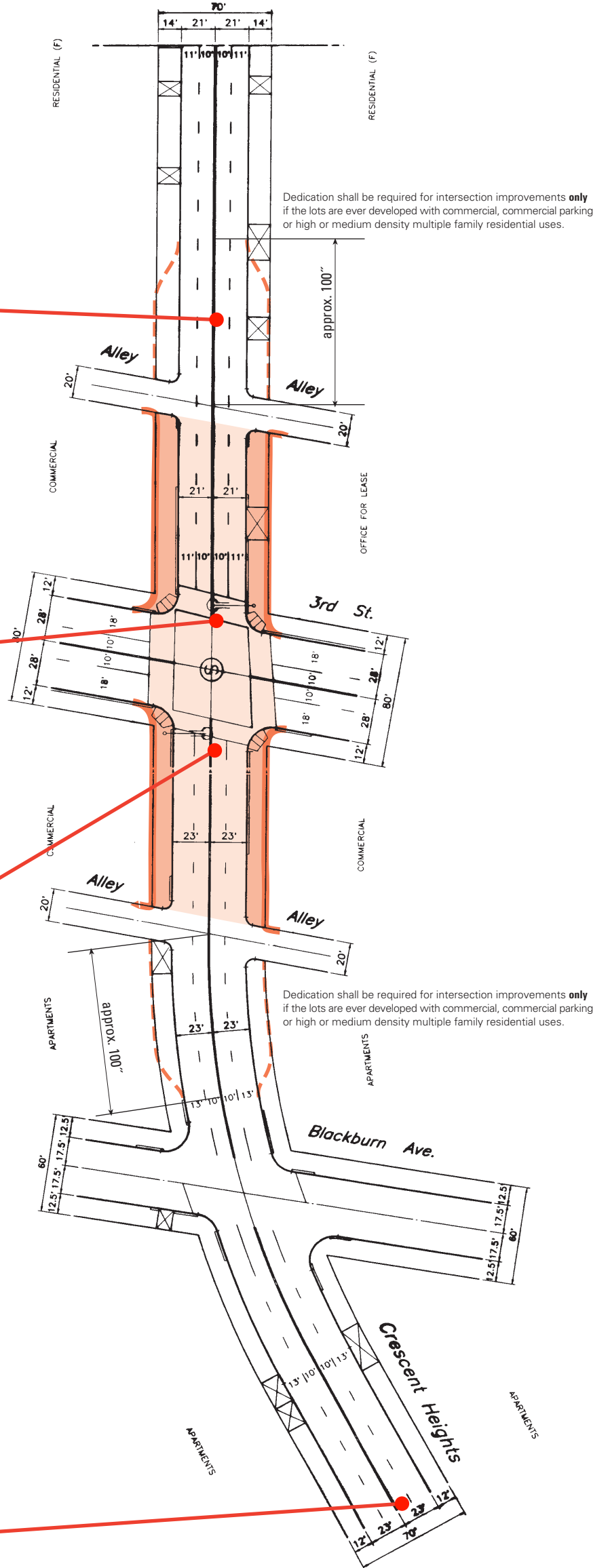


Exhibit C GENERAL MODEL of INTERSECTION IMPROVEMENT Crescent Heights Boulevard & Third Street

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Rockard Delgadillo, City Attorney

Laura Chick, Controller

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MIRACLE MILE

COMMUNITY DESIGN OVERLAY DISTRICT (CDO)

Design Guidelines & Standards

Approved by the City Planning Commission on July 8, 2004
Boundary Ordinance No. 176,331 effective January 16, 2005
Permanent [Q] Conditions Ordinance Nos. 176,332, 176,333,
and 176,334 effective January 16, 2005

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Section 9.	Landscaping
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Appendix A:	Historic Resources in the Miracle Mile CDO
Appendix B:	Art Deco Dictionary

Section 1.

INTRODUCTION

The Miracle Mile Community Design Overlay District (CDO) provides guidelines and standards for public and private development projects in commercially zoned areas along the Miracle Mile. The intent of the CDO is to provide guidance and direction in the design of new and rehabilitation of existing buildings and storefronts in order to improve the appearance, enhance the identity and promote the pedestrian environment of the District.

All projects within the boundaries of the Miracle Mile CDO District should comply with the following Design Guidelines and Development Standards. These requirements have the overall goal of preserving the unique Art Deco character of the District while attracting new businesses and customers, and providing for the comfort, convenience, and safety of workers, residents and shoppers.

A. Boundaries and Organization

The boundaries of the Miracle Mile CDO are shown on the enclosed map on page 3. The Miracle Mile CDO is confined to commercially zoned properties only in the area generally bounded by Sycamore Avenue to the east, Fairfax to the west, 6th Street to the north and 8th street to the south.

Design guidelines are policy directives and are implemented through the application of design standards. Often, more than one standard per guideline is provided.

B. Miracle Mile Background

The Miracle Mile is a one mile commercial corridor fronting Wilshire Boulevard, generally recognized as extending from Sycamore Avenue to Fairfax Avenue. Conceived as an affluent shopping area for the nouveau riche in the early twenties, real estate developer A.W. Ross designed his district with the newly introduced automobile in mind. As a result, Wilshire Boulevard was much wider than other streets in the City at the time with large storefronts and windows so that motorists could easily see what was inside of the stores lining the roadway. However, unlike commercial strip malls of today, the Miracle Mile still resembled a traditional main street with a strong pedestrian orientation. Thus, the Miracle Mile was developed to accommodate both pedestrians and automobiles with parking located in the rear and two dominant entrances, one in the front for pedestrians and one in the rear for those traveling by car. These retail buildings were highly stylized, designed in Art Deco, and constructed of high quality materials to lure wealthy clients.

Today, Miracle Mile is characterized by numerous high rise office buildings, neighborhood retail, well-known entertainment establishments and the City's greatest concentration of museums. The District also contains some of the best examples of Art Deco architecture in the country. Over the years, many of the premier examples of this Art Deco architecture have been demolished to make room for new development. Unfortunately, much of this new development has been inconsistent with the surrounding environment.

As a result of the Wilshire Community Plan Update in 2001, several properties have been re-zoned to allow for mixed-use development. In addition, several large vacant properties are available along Miracle Mile for development. Recent opportunity for further development has led to strong community desire to develop a CDO, which preserves the existing Art Deco architecture and insures that new construction is consistent with the spirit of the District

Section 2.

GOALS AND PRINCIPALS

A. Goals

The Miracle Mile CDO provides Design Guidelines and Standards intended to promote and enhance the identity of the District. Specifically, the goals of the CDO are:

- To promote development that preserves and enhances the physical appearance of the corridor and contributes to the District's unique historical context.
- To encourage development that adds to a pedestrian friendly retail environment and contributes to the safety and comfort of both pedestrian and automobile traffic.
- To provide direction in site planning and insure a high degree of design quality in development of the Miracle Mile through the use of Design Guidelines and Standards.
- To preserve architecturally significant buildings in the Miracle Mile by providing direction of the responsible rehabilitation of these developments.

B. Design Principals

The Miracle Mile CDO is based upon a set of principles. These principles are:

1. **Consistency:** The Miracle Mile CDO features a mixture of development types including high-rise office towers, large-scale commercial development, neighborhood serving retail, nighttime entertainment venues, and regionally significant museums. Design of these structures has been influenced by use, age, and site dimensions. Within the context of these constraints, developments can achieve the principle of consistency through selection of colors, exterior surface materials, landscaping and sign programs.
2. **Activity:** Active street life, which can be enhanced by design considerations, is a major component of thriving pedestrian commercial districts. In spite of recent development, which has detracted from

a pedestrian environment, many of the area's residents, workers and shoppers opt to walk along the Miracle Mile. Through building orientation, circulation, storefront design and landscaping, development can further promote the principle of pedestrian activity.

3. **Pedestrian Orientation:** Pedestrian orientation can be achieved through storefront ornamentation, reduction of blank surfaces, building articulation, color, and texture. Guidelines and Standards based upon this principal address wall surfaces, windows, awnings, signage, and architectural treatments.
4. **Safety:** Public safety is critical to the success of a commercial district. Public safety in this case refers not only to safety from criminal activity, but also creating an environment in which pedestrian and automobile traffic can safely coexist. The design and development of commercial centers and the public open space adjacent to them should include considerations of public safety. Public safety issues can be addressed through site planning considerations such as the location of parking lots, lighting, signage and landscaping.
5. **Simplicity:** Design Guidelines and Standards for the Miracle Mile CDO should provide for public convenience by clearly identifying the nature of the business and communicating points of ingress and egress for pedestrian and automobile traffic

Section 3.

ADMINISTRATION

All projects as defined in the Miracle Mile Community Design Overlay District will be reviewed for compliance with the Design Guidelines and Standards prior to being issued a building permit.

A. **Definition of a Project**

A project as defined in Section 13.08.C.2 is "The erection, construction, addition to, or exterior structural alteration of any building or structure, including, but not limited to, pole signs and/or monument signs located in a Community Design Overlay District. A Project does not include construction that consists solely of (1) interior remodeling, interior rehabilitation or repair work; (2) alterations of, including structural repairs, or additions to any existing building or structure in which the aggregate value of work,

in any one 24-month period, is less than 50 percent of the building or structure's replacement value before the alterations or additions, as determined by the Department of Building and Safety, unless the alterations or additions are to any building facade facing a public street; or (3) a residential building on a parcel or lot which is developed entirely as residential use and consists of four or fewer dwelling units, unless expressly provided for in a Community Design Overlay District established pursuant to this section".

B. Procedures for CDO Approvals

No building permit will be issued for any project, and no person will perform any construction work on a project, until an application Design Overlay Plans have been submitted to the Community Planning Bureau of the Department of City Planning and approved according to the procedures in Section 13.08.E of the Los Angeles Municipal Code.

C. Submittals

An application for a Design Overlay Plan approval shall include the project submittals as indicated in the Master Land Use Application.

D. Nonconforming Buildings and Uses

Those structures or buildings that do not comply to the CDO Design Guidelines and Standards at the time of adoption retain nonconforming rights pursuant to the Nonconforming Building and Uses Provisions in Section 12.23 of the Los Angeles Municipal Code. Legally existing sign and/or sign structures that do not comply with the CDO Guidelines and Standards at the time of adoption are governed by the Nonconforming Building and Uses provisions in Section 12.23 of the Los Angeles Municipal Code and the Existing Sign provisions in the Los Angeles Building and Safety Code.

Section 4.

DEFINITIONS

The following words and phrases, whenever used in this document, shall be construed as defined in this section. Words and phrases not defined herein shall be construed as defined in Sections 12.03 and 13.08.C of the Los Angeles Municipal Code (LAMC).

Architectural Bay: The area enclosed by the storefront cornice above, piers on the side and the sidewalk at the bottom.

Awning: A roof-like cover of canvas or cloth framed by wood or metal that extend in front of a doorway or window to provide protection from the sun or rain.

Awning Sign: Any sign located on the valance of a shelter supported entirely from the exterior wall of a building which extends over a building feature such as a door or window or a landscape/site feature such as a patio, deck or courtyard and which is constructed of fabric.

Bright Paint: Paint containing “fluorescent dye of pigment which absorbs UV radiation and re-emits light of a violet or bluish hue. Used to increase the luminance factor and to remove the yellowishness or white or off-white materials.” (Coatings Encyclopedic Dictionary)

Can Sign: A sign with text, logos and/or symbols that are placed on the plastic face of an enclosed cabinet attached to a building, structure or pole.

Canopy: A projecting horizontal architectural element of a building that is constructed of solid material and has the form of a flat band.

Cornice: Horizontal architectural band.

Electronic Message Display Sign: A wall, projecting or pedestrian sign that displays still images, scrolling or moving images, including video and animation, utilizing a series of grid lights that may be changed through electronic means such as cathode ray, light emitting diode display (LED), plasma screen, liquid crystal display (LCD), fiber optic, or other electronic media or technology.

Facade: The front of a building or any of its sides facing a public way or space.

Fenestration: The design, proportioning, and disposition of windows and other exterior openings of a building.

Frieze: Ornamental architectural band.

Ground Floor: The lowest story within a building which is accessible to the street, the floor level or which is within three feet above or below curb level, is parallel to or primarily facing any public street.

Historic Building/Historic Structure: A historic building or structure is one that is (1) listed as a Historic-Cultural Monument by the City of Los Angeles; or (2) is listed in, or has been determined to be “eligible” or “potentially eligible” for listing in the National Register of Historic Places or has been determined “eligible” for listing in the California Register of Historic Places by a local, state, or federal agency determination or is listed as such in the State Historic Resources Inventory.

Parapet: A low wall along the edge of a roof

Pedestrian Sign: A type of sign which is attached to a wall or to the underside of an awning, architectural canopy or marquee with one or two faces perpendicular to the face of the building which identifies a use of service exclusively or primarily by symbol.

Spandrel: Space between the curve of an arch.

Streetwall: The fall of facades created in a pedestrian oriented district when stores are build to the front lot-line and built from side lot-line to side lot-line.

Stucco: A coarse plaster composed of Portland or masonry cement, sand and hydrated lime, mixed with water and applied in a plastic state to form a hard covering for exterior walls.

Troweled Finish: A dense, smooth finish obtained by working a fresh concrete or plaster surface with a steel trowel.

Section 5.

SITE PLANNING

Site planning involves the proper placement and orientation of structures, open spaces, parking and pedestrian and vehicular circulation on a given site. The purpose of good site design is to create a functional and attractive development, to minimize adverse impacts, and to ensure that a project will be an asset to the community.

Proper site planning should promote harmony between new and existing buildings and should be sensitive to the scale, form, height, and proportion of surrounding development. Good design with complementary landscaping is a major component in creating vibrant commercial areas that foster a pleasant and desirable character, pedestrian activity, and economic vitality. Factors such as the size and massing of buildings, the orientation of storefronts, and circulation greatly influence the quality of the pedestrian experience.

In the Miracle Mile Community Design Overlay District, site planning of new buildings and the rehabilitation of existing buildings should promote continuity of the historic context of buildings in relationship to the existing pattern and scale of streets, sidewalks and parking. The guidelines and standards below reinforce the existing historic development patterns and provide a site planning framework for both infill developments and rehabilitation and revitalization of existing buildings.

A. Building Orientation

Guideline 1: Orient buildings towards Wilshire Boulevard and adjacent cross-streets in order to encourage pedestrian activity along the sidewalks of the Miracle Mile and facilitate pedestrian access to and from the sidewalk to adjacent properties.

Standard 1: Projects with rear lot lines abutting a street, alley, or parking lot should incorporate pedestrian entrances at the rear lot line in addition to those on Wilshire Boulevard.

B. Circulation

Guideline 2: Provide easy sidewalk access to pedestrians by locating vehicle access and loading areas where there will be minimal physical or visual impact on pedestrians, the flow of traffic, and/or adjacent uses.

Standard 2a: All vehicular entrances should be located off of a side street or an alley in order to minimize pedestrian and vehicular conflicts.

Standard 2b: Walkways for pedestrian access should be provided between parking areas and the Project.

Standard 2c: Passenger loading zones located on the street should not impede foot traffic or sidewalks.

Standard 2d: **Parking lots and structures** should be designed to provide safe pedestrian circulation between parked vehicles and the primary building through the use of clearly marked pedestrian walkways, stop signs, speed bumps, lighting, or other similar measures.

C. Utility & Service Areas

Guideline 3: Locate utilities, storage areas, mechanical equipment, fire alarms, sprinklers and other service areas so that they are not visible from the public right-of-way.

Standard 3: Utilities, storage areas, mechanical equipment, fire alarms and sprinklers installed as part of a new project should be placed to the rear of the site or underground when feasible.

Section 6.

ARCHITECTURE

The architectural elements used in the design of new buildings should create and/or maintain continuity of the street facade. New building facades should employ architectural devices that provide gradual or compatible transitions between existing and new buildings. Such elements include continuity of scale, massing, and design, fenestration, facade treatment, building material, color, access, and open space -- logical evolutions of the existing character of the street. This does not mean that identical architectural styles should be duplicated from neighborhood buildings. Rather, continuity should be maintained through a consistency in proportion and character of defining elements of existing facades or repetition of other architectural features.

A. Articulation

Guideline 1: Reduce the monotony of large buildings by breaking architectural elements into smaller pedestrian scale components or through use of varied materials, textures or colors, trim, roof lines, canopies and awnings in order to provide variation and visual interest.

Standard 1a: The incorporation of expressed architectural bays should be encouraged to break up large unbroken surfaces along the street wall.

Standard 1b: All projects should provide horizontal architectural treatments and/or facade articulations such as cornices, friezes, balconies, piers, awnings, pedestrian amenities, or other features for the first 30 feet of building height.

Standard 1c: Projects with forty linear feet or more of building frontage should provide vertical architectural treatments and/or facade articulations such as columns, pilasters, indentations, storefront bays, windows, landscaping, or other feature at least every thirty feet on center. The vertical break shall be at least two feet in width.

Standard 1d: Balconies fronting Wilshire Boulevard and/or the side streets setback less than 30 feet from Wilshire Boulevard are generally discouraged because of the historic context of Wilshire Boulevard as a major commercial corridor. Notwithstanding the above, small decorative balconies that protrude 30 inches from the building wall and are no more than 12 feet in length may be included.

B. Building Continuity

Guideline 2: Maintain building openings that enhance building design and continuity, as well as the pedestrian experience.

Standard 2: Buildings should generally be designed to maintain a continuous street wall along the length of a block except to accommodate building articulation pursuant to Guideline 1.

C. **Entry Treatment**

Guideline 3: Construct a dominant Wilshire Boulevard entryway to reinforce the character of the building, add visual interest, break up the monotony of flat surfaces, add a vertical element to break up the facade of the building and create an inviting entrance.

Standard 3a: A dominant entryway fronting Wilshire Boulevard that is differentiated from the building facade and provides a distinctive use of architectural treatments, materials, or special lighting should be constructed.

Standard 3b: Buildings constructed on a corner should place the dominant entry on the corner at a diagonal. The use of a curvilinear element for this entryway is strongly encouraged.

Standard 3c: Building entries should be illuminated at night.

Standard 3d: Doors should be comprised of non-tinted clear glass, which is free of temporary signage and/or other types of materials that may obstruct visibility.

D. **Roof Lines**

Guideline 4: Design new buildings to achieve consistency by creating continuity between the heights of adjacent roofs, parapets, and cornices.

Standard 4a: Roof lines should be designed to reflect the prevailing styles of the Miracle Mile 1) a relatively consistent horizontal cornice with a dominant vertical architectural element to pierce the roof line similar to the Dominguez Wilshire Building at 5410 Wilshire Blvd. or 2) a collage affect with clearly juxtaposed roof lines that have a repetitive element.

Example of Vertical Element



Example of Juxtaposed Roof Lines



Standard 4b: Severe roof pitches that create prominent out-of-scale building elements should be avoided.

**Example of
Severe Pitched Roof**



E. Exterior Surface Materials

Guideline 5: Select building materials to reduce building mass, create visual interest, and complement the existing historic resources of the Miracle Mile.

Standard 5a: The base of a building (the first two to five feet above the sidewalks) should be differentiated from the rest of the building facade with treatments such as change in material and/or color.

Standard 5b: The exterior facade of low-and mid-rise buildings should incorporate no more than three complementary building materials including but not limited to glass, tile, stucco or stone.

F. Windows

Guideline 6: Add visual interest and create a feeling of openness by incorporating windows with architectural defining features such as window frames, sashes, muntins, glazing, paneled or decorated jambs and moldings.

Standard 6a: Street facing, ground floor windows should be comprised of non-tinted, clear glass.

Standard 6b: Windows of high-rise buildings should be comprised of non-tinted, clear glass.

G. Storefronts

Guideline 7: Promote an active pedestrian district by incorporating attractive and functional storefronts into new construction.

Standard 7a: Multiple storefronts within a single building should be architecturally consistent, but defined and separated through structural bays, horizontal lintels, vertical piers or other architectural features at 20-30 foot intervals.

Standard 7b: Individual storefronts should not be used for storage or left empty without window displays.

H. Color

Guideline 8: Use a color palette which complements adjacent buildings and promotes the Art Deco identity of the Miracle Mile.

Standard 8a: Bright or intense colors should not be utilized for large areas unless consistent with the historical context of the area as shown in historic documentation.

Standard 8b: Bright colors on architectural detailing, trim, window sashes, doors and frames, or awnings may be used if they are consistent with the historical context of the area as shown in historic documentation.

Standard 8c: All vents, gutters, down spouts, etc. should be painted to match the color of the adjacent surface, unless being used expressly as trim or an accent element.

I. **Awnings and Canopies**

Guideline 9: Add awnings or canopies to provide variation to simple storefront designs in order to establish a horizontal rhythm between structures where none exists and add color to a storefront.

Standard 9a: The size, scale and color of the awnings should be compatible with the rest of the building and should be designed as an integral part of the building architecture.

Standard 9b: Barrel awnings are strongly discouraged.

Standard 9c: Awnings and canopies should be constructed of high quality, substantial materials which must be durable and fade resistant and maintained in good condition and replaced periodically.

Standard 9d: Canopies and awnings that span an entire building are discouraged. The careful spacing of awnings that highlight certain features of a storefront or entryway are encouraged.

J. **Ground Floor Lighting**

Guideline 10: Incorporate lighting into the design not only to accentuate architectural features, but to provide a safe environment for pedestrian activity.

Standard 10a: Lighting should be shielded to prevent glare to adjacent properties.

Standard 10b: Intense lighting which is used solely for advertising purposes should not be used.

Standard 10c: Buildings should be highlighted through “up” lights or accent lights placed on the facade.

K. Utilities and Mechanical Equipment Screening and Trash Containers

Guideline 11: Screen or enclose existing utilities, storage areas, mechanical equipment, fire alarms, sprinklers and other service areas with attractive landscaping or architectural barriers.

Standard 11a: Screen or enclose rooftop mechanical equipment by materials that are architecturally integrated with the building.

Standard 11b: Locate enclosed trash containers at the rear where they are not visible to the public.

Standard 11c: Trash storage bins should be located within a gated, covered enclosure constructed of materials identical to the exterior wall of the building and screened with landscaping, so as not to be viewed from the public right-of-way.

L. Security Grilles

Guideline 12: Use alternatives to roll down security grilles that are attached to building facades so as not to obscure storefront windows and create a negative atmosphere that detracts from a positive pedestrian environment.

Standard 12a: Stores should use alternatives such as interior security systems or vandal proof glazing which is resistant to impact.

Standard 12b: If interior security grilles are installed on the ground floor, they should be constructed of a open weave, non-solid grate material, painted to match the building and shall not detract or obscure architectural defining features.

Section 7.

ARCHITECTURE - REHABILITATION OF HISTORIC STRUCTURES

Due to the importance of the historic context of the Miracle Mile and its Art Deco architecture, it is critical to develop guidelines, which call for the preservation of these significant resources (**See Appendix A**). The standards below shall apply to all structures that are City Cultural Monuments. These standards shall also apply to all structures that are listed or determined to be eligible for listing on the National and/or State Register of Historic Places. Any alterations to a structure with historic status is required to obtain a CEQA Clearance. This clearance requires adherence to the Secretary of Interior Guidelines in order to mitigate the impact to these historic resources. The guidelines and standards below are based upon the Secretary of Interior Guidelines and therefore should be congruent with applicable historic requirements. In addition, there are a few structures listed in **Appendix A** that are considered significant by the community. It is recommended that these structures also use the guidelines and standards below.

To assist in understanding the character defining features of the predominant architecture, Art Deco, an Art Deco Dictionary has been included in **Appendix B** in addition to the general description below. This appendix should be referred to in order to understand the character defining features of Art Deco architecture.

Art Deco was first showcased at the Exposition Internationale des Arts Decoratifs and Industriels et Modernes held in Paris in 1925. From this Exposition, British critic and historian, Bevis Hillier derived the term Art Deco in the 1960s. At its core, Art Deco embraced the promise of the modern era and an idealized vision of the machine age with a more simple stripped down form. Encompassing the period between two World Wars from roughly 1920 to 1940, the Art Deco style evolved with the times.

During the gay twenties, Deco tended to be more playful and flamboyant with lush ornamentation utilizing flora and fauna or designs drawing from Eastern, Greek, Roman, Egyptian, African, Mayan and Aztecan influences. Architecture from this period also incorporated materials associated with sophistication and elegance such as rich woods, marble, copper, brass, bronze and brightly colored terra cotta and tile. Despite the use of luxurious materials and reference to exotic cultures, Deco even in

the twenties, was characterized by a return to a more simplistic form and an emphasis on geometric shapes and patterns. Common patterns included, the sunrise, ziggurat, chevron and frozen fountain as well as an interplay of horizontal and vertical elements.

As the era progressed, Art Deco took on a truly modern form with more extreme geometric, linear and curvilinear elements. The Depression and impending war had a dramatic impact on the style, as Art Deco's opulence and ornamentation were stripped away further. This new style of Deco is often referred to as Art Moderne or Streamline Moderne. Architectural shapes of this style shifted from a vertical to a more horizontal orientation. Buildings became heavy and blocky, with a monumental volume, evidence of the change in attitudes from the frivolous and decorative to those of strength and security. The use of imagery drawn from industry and technology connoted strength, speed with an aerodynamic quality, and importance. Buildings were constructed to resemble modern age machinery: airplanes, trains and ocean liners. Aerodynamic curves and industrial materials created an appearance of movement.

A. Articulation of Historic Structures

Guideline 1: Retain the buildings' original appearance and all architectural defining features.

Standard 1a: Architectural defining features as shown in **Appendix B**, which articulate a building facade should be repaired by reinforcing historic materials and through limited replacement of compatible substitute material when there is extensive deterioration or missing parts of key features.

Standard 1b: When an architectural defining feature as shown in **Appendix B**, highlights a building facade that is too deteriorated to repair, but the overall form and detailing are still apparent, the replacement of this feature using compatible substitute material is encouraged

Standard 1c: Architectural defining features, as shown in **Appendix B** should not be hidden behind merchandise

displays, signage and/or building alterations and additions.

Standard 1d: Removing building sidings and other non-historic additions is encouraged to expose and restore the original design elements.

B. Building Continuity of Historic Structures

Guideline 2: Retain the original building continuity of historic structures. Whenever possible, rehabilitate and/or restore the original building continuity of altered structures. Adapt historic structures for a new use so that additions do not conflict with the scale, massing or design of the existing structure.

Standard 2a: Historic structures should be repaired by reinforcing historic materials and through limited replacement of compatible substitute material when there is extensive deterioration or missing parts of key features.

Standard 2b: New additions required to adapt a building for reuse should be designed to clearly differentiate between the historic and new and shall be compatible with the overall scale, massing and design of the existing building.

C. Entry Treatment of Historic Structures

Guideline 3: Retain and preserve entryways and their defining architectural features such as doors, fanlights, sidelights, pilasters, entablatures, columns, balustrades, and stairs as shown in **Appendix B**.

Standard 3a: Existing entryway materials such as masonry, wood, metal, tile and terrazzo should be cleaned and maintained using the gentlest methods available as prescribed in recognized preservation guidelines. The application of protective coating to preserve this type of restoration work is encouraged.

Standard 3b: Entryways should be repaired by reinforcing historic materials and through limited replacement of compatible substitute material when there is extensive or missing parts of key features.

Standard 3c: When an entryway is too deteriorated to repair, but the overall form and detailing are still apparent, the replacement of an entryway using compatible substitute material is encouraged.

Standard 3d: New entryways may be added as required for a new use, so long as these entryways preserve the overall historic character of the building and do not eliminate or detract from architectural defining features.

D. Roof Lines of Historic Structures

Guideline 4: Retain and preserve the existing roof lines and decorative features of historic buildings.

Standard 4a: Existing roof lines should not be altered. Whenever possible rehabilitate and/or restore the original roof line of altered structures.

Standard 4b: Roofs should be repaired through limited replacement of compatible substitute material when there is extensive deterioration or missing parts of key features.

Standard 4c: When a roof is too deteriorated to repair, but the overall form and detailing are still apparent, the replacement of the roof and its key features using compatible substitute material is encouraged.

Standard 4d: Roof top additions should be avoided whenever possible. However, if roof top additions are

necessary to reuse a historic building, then these additions should be discreet and should not be visible from across the street at ground level. These additions should be simple and integrated into the overall design of the building especially in relationship to window patterns and roof lines.

E. Exterior Surface Materials of Historic Structures

Guideline 5: Retain and preserve building exterior materials, which are critical in defining the overall historic character of the building.

Standard 5a: Building materials should be protected and maintained by providing proper drainage so water does not damage surfaces.

Standard 5b: Exterior surface materials such as masonry, wood, metal and tile should be cleaned and maintained using the gentlest methods available as prescribed in recognized preservation guidelines. The application of protective coating to preserve this type of restoration work is encouraged.

Standard 5c: Exterior materials that have been historically unpainted should not be painted to create a new look.

Standard 5d: Whenever possible the original coat of paint, should not be removed. However, if an area is to be repainted, historically appropriate colors to the building and district should be used.

Standard 5e: Exterior materials should be repaired by patching, piecing-in or consolidating the original material or limited replacement of compatible substitute material.

Standard 5f: If the overall form and detailing are still apparent and exterior

materials are too deteriorated for repair, then exterior materials should be replaced in kind with a compatible substitute material.

Standard 5g: If there is not adequate historical, pictorial and physical documentation about the type of material used for a historic feature, then new materials compatible with the existing materials, color and finish should be used.

F. Windows of Historic Structures

Guideline 6: Repair and maintain windows and architectural defining features such as the window frame, sash, muntin, glazing, hood mold, paneled or decorated jamb and molding.

Standard 6a: Windows should be cleaned and maintained using the gentlest methods available as prescribed in recognized preservation guidelines.

Standard 6b: Windows should be repaired whenever possible rather than replaced.

Standard 6c: Windows should be repaired by reinforcing historic materials and through limited replacement of compatible substitute material when there is extensive deterioration or missing parts of key features.

Standard 6d: When a window is too deteriorated to repair, but the overall form and detailing are still apparent, then the window should be replaced using compatible substitute material and a design similar to that of the original window.

Standard 6e: Street facing, ground floor windows should be comprised of non-tinted clear glass, which is free of temporary signage and/or

other types of materials that may obstruct visibility.

G. Storefronts of Historic Structures

Guideline 7: Preserve, repair and highlight storefronts and their defining architectural features such as doors, transoms, windows, bay divisions and bases.

Standard 7a: Exterior storefront materials such as masonry, wood, metal and tile should be cleaned and maintained using the gentlest methods available as prescribed in recognized preservation guidelines. The application of protective coating to preserve this type of restoration work is encouraged.

Standard 7b: Individual storefronts should not be used for storage or left empty without window displays.

Standard 7c: Storefronts should be repaired by reinforcing historic materials and through limited replacement of compatible substitute material when there is extensive deterioration or missing parts of key features.

Standard 7d: When a storefront is too deteriorated to repair, but the overall form and detailing are still apparent, the replacement of a storefront using compatible substitute material is encouraged.

H. Color of Historic Structures

Guideline 8: Retain and preserve original finishes or apply new finish, paint or plaster with colors appropriate to the historic character of the building.

Standard 8a: Unpainted masonry, brick or tile should not be painted, but cleaned using the gentlest methods available as prescribed in

recognized preservation guidelines. The application of protective coating to preserve this type of restoration work is encouraged.

Standard 8b: Existing finishes, paint and plaster should be cleaned and maintained using the gentlest methods available as prescribed in recognized preservation guidelines. The application of protective coating to preserve this type of restoration work is encouraged.

Standard 8c: Colors used for the finish, plaster or paint should be consistent with the original color of the building based on historical documentation.

Standard 8d: Bright or intense colors should not be utilized unless consistent with the historical appearance of the building as shown in historical documentation.

I. **Awnings and Canopies of Historic Structures**

Guideline 9: Retain and preserve historic awnings and canopies or add new canopies or awnings, which do not detract from the historic character of a building.

Standard 9a: Signs that are not part of the original awning should not be affixed to the awning or hung from its edges.

Standard 9b: Canopies and awnings that are architectural defining features should be restored and/or repaired by reinforcing historic materials and through limited replacement of compatible substitute material when there is extensive deterioration or missing parts of key features.

Standard 9c: Added awnings or canopies should not obscure character defining

features and should be limited to one sign per awning, so as not to conflict with the historic character of the building.

Standard 9d: Canopies and awnings that span an entire building are discouraged. The careful spacing of awnings that highlight certain features of a storefront or entryway are encouraged.

J. Ground Floor Lighting of Historic Structures

Guideline 10: Retain and preserve existing historic lighting fixtures and/or incorporate new lighting into the a building's overall design in order to accentuate architectural features and provide a safe environment for pedestrian activity.

Standard 10a: Whenever possible existing historic lighting fixtures should be preserved and retained or rehabilitated and upgraded.

Standard 10b: During hours of operation, storefronts should be illuminated within.

Standard 10c: Buildings should be highlighted through "up" lights or accent lights placed on the facade.

Standard 10d: Lighting should be shielded to prevent glare to adjacent properties.

Standard 10e: Intense lighting which is used solely for advertising purposes is strongly discouraged.

K. Utilities and Mechanical Equipment Screening and Trash Containers of Historic Structures

Guideline 11: Preserve and retain visible architectural defining features of early mechanical systems and whenever possible screen or enclose utilities, mechanical equipment, and trash containers.

Standard 11a: Whenever possible existing mechanical equipment should be preserved and retained or rehabilitated and upgraded by adding new parts.

Standard 11b: Locate enclosed trash containers at the rear where they are not visible to the public.

Standard 11c: Trash storage bins should be located within a gated, covered enclosure constructed of materials identical to the exterior wall of the building and screened with landscaping, so as not to be viewed from the public right-of-way.

L. Security Grilles of Historic Structures

Guideline 12: Use alternatives to roll down security grilles that are attached to building facades so as not to obscure storefront windows and create a negative atmosphere that detracts from a welcoming pedestrian environment.

Standard 12a: Stores should use alternatives such as interior security systems or vandal proof glazing which is resistant to impact.

Standard 12b: If interior security grilles are installed on the ground floor, they should be constructed of a see-through, open weave, non-solid grate material, painted to match the building and shall not detract or obscure architectural defining features as shown in **Appendix B**.

Section 8.

PARKING

The location and design of parking lots and buildings in a development is critical in promoting safety for pedestrians and minimizing conflict with vehicles. Parking structures and areas should form an integral part of the project and be well landscaped, so as not to detract from the pedestrian experience and maintain visual interest.

A. Surface Parking

Guideline 1: Locate surface parking in the rear of buildings and provide pedestrian access from the parking to the building and street.

Standard 1: A surface parking lot adjacent to a public street should conform to the landscape requirements detailed in Section 9 of these guidelines.

B. Parking Structures

Guideline 2: Integrate a parking structure into the overall design of a development through compatible materials, color and architectural defining features.

Standard 2a: Parking should be located underground where possible.

Standard 2b: Parking structures should be compatible with the main building through a consistency in building material, color and design.

Section 9.

LANDSCAPING

Through the use of a variety of vegetation such as trees, shrubs, ground cover, perennials and annuals, as well as other materials such as rocks, water, sculpture or paving materials, landscaping unifies streetscape and provides a positive visual experience . Landscaping also can emphasize sidewalk activity by separating vehicle and pedestrian traffic, provide shade, define spaces, accentuate architecture, create inviting spaces and screen unattractive areas.

A. Surface Parking Lots

Guideline 1: Buffer existing parking adjacent to a public right-of-way as well as residential buildings with a landscaped barrier.

Standard 1: A minimum of 7% of the total area of surface parking should be landscaped with one tree (minimum canopy of 200 feet in diameter at maturity) for every 6 parking spaces evenly dispersed throughout the lot.

B. Building Sites

Guideline 2: Landscape the areas surrounding a building including site entrances, walkways and parking lots with small trees, planter boxes and tubs of flowers.

Standard 2a: Landscaping should not obstruct the pedestrian right-of-way or create inappropriate visual or physical barriers for vehicles and pedestrians.

Standard 2b: Landscape plans should include a maintenance plan and be designed by a certified landscape architect.

Standard 2c: Blank walls or other unattractive areas of a site or building shall be screened with landscaping.

Standard 2d: Landscaping should be designed in such a way as to accentuate the architectural features of a building, not detract from them.

Section 10.

SIGNAGE

The placement, construction, color, font style, and graphic composition of signs has a collective impact on the appearance of an entire district. Therefore, it is important to integrate signage with the overall design of a building and its surrounding landscape. Signage should convey a **simple straightforward** message to identify businesses and/or to assist pedestrians and vehicular traffic in locating their destination. The size, number, location and use of signage is further regulated in Chapter 9 of the LAMC.

A. All Signs

Guideline 1: Design signage which is incorporated into the overall design of a building and complements the facade or architectural element on which it is placed.

Standard 1a: All signs should be maintained in good repair.

- Standard 1b:** **Easy to read signs** with a brief simple message and a limited array of font styles are encouraged.
- Standard 1c:** Colors should be selected to contribute to the legibility and design integrity of a sign with sufficient contrast between the background color and that of the letter or symbol.
- Standard 1d:** Signs should not dominate or obscure the architectural elements of building facades, roofs or landscaped areas.
- Standard 1e:** Signs should be constructed of metal, stone, wood or other non-illuminated, non plastic material.
- Standard 1f:** Signs made up of channel lettering, hung away from the face of a building such as a projecting sign and or signs perpendicular to the face of a building tend to have a lighter appearance and are strongly encouraged.
- Standard 1g:** Neon signs and channel lettering are strongly encouraged.
- Standard 1h:** **Internal illumination** should be used only for signs composed of individual channel or neon letters or graphics.
- Standard 1i:** The height and width of letters and logos should be properly proportioned to the sign area on which the sign is to be located
- Standard 1j:** Signs should be scaled to fit within the boundaries of a storefront or building it is advertising.
- Standard 1k:** The exposed backs of all signs visible to the public should be suitably finished and maintained.

Standard 1l: Projects or buildings containing more than one storefront should have a planned coordinated sign program that provides consistency with regard to height, size, shape, colors and degree of illumination.

Standard 1m: The restoration of historic signage as prescribed in recognized preservation guidelines is strongly encouraged.

Standard 1n: After 90 days of closing a business, any related signs should be removed and replaced with blank panels or painted out unless the sign qualifies as an “advertising display” per the State of California Business and Professions Code.

B. Pedestrian Signs

Guideline 2: Develop coordinated pedestrian signage, which complements the pedestrian orientation of the Miracle Mile.

Standard 2a: Each business on the ground floor may have one pedestrian sign, except that corner business with frontage on both streets may have two pedestrian signs.

Standard 2b: Each business that is located on a second floor may have a pedestrian sign on the ground level if there is direct exterior pedestrian access to the second floor business space.

C. Projecting Signs

Guideline 3: Design projecting signs, which are compatible with the historical context of the Miracle Mile and improve the overall appearance of the area.

D. Wall Signs

Guideline 4:

Standard 4: Multiple wall signs on a building facade should be located in order

to maintain a physical separation between each individual sign, so it is clear that the sign relates to a particular store below.

E. Information Signs

Guideline 5:

Standard 5: Signs which direct vehicular and pedestrian traffic to parking areas or other onsite destinations or explain parking fees should not exceed nine (9) square feet or a vertical or horizontal dimension of thirty-six (36) inches, and should be consistent in design with the signage for the rest of the project.

F. Window Signs

Guideline 6:

Standard 6a: Only one window sign per business is allowed.

Standard 6b: Window signs, consisting of text, graphics or images, either permanent or temporary, should not exceed four (4) square feet or ten (10%) of the total window area, whichever is less.

DEPARTMENT OF CITY PLANNING

Con Howe, Director of Planning
Gordon B. Hamilton, Deputy Director
Robert H. Sutton, Deputy Director

COMMUNITY PLANNING

Dave Gay, Principal Planner
Charlie Rausch, Senior City Planner
Ron Maben, City Planner
Megan Hunter, Planning Assistant

COMMUNITY ADVISORY COMMITTEE

Donald Battjes, Jr, Chief of Operations, Los Angeles County Museum of Art
Nicole Bernson, Miracle Mile Residential Association
Ken Bernstein, Director of Preservation Issues, Los Angeles Conservancy
Julie Carpenter, AICP, Miracle Mile Residential Association, Planning & Land Use Committee
Ken Draper, Vice Chair, Mid-City West Community Council
John Kaliski, AIA, Principal, Urban Studio - Los Angeles
Mitzi March Mogul, President, Art Deco Society of Los Angeles
Walter Marks III, Chair, Miracle Mile Civic Coalition
Denise Munro Robb, Miracle Mile Action Committee
James O'Sullivan, President of the Miracle Mile Residential Association
Renee Weitzer, Chief Planning Deputy, Council District 4

GRAPHIC ILLUSTRATIONS

Ben Cam, Graphic Designer II

PUBLICATION

Megan Hunter, Planning Assistant

APPENDIX A

Historic Resources in the Miracle Mile Community Design Overlay District

Address	Building Name	Current Use	Date Built	Historic Status	Comments
5209 Wilshire Blvd.	Zephyr Club	Office	1929	Eligible for National Register of Historic Places	
5217-5231 Wilshire Blvd.	Clem Wilson Building (Miracle Mile Historic District)	La Luna Restaurant, Furniture Store, Cingular Wireless, Office	1932	Eligible for National Register of Historic Places	
5318-5328 Wilshire Blvd.	Commercial Building	Yamaha Music, Marriage Chapel, Print Shop	1936	Eligible for National Register of Historic Places	Originally Spanish Colonial Revival, this building has been significantly altered, but still retains its form and massing.
5350 Wilshire Blvd.	Kress Department Store	Post Office, Panini Grill, Eclectic Salon	1937	Eligible for National Register of Historic Places	1st floor has been altered.
5355-5361 Wilshire Blvd.	Hahn's Music, Pianos and Organs	New Mixed Use Development at Detroit	1937	Eligible for National Register of Historic Places	The front façade has been retained.
5363-5379 Wilshire Blvd.	Wilshire Center Building	Precious Hair & Nails, Several Boutiques	1928	Eligible for National Register of Historic Places	
5364 Wilshire Blvd.	Jack La Lanne's European Health Spa	Conga Room	1926	Eligible for National Register of Historic Places	
5366-5374 Wilshire Blvd.	(Miracle Mile Historic District)	La Boca, Wig Store	1926; remodeled 1938	Eligible for National Register of Historic Places	The structure has been altered, but the façade on the second story seems to be intact covered by screening.
5370 Wilshire Blvd.	Darkroom	La Boca Restaurant	1926	City Cultural Monument	

APPENDIX A

Historic Resources in the Miracle Mile Community Design Overlay District

Address	Building Name	Current Use	Date Built	Historic Status	Comments
5401-5403 Wilshire Blvd.	Tru-Line Litho	Wilshire Beauty Supply	1938	Eligible for National Register of Historic Places	
5407-5411 Wilshire Blvd.	Commercial Building	Staples	1936	Eligible for National Register of Historic Places	The storefronts have been enclosed.
5410 Wilshire Blvd.	Dominguez Wilshire Building	Express Night Club, Electronic Store, Office	1930	Eligible for National Register of Historic Places	
5413 Wilshire Blvd.	Roman Foods Mart	Staples	1935	Eligible for National Register of Historic Places	The storefronts have been enclosed.
5423-5425 Wilshire Blvd.	Flying Saucer Restaurant & Brown's Bakery	Staples	1930s	Eligible for National Register of Historic Places	These buildings have been demolished.
5450 Wilshire Blvd.	Ever-Ready Lighting	Icon	1937	Eligible for National Register of Historic Places	
5464	Commercial Structure	The Wireless Outlet	1928	Eligible for National Register of Historic Places	The address in the application for the National Register of Historic Places was misidentified as 5465, but shown correctly on the corresponding map.
5466-5470 Wilshire Blvd.	Spanish Revival Commercial Building (Miracle Mile Historic District)	Quizno's, National Restaurant	1927	Eligible for National Register of Historic Places	
5467 Wilshire Blvd.	Zachary All (Miracle Mile Historic District)	Walgreen's	1936	Eligible for National Register of Historic Places	The 1st floor has been altered.

APPENDIX A

Historic Resources in the Miracle Mile Community Design Overlay District

Address	Building Name	Current Use	Date Built	Historic Status	Comments
5500-5522 Wilshire Blvd.	Wilshire Tower (Former Desmond's)	Kinko's, Hollywood Video, Office Building	1929	City Cultural Monument	The 1st high-rise building outside of downtown.
5505 Wilshire Blvd.	Korean Cultural Services Building	Korean Cultural Center	1929	Eligible for National Register of Historic Places	
5507-5511 Wilshire Blvd.	Commercial Structure	Brown's Bakery	1939	Eligible for National Register of Historic Places	Demolished as a result of extensive fire damage in 1985.
5515-5519 Wilshire Blvd.	El Rey Theatre	Theatre	1936	City Cultural Monument	
6067 Wilshire Blvd.	May Company Wilshire	Los Angeles County Museum	1940	City Cultural Monument	

OTHER SIGNIFICANT BUILDINGS

5655 Wilshire Blvd.	Shanghai Gardens	IHOP	1932		
5828 Wilshire Blvd.	Arthur Murray Studios	Office Building	1947		
5814 Wilshire Blvd.	Folk Art & Craft Museum	Museum	1930		

APPENDIX B

ART DECO DICTIONARY

Art Deco was first showcased at the Exposition Internationale des Arts Decoratifs and Industriels et Modernes held in Paris in 1925. From this Exposition, British critic and historian, Bevis Hillier derived the term Art Deco in the 1960s. At its core, Art Deco embraced the promise of the modern era and an idealized vision of the machine age with a more simple stripped down form. Encompassing the period between two World Wars from roughly 1920 to 1940, the Art Deco style evolved with the times. During the gay twenties, Deco tended to be more playful and flamboyant with lush ornamentation utilizing flora and fauna or designs drawing from Eastern, Greek, Roman, Egyptian, African, Mayan and Aztecan influences. Architecture from this period also incorporated materials associated with sophistication and elegance such as rich woods, marble, copper, brass, bronze and brightly colored terra cotta and tile. Despite the use of luxurious materials and reference to exotic cultures, Deco even in the twenties was characterized by a return to a more simplistic form and an emphasis on geometric shapes and patterns. Common patterns included, the sunrise, ziggurat, chevron and frozen fountain as well as an interplay of horizontal and vertical elements.

As the era progressed, Art Deco took on a truly modern form with more extreme geometric, linear and curvilinear elements. The Depression and impending war had a dramatic impact on the style, as Art Deco's opulence and ornamentation were stripped away further. This new style of Deco is often referred to as Art Moderne or Streamline Moderne. Architectural shapes of this style shifted from a vertical to a more horizontal orientation. Buildings became heavy and blocky, with a monumental volume, evidence of the change in attitudes from the frivolous and decorative to those of strength and security. The use of imagery drawn from industry and technology connoted strength, speed with an aerodynamic quality, and importance. Buildings were constructed to resemble modern age machinery: airplanes, trains and ocean liners. Aerodynamic curves and industrial materials created an appearance of movement.

The purpose of this dictionary is to highlight the most common character-defining features of Art Deco and Streamline Moderne. Since this dictionary has been put together as part of the Miracle Mile Community Design Overlay District, all of the examples are taken from the area defined as the Miracle Mile (Wilshire Blvd. from Sycamore to Fairfax Ave.).

CHARACTER DEFINING FEATURES OF ART DECO



Vertical Emphasis

Art Deco employs such architectural features as a tower atop a podium to emphasize the vertical, perhaps a representation of the optimistic view that man can accomplish anything in the industrial era.

Flat Roofs

Most Art Deco architecture consists of flat roof lines, frequently with decorative parapets or vertical elements to break up the monotony of a level plane.



Stepbacks

Some of the most beloved skyscrapers in New York City such as the Chrysler and Empire State Buildings, incorporated stepbacks, creating a tiered effect in their architecture. This architectural design was a result of a 1923 New York City zoning ordinance, which required designers to include stepbacks to allow sunlight to penetrate to the streets below. This architectural feature was adopted throughout the country becoming synonymous with the Art Deco style.

Geometric Ornament

Taking its cue from the modern arts movements of Cubism, Futurism and Constructivism and the mechanization of the Industrial Age, Art Deco architecture incorporated repetitive patterns of geometric shapes and angles. Art Deco also borrowed from the geometric designs of ancient civilizations, most notably Egypt, to adorn its buildings. Thus, common patterns included ziggurats shaped like pyramids, sunbursts, and zig zags reminiscent of lightning bolts. As time passed, geometric ornamentation became more simplistic and abstract until it was almost entirely stripped away leaving behind the clean lines and curves of the Streamline Moderne period.

Straight Lines



Art Deco's interplay between the horizontal and vertical is often emphasized through the use of straight parallel lines. Earlier Deco employed lines to accentuate verticality and later Deco utilized them to highlight a horizontal orientation.



Zig Zag

Sometimes referred to as the lightning bolt, zig zag is a series of jagged, uneven lines.

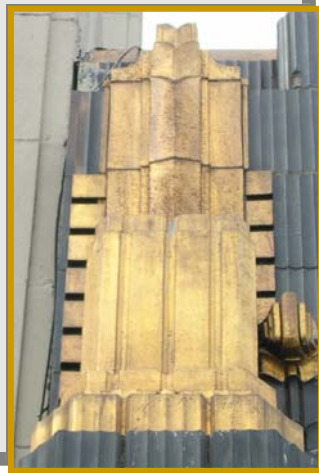


Chevron –
A V-shaped
stripe, which
points up and
down.

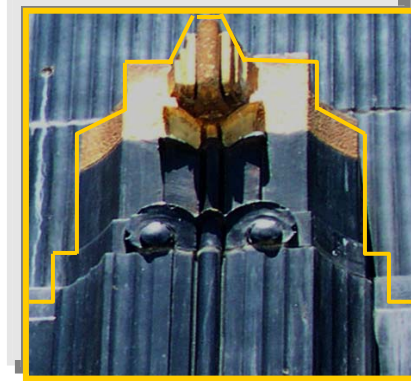


Lozenge –
A diamond
shape that is
not square.

Ziggurat



A Ziggurat or stepped pediment has a contour like a staircase. Resembling a pyramid, it represents Deco's fascination with Egypt as a result of the 1922 discovery of Tutankhamen's tomb.



Sunburst



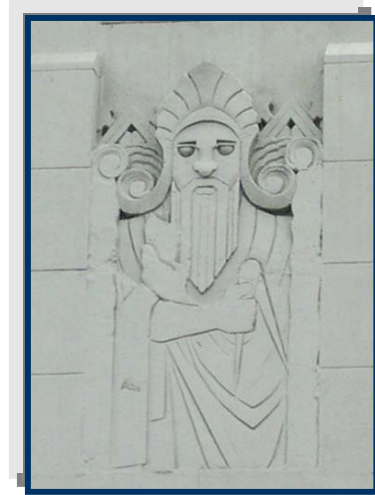
Stylized Floral Motifs

Floral Motifs evolved from the sensuous lines of Art Nouveau. The natural world was depicted through an industrial lens with sharper lines, angles, and geometric shapes evoking the image of machinery.



Stylized Figures

Similar to stylized flora motifs, animal and human figures were also influenced by industrialization and the modern art movements. As a result, Art Deco figures took on a more dramatic form with sharper lines and angles.



Influence of Ancient Civilizations and Exotic Cultures

Stemming from the Revivalist and Beaux Arts traditions, early Deco embraced the classicism of Greece and Rome. The symmetry of Grecian and Roman architecture is replicated within Art Deco's use of three elements, such a large storefront window bracketed by two smaller sized windows. Columns or reliefs were also a recurrent feature of Art Deco architecture.

In addition to ancient Greece and Rome, Art Deco drew upon the more exotic civilizations of Egypt, Latin America, Assyria and Persia. The discoveries of King Tutankhamen's tomb and Mayan ruins in the 1920s aroused the imaginations of architects, who reworked ancient designs with the principals of modernism. Architects also took inspiration from the sleek elegance of the Orient's lacquers and china and the simple grace of African tribal textiles. Despite the culture, these influences were always reinterpreted with a modern twist.



Clean lines, sharp angles and repetitive shapes are classic modern features in spite of the exotic theme.





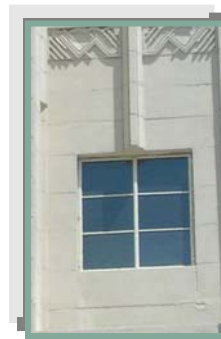
Low Relief Ornamentation

A common characteristic of Art Deco is the addition of hard-edged low reliefs, usually around window and door openings. Favorite designs included stylized flora motifs or figures, as well as geometric patterns of chevrons, lozenges, ziggurats and zig zags.



Metal Casement Windows

A casement window is hung vertically by hinges so that it can open outward. Metal casement windows were generally used in Art Deco architecture.



Smooth Finishes and Use of Luxurious Materials (Rich woods, Marble, etc.)

Celebrating the sleek form of modernism, architects utilized materials, which had smooth finishes. Advancements in technology provided the architect with a greater selection of materials, which included vitrolite (colored glass), bakelite (a hard plastic), stainless steel, and chrome. Early Deco also employed luxurious materials such as marble and mahogany. After the Depression hit, the usage of these expensive materials was rare.

The Darkroom (above) is encased in vitrolite.

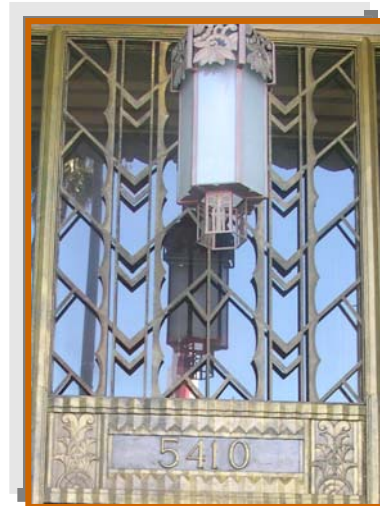
Terrazzo Flooring



Terrazzo was first used during the Roman Era. However, it is most associated with the Art Deco period. Terrazzo is composed of a loose mixture of multi-hued stones such as granite, marble and quartz and a binding agent such as cement. Like cement, the mixture is poured, trawled and dried, and then it is buffed to a high polish creating a unique flecked appearance. Typical terrazzo designs included geometric shapes and patterns, which gave building entrances a dramatic flair.

Iron Grille Work

Art Deco architecture often incorporated iron grille work around windows and doors, usually composed of geometric patterns.



Octagonal Lamps/Clocks

In early Deco, the roundness of the circle was converted into the hard edges of an octagon resulting in octagonal lamps and clocks. As architecture became more curvilinear with the Streamline Moderne period, circles became in vogue once again.

CHARACTER DEFINING FEATURES OF STREAMLINE MODERNE

Horizontal Orientation



As the Depression wore on, resources were no longer available to build skyscrapers. Construction during this period consisted of smaller scale single or two-story commercial buildings. The vertical emphasis of the skyscraper was replaced with the horizontal orientation of these new commercial structures. Architects used simple linear ornament, bands of windows, and cantilever awnings to underscore a horizontal orientation. This gave buildings the appearance of stability and strength, qualities much sought after with the Stock Market Crash of 1929 and as war loomed ever closer.



Rounded Edges

The Depression had a major impact on Art Deco. The more frivolous ornamentation of the twenties was stripped away. However, the focus on simplistic geometric lines and the celebration of the Machine Age took an even more dramatic turn. The building itself reflected a geometric form with an aerodynamic panache resulting in the prevalence of rounded edges.



Corner Windows and Entrances

The incorporation of rounded edges led to a repositioning of windows and doors to the corner.

Glass Block Walls

The more opulent materials of early Deco were exchanged in favor of mass produced materials such as glass block. The usage of heavy glass block walls added to the solid, stable appearance of the building.



Flat Roofs

Gone were the decorative parapets of early Deco and in their stead an even flatter roofline. This level roofline further accentuated the horizontal orientation of the Streamline Moderne period.



Ribbon or Band of Windows with Metal Frames

As with the period's modern art movements, architecture was further deconstructed resulting in simple linear elements. Thus, architects used ribbons or bands of windows to reflect this new influence. Frequently, windows were sheathed in metal louvers, again highlighting a horizontal linear orientation and evoking the look of a machine.

Curved Awnings

Streamline Moderne embraced the Era of the Machine in particular advances in transportation. Airplanes, trains, ocean liners and the automobile were becoming ever faster and more aerodynamic. This progression is seen in the use of curved awnings, which often parallel the shape of the building. The use of curvilinear elements creates an appearance of movement, probably a reference to the improvements in transportation.



Smooth Wall Finish & Aluminum and Stainless Steel Door and Window Trim

As with early Deco, Streamline Moderne embodied a sleek appearance from which its name is derived. To capture this appearance, Streamline Moderne applied smooth materials such as stucco, granite and stainless steel. During the Streamline Moderne period, materials such as aluminum and stainless steel were mass-produced and therefore could be used in architecture more economically.



The Board appreciated this recognition of its director and a motion was presented, seconded and carried approving the acceptance by Dr. Friedmann of the appointment as Professor in Residence at UCLA in Zoology.

Dr. Friedmann told of a request from the National Parks Service to permit them to designate Hancock Park as a national scientific landmark. He explained that that Department had conducted a survey and had erected markers on nationally famous historic places and now they are planning to do the same thing for scientific areas which they consider should be recognized in this way. The only obligations would be to allow display of the marker; to agree to maintain and preserve so far as possible the scientific integrity of the site, and agree to forfeit the marker if in the judgment of the Department the area should deteriorate to the degree where it was no longer desirable to be designated in that way. If the Board was agreeable to this Dr. Friedmann would notify the government department.

Request of
U.S. Dep't.
of Parks
to place
Marker at
Hancock
Park

Discussion of the request followed. It was recommended that Dr. Friedmann confer with the County Counsel concerning the request before approval is given.

A motion was presented, seconded and carried that Dr. Friedmann take up with the County Counsel the request of the Department of National Parks to place a marker at Hancock Park as a scientific area.

Dr. Friedmann reported that when the Museum's Registrar and Mr. Ariss, Curator of Anthropology, catalogued the Melanesian collection being purchased from Mr. Earl Stendahl, that Mr. Stendahl added to the collection a number of pieces from his own collection. He wished the Board to know of this generous action on the part of Mr. Stendahl.

Gifts of
Earl
Stendahl

On April 1 Dr. Friedmann started his third year as director of this Museum and he had prepared a brief summary of what had happened during the first two years of his tenure which he wished to present to the Board.

Director's
Summary of
First Two
Years in
Office

Instead of having it read at the time, a request was made that Dr. Friedmann have his report reproduced and sent to each Board member and that it could then be taken up at the next meeting of the Board.

Dr. Friedmann agreed to do this.

for storeroom, etc., for the guards there; \$25,200 for planning Taxidermy shop on east end of the fourth floor and \$15,000 for planning a new eating area on the open area back of the main foyer. The last named was granted due to the interest of Supervisor Hahn, who is pushing it.

Dr. Friedmann reported that he had spoken to Joel Bennett, Assistant County Counsel, about the Hancock Park Marker proposal of the National Park Service, but Mr. Bennett said he wanted to see all the legislation about it before giving an opinion.

Marker Proposal for Hancock Park

A travel request for the Director was presented which would allow him to go to Seattle, Washington, May 24, returning June 2 to attend the annual meeting of the American Association of Museums being held there and for which he was to conduct a symposium on "The Curator."

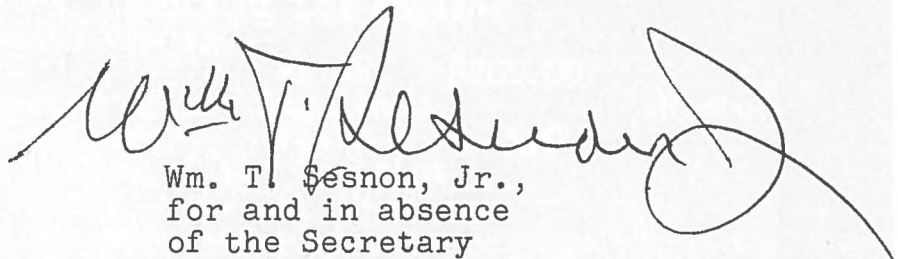
Travel Request of Director

A motion was presented, seconded and passed recommending approval of the request by the Board of Supervisors.

Dr. Friedmann spoke of the Machris-Knudsen expedition to East Africa. They have collected 5 elephants, taking the last one just in time to move from that area before the heavy rains set in; they have four chimpanzees and the Museum has already received a shipment of over 1000 birds from them. They have a number of other things for the Museum, too. The taxidermist, George Adams, has already left there, so the collecting will come to an end now. Mr. Machris is going farther south to get some things for the breeding farm of his Zoo. The expedition has been successful in getting everything wanted, except the leopards. They did get one, but it is not very good. The Museum already has two, shown in a night scene because they are not good enough to put in daylight.

Machris-Knudsen Expedition

The meeting adjourned on motion.


Wm. T. Sesnon, Jr.,
for and in absence
of the Secretary

A travel request was presented to allow the Director to go to Gainesville, Florida, and Washington, D. C., from August 10 to 28, 1963, in order to attend the annual meeting of the American Ornithologists Union and the 16th International Congress of Zoology in Washington, D.C.

Travel
Request
for
Director

A motion was presented, seconded and carried, approving the request and authorizing that the Board of Supervisors be asked to approve it.

Dr. Friedmann announced the addition of two new members to the Science staff. They were Dr. Shelton P. Applegate, Associate Curator, Vertebrate Paleontology and Robert J. Lavenberg, Assistant Curator, Ichthyology.

New Staff
Members
in Science

Dr. Friedmann said the new paleontology unit on the fourth floor is practically finished and that moving in would start within a very few days. It is planned to have an official dedication of it on November 6 when Dr. Edwin H. Colbert of the American Museum of Natural History, New York, will be here to give a lecture.

Opening
of New
Pale-
ontology
Unit on
Fourth
Floor

Whether or not a meeting of this Board in August was needed was considered. A motion was presented, seconded and passed, to omit that meeting.

August
Meeting
Omitted

Dr. Friedmann made a report concerning the marking of Hancock Park as a National Scientific Landmark. He had received an opinion from Joel Bennett, Deputy County Counsel. Mr. Bennett had said he had examined the various statutes referred to in the letter of Bennett Gale and in his opinion there was nothing in such statutes nor in the conditions listed in Mr. Gale's letter which would divest the County of its control over Hancock Park in the event that the park is designated as a national scientific landmark.

National
Scientific
Landmark
for
Hancock
Park

Dr. Friedmann understood that if at any time the area should not meet qualifications for such a marker, the only result would be the removal of the marker. He felt that to have a marker placed there would tend to identify it more officially as a scientific area, now that the art museum is in progress, and when the fossil museum is built that would emphasize it more.

Objection to the marker was removed if Dr. Friedmann felt completely assured there would be no possibility of involving the area any further.

The meeting adjourned on motion.

W. J. Sheffler
Wm. J. Sheffler,
Secretary

Mr. Sheffler reported for the Nominating Committee which had agreed upon the following recommendations:

For Mrs. Rudolph S. Liebig who had resigned from the Board last month -- the appointment of Ed Ainsworth for a 4-year period should be recommended to the Board of Supervisors.

Report
of the
Nominating
Committee

For the four Board members, John Jewett Garland, David W. Hearst, Charles O. Matcham, and M. Norvel Young, whose terms would expire at the end of June -- reappointment for another 4-year period should be recommended to the Board of Supervisors.

A motion was presented, seconded and unanimously carried to recommend to the Board of Supervisors:

The appointment of Ed Ainsworth to the Board of Governors, starting July 1, 1964, to replace Mrs. Rudolph S. Liebig;

Replacement
of Board
Member

and,

The reappointment of the four Board members whose terms would expire at the end of June.

Renewal of
Four Terms

Dr. Friedmann announced that Hancock Park has been officially named a National History Landmark. Papers had been received to be filled out and returned authorizing the installation of the bronze marker. The terms and conditions of this designation has been reviewed and approved earlier by the Board.

Hancock Park
Named a
Natural
History
Landmark

Dr. Friedmann spoke on the status of the Budget Requests for 1964-65. The Budget Analyst had gone over the requests and a hearing with Mr. Hollinger is set for Wednesday afternoon to go over the budget for the review on Issue and Policy items. The total amount recommended by the budget analyst is \$1,316,661, an increase of \$108,134 over the budget of the current year. This allows for several additional positions including 4 carpenters (348 days), 1 electrician (65 days), a museum preparator in History and 1 in Earth Sciences, and additional student professional workers in Life and Earth Sciences and History. Among Issue and Policy items to be asked for are an additional \$2000 for books for the Library, an increase of \$25,000 in the County acquisition fund, \$1000 for the rental of studio equipment for filming of educational t.v. material, and \$3550 for Earth Sciences to collect minerals in Alaska for exhibition.

Status of
Budget
Requests
for
1964-65

The Board of Governors meeting reconvened following the meeting of the Board of Museum Associates, at 5:00 p.m. with the following persons in attendance:

Mrs. Rudolph S. Liebig; Messrs. Edward W. Carter, John Jewett Garland, David W. Hearst, Charles O. Matcham, J. R. Pemberton, Wm. T. Sesnon, Jr., Wm. J. Sheffler, Norton Simon and Dr. R. B. von KleinSmid;

C. F. Gehring, Acting Director.

Mr. Sesnon, the President, presided.

The need for authorization to accept gifts on behalf of this Board up to the end of the calendar year was brought up and a motion empowering the Acting Director to make these acceptances subject to ratification of the Board was enacted.

Acceptance
of Gifts to
the End of
the Year

Approval of the changed location of the art museum building at Hancock Park as designated on the plot plan and approved by Museum Associates, was requested.

Mr. Sheffler presented a motion, as follows:

Moved, That the plot-plan showing the location of the art museum building to be erected in accord with the recently altered designation as approved by Dr. Hildegard Howard (20 ft. nearer Wilshire Blvd.) be approved.

Approval of
Altered Situ-
ation of Art
Museum for
Hancock Park

The motion was seconded and carried.

Returning to the unfinished discussion concerning appointment of Dr. Herbert Friedmann as director of the Museum, a motion was presented by Mr. Carter, as follows:

Moved, The election of Dr. Herbert Friedmann subject to his understanding that there will be worked out an orderly transition of the administration of the Art Department to the Director of the Los Angeles County Art Museum.

Appointment
of Director

The motion was seconded and further discussion and explanations took place.

The motion was put to vote and passed over the negative vote of Mr. Simon.

The meeting adjourned on motion.

Wm. J. Sheffler, Secretary

W. J. Sheffler

ting the Chief Administrative Officer, in cooperation with the Acting Director of the Museum to study and report on the feasibility of establishing a children's museum in Exposition Park.

3
Question of
Children's
Museum in
Exposition
Park

A children's museum is something which must first be defined as there are many aspects of operations commonly known by this name. The more effective childrens museums are those which relate their program to the total resources of the Museum with an approach designed to prepare the younger mind for proper understanding and appreciation of the museum's collections rather than the entertainment or amusement of children.

Some aspects of a childrens museum operation are being conducted as a part of the broader educational program of our Division of Education and discussion with the representative of the Chief Administrative Officer who had been assigned this study and the Museum staff favored this approach rather than a childrens museum per se. Space is not available in the present Museum building for these facilities and the study will show what these requirements would be. Discussion favored this department taking the position indicated.

The following order of the Board of Supervisors which was adopted on January 10, 1961, upon motion of Supervisor Kenneth Hahn was read:

"Hancock Park was established by the County of Los Angeles to preserve and protect for all time the famed La Brea Tar Pits; one of the world's greatest sources of information about prehistoric ages. The well preserved bones and complete skeletal fossils of many animals trapped in the tar pits, such as prehistoric sloths, sabre-toothed tigers, camels, horses and other animals have been of great educational and scientific use to the world. However, visitors to Hancock Park who have looked forward eagerly to seeing the famed Tar Pits have been disappointed because all of the bones and fossils have been removed and placed in museums around the world, and there is nothing to be seen at the pits but a sump-like depression.

Order of
Board of
Supervisors
to Plan for
a Science
Museum in
Hancock
Park

"I have been informed that the Los Angeles County Museum has stored away, because of a lack of proper and adequate display space, many thousands of fossils, bones and skeletons which have been taken from the tar pits. and these can not be viewed by the public.

"Therefore, in order to emphasize the historic and scientific background and the original purpose of Hancock Park, I move that the Chief Administrative Officer, in conjunction with the Director of the County Museum, the Chief Curator of the Science Division of the Museum and the Director of Parks and Recreation, be instructed to develop a master plan for the erection of a building, near the northwest corner of Wilshire Boulevard and Curson Street, adjacent to the tar pits, for the proper display of these historic animal bones and fossils so that they may be seen and enjoyed by the public, the school children, and visitors to Los Angeles County, and report back to the Board in 90 days."

This proposal met with approval of the Governors, but it was felt that all plans for the Park should be coordinated and for that purpose should be prepared by the same architect, Wm. L. Pereira. The opinion was also expressed that it was desirable to delay solicitation of funds for a Science Museum until that for the Art Museum had been completed.

Concluding discussion a motion was presented, seconded and passed, as follows:

Moved, That the proposal for erection of a Science Museum building in Hancock Park for the display of fossil remains from the Rancho La Brea tar pits meets with the approval of this Board and that it is the consensus of this Board that it is extremely important for the plans for such building to be in consonance with the new art museum facilities now in the plans stage and to this end recommends that if an architect is employed to develop plans for this facility that it be Wm. L. Pereira, architect for the art museum buildings."

Mr. Garland requested that a directive be adopted by this Board concerning the preparation of East African animals for habitat groups obtained on an expedition he led to East Africa for the Museum five years ago. Some groups have been completed, but others have not been. He had heard that expeditions had been made elsewhere in the meantime for other animals and that another expedition is being planned. He would like to see the groups for which he was responsible completed forthwith and asked that the Board take action for this purpose.

East African
Habitat
Groups

The regular monthly meeting of the BOARD OF GOVERNORS was held at 2 p.m. on Tuesday, February 21, 1961, in the Director's Office of the Museum with the following persons in attendance:

Board Members: Mrs. Rudolph S. Liebig; Messrs. Edward W. Carter, C. V. Duff, Charles O. Matcham and Wm. J. Sheffler;

Staff Member: C. F. Gehring, Acting Director.

In the absence of both the President and Vice President, William J. Sheffler, Secretary, presided.

The Minutes of the January meeting were approved by motion duly passed.

Minutes
Approved

The Registrar's Report was also approved by motion regularly passed.

Registrar's
Report
Approved

Mr. Gehring gave a report on the legal aspect of the request to admit organized and scheduled school groups free of charge to admission fee exhibits in the Museum.

The County Counsel's Office is of the opinion that this question could be decided on a policy basis considering these visits a part of the schools' program of the Division of Education which serves all aspects of the Museum and because of the fact that the Board of Governors sets rates and regulations for the admission fee shows.

Legal Opinion
on Admitting
School
Classes Free
to Admission
Charges
Exhibits

Since there was barely a quorum of the Governors represented at the meeting, the Chairman recommended that the question be postponed until more of the Board members should be present to consider the decision.

Decision
Postponed

A motion was accordingly presented, seconded and carried to hold the decision on the matter in abeyance.

Referring to the order adopted by the Board of Supervisors reported at the January meeting of this Board requesting that a master-plan be prepared to develop a museum at Hancock Park to house fossils taken from the tar pits, a narrative plan for the Science Museum started some years ago and recently reviewed by Dr. Howard, Chief Curator of Science, was submitted for approval to be transmitted to the Chief Administrative Officer in compliance with the order.

Narrative
Description
of Proposed
Museum for
Fossils at
Hancock Park

The narrative report outlined location, space, requirements and function for the Science Museum. The motion adopted by this Board at its last

meeting had been transmitted to the Chief Administrative Officer recommending that the master-plan for the Science Museum be prepared by the architect for the Art Museum, William L. Pereira, so that an over-all harmony of design would prevail.

Consideration of the subject emphasized reluctance to refer the narrative description until appointment of the architect for the master-plan had been assured. Concern was also expressed because of the large sum still to be raised for the Art Museum and the need for the supporting budget from the County to be established with the Supervisors. It was decided, therefore, to withhold approval of the description until the March meeting which would give Mr. Carter and Mr. Sheffler time to confer with members of the Board of Supervisors relative to appointment of an architect.

A gift to the Art Division was reported by Mrs. Liebig, Chairman of the Art Committee, as follows:

Gift to Art

From Mrs. Rowena Thom Rathbone, Los Angeles Oil painting, STORMY LANDSCAPE, by Narcisse Virgile Diaz de la Pena (French 1807-1876), remaining half interest given now, \$2,600, other half having been given in 1960. Total value - \$5,200.

A motion accepting this gift with appreciation was presented, seconded and passed.

It was reported that five woodcuts from the Ninth German Bible published by Anton Koberger, Nuremberg, 1483, were available for purchase for the Museum's print collection from the Exhibit Acquisitions Fund as follows:

Purchase for Art

a. God Sends the Locusts to Egypt	\$ 45
b. Tobias and the Angel	45
c. God Sends the Plagues to Egypt	45
d. Esther before Ahasuerus	45
e. Unidentified subject	45
	<u>\$225</u>

The sum in the Exhibit Acquisitions Fund at this time (allocated to Art) was \$375.

A motion approving this purchase was presented, seconded and passed.

Mr. Duff presented the recommendation of the Science Committee that the following three collections should be purchased for the Science Division from the Exhibit Acquisitions Fund (allocated to Science) the amount available being \$9,963.

Purchase for Science

The regular monthly meeting of the BOARD OF GOVERNORS was held on Tuesday, March 21, 1961, at 2 p.m. in the Director's Office of the Museum with the following persons in attendance:

Board Members: Mrs. Rudolph S. Liebig; Messrs. Edward W. Carter, C. V. Duff, Charles O. Matcham, Wm. T. Sesnon, Jr.;

Staff Member: C. F. Gehring, Acting Director.

The President, Wm. T. Sesnon, Jr., Presided.

The minutes of the February meeting were approved by motion, seconded and carried.

Minutes
Approved

The Registrar's Report for February was also approved by motion duly passed.

Registrar's
Report
Approved

With reference to the project for a museum at Rancho La Brea for fossils from the tar pits which had recently been advocated by the Board of Supervisors, it was reported that Mr. Sheffler had spoken to Supervisors Hahn and Chace since the last meeting of this Board because of the desire to keep the project out of publicity and to promote the plan of having Mr. Pereira as architect.

Fossil
Museum
at Hancock
Park Project

Mr. Matcham had also had contact with a representative of Supervisor Hahn when the subject was brought up.

With reference to the project for providing laboratory facilities for vertebrate paleontology on the fourth floor of the West Wing of the Museum it was reported that at the Board of Supervisor's meeting on March 14 Supervisor Hahn had introduced a motion and the Board had adopted an order to place in the 1961-62 budget a sum of \$72,960 for an addition to the Los Angeles County Museum of a fossil vertebrate laboratory, to be supplemented by a \$130,000 grant from the National Science Foundation.

County Fund
for Fossil
Laboratory

The question of admitting scheduled school groups free of charge to admission-fee exhibits was taken up and Mr. Gehring reported that the opinion rendered by the County Counsel's office indicated that the question could be decided by this Board on a policy basis.

Decision
Postponed
on Admitting
School
Groups free
to Fee-
Charged
Exhibits

Since consideration of the matter had been deferred from the February meeting because of lack of a sufficiently large representation of Governors, it was decided to postpone decision until the April meeting

The regular meeting of the BOARD OF GOVERNORS was held on Tuesday, April 18, 1961, in the Director's Office of the Museum with the following persons in attendance:

Board Members: Messrs. C. V. Duff, Ed N. Harrison, Joseph B. Koepfli, William T. Sesnon, Jr., William J. Sheffler, M. Norvel Young and Edward W. Carter;

Staff Members: Herbert Friedmann, Director, C. F. Gehring, Assistant Director.

The President, William T. Sesnon, Jr., presided.

The minutes of the March meeting were approved by motion, seconded and voted.

Minutes
Approved

The Registrar's March Report was also approved by motion, seconded and carried.

Registrar's
Report
Approved

Mr. Gehring reported with reference to the concern of this Board that William L. Pereira be appointed to make a study of the site and plan the building for the proposed Museum for Rancho La Brea Fossils at Hancock Park, that the Chief Administrative Officer had made this recommendation to the Board of Supervisors and the Board had authorized him to negotiate an agreement with Wm. L. Pereira for this purpose. It will be presented to the Board of Supervisors when it has been prepared.

Re. Architect
for Proposed
Fossil Museum
at Hancock
Park

The question of admitting scheduled school groups free of charge to admission-fee exhibits was mentioned and briefly discussed, but since there was no urgency in reaching a decision in the matter, it was thought that Dr. Friedmann and Mr. Gehring should study the question and make a recommendation at a later meeting of this Board.

Problem of
Admittting
School Groups
Free to Ad-
mission-fee
Exhibits

The meeting was adjourned briefly at this point to provide for a short meeting of the Nominating Committee, and then reconvened within ten minutes.

The report of the Nominating Committee concerning renewal of terms of those Board members whose terms would expire June 30th was as follows:

Renewal of
Terms Recom-
mended for
Four Members
of this
Board

That the Board of Governors recommend to the Board of Supervisors that the terms of the following four members of this Board be renewed effective July 1, 1961:

Edward W. Carter,
C. V. Duff,

Mrs. Rudolph S. Liebig
William T. Sesnon, Jr.

seemed that the name of this Museum should be such as to distinguish it clearly.

The individual Board members were asked to think about it.

Mr. Matcham reported having had a call from Mr. Dave Factor of the County Administrative Office concerning a letter written to the Board of Supervisors recommending that the new art building project be taken out of Hancock Park and put at the Civic Center, arguing that it was inappropriate at Hancock Park. The writer of the letter was Superior Court Judge Donald R. Wright. Proposal to Change Location of new Art Museum

Mr. Gehring had known of this, and had explained to the Administrative Office that the present site had been determined after extensive study and consideration, and that the plans were well along as well as the fund-raising for the new museum which was undertaken by Museum Associates in accordance with its agreement with the County, so that it would be impracticable to make such a change at this time. The Chief Administrative Office merely wished information with which to reply to the Judge.

The report of the Nominating Committee was given by its Chairman, Mr. Sheffler.

Re-election of the present officers for the ensuing year was recommended. A motion was presented as follows:

Moved; That the recommendations of the Nominating Committee for re-election of the present officers be adopted; that the nominations be closed and the Secretary be instructed to cast a unanimous ballot for re-election of the present officers for the ensuing year: Re-election of Officers

- President, Wm. T. Sesnon, Jr.
Vice President, Ed N. Harrison
Secretary, Wm. J. Sheffler

The motion was seconded and unanimously carried.

It was reported that a motion had been introduced at a recent meeting of the Board of Supervisors by Supervisor Hahn, a copy of which was read by Dr. Friedmann, as follows: "That the Board of Governors of the Los Angeles County Museum of History, Science and Art be requested to consider setting aside property 40 x 40 ft. on Exposition Boulevard next to the parking lot for a Jewish Survivors Concentration Camps Memorial and that the County Counsel Request for Jewish Survivors Concentration Camps Memorial

The recommendation was accepted as suitable. A motion was therefore presented, seconded and carried approving the procedure.

Dr. Friedmann reported that an order had been adopted by the Board of Supervisors on July 5, 1961, authorizing an architectural services agreement for the master development plan for Hancock Park, Capital Project No. 8716 of the County, for which that Board had appointed Wm. L. Pereira as architect on April 11, 1961. Dr. Friedmann read the letter as follows:

"On April 11, 1961, your Board appointed Architect William L. Pereira to prepare a master plan for Hancock Park and instructed the chief Administrative Officer to negotiate an agreement.

"Accordingly, staff members of the Museum, Chief Administrative Office and the Architect have reviewed the proposed development program for Hancock Park and have determined the following scope for the master plan.

"This plan will encompass all facets of the proposed development of this site including planning of pathways and approaches so as to enhance the natural characteristics peculiar to this facility in addition to providing efficient circulation patterns as well as utility distribution, parking and other site requirements. The plan will also show all present and future planned phases of development so as to integrate these units into a well coordinated complex of educational and cultural facilities.

Architectural
Services
Agreement
for
Hancock
Park
Master
Plan

"The recommendations for the terms of this contract are based on a fixed fee of \$3,000 plus reimbursement of the Architect's direct costs for the services of a Foundation Engineer not to exceed \$1,600.

"RECOMMENDATIONS:

- "1. That the Chief Administrative Officer and County Counsel be instructed to prepare an architectural services agreement with Architect William L. Pereira and Associates, 5657 Wilshire Boulevard, Los Angeles 36, California.
- "2. That the architectural services agreement provide for a fixed fee of \$3,000 and reimbursement to the Architect of his direct costs for a Foundation Engineer not to exceed \$1,600.
- "3. That the Chairman of the Board be instructed to sign the architectural services agreement.

"It is requested that the Clerk of the Board be instructed to notify the Architect of the Board action, based on the recommendations herein."

"L.S. Hollinger, (Signed)

special alarms have been added on the doors.


The meeting adjourned on motion.

The Board of Governors reconvened in order to act upon proposed changes to the Administrative Code of the County to establish the Los Angeles County Museum of Art in Hancock Park as a separate County Department, **remove Art from the title** of this department and give jurisdiction over that portion of Hancock Park which is to be devoted to the art museum. The name of this institution as Los Angeles County Museum would be included in these changes.

Changes to
County
Adminis-
trative
Code con-
cerning
the two
Museums

Consent to these alterations to the Administrative Code was given by consent of all present.

The meeting adjourned.



Wm. J. Sheffler,
Secretary

started, so he thought it would not be necessary to do anything further just now. In the meantime he would keep in touch with the planning, get more sketches, more information, etc.

Mr. Gehring, however, expressed the opinion that it would be well to request funds in the current budget in order to be able to deal with developments when work starts, since it must be requested in advance in order to be available. The budget for 1962-63 is now in preparation, in which it should be included. If a Committee were authorized to plan alterations to the existing lot and the money authorized, we would be in a position to proceed when the time comes.

Budgeting
Money for
Work

Mr. Matcham spoke of the Museum's passenger elevator, how very slow and old it is. He wondered if a request could not be included in the budget for improvements to it.

Passenger
Elevator
Improvements
Needed

Mr. Gehring agreed that the matter could be explored with that in mind.

Mr. Sesnon reported having received from Mr. Leisure, President of the Museum Association, a letter concerning changes contemplated in that organization in relation to the new art museum and how they would continue to function. It was designed to be constructive. He thought all members of the Board should receive copies of the letter and would ask Mr. Leisure to send them.

Contemplated
Changes in
Museum
Association

Mr. Sesnon reported also having received a letter addressed to the Board of Governors from Sherwin Wood protesting the building of an art museum at Hancock Park.

Dr. Friedmann said that Dr. Wood had come to the Museum to see him when Dr. Hildegarde Howard was present and registered his complaint in person. Dr. Friedmann had assured him that the project had the consent and understanding of Captain Hancock and that only a limited part of the area was to be turned over to the art museum; that the plans were well along, and that his protest was actually too late.

Protest
against
Art Museum
Building
at Hancock
Park

Mr. Harrison, who serves on the board of the San Diego Natural History Museum as well as on this Board, reported a circumstance which arose out of an accident occurring more than a year ago when a truck of that museum was involved in an accident and a person was badly injured. The result was that

The sum in the Exhibit Acquisitions Fund for Science at this time was \$5,911.

2

A motion was presented to accept the gifts and authorize the purchases as outlined.

The subject of reorganization of the Museum Association concerning which copies of a letter had been received by Board members during the month at the President's direction, was raised. It was explained, however, that a meeting of a Committee to consider the matter and make plans had been arranged for the following day, so it was recommended that this Board wait until later to give its attention to the matter.

Reorganiza-
tion of
Museum Asso-
ciation

This course was agreed upon and no further discussion of the matter took place.

Considera-
tion
Delayed

Dr. Friedmann reported the gift of two important archeological items which came at the end of the year and were acknowledged by him on behalf of the Board. One was a Remojadas figurine of terra cotta, seated man with large headdress, probably representing plumage; face decorated with "hule"; from Vera Cruz, Mexico, 800 A. D. It was presented by Dr. Julian Royce Goldsmith of Chicago. The Museum was given a two-thirds interest in it for 1961, the remaining third to be given in 1962. The other piece was a carved andesite Aztec plumed rattlesnake effigy (Quetzalcoatl), ca. 1200, excavated at San Juan Barrio, Mexico, in 1950. It was valued at \$6,000, and is a gift from Dr. Donald Slocum of Eugene, Oregon. Both of these gifts came to this Museum through the efforts of Dr. George C. Kennedy of the Museum Association. They are significant pieces and Dr. Friedmann expected to have them put on exhibition very soon.

Gift of
Two
Archeo-
logical
Items

A supplementary report from the Museum Registrar listed these and other items received at the end of the year which were accepted by the Director.

Supple-
mentary
Report from
Registrar

A motion was presented, seconded and unanimously carried, approving the action of the Director.

Dr. Friedmann spoke about a move by Mr. Sherwin Wood to block the building of an art museum at Hancock Park. A letter from Mr. Wood had been received by the President of this Board a month ago and had been referred to Dr. Friedmann for reply. It had been explained that the art building would only take a small portion of the whole area, that this arrangement had been approved by the Board of Supervisors

and the donor, Captain Hancock. It appeared that Mr. Wood was satisfied, but since that time letters have been received from people who had been circularized by him urging them to join a campaign to have Hancock Park made a national monument. In an effort to provide correct information to those writing in, Dr. Friedmann had prepared a statement setting forth the Museum's position in the matter, which he read.

Protest
Against
Art
Building
in Han-
cock Park

In Dr. Friedmann's opinion it would be a great mistake for Hancock Park to become a national monument, since that would take it out of the jurisdiction of the Museum, and of the County, and put it under the federal government.

It was recommended that the statement bring out the fact that there is no essential difference of opinion as to the use of Hancock Park for science, while taking a small portion for the art building.

Dr. Friedmann told of a report having been made at the meeting of County Department Heads concerning possible racial discrimination in employment practices of County departments, when the Museum had been cited as one of the departments whose present employment roster deviated from the County pattern in one specific job category. It had been stated that we had ten positions in this category with no minority group representation. Investigation afterward, however, showed that the Museum has only four positions in this category and that if the survey had been made two years ago, it would have shown 50% Caucasian, 25% Negro, 25% Oriental. It seemed that the survey should have covered a longer period, year by year, to reveal possible trends. The object of the survey was to determine whether there was any indication of possible racial discrimination in the hiring practices of the County and to assure that impartiality was practiced in this connection.

Report of
Unfair
Employ-
ment
Practices

The meeting adjourned on motion.

Wm. J. Sheffler,
Secretary

Recommendation for Purchase:

From Dr. Hugh C. Land, Athens, West Virginia

608 specimens of bird skins from the highlands of Guatemala \$1,000.00 (Occasional sale, no tax)

A motion was presented seconded and carried accepting these gifts and authorizing the purchase.

Dr. Friedmann reported the present status of the budget for the next fiscal year. At a budget hearing with Mr. Hollinger, Chief Administrative Officer, 10 new positions were granted and the total funds increased over last year by \$86,000. The new positions granted were: a Painter; an Assistant Curator for California History; a Curator, an Associate Curator and Museum Preparator for the new Earth Sciences facility; a Curator, an Assistant Curator and a Preparator in Life Sciences; a Preparator and Intermediate Typist-Clerk for Exhibitions. On the whole Dr. Friedmann felt the Museum had fared very well in the budget request.

Report on Budget Request for 1962-63

Mr. Sesnon who had been present at the budget hearing, also, said that the hearing had been very satisfactorily handled. He felt it had gone very well.

Dr. Friedmann reported that the master plan for Hancock Park had been received from the architect's office. A joint meeting had been held of the Science and Building Committees with members of the staff to examine it and certain points were outlined to be reported to this Board, as follows:

Hancock Park Master Plan

- 1. We approve the master plan of Hancock Park as drawn by Pereira and Associates with the following two provisions,
a. The limits of the area allocated to the purposes of the art museum be those accepted by resolution of the Board of Supervisors on January 3, 1961, on the basis of Los Angeles County Surveyor's Map C. S. 7928-2.
b. The plan indicated on the master plan for the science structures be considered flexible and subject to change with regard to
1. the orientation of the buildings,

- 2. the interchange of location of the cyclorama and the paleontological museum,
- 3. the shape of the observation deck protruding over the lake,
- 4. the exact location of the easterly buildings,
- 5. the location of service yard for the science buildings and for the park maintenance.

2. We recommend **scheme no. 3 for the parking area**, - a three-storied structure, in order to save valuable land, in keeping with our original understanding with the donor, Captain Hancock, to preserve and to further the development of the scientific aspects of the Park.

3. We recommend to the Board of Governors that the latter group suggest to the Board of Supervisors that, to effect as harmonious a design as possible for the entire Hancock Park, the firm of Wm. L. Pereira and Associates be selected as the architects for the science buildings. This firm has already designed the art buildings and has drawn the master plan.

4. The Director be instructed to show the tentative perspective rendering of the science buildings to the meeting at the Hall of Administration on the morning of Monday, April 16.

Mr. Factor of the Administrative Office of the County was to check the acreage with the County Engineer, but no response from him had yet been received.

A later meeting had been held in the Administrative Office concerning the plan, **but no mention was made of the parking.**

Because Supervisor Debs had requested a sketch of the fossil museum, Mr. Wade of the Museum's Exhibitions Department had made a quick one and a copy had been sent to the architect's office, as well.

Sketch of Fossil Museum

Dr. Friedmann reported that a resolution had been entered in the Sacramento legislature by Representative Brown to recommend to the authorities in Washington D. C. that Hancock Park be made a national monument as advocated by Dr. Sherwin Wood. Los Angeles Councilman Henry said that while the measure has not been voted on, there was some chance that bickering for votes among representatives may have some influence.

Resolution in Calif. Legislature re, Hancock Park

Invertebrate Zoology

From Dr. Bruce Campbell, Lynwood, Calif.	<u>Value</u>
1 pelecypod and 2 gastropods	\$ 20.00

Marine Zoology

From U. S. Fish & Wildlife Service, Pascagoula, Miss.	
8 lots of preserved marine fishes, (approx. 25 species)	25.00

Mineralogy

From R. T. Chew, III, Mineralogy Dep't., Museum	
3 specimens recrystallized limestone	3.00

Mineral Research Society of California c/o Marion Godshaw, Santa Monica	
11 specimens	70.00

Ornithology

From Mr. Alfred L. Wise, Pasadena	
1 blue-fronted Amazon parrot	3.00

Vertebrate Paleontology

From Mr. W. M. Childers, El Centro, Calif.	
5 sets of fossil vertebrates	30.00

Mr. Harley Garbani, San Jacinto, Calif.	
6 sets fossil specimens	250.00

Mr. Matcham, Chairman of the Building Committee, had met, in company with Dr. Truxal and Dr. Downs, with Mr. Pereira, architect, who had prepared the master plan for Hancock Park, including the proposed Fossil Museum.

Mr. Pereira had received no appointment from the Board of Supervisors as architect for the Fossil Museum. Beside this he was very skeptical of the idea for the Cyclorama. He had had much experience in planning dioramas for Fair exhibits in the past and understood the problems very well. The meeting ended with Drs. Truxal and Downs agreeing that with the sketch and plot-plan, they had enough material for the present. They want to go further with plans as soon as the campaign for the Art Museum has been completed.

Re Plans
for Fossil
Museum at
Hancock
Park

Concern was expressed among Board members that ideas for the Fossil Museum be well formulated and a plan worked out before any solicitation should start. Mr. Gehring said this point had been stressed by him. Further discussion was concluded with agreement that Mr. Sesnon and Mr. Sheffler would meet with Dr. Friedmann soon after his return to the Museum to formulate proper steps to be taken toward planning the Museum.

Dr. Friedmann reported there had been some discussions with the State Museum in Exposition Park about loan of some of our mechanical sciences material. Originally they had asked for long-term loans which we were considering, but now the request contemplates loans for 30 to 60 day periods for special exhibits to be held each year. This would not be feasible for this Museum since we do not have the staff to take care of short-term loans of this kind.

State
Museum
Request
for Loans

A motion was presented, seconded and carried providing that action in this matter be left to the discretion of the Director of this Museum.

Director
to Handle
Request

A meeting with the Miracle Mile Association attended by Dr. Downs and Dr. Friedmann concerning the proposed Science Museum to be placed in Hancock Park had been held. Dr. Friedmann explained the great interest of the Miracle Mile Association and its willingness to participate in the drive for funds as soon as the time was ripe to do so. He did not feel they would go ahead with any activity, however, without approval from this Museum at the proper time. The Soroptimists Club there is also much interested and had expressed its wish to lead off the fund drive by a donation of \$1,000. No definite steps were formulated at this time with either of these groups and they will await the proper time for action, Dr. Friedmann felt sure.

Miracle
Mile
Interest in
Fossil
Museum

Dr. Friedmann reported that his trip during May to London, provided by a grant of funds for research through the American Museum of Natural History in New York, had afforded him the opportunity to study a group of birds in the collection in the British Museum where he spent three weeks. He continued the study in Washington, D. C. on his return to this country. He also attended the Annual Meeting of the American Association of Museums in Williamsburg to report for this Museum, and was appointed Chairman of the Science Museum Section for next year's meeting of that Association.

Director
Appointed
Chairman
of Science
Section of
Ass'n

Mr. Harrison reported having turned over to Mr. Toll the draft of by-laws for the members group for History and Science for review after it had been very carefully thought out by the Committee. Mr. Toll had praised it and only recommended minor changes. A report would be given at the next meeting.

By-laws
for new
History-
Science
Member
Group

Dr. Friedmann said a request had come from an organization known as "Community Television for Southern California" for endorsement of their program. Mrs. Rose Blyth, Executive Secretary, for Southern California, said they

Dr. Friedmann reported concerning the provisions of the will by which the Mt. Lowe Street Car was given to the Museum. He said there was nothing to indicate that it must be exhibited. He said, however, that all four curators of the History Division were interested in it and wanted the Museum to have it. The City Parks Department would move it to Travel Town and keep it there indefinitely without cost to the Museum. We would have no obligation to restore it, but if in time we should wish to do so, we could.

Mt. Lowe Street Car

A motion was presented, seconded and carried, approving acceptance of the Mt. Lowe street car under the circumstances reported.

Dr. Friedmann referred to the request of Supervisor Hahn that the museum prepare a five-year program of development, some items of which he had mentioned as being highly desirable. A start had been made on storage and research facilities, but planning was still in the conversational stage.

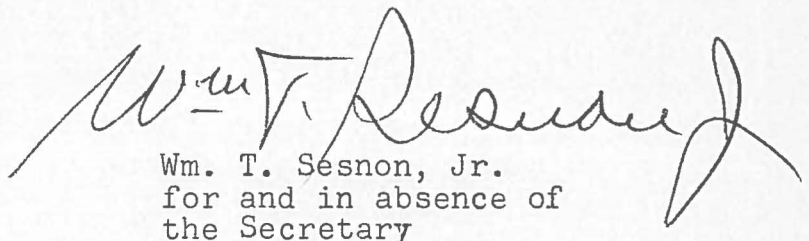
Concerning the new fossil museum, there was some thought that more definite planning should get under way before long. Discussion of this subject followed and was resolved with the recommendation that after the first of the year more definite plans probably could be formulated, but that it would be best to wait until that time. It was important that adequate preliminary planning be done.

Fossil Museum Plans - After first of year

The date for the next meeting of the Board would be January 1st. It was shown, however, that the by-laws provide that if the regular meeting falls on a holiday the meeting should be held on the same day one week later. This would provide for the meeting to be held on January 8, 1963.

Date of January Meeting

The meeting adjourned on motion.


Wm. T. Sesnon, Jr.
for and in absence of
the Secretary

The regular monthly meeting of the BOARD OF GOVERNORS was held on Tuesday, November 17, 1959, at 2:30 p.m. in the Director's Office of the Museum with the following persons present:

Board Members: Messrs. Edward W. Carter, C. V. Duff, John Jewett Garland, Ed N. Harrison, Joseph B. Koepfli, Charles O. Matcham, Wm. T. Sesnon, Jr., Wm. J. Sheffler, Norton Simon and Dr. R. B. von KleinSmid;

Staff Members: Jean Delacour, Director, C. F. Gehring, Assistant Director, Richard F. Brown, Chief Curator of Art.

The President, William T. Sesnon, Jr., presided.

The minutes of the October meeting, as mailed, were approved by motion, duly passed. Minutes Approved

The Registrar's Report for October was also approved by motion seconded and carried. Registrar's Report Approved

It was reported that the Board of Supervisors had approved the recommendation of the Board of Governors to deny the request of the City for space for a branch library at Hancock Park. A copy of their resolution had been transmitted to the Museum. Branch Library at Hancock Prk Denied

Because of the letter received by the Board of Supervisors from a Conservation Committee of Natural Scientists at the American Museum of Natural History in New York expressing concern that the project to place a new art museum in Hancock Park would jeopardize the preservation of the tar pits there, the Chief Administrative Officer of Los Angeles County had requested that a statement of policy be made by the Board of Governors a copy of which could be transmitted to the Committee assuring it that proper recognition of these aspects of Hancock Park were being adequately observed. Policy re. Hancock Park

Discussion and consideration of the request followed and the following resolution was presented and duly adopted:

RESOLVED; That the Board of Governors of the Los Angeles County Museum, as the duly constituted body having jurisdiction over Hancock Park, in recognition of the scientific significance of the area, hereby declares that with respect to Museum Associates plans for erection of art museum facilities in Hancock Park it will be the objective of this Board to approve a master plan which will not

jeopardize the protection and preservation of the tar pits and fossil remains and the significance of the park.

Since it appeared that the Museum's West Wing containing the new auditorium would be completed in late January, Mr. Delacour thought plans should be put in motion for some kind of opening celebration. He suggested that on the 14th of February there could be a special music program at 3 p.m. with some ceremony afterward. He asked for recommendations from the Board.

Plans for Opening West Wing

Consideration by the Board recommended that an evening opening reception be held to which all the Supervisors and their wives should be invited; that it should be the kind of reception which would be complimentary to the Supervisors in appreciation of their making the new Wing possible.

Concluding discussion Mr. Delacour was delegated to contact the Supervisors to find out what kind of observation would be suitable to them.

Dr. Brown reported gifts from 7 donors for acceptance, as follows:

- 1. From Mr. and Mrs. John C. Best, West Los Angeles

Oil painting by Max Pechstein, "Landscape with Red Houses", German, signed and dated 1922
 (on loan 1957-58-59)
 (Valuation by Kantor Galleries) \$5,500

Gifts to Art

- 2. From Mr. Frederick N. Nicholas,
 Mr. Harry B. Swerdlow, and
 Mr. William K. Glikbarg, Beverly Hills

Oil painting by John Henry Fuseli (born Füssli)
 "Sin Separating Death and the Devil" Swiss-English, c. 1790 (Value by donors' appraiser)
 \$14,000

- 3. From Mrs. Anna Popper, Los Angeles

Glass Chandelier with baluster shaft
 12 lights in two tiers of six each, English,
 c. 1750-75 (on loan since 1957)
 (Valuation by donor's appraiser) \$ 6,000

- 4. From Mrs. Joseph M. Blanck, Palos Verdes Estates

Cash (for purchase of Oriental Art) \$ 4,000

December 12, 2017

Mr. Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012

By email: pburgis@ceo.lacounty.gov

Dear Mr. Burgis:

Thank you for the opportunity to comment on LACMA's proposal for a new building. The Greater Miracle Mile Chamber of Commerce welcomes this project for several reasons. We are very pleased to see that the museum is making such a tremendous investment in our community, improving Hancock Park and creating an entirely new approach to engaging arts and culture.

The Miracle Mile has always been the site of innovation and the advancement of new approaches to commerce and culture. LACMA's new building will continue that tradition, joining its transformed neighbors to firmly establish our credentials as the cultural center of the region. With the soon to open Purple Line Station at Wilshire and Fairfax, we believe that the Miracle Mile will be an attractive and accessible destination for visitors to all of our businesses and museums, and a walkable inviting neighborhood for our residents.

As you are reviewing the LACMA project we hope you will consider the very positive economic impact of the plan, as visitors and neighbors spend more time on Wilshire Boulevard. LACMA's investment supports its future, and contributes to the economic security of our community.

We hope this project advances quickly, and we appreciate your consideration.

Sincerely,



Meg McComb
Executive Director
Greater Miracle Mile Chamber of Commerce
5858 Wilshire Boulevard #205
Los Angeles, CA 90036



December 13, 2017

Mr. Peter Burgis, Capital Projects
Los Angeles County, Chief Executive Office
555 West Temple Street, Room 754
Los Angeles, CA 90012

Via email: pburgis@ceo.lacounty.gov

Dear Mr. Burgis:

I am President of Le Melange Homeowner's Association. Our community is located directly adjacent to the new Academy Museum currently under construction on the West end of the LACMA campus. As one of the closest neighbors to LACMA, I'm writing to comment on the proposal for a new building to replace some of their current structures. The design is nothing short of stunning and will be a welcome addition to the neighborhood when it is hopefully completed. The fact that it will also be accompanied by new open space that will be created on the Spaulding property is an added benefit to a metro area in short supply of public park area.

Our community understands that there will have to be a traffic and noise plan to coincide with construction, and we hope that you will carefully consider the best ways to mitigate the impacts so that those of us who live and work nearby will be as inconvenienced as is reasonable to expect for a project of such size and scope.

I can confidently speak for my Association, that we look forward to the improved park, the new world class building and the many ways the project will enhance the museum's programs and stature all the while returning some sparkle to Los Angeles's Miracle Mile.

Thank you for your consideration.

David Fanarof
President
Le Melange Homeowner's Association
637 S Fairfax Ave 501
Los Angeles, CA 90036

From: Emilia Crotty [mailto:emilia@losangeleswalks.org]

Sent: Thursday, December 14, 2017 4:52 PM

To: Peter Burgis

Cc: david.ryu@lacity.org; renee@advocacy.la; julia.duncan@lacity.org; francois.nion@jcdecaux.com

Subject: LACMA DEIR Comments - Pedestrian safety, access, experience

Dear Mr. Burgis,

Please accept the attached comment letter, which outlines Los Angeles Walks' recommendations regarding LACMA's new building.

Please don't hesitate to reach out to me with any questions. We appreciate your consideration.

Thanks,
Emilia

--

Emilia Crotty
Los Angeles Walks, Executive Director
830 Traction Ave., 3rd floor
Los Angeles, CA 90013
c (508) 916-7863
losangeleswalks.org

Peter Burgis
County of Los Angeles, Chief Executive Office
500 West Temple Street, Rm 754
Los Angeles, CA 90012
Via email: pburgis@ceo.lacounty.gov

December 14, 2017

Re: LACMA DEIR comments regarding pedestrian safety, access, and experience

Dear Mr. Burgis,

Los Angeles Walks advocates for people walking in the City of Los Angeles, and promotes infrastructure and public policies that make walking SAFE (safe, accessible, fun, and equitable) for all Angeleños. While the proposed new Los Angeles County Museum of Art building is to be constructed on L.A. County land, and the County is the lead agency, the LACMA campus, located in the heart of Los Angeles, is of importance to us.

We are writing today with recommendations that, we believe, will make walking safer, more pleasant, more convenient, and more of a natural choice for people who visit, live near, or simply pass by LACMA.

1. No new parking should be built. If parking must be built, only enough parking to satisfy the existing covenants should be constructed.

We encourage the use of the Ogden parcel for museum operations or something other than parking, considering a new transit station will soon be located near the museum. Especially since the construction of the Pritzker Parking Garage, no additional parking should be built.

If parking must be constructed to service the covenanted spaces currently at the Spaulding lot, we hope that only those that need to be built are. If this is the case, the Ogden Parking Structure could be smaller, or could replace a level or more of parking with other uses.

2. The LACMA/AMPAS campus should be open to pedestrian traffic during the same daily hours of operation that the future Metro Wilshire/Fairfax subway station will be operating.

The new Metro station will be an important hub for the entire neighborhood. If the LACMA/AMPAS campus does not allow pedestrian access during operating hours of the subway station, users would have to walk



indirect routes to point north and northeast.

3. The Spaulding Lot should not be fenced.

Since there are no scientific operations set to occur on the Spaulding Lot, there seems to be no need to construct fencing around the lot. The building security should suffice for that entrance. Eliminating the fence on the Spaulding Lot would enable the open space to be of use to the community more readily and more freely.

4. LACMA should work with Metro, the City of Los Angeles, and JC Decaux to move the current Metro 20 line bus stop on the corner of Curson and Wilshire to Spaulding and Wilshire.

Currently, the westbound Metro 20 line stops at Masselin, Curson, and Fairfax on the north side of Wilshire. With the proposed entrance to be near Spaulding on the north side of Wilshire, LACMA should work with Metro to re-locate the stop currently at Curson to Spaulding to be as close as possible to the new entrance. This would also help to space stops more efficiently, as Masselin and Curson are only one block from one another. Ideally, the stop could be placed on the near side of Spaulding (the east side), where there is currently a red curb. This would enable the bus to stop in the current peak hour bus lane, without needing to pull into a curb cut, which lowers dwell times and improves rider experience and transit efficiency.

LACMA should work with the City of Los Angeles and Metro to site the stop, and should work with JC Decaux to provide a shelter with seating for the stop. LACMA could have an opportunity to make an artistic, or aesthetically unique bus stop.

5. LACMA should work with Metro, the City of Los Angeles, and JC Decaux to improve the current Metro 20 line stop on the south side of Wilshire at Wilshire and Spaulding.

Currently, the bus stop at Spaulding and Wilshire, on the south side of Wilshire, consists of a trash can and two benches. LACMA should seek to improve the bus stop with the addition of a shelter. Furthermore, this corner offers a great opportunity for expanded pedestrian space as it is one of the two pedestrian site access points to the Spaulding Lot. An improved bus stop would therefore improve the pedestrian experience.

6. The southeast corner of Spaulding and Wilshire should be expanded to create a pedestrian plaza that leads into the pedestrian access point from that corner into the Spaulding lot.

In figure II-5 (Conceptual Site Plan), the southeast corner of Spaulding and Wilshire is shown as having a pedestrian access point with the fencing around the Spaulding Lot nearly extending all the way to the curb. This corner should be a large, more spacious, more welcoming space that would better bridge the gap between the public right-of-way and the museum's Spaulding Lot open space, and new building entrance. This can most readily be achieved by pushing the fencing in towards the center of the lot by 20' - 30' (roughly the disabled blue hash travel space in place currently). The space could also be slightly expanded through a curb extension across Spaulding.



7. All street corners within the project scope should receive the following improvements to the extent feasible for pedestrian safety and comfort:

a. Perpendicular ADA-compliant curb ramps.

Currently, the curb ramps on the south side of Wilshire at Spaulding and Ogden are diagonal, or in other words they direct users into the middle of the intersection. They should, rather, have curb ramps that direct users to the other side of the crosswalk, perpendicular to the street they are crossing. See examples at: <https://nacto.org/publication/urban-street-design-guide/intersection-design-elements/crosswalks-and-crossings/conventional-crosswalks/>

b. Curb extensions or corner radius tightening.

Currently the corners of Ogden and Wilshire, and Spaulding and Wilshire, have relatively well designed corners as it pertains to pedestrian safety. LACMA should make sure that they either maintain those good dimensions (mainly in not having large corner radii to facilitate automobile turns) or improve it for heightened pedestrian safety and comfort. Curb extensions, for example, could likely be placed at the corners of Wilshire/Ogden and Wilshire/Spaulding across Ogden and Spaulding, respectively. If curb extensions are not feasible, it may be feasible to tighten the corner radii to induce automobiles to make slower, safer, turns. See examples at: <https://nacto.org/publication/urban-street-design-guide/intersection-design-elements/corner-radii/> and <https://nacto.org/publication/urban-street-design-guide/street-design-elements/curb-extensions/>

8. Pedestrian refuge islands should be placed at appropriate medians at Ogden and Spaulding intersections

Currently, there are no pedestrian refuge islands at the intersections of Ogden/Wilshire and Spaulding/Wilshire, even though there are medians present on Wilshire at both intersections. The existing three crosswalks across Wilshire at those two intersections should receive pedestrian refuge islands. In practical terms, that would mean building “noses” on the side of the crosswalk across from the existing median, as well as installation of ADA-compliant truncated domes and pedestrian signal request stanchions. See example at: <https://nacto.org/publication/urban-street-design-guide/intersection-design-elements/crosswalks-and-crossings/pedestrian-safety-islands/>

9. The east leg of the Ogden/Wilshire intersection should receive a crosswalk.

Currently there is no crosswalk on the east side of Ogden at Wilshire. To the extent possible, LACMA should work with LADOT and other City of Los Angeles agencies to install a crosswalk there.

10. The drop off lane on the north side of Wilshire between Ogden and Spaulding should be shortened so that it exists between any crosswalks across Wilshire.

Currently, the crosswalks across Wilshire at Spaulding also have to cross the drop off lane on the north side of Wilshire, which adds about another 11’ to the distance it takes to cross Wilshire for a pedestrian. It is good that, according to the DEIR and testimony from LACMA representatives at a public meeting held on 12/5/2017 at the Mid City West Community Council Planning & Land Use Committee special meeting on LACMA, the drop off lane is to be shortened to begin *west* of the west leg crosswalk at Spaulding. However,



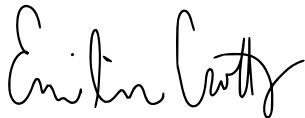
the western end of the drop off lane, as per Figure II-5 (Conceptual Site Plan), is proposed to remain as is, extending west, past the west leg crosswalk at Ogden. The drop off lane should rather terminate *east* of the east leg crosswalk at Ogden (if installed) or the east edge of the Ogden intersection in order to facilitate a shorter, and safer pedestrian crossing of Wilshire as well as expanded pedestrian space in front of LACMA's most popular attraction, Urban Lights.

II. Lighting under the span crossing Wilshire should not be merely “adequate”, it should be plentiful and, if possible, artistic.

According to the DEIR, the lighting to be placed under the span proposed to cross over Wilshire will be “adequate.” Adequate lighting is not sufficient to make the space safe and inviting for pedestrians during hours of darkness. The space under the span should be brightly lit in such a way as to reduce glare and reflectivity, drown out car headlights, as well as present a safe and inviting space. LACMA should look to install a permanent piece of lighting art to invite more people into the space and thus provide more “eyes on the street” at night, as well as provide another artistic element available to the public outside of the museum building---one of the goals of the project (*“Provide a sense of transparency with a new museum building where artwork is visible from the exterior and the City and its surrounding environment are visible from the interior.”*).

Thank you for considering these recommendations. Please reach out to me at emilia@losangeleswalks.org with any questions.

Sincerely,



Emilia Crotty
Executive Director
Los Angeles Walks

Cc:

Los Angeles City Councilmember David Ryu
Julia Duncan, Senior Planning Deputy, Office of Councilmember David Ryu
Francois Nion, JCDecaux
Renee Schillaci, LACMA





RON MILLER
Executive Secretary

Los Angeles / Orange Counties Building and Construction Trades Council

Affiliated with the Building & Construction Trades Dept., AFL-CIO

1626 Beverly Boulevard
Los Angeles, CA 90026-5784
Phone (213) 483-4222
(714) 827-6791
Fax (213) 483-4419



December 13, 2017

Peter Burgis, Capital Projects
Los Angeles County, Chief Executive Office
500 W. Temple Street, Room 754
Los Angeles, CA 90012

Dear Mr. Burgis,

On behalf of more than 100,000 skilled men and women in 48 local unions for the Building and Construction Trades in LA & Orange Counties, We express our strong support for Building the LACMA project. The project is in the EIR process now, and we urge you to move forward on all its steps toward approval in a timely way.

Although we represent all construction trades in the city, I come from the plumbing trade and had the privilege of working on a LACMA project in the 1980s. Now, many years later, it is time for LACMA to remake itself again. We believe the new project incorporates a design that is more inclusive to the community. We in the Building Trades are proud of our skills and our ability to meet any building challenge. We also are building the Academy of Motion Picture Museum and the Metro Purple Line nearby. The LACMA project will complete the revitalization of this area, and be served by public transit, cutting down on car trips. It will also have the opportunity to create many new careers in the construction industry for individuals who live in the local community and help contribute to the local economy. It is a great way to bring Los Angeles into the future.

We strongly support Building LACMA.

Sincerely,

Ron Miller

Executive Secretary

From: Vera Sergeeva [<mailto:vsergeeva@lunaglushon.com>]
Sent: Friday, December 15, 2017 10:59 AM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Cc: Rob Glushon <rglushon@lunaglushon.com>; Kristina Kropp <kkropp@lunaglushon.com>
Subject: Draft Environmental Impact Report SCH 2016081014

At the request of Rob Glushon and Kristina Kropp, please see the attached correspondence regarding the above referenced matter.
Hard copy is to follow via U.S. mail.

If you have any questions or concerns regarding this, please contact Rob Glushon or Kristina Kropp directly (both are cc here).

Vera Sergeeva
Paralegal
LUNA & GLUSHON, A Professional Corporation
16255 Ventura Boulevard, Suite 950
Encino, California 91436
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Dennis R. Luna
(1946-2016)

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Century City Office
1801 Century Park East, Suite 2400
Los Angeles, CA 90067

December 15, 2017

VIA EMAIL and US MAIL

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012
Fax: (213) 626-7827

Re: Draft Environmental Impact Report SCH 2016081014

Dear Mr. Burgis:

We submit this letter in response to the Draft Environmental Report prepared pursuant to State Clearing House Case No. SCH 2016081014 ("DEIR") for the proposed expansion of the LACMA campus ("Project"). This letter is submitted on behalf of the Wilshire Galleria Homeowners' Association, the Homeowners' Association for the 118-unit building located at 750 S. Spaulding Ave., immediately next to the existing Spaulding Lot which will be replaced by the portion of the proposed Museum Building where the Museum Building will cross Wilshire onto the Spaulding Lot.

I. Prefatory Statement

The California Legislature enacted the California Environmental Quality Act ("CEQA") to protect the environment of California, *Cal. Pub. Res. Code* § 21000(a); to protect the environmental health of Californians, *Cal. Pub. Res. Code* §§ 21000(b), 21000(6), 21404(9); to prevent the elimination of plant and animal species due to man's activities, *Cal. Pub. Res. Code* § 21001(b); to create and maintain ecological and economic sustainability, *Cal. Pub. Res. Code* § 21001(8); and to "take all action necessary to protect, rehabilitate, and enhance the environmental quality of the State." *Cal. Pub. Res. Code* § 21001(a).

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
December 15, 2017
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The purpose of an Environmental Impact Report ("EIR") is "to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided," before a project is built. *Cal. Pub. Res. Code* § 21002.1(a).

A sufficient discussion of possible significant environmental impacts requires a flexible determination involving a careful balancing of the many CEQA goals and policies and of the significant aspects of the proposed Project. Specificity and use of detail in EIR's is favored since conclusory statements that are unsupported by empirical or experimental data, scientific authorities, or explanatory information afford no basis for comparison of the problems involved with a proposed project and the difficulties involved in the alternatives. *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 397, 411. **Specific data must be presented in an EIR for a meaningful analysis of all significant impacts.** *Berkeley Keep Jets Over the Bay v. Bd. Of Port Comm'n's* (2001) 91 Cal.App.4th 1344, 1381.

The standard that must be achieved is the gathering of all that critical information necessary for informed decision making by both the public and decision makers. *Laurel Heights Improvement Association v. Regents of the University of California*, 47 Cal.3d page 409, fn. 12. An EIR must provide the decision-makers, and the public, with all relevant information regarding the environmental impacts of a project. *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 391-92 (the preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been taken into account). If an EIR does not adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the project, informed decision making cannot occur and a final EIR is inadequate as a matter of law. *Karlson v. City of Camarillo* (1980) 100 Cal.App.3d 789, 804 (in reviewing an EIR, a paramount consideration is the right of the public to be *informed* in such a way that it can intelligently weight environmental consequences of any action).

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
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Page Three

Here, the DEIR, as presented, plainly fails in its essential role as an informational document under CEQA. As set forth below, it not only fails to provide the relevant empirical data and technical evidence necessary to adequately support its conclusions, it even fails to identify the complete scope of the Project. It defers environmental analysis and identification of impacts, based thereon regurgitates boilerplate, vague and unenforceable mitigation measures, and precludes intelligent weighing of the environmental consequences posed by the Project. It leaves the public and decision makers asking questions rather than apprising them of answers. It lacks the specificity and use of detail required for intelligent decisionmaking and is, therefore, inadequate as a matter of law.

II. Aesthetics

The DEIR erroneously misleads the public and decision makers that aesthetic impacts of the Project are not to be considered significant under *Public Resources Code* §21099 (SB 743). Indeed, nothing can be further from the truth. *Public Resources Code* §21099(d)(1) provides that aesthetic and parking impacts of only a “residential, mixed-use residential, or employment center project” on an infill site within a transit priority area shall not be considered significant impacts on the environment. Undoubtedly, here, the Project is neither a residential nor a mixed-use residential one. It also does not qualify as an employment center (as the DEIR claims) because an employment center is defined as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. *Public Resources Code* §21099(a)(1). Here, the Project is not wholly located on commercially zoned properties. The Project also sits on lots which are zoned “PF” (public facilities zone which only permits such public uses as farming and nurseries, public parking facilities, fire and police stations, public libraries, etc., see Los Angeles Municipal Code §12.04.09), and “R3” (multiple dwelling zone which only permits residential and certain associated uses). Accordingly, the aesthetic impacts of the Project, which the DEIR Initial Study admits are all potentially significant as to all thresholds, must be evaluated and considered fully, they cannot be swept under the rug as “provided for informational purposes solely.”

Furthermore, the DEIR is inherently contradictory with regard to its aesthetics analysis. As noted above, in the Initial Study it admits that the Project will have a substantial adverse effect on scenic vistas (Hancock Park – a registered National Natural Landmark and California Historical Landmark, and

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
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the Hollywood Hills); will substantially damage scenic resources; will substantially degrade the existing visual character and quality of the site and its surroundings; and will create a new source of substantial light/glare which will adversely affect views in the area. Yet, in the body of the aesthetics section, the DEIR determines that all of these impacts would be less than significant and imposes absolutely no mitigation measures to mitigate these aesthetic impacts identified in the Initial Study.¹

Such “analysis” is unacceptable under CEQA. Once identified in the Initial Study, the County cannot simply change its mind and downplay the aesthetic impacts of the Project for the purpose of limiting or avoiding mitigation measures. In order to be adequate under CEQA, the EIR must, with detail and specificity, explain the impacts of all identified environmental impacts and propose adequate mitigation measures to such impacts. *Woodward Park Homeowners Ass’n, Inc. v. City of Fresno* (2007) 150 Cal.App.4th 683, 724 (an agency preparing an EIR cannot acknowledge a significant impact and approve the project after imposing a mitigation measure not shown to be adequate by substantial evidence).

Here, the aesthetic impacts of the Project area clearly significant, as the Initial Study found. First, the Project will substantially degrade the existing visual character and quality of the site and its surroundings. Instead of analyzing this aspect in complete detail, the DEIR instead relies almost exclusively on the Project’s “consistency” with the buildings along Wilshire Boulevard.² But such “analysis” omits from its purview the entirety of the R-3 and R-1 residential neighborhood to the south of the Project. The Project will introduce a height into this residential neighborhood that will overwhelm and overpower the airspace, sunlight and views from this *residential* neighborhood. It will replace a surface parking lot with a 260-parking space, 85-foot building. What’s more, this 85-foot building, *per the DEIR itself*, will introduce light and glare from headlights

¹ The DEIR provides the same inconsistent analysis with regard to Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning.

² The DEIR admits that the Project has been designed to create a visually appealing and interesting site that would contribute to the cultural identity of the Miracle Mile. Its analysis concludes, over and over, that “the scenic nature of *Wilshire Boulevard*... would be maintained and enhanced.”

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
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during the evening hours as well as security lighting on the roof.³ The DEIR concludes, without any evidence whatsoever, that these impacts are “typical for the area.” This statement is provided in a conclusory manner and is completely unsubstantiated. Again, the Project will replace a surface parking lot with 260 above ground spaces and rooftop security lighting which will be glaring into the homes of the surrounding *residential* neighbors (as the DEIR itself admits). As such, it will undoubtedly degrade the existing visual character and quality of the site and its *residential* surroundings.

The County cannot simply ignore these impacts, including the identified “light and glare” impacts from headlights. These aesthetic impacts must be analyzed in detail and with empirical data as to glare and light, and mitigated, as necessary and appropriate.

III. Air Quality

The DEIR fails to provide for the impacts on air quality caused by the Project being in a Methane Hazard Zone (the lack of adequate methane gas analysis is further discussed in the attached report from Wilson Geosciences, Inc. and Geo-Dynamics, Inc. – Exhibit 1).⁴ The DEIR further fails to provide a Health Risk Assessment (HRA) to assess potential construction impacts to nearby residential sensitive receptors, or an analysis of dust levels at night (given the proposed hours of operation and anticipated “special events,” air quality at night is a serious potential impact that must be assessed). This information and analysis must be included and analyzed in order to comply with the CEQA informational requirements.

Furthermore, the DEIR identifies, but fails to adequately mitigate, construction impacts on air quality. The DEIR confirms that construction emissions resulting from the Project would result in significant short-term impact (NO_x would exceed the SCAQMD-recommended significance threshold) and

³ Most notably, no adequate analysis of glare and light is conducted or provided with regard to the impacts on the 750 Spaulding Building.

⁴ Notably, the City of Los Angeles maintains an Ordinance regulating methane which provides that methane mitigation is required for all sites located in a Methane Zone or a Methane Buffer Zone, regardless of results obtained in a methane investigation.

concludes that implementation of B-1 through B-5 would reduce NOx impacts and localized impacts to a less than significant level. But mitigation measures B-1 and B-2 are nothing more than requirements to “check in” with the SCAQMD to provide an inventory of all off-road construction equipment (B-1) and to make sure that construction equipment is “tuned and maintained” (B-2). As such, they do not actually mitigate anything. Mitigation measures B-3 through B-5, furthermore, are nothing more than vague, boilerplate conditions to “minimize” exhaust emissions and “to the extent possible” utilize electricity from power poles.

CEQA requires that mitigation measures be both feasible and “fully enforceable.” *Lincoln Place Tenants Ass’n v. City of Los Angeles* (2007) 155 Cal.App.4th 425 (the purpose of monitoring and reporting requirements for enforcement of mitigation measures is to ensure that a feasible mitigation measure will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded); *CEQA Guidelines*, § 15126.4 (a)(2) (mitigation measures must be “fully enforceable”). And certainly there is a requirement for a nexus between the mitigation measures and the actual impact. *See CEQA Guidelines*, §15126.4(a)(4)(A); *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987)(there must be an essential nexus (i.e. connection) between the mitigation measure and a legitimate governmental interest). For all of the reasons set forth above, “mitigation measures” B-1 through B-5 fail these requirements.

IV. Geology and Soils/Hazards and Hazardous Materials

As set forth in the attached report from Wilson Geosciences, Inc. and Geo-Dynamics, Inc. the Geology and Soils and the Hazards/Hazardous Materials (Exhibit 1), the DEIR fails to provide sufficient data and information to adequately evaluate and confirm the conditions at the proposed Project site and the environmental impacts of the Project with regard to geology and soils and hazards/hazardous conditions. Indeed, (and presumably because no such tests were done), the DEIR even fails to discuss field subsurface explorations such as the drilling of borings and/or Cone Penetration Test (CPT) soundings and fails to address the very serious potential impacts caused by the hydrocarbon and tar in the groundwater below the LACMA East and Spaulding Lot (the geotechnical report fails to provide *any* data about the percentage of tar in the soil). Without such information, it is impossible to evaluate the significant impacts of the Project, including the Project site’s susceptibility of soils liquefaction, on Geology

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and Soils and the Hazards/Hazardous Materials. For this reason alone the DEIR fails as an informational document.

What's more, instead of adequately conducting such scientific analysis, the DEIR simply includes "mitigation measures" D-1 through D-4, for a *future* "site-specific, design-level geotechnical, and seismic hazard investigation report;" a *future* chemical analysis; and the *future* implementation of an instrumentation program. But such *future* analysis and environmental review is plainly against the CEQA statute. It is well settled that under CEQA, adoption of mitigation measures from a *future* study is impermissible. *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306-07 (requiring applicant to submit a future hydrology study and soils study subject to review by County found deficient for improperly deferring environmental assessment to a later date); *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275 (deferral is impermissible when agency "simply requires a project applicant to obtain a biological report and then comply with recommendations that may be made in the report").

All site-specific, design-level geotechnical, and seismic hazard investigations and analyses must be completed and provided now so that the decisionmakers and public are apprised of the true scope and impacts of the proposed Project on Geology and Soils.

V. Land Use

a. Land Use Consistency

CEQA requires strict compliance with the procedures and mandates of the statute. *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 118. In the context of "land use and planning," in order to be legally adequate, the EIR must identify and discuss, as part of its substantive disclosure requirements, any *in*consistencies between the Project and applicable general plans and regional plans, including relevant environmental policies in other applicable plans. See CEQA Guidelines §15125(d).

Here, the DEIR, as drafted, has made a thorough land use consistency analysis impossible because it has completely failed to identify what entitlements will be necessary for the Project, and the Ogden Parking Structure, which the

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DEIR admits is subject to all City of Los Angeles regulations, in particular. Instead, it vaguely provides that the Ogden Parking Structure will require “zoning approvals, *if necessary* (possible variances or adjustments, etc.);” provides that the spanning of the Museum Building over Wilshire Boulevard will require “vacation of airspace and related City grants, approvals, or agreements, *as necessary*;” states that termination of existing parking covenants on the Spaulding Lot and recordation of a new parking covenant for the Ogden Lot (including a variance, *if necessary*) may be needed; and ends each agency’s entitlements list with a “other approvals and permits as needed and as may be required” catchall.

What’s more it has deferred and punted analysis of the impacts of the necessary street/airspace vacation in the very manner warned against in the recent California Supreme Court case of *Banning Ranch Conservancy v. City of Newport Beach* (2017). As the City of Newport Beach argued in the *Banning Ranch* case, the DEIR here argues that through the eventual process of the street vacation, “the City would ensure that the requested airspace vacation would comply with the purpose, intent and provisions of the General Plan and the California Streets and Highways Code.” But as the Supreme Court specifically disagreed in *Banning Ranch*, such deferring runs afoul of the CEQA policies requiring local agencies to “integrate the requirements of this division with planning and environmental review procedures otherwise required by law or by local practice so that all those procedures, to the maximum feasible extent, run concurrently, rather than consecutively.” *Public Resources Code* §21003(a).

The CEQA Guidelines specify that “to the extent possible, the EIR process should be combined with the existing planning, review, and project approval process used by each public agency.” CEQA Guidelines §15080. For this reason, an EIR project description must include “a list of related environmental review and consultation requirements found in federal, state, or local laws, regulations, or policies. To the fullest extent possible, the lead agency should integrate CEQA review with these related environmental review and consultation requirements.” CEQA Guidelines §§15124(d)(1)(C), §15006(i). Toward that end, agencies are encouraged to “consult with state and local responsible agencies before and during preparation of an environmental impact report so that the document will meet the needs of all the agencies which will use it.” CEQA Guidelines §15006(g).

Here, it is clear that the County has failed in its obligation to integrate CEQA review with the requirements arising from the City of Los Angeles,

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including all zoning, general plan and street/air vacation regulations which are admittedly necessary for the Project. The document is completely devoid of specific identification of what zoning approvals, variances, and City grants/approvals will be necessary. The County needs to further consult with the City of Los Angeles, put together a list of environmental land use impacts (and in particular the Ogden Parking Structure which will be subject to all City of Los Angeles regulations⁵ and the impacts of the street/airspace vacation) and integrate all of this specificity into the EIR in order to comply with CEQA. Otherwise it is impossible for decisionmakers, and the public to identify what, if any, land use impacts are posed by the proposed Project.

Furthermore, in order to get around the requirement to discuss land use inconsistencies as set forth in the CEQA Guidelines, the EIR *assumes* land use consistency based upon the projected approval of the Project (“with the approval of the requested entitlements, impacts related to land use would be less than significant”).

This approach is not only incorrect, it obscures the language and intent of the CEQA statute. It is inherently against the CEQA mandates to simply state that once the entitlements are approved, the Project will be consistent with the zoning restrictions on-site, and therefore with all applicable land use regulations and policies. If such were the standard, any and all zone changes, general plan amendments, and variances would be inherently “consistent” with applicable land use plans. If such argument were accepted, the entirety of the “conformance with applicable land use plans” findings, both under the CEQA and the County’s and City’s Codes, would be eviscerated.⁶

To the contrary, under CEQA, the threshold question that must always be answered is what environmental effects the project will have on the existing (pre-Project) environment. Projected, future, conditions may only be used as the

⁵ It is, for instance, unclear whether the parking structure, as proposed, is even allowed in the R3 zone and whether it would comply with Los Angeles Municipal Code §12.21.A, as required.

⁶ And again this *assumes* that consistency will be found. The DEIR cannot make any such assumption without data, analysis or evidence to back this up. What if during the street vacation process, it is determined that the vacation request is inconsistent with land use policies?

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baseline for impact analysis if their use in place of measured existing conditions, a departure from the norm, is justified by some unusual aspects of the project or the surrounding conditions. However, even in such unusual circumstances, an agency still does not have the discretion to completely omit an analysis of impacts on existing conditions, unless inclusion of such an analysis would detract from an EIR's effectiveness as an informational document, either because an analysis based on existing conditions would be uninformative or because it would be misleading to decision makers and the public. *Neighbors for Smart Rail v. Exposition Metro Line Const. Authority* (2013) 57 Cal.4th 439, 508-09.

Here, there are simply no "unusual" circumstances which would in any way render the "existing" conditions baseline required inapplicable. And, again, even if there were, there is still a burden on the County to include the impacts on the *existing* land use policies and regulations (pre-Project), and, if appropriate, present the facts warranting the use of the projected future conditions as the baseline.

Finally, the EIR fails as an informational document and under CEQA Guidelines §15125(d) because it fails to identify, consider or analyze any of the following City of Los Angeles land use regulations and policies with which the Ogden Parking Structure is *inconsistent*:

- Parking structures and areas should form an *integral* part of the project and be well landscaped, so as not to detract from the pedestrian experience and maintain visual interest. (p. 28, Miracle Mile CDO).
- Parking *should be located underground* where possible. (p. 28, Standard 2a, Miracle Mile CDO).
- Need to *preserve the existing character of residential neighborhoods* while accommodating more affordable housing and child care facilities. (Wilshire Community Plan, p. I-5).
- *Improved land use transitions* are needed between commercial uses and single family and multiple family areas. (Wilshire Community Plan, p. I-5).

- *Preserve and enhance* the varied and distinct *residential character* and integrity of existing residential neighborhoods. (Wilshire Community Plan, p. III-3).
- *Apply the Urban Design Chapter*⁷ guidelines for parking facilities. (Wilshire Community Plan, p. III-3).
- The design guidelines of Ordinance No. 176, 332.⁸

All of these issues and land use *inconsistencies* need to be further reviewed and analyzed under CEQA.

b. Land Use Compatibility

In finding that the Project would have a less than significant impact on land use compatibility, the EIR completely fails to analyze compatibility with respect to the entire *residential* community immediately to the south of the Project Site. Focusing, if not almost exclusively, on the development along Wilshire Boulevard, the EIR intentionally distorts the land use patterns in the area in order to conclude that there is a less than significant impact.⁹

What's more, the DEIR's incredibly abbreviated compatibility "analysis" with regard to the Ogden Parking Structure (and therefore, the residential neighborhood) is nothing more than a list of conclusory statements completely devoid of substantial evidence:

The Ogden Parking Structure would be located on a lot separated from the Museum Building and would, thus, be designed to be generally compatible with the neighborhood surrounding the structure. This would

⁷ Except for mentioning the existence of the Urban Design Chapter, the DEIR completely fails to analyze the parking lot's compliance therewith.

⁸ The DEIR makes zero effort to analyze the parking structure's consistency with the [Q] conditions imposed by Ordinance No. 176, 332.

⁹ The DEIR also makes an absurd argument that the Project site is surrounded by a "variety of land use designations and zones" and, therefore, the Project would be compatible with these "various" types of land uses and zones. Such vagueness and lack of analysis with actual, specific land uses surrounding the Project is prohibited under CEQA.

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be achieved through the incorporation of building articulation, compatible finish materials, and compatible height and massing. In addition, the Ogden Parking Structure would generally align with the facades of the multi-family residential structures on the west side of Ogden Drive. Furthermore, the Ogden Parking Structure would be designed to substantially screen automobiles in the garage and would include perimeter landscaping along Ogden Drive, including trees and shrubs, which would provide additional screening.

How does the fact that the Ogden Parking Structure will be located on a lot separated from the Museum Building ensure that such structure will be generally compatible with the neighborhood surrounding the structure? (It does not). What building articulation, compatible finish materials, and compatible height and massing elements will be incorporated mitigate the Project's land use impacts? What landscaping is proposed to mitigate the Parking Structure's impacts? Again, specificity and use of detail must be used in EIR's since conclusory statements that are unsupported by empirical or experimental data, scientific authorities, or explanatory information afford no basis for comparison of the problems involved with a proposed project and the difficulties involved in the alternatives. *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 397, 411. Here, the DEIR's lack of specificity on the compatibility of the Ogden Parking Structure is shocking.

To add insult to injury, the DEIR again provides that the "discretionary actions required for the Project would not promote development that is incompatible with the surrounding community." But, again, as set forth above, such "punting" of impact analysis is specifically prohibited by CEQA. All discretionary processes involved, and their impacts, must be integrated with the CEQA process. The DEIR cannot simply *assume* that the discretionary actions will ensure compatibility, there is no such guarantee (especially here where the DEIR cannot even identify what specific discretionary actions are going to be required).

For all of these reasons, the DEIR's analysis of land use compatibility is woefully lacking.

VI. Transportation/Traffic¹⁰

Relying narrowly on thresholds, the DEIR fails to address critical impacts of construction and operational traffic on the surrounding residential properties. This is in error. The fact that a particular environmental effect meets a particular threshold cannot be used as an automatic determinant that the effect is or is not significant, and the use of the Guidelines' thresholds does not necessarily equate to compliance with CEQA. *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-09.

Here, the Project proposes two main entrances, one north of Wilshire and one south. As the south entrance abuts the property located at 750 S. Spaulding, it will bring additional traffic impacts on residents moving in and out of the building, especially during construction. By looking solely at the temporary impacts on travelers on roadways, visitors, bus travelers and parkers, the DEIR completely ignores such impacts, both on the 750 Spaulding building and on the whole of the residential units surround the Project. These impacts must be analyzed in order to meet the informational requirements of CEQA and adequate mitigation measures must be imposed in order to adequately mitigate the impacts on the 750 Spaulding building. Where an agency fails to abide the informational requirements of CEQA by omitting material necessary to informed decisionmaking and informed public participation, as it has here, harmless error analysis is inapplicable and the agency is deemed to have erred and abused its discretion. *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645.

Furthermore, the DEIR finds that the Project does not substantially increase hazards due to a design feature or incompatible uses. This is blatant error and completely unsubstantiated by the requisite substantial evidence. The Project will include a 260-parking space, 85-foot building immediately next to (within five feet of a five-story multi-family residential building) a multi-family residential zone where residents enter and exit to get to their homes and where a surface parking lot currently exists. It will introduce a south entrance *immediately next to* a multi-family residential building. The impacts of increased hazards on such residential traffic are not analyzed in order to adequately conclude that the

¹⁰ As noted above, the DEIR makes the same erroneous argument regarding SB 743 in the transportation section as it does in the aesthetics section.

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Project does not substantially increase hazards due to a design feature or incompatible uses.

What's more, in order to mitigate the impacts that the DEIR does identify on construction traffic, it imposes one mitigation measure, the submission of a future Construction Management Plan. There is no way to gauge the adequacy of such future construction management plan or whether it adequately mitigates the identified impacts. For that reason it is well settled that under CEQA, adoption of mitigation measures from a *future* study is impermissible, as set forth above. See *Sundstrom v. County of Mendocino*; *Defend the Bay v. City of Irvine*. The DEIR must identify, in specific detail, the aspects of the Construction Management Plan which will mitigate the construction traffic impacts on all road arteries and surrounding uses, and in particular with regard to the 750 S. Spaulding Building which is immediately next door. Without such detail and specificity, it cannot be determined whether the construction transportation impacts are adequately mitigated or enforceable.

The DEIR also evaluates existing traffic conditions based upon traffic studies conducted on weekdays. But the highest volume of attendance to the Project historically has been and is anticipated to be on the weekends. Accordingly, the DEIR's analysis is skewed and, in order to adequately analyze traffic levels at such peak times, further analysis and study is necessary.

Finally, the DEIR provides no discussion whatsoever of an additional Metro Purple Line Subway entrance on the north side of Wilshire Boulevard which has been identified in previous public hearings as necessary to accommodate the increase in visitors coming to Project site (for more, see comments and concerns presented by METRO), and no analysis regarding cumulative traffic/transportation impacts arising from the ongoing METRO construction which plans to close the intersection of La Brea and Wilshire. These omissions renders the scope of Project and the Project description deficient under CEQA, and bars the DEIR's utility as an adequate informational document.

VII. Public Services

Compounding the detrimental impacts caused by the admitted, anticipated construction transportation impacts, the DEIR completely ignores this condition with regard to public services, fire and police impacts. Common

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sense dictates that traffic impacts will hinder police and fire vehicles in the same manner as they do all other vehicles. By failing to provide any data or analysis to the contrary, the DEIR has patently failed to evaluate these impacts on public services. Again, as discussed hereinabove, the DEIR cannot rely on thresholds of significance to ignore these impacts. See *Woodward Park Homeowners Ass'n, Inc. v. City of Fresno*; *Protect the Historic Amador Waterways v. Amador Water Agency*.

VIII. Noise

Similar to traffic, in order to avoid a detailed analysis of noise impacts, the EIR simply concludes that because operational Project-related noise would not exceed established thresholds, impacts are less than significant. But, as discussed above, the use of the Guideline's thresholds does not necessarily equate to compliance with CEQA. In order to provide the requisite detail/information necessary for informed decisionmaking, the EIR must address why and how the thresholds being used for this particular Project, where the Project not only proposes to construct a 260-parking space, 85-foot parking structure immediately next to residential uses, but a main south entrance next to a multi-family residential building, are appropriate.

There is no adequate analysis completed of the noise impacts relating to the Ogden Parking Structure when that structure will be most impactful to the surrounding residential neighborhood in terms of noise impacts. There is not even a discussion of allowed uses and considerations to mitigate operational noise impacts from that location. What's more, the DEIR fails to analyze, with the specificity required by law, the noise and vibration impacts to the 750 Spaulding Building which will be immediately next to the south end of the proposed Project and particularly impacted as a result of the Project's unique design and size.

The DEIR further provides that existing ambient noise levels were monitored on only *two* days - November 16 and 17, 2016. This is a distressingly small sample from which to conclude ambient noise levels and does not constitute "substantial evidence" in support of the DEIR's analysis of ambient noise levels. It fails to measure ambient noise levels on the weekends, when the Museum is busiest. What's more, it does not take into account the ongoing

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METRO construction which has altered the ambient noise levels,¹¹ or the noise levels that will exist at night (given the proposed hours of operation and anticipated "special events," noise at night is a serious potential impact that must be assessed).

It must also be noted that the side of the Project along Spaulding site will be designed to attract visitors. Yet the noise impacts from this design element in particular on all of the residential uses on the Spaulding site arising therefrom are completely unidentified, unanalyzed and unmitigated. This is error. Once identified, the DEIR cannot ignore Project impacts, it must mitigate them fully. *Woodward Park Homeowners Ass'n, Inc. v. City of Fresno* (2007) 150 Cal.App.4th 683, 724.

IX. Conclusion

In conclusion, we request that the County address all of the inadequacies of the DEIR as set forth herein.

Recirculation of the DEIR is necessary under CEQA.

Very truly yours,

LUNA & GLUSHON
A Professional Corporation



ROBERT L. GLUSHON

¹¹ The DEIR admits that the ambient noise levels consistent of local traffic, parking lots and other typical urban uses. No ongoing construction noise was included.

Exhibit 1

December 12, 2017

Kristina Kropp, Esq.
Luna & Glushon, APC
16255 Ventura Boulevard, Suite 950
Encino, California 91436

SUBJECT: Comments and Questions Relating to the Scope and Content of the AECOM Geotechnical Report and the Draft EIR for the Proposed LACMA Building for Permanent Collection, Los Angeles, California

Dear Ms. Kropp:

As indicated herein, the geotechnical report to the above mentioned Draft EIR does not provide sufficient data or information to adequately evaluate or confirm the site conditions at the proposed Project site or the environmental impacts of the Project, especially with regard to geology and soils and hazards/hazardous conditions. Accordingly, we are commenting generally on the 2017 AECOM geotechnical report and the Eyestone Draft EIR (2017). The following comments have been prepared by the undersigned.

AECOM Geotechnical Report (September 6, 2017)

Lack of Site-specific Data - AECOM indicates that its bases for the data and conclusions presented are "Review of readily available aerial photographs, topographic and geologic maps, published geotechnical literature, geologic and seismic data, soil data, groundwater data, and the geologic/geotechnical data obtained during recent and previous geotechnical investigations in the near-vicinity of the subject site." Considering the geologic/geotechnical data aspect there are numerous geotechnical reports listed in the SECTION 5 REFERENCE portion of the report (numbers 1, 18-21, 24-28, 30, 31, 34, and 36-39). From what we can determine, a few of these reports refer to the 731 Ogden site (numbers 18-21), but apparently after the excavation had been abandoned and was being refilled/repaved. The other reports enumerated above are at sites ranging between 700-feet and 1.75-miles away from the proposed Spaulding Parking structure. There apparently are no geotechnical reports or data for the LACMA East or Spaulding sites. Borings B-3 and B-4 are shown as boring/well locations, but are not discussed. Without such information it cannot be known if there are significant effects that are not discussed in the Draft EIR.

The importance of having site-specific geotechnical data at this location is to understand that 1) conditions of Level V methane (AECOM, 2017, page 3-3) are the highest rated hazard, 2) the underground geologic layers (stratigraphy) in this Pleistocene alluvial environment are not continuous over large distances, even a few hundred feet, and 3) preliminary design for excavations of underground parking and/or basement structures in heterogeneous geologic materials require up-to-date geotechnical information at the structure locations. Lacking this site-specific information, it is not possible to define potential significant effects on the environment or evaluate the feasibility of the project in the EIR. Aspects related to the geotechnical data and findings are discussed below.

Though the referenced reports would provide a generalized description of materials within 700-feet to 1.75-miles away, since they are not provided with the geotechnical report it is not possible for the public to make an educated evaluation of the conditions at the proposed museum facilities and potentially significant effects that the project may have on the environment. Subsurface condition descriptions are not based on AECOM site investigations since none are presented. It appears other investigations were performed on or near areas of the site, but these are not specifically referred to.

The potential for methane gas seepage and accidents resulting from this phenomenon are well known (Bilodeau and others, 2007; Dolan and others, 1997; Hamilton and Meehan, 1992). While the potential for methane gas issues are discussed, the report fails to discuss the potential impacts of hydrogen sulfide gas. However, hydrogen sulfide gas is recognized in the Alternatives section of the Draft EIR as a hazard alongside methane. In this general regard, there is no mention that could be found of the use of impermeable membranes beneath structures to help lessen the impact of methane and hydrogen sulfide gasses. Such membranes are considered in other nearby projects, such as Wilshire Crescent Heights at 6245 Wilshire Boulevard (City of Los Angeles, 2010). Even with the City methane mitigation requirement that have been in place since 1986, it is reported (FOX News LA, 2015) that in early 2015 a methane gas explosion occurred “on Wilshire Boulevard near Hauser Boulevard despite monitors and vent pipes being in place.

Lack of Clear References to Critical Reports – In addition to the lack of critical data, the report also does not often cite a specific report(s) where descriptions of subsurface materials are presented. In general the REFERENCES listed are not noted with attribution in the text so that one cannot evaluate the legitimacy of the descriptions and therefore the conclusions drawn. For example, no direct site or area-specific references are provided for descriptions on pages 2-1 through 2-3 (Section 2.1.3 describes artificial fill, alluvium, shallow marine sediments, and bedrock with specific depth, thicknesses, and nomenclature, but provides no specific references for the information), groundwater (Section 2.2), and Sections 3.2.2, 3.2.4 through 3.2.7 (oil wells, tar sands and methane discussions). Again without the cited reports and specific references it is not possible for the public to evaluate the adequacy of 1) the data and recommendations presented and 2) the mitigations mentioned in the RECOMMENDATIONS TO HAZARDS section.

Active Faulting - In the AECOM report it is noted that the San Vicente fault is 0.1 mile from the site (Schneider and others, 1992), but it is not shown on a site-map scale so that its proximity to the site can be properly judged. Categorized as a major fault, the San Vicente fault is considered an active blind thrust fault that could cause differential uplift in the area of the proposed development. Because the fault is buried, its exact location is not known and it could be much closer to, or under, the proposed museum sites. There is no discussion of potential impacts if inches or feet of differential uplift were to be experienced for the likely maximum 6.17 magnitude earthquake indicated for the San Vicente fault.

Geotechnical Issues -

Based on a review of the above referenced AECOM geotechnical report for the proposed Los Angeles County Museum of Arts (LACMA), the report does not provide the basis for most of the conclusions regarding some of the geotechnical hazards that could pertain to the site. Specifically, the conclusion by the consultant regarding the low impact for the potential hazards is not substantiated as discussed below:

Liquefaction: The site is located in Southern California; therefore is expected to experience medium to severe ground shaking during the lifetime of the project. The site is underlain by alluvial deposits, some of which are predominantly sandy and silty in composition. Historical-high groundwater at the site is near the ground surface. Saturated sandy and silty soils are typically susceptible to liquefaction if subjected to medium to high ground shaking. Hence, the potential for liquefaction and related hazards at the site needs to be evaluated. Hazards related to the liquefaction phenomenon include seismic settlement, lateral spreading and surface manifestation in the form of fissures, sand boils and loss of bearing. The consultant concluded that liquefaction potential and related hazards at the site are "remote" due to the dense to very dense fine-grained underlying materials, and due to the "tar-impregnated sands with low liquefaction-susceptibility."

The engineering characteristics/indices that would determine the susceptibility of soils for liquefaction include soil type/classification and consistency (compactness of soils). This information is usually obtained from field subsurface explorations such as drilled borings and/or Cone Penetration Test (CPT) soundings and laboratory testing of samples obtained from borings. For example, logging the recovered soil samples and soil cuttings from drilled borings would provide information regarding the soil type. Also, counting the number of blows required for a hammer to drive a sample into the soil is directly related to the compactness of the soil. Laboratory testing on samples of underlying materials helps in verifying the soil type, and in determining the percentages of sand, silt and clay, liquid limit and plasticity index, as well as other indices and parameters needed to evaluate the potential for liquefaction at a site. The consultant did not provide any field or laboratory data to substantiate/verify the conclusion that liquefaction potential at the site is low. The consultant did not also provide any data about the percentage of tar in the soil. The report also did not provide any reference that would relate the cyclic mobility of soils (that is susceptibility to liquefaction) with the presence of tar in soils. Were a severe earthquake to occur in the basin area and liquefaction-lateral spreading occurred, the potential for neighboring properties to be impacted by lateral movement toward the two-story basements appears possible should their foundations be compromised.

Settlement Due to Dewatering: Temporary dewatering for the construction of underground basements will be needed. The report did not discuss or evaluate the impact of dewatering on existing improvements/structures at and immediately adjacent to the sites. For example, dewatering would change (increase) the effective pressure, which could cause settlement to occur. In other words, if dewatering at the site causes changes to groundwater level on adjacent sites, settlement of foundations of structures on adjacent sites may occur.

Tar Sands: The consultant indicates that soils from below 10-feet and below groundwater will likely contain hydrocarbon from natural soils and tar at the LACMA East and the Spaulding Lot. The consultant did not provide any site-specific data or referenced any source to substantiate this statement.

Hydrocollapse: Hydrocollapse refers to the compression of soils when inundated by subsurface water under normal pressure. The ASTM D5333 provides a testing procedure for the evaluation of the hydrocollapse potential of soils. The consultant did not provide any testing to evaluate the hydrocollapse potential of underlying materials, or to delineate the distribution of such materials if present at the site.

Eyestone Environmental Draft EIR (October 2017)

Technical discussions in Section 2.b of the Draft EIR Geology and Soils (Section D) are based on the AECOM geotechnical report. Due to the conditions outlined above with regard to the geotechnical report, the public cannot properly evaluate the existing conditions, analysis of impacts, potential significant effects, or mitigation measures without a clearer, more complete presentation and explanation of the data used to analyze the conditions within the boundaries of the proposed development.

With regard to references, aside from a general reference to the AECOM geotechnical report, there are very few specific references within the Geology and Soils section to back up the analysis of impacts and the proposed mitigations. Without these specifics the public's ability to evaluate the potential significant effects and adequacy of the mitigations proposed is severely hampered.

References Cited

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City of Los Angeles, 2010, Wilshire Crescent Heights Final Environmental Impact Report, ENV-2008-0729-EIR, March 2010, Section IV.

Dolan, James F., Kerry Sieh, Thomas K. Rockwell, Paul Guphill, Grant Miller, 1997, Active tectonics, paleoseismology, and seismic hazards of the Hollywood fault, northern Los Angeles basin, California, GSA Bulletin; December 1997; v. 109; no. 12; p. 1595–1616; 15 figures; 5 tables.

Proposed LACMA Building for Permanent Collection
December 12, 2017

Dolan, James F., Eldon M. Gath, Lisa B. Grant, Mark Legg, Scott Lindvall, Karl Mueller, Michael Oskin, Daniel F. Ponti, Charles M. Rubin, Thomas K. Rockwell, John H. Shaw, Jerome A. Treiman, Chris Walls, and Robert S. Yeats (compiler), 2001, Active Faults in the Los Angeles Metropolitan Region Southern California Earthquake Center Group C, <https://www.scec.org/>.

Eyestone Environmental, 2017, County of Los Angeles, LACMA Building for the Permanent Collection, SCH NO. 2016081014, Draft EIR, October 2017.

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Hamilton, D. H. And Meehan, R. L., 1992, Cause of the 1985 Ross store explosion and other gas ventings, Fairfax District, Los Angeles. In Pipkin, B. W. and Proctor, R. J. (Editors), Engineering Geology Practice in Southern California: Association of Engineering Geologists Special Publication No. 4, Star Publishing Company, Belmont, CA, pp. 145–157.

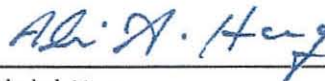
Schneider, C., Hummon, C., Yeats, R. S., and Huftile, G. J., 1996, Structural evolution of the northern Los Angeles basin, California, based on growth strata: Tectonics, v. 15, p. 341–355.

Please contact the undersigned if you have any questions.

Sincerely,

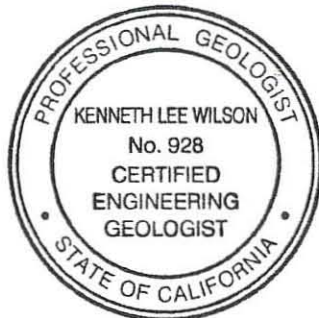
WILSON GEOSCIENCES INC.

GEO-DYNAMICS, INC



Kenneth Wilson
Principal Geologist
P.G. #3175, C.E.G. #928
(626) 791-1589

Ali Abdel-Haq
Principal Engineer
P.E. 46989, G.E. 2308
(805) 496-1222



KENNETH WILSON

Principal Engineering Geologist

EDUCATION

University of California at Riverside, B.S. Geological Sciences, 1967

University of California at Riverside, M.S. Geological Sciences, 1972

PROFESSIONAL REGISTRATIONS

Professional Geologist, California, #3175 [Issued 1-08-1974; Expires 2-28-2019]

Certified Engineering Geologist, California, #928 [Issued 1-08-1974; Expires 2-28-2019]

PROFESSIONAL SUMMARY

Kenneth Wilson is responsible for management, technical supervision and performance of engineering geology, geotechnical, environmental impact, and environmental geology projects, and is a Professional Geologist (#3175) and Certified Engineering Geologist (#928) in California. He performs and supervises environmental assessments for commercial, industrial and government projects covering the disciplines of hydrogeology, engineering geology, geology, hydrology, seismicity, tectonics, faulting, mineral resources, and waste management. Geotechnical studies include fault evaluations, ground failure assessments, slope stability and foundation materials characterization, liquefaction potential, flooding hazards and site selection. The emphasis of his work is on defining geologic and geotechnical conditions, and hazards, which may affect the feasibility and design of any type of development project. Mr. Wilson has over 30 years of technical performance and project experience in critical facilities studies, radioactive/mixed/hazardous waste management, energy plant site licensing, impacts to surface and groundwater resources, waste disposal site development, dams and reservoirs and numerous other engineered structures. Specialized experience is in engineering geology in support of geotechnical studies, site selection/evaluation, seismic safety, integration of multidisciplinary technical teams, project management, and EIRs, EAs, and EISs.

PROFESSIONAL EXPERIENCE

Wilson Geosciences, Engineering and Environmental Geology [1989-Present]: Principal Engineering Geologist

Responsible for all management, technical and marketing activities for engineering geology, environmental impact, and environmental geology projects. Performs and supervises environmental assessments for commercial, industrial and government projects covering the disciplines of hydrogeology, engineering geology, geology, hydrology, seismicity, tectonics, faulting, mineral resources, and waste management. Geotechnical studies include fault evaluations, ground failure assessments, slope stability and foundation materials characterization, liquefaction potential, flooding hazards and site selection

The Earth Technology Corporation [1974-1989]: Corporate Vice President [1987-1989]; Vice President; Director, Program Management [1985-1987]; and Vice President, Associate and Senior Manager [1974-1988]

Vice President, Associate and Senior Manager: Mr. Wilson had numerous challenging technical and management responsibilities and assignments during the period 1974-1988. There was a wide range of projects for which he had a technical role, either performance, supervisory, or management in scope. A substantial portion of the time he was Program Manager for the Missile-X (MX) ICBM, Siting and Characterization Studies in the Western and Midwestern United States: for United States Air Force, Ballistic Missile Office, and the Southern Region Geologic Project Manager (SRGPM) in Mississippi, Louisiana, Texas, Georgia, South Carolina, Virginia, Maryland for Office of Nuclear Waste Isolation (ONWI) and Office of Crystalline Repository Development (OCRD). These projects were national in scope and involved most geologic, geotechnical, geophysical, environmental, and hydrologic disciplines

Converse Consultants (formerly Converse, Davis and Associates) [1970-1974]: Staff and Project Geologist

Staff and Project Geologist: Conducted and supervised investigations in southern, central, and northern California, southern Nevada, and eastern Washington. Numerous earthquake and fault risk studies were performed for earth dams and reservoirs, high-and low-rise buildings, hospitals and schools, proposed nuclear power plant sites, water storage tanks, and large-diameter pipelines. Landslide and other slope failure studies were performed in rock and soil terrains. Offshore studies planned and conducted include coastal geophysical (seismic reflection, side scan sonar, fathometer), sampling and scuba investigations near Monterey and Dana Point, California.

PROFESSIONAL ORGANIZATIONS

Member Association of Engineering Geologists, National and Southern California Sections

EXPERIENCE ON SEVERAL REPRESENTATIVE CEQA/NEPA PROJECTS CONSIDERING THE GEOLOGY AND SOILS TECHNICAL ISSUE AREA (2006 to Present):

1. Lake Cachuma Final Environmental Impact Statement Document and Related Studies in Consideration of Modifications to Water Rights Permit for the Cachuma Project, Santa Barbara County, California (2009-Present)
2. SCE Eldorado-Ivanpah 230 kV Transmission Line Proponents Environmental Assessment (PEA)—Geology, Mineral Resources, and Soils, and Hydrology and Water Quality Sections, California and Nevada (2008-2010)
3. Proposed Travertine Properties Master Planned Community EIR, Torres-Martinez Reservation and Oasis/Salton Sea Area of Riverside and Imperial Counties, California (2009)
4. Santa Barbara Botanic Gardens EIR, Santa Barbara, Santa Barbara County, California (2006-2009)
5. Sakaida & Sons Surface Mine Project EIR near Pacoima Canyon, Los Angeles County, California (2008)
6. Fault Investigation Review to Support an EIR for the 2935± Acre AERA-Master Planned Community, near Diamond Bar, Counties of Los Angeles and Orange, California (2007-2008)
7. SCE Fogarty Substation Fogarty Substation Project EIR, City of Lake Elsinore, Riverside County, California (2006-2008)
8. Citrus Village Project Vesting Tentative Tract Map and Final Development Plan EIR, 7388 Calle Real, Goleta, Santa Barbara County, California (2007)
9. Hsi Lai Buddhist Community Center 20,000-square-foot Multipurpose Facility MND, Hacienda Heights, Los Angeles County, California (2007)
10. Vulcan Materials Company (Vulcan) Durbin Quarry EIR, Reliance I Quarry, and Reliance II Landfill, Irwindale, California (2006)

SUMMARIES OF THREE RELEVANT PROJECTS

Fault Rupture Study Area Report for the Canoga Transportation Corridor Lassen Street/Railroad Overcrossing, Chatsworth, California, for Diaz-Yourman & Associates (2009): The Canoga Transportation Corridor Project Draft EIR identified the Fault Rupture Study Areas, an area where fault rupture potential exists, within the project area, but did not identify the underlying basic source data for the fault locations within the FRsAs. Wilson Geosciences Inc. prepared a study to identify the potential for fault rupture through the grade separation area (bridge site) within the FRSA. The study determined if there was evidence for a fault or faults within the bridge site using (a) geologic and topographic map analysis, (b) analysis of information from multiple geotechnical borings, and (c) geophysical data (seismic refraction and electrical resistivity) collected within and near the proposed bridge location. Evidence for Holocene warping of geologic features is also considered. It was determined that no evidence existed within the grade separation area for active folds or faults.

Eldorado-Ivanpah 230 kV Transmission Line Proponents Environmental Assessment (PEA)—Geology, Mineral Resources, and Soils Section, near Primm, Nevada along the California-Nevada Border for Southern California Edison (2008-2010): Wilson Geosciences Inc. prepared the Geology, Mineral Resources, and Soils, and the Hydrology and Water Quality sections of the PEA for the Transmission Line extending across the California-Nevada border. These sections formed the basis for the Draft and Final EIR/EIS, which required substantial detail describing the existing environment, potential impacts of the primary and alternative routes, applicant proposed measures to reduce potential impacts, and necessary mitigation measures. Mr. Wilson performed all of the collection and compilation of existing data, conducted an extensive field reconnaissance, prepared all report text and graphics, the later in coordination with the Southern California Edison (SCE) GIS department. Mr. Wilson's report sections were reviewed by SCE staff, management, and legal department, by the SCE editorial consultant, and by the SCE engineering geologist.

Technical Review Opinion Letter Considering a Draft Technical Memorandum and Other Materials Related to Geologic Hazards and Hydrogeologic Conditions at the Proposed Anaheim Regional Transportation Intermodal Center (ARTIC) - Phase 1 Project Site, Orange County, California for Diaz-Yourman & Associates (2010): Wilson Geosciences Inc. conducted a technical review and prepared a second opinion regarding the technical analyses and conclusions from the Kleinfelder West, Inc. (KWI) specifically related to fill materials placed in a previous quarry identified by KWI within the project site. These conclusions address the probable lateral and vertical extent of quarry fill, groundwater levels, geologic hazards, and the location of river alluvium in the area of the proposed buildings. In addition, information was provided for the El Modeno fault. Borings, CPT soundings, vintage topographic maps, and aerial photographs were utilized to evaluate the KWI findings and to make recommendations, e.g., changes to the lateral extent and vertical thickness of the unsuitable quarry fill materials and alluvium beneath the site,

EDUCATION

Advanced Courses in Environmental Engineering, UCLA, 1989-1991
M.S. Engineering (Geotechnical), University of Ohio, 1987
B.S. (Civil Engineering), Nottingham University-England, 1983
Advanced Level in Mathematics & Physics, Swindon College-England, 1980.

REGISTRATIONS

Geotechnical Engineer, California, GE#2308
Professional Engineer (Civil), California, CE#48989

PROFESSIONAL HISTORY

GeoDynamics, Inc., Thousand Oaks, Principal Engineer, 2005-present
Bing Yen & Associates, Inc., Camarillo, Principal Engineer, 2000-2005
Leighton and Associates, Inc., Westlake Village, Senior Project Engineer, 1999-2000
Gorian & Associates, Inc., Senior Project Engineer, 1997-1999
Burns & McDonnell, Senior Project Engineer, 1994-1997
Gorian & Associates, Inc., Senior Project Engineer, 1989-1994
Ensotech, Inc., Senior Project Engineer, 1987-1989

AFFILIATIONS

American Society of Civil Engineers (ASCE), Member

REPRESENTATIVE EXPERIENCE

Mr. Abdel-Haq has over 25 years of professional experience in geotechnical engineering in the State of California, and 3 years of experience on projects throughout the United States. His project experience includes field explorations, laboratory testing, engineering analyses, and construction observations, of various types of projects including hillside land development, commercial and industrial buildings, landslides, theme parks, schools, water tanks, airport facilities, wastewater treatment plants, transmission and distribution lines, and power generator facilities. Mr. Abdel-Haq has managed multiple projects with an emphasis on client and project management particularly on meeting project schedules and budgets.

Mr. Abdel-Haq has performed geotechnical engineering reviews for over 8 years for various projects for the cities of Simi Valley, Calabasas, Agoura Hills, Moorpark, Hidden Hills and Malibu. He also performed third party reviews of projects for private consultants. He has also served as a geotechnical engineer on several public work projects for municipalities in Southern California, and other parts of the United States including City of Laramie Waste Water Treatment Plant, City of Laramie-Wyoming, clay liner design for lime storage ponds, City of Liberty Waste Water Treatment Facility, Liberty-Missouri, and Doris Drain Channel Improvement, Ventura County, California.

He evaluated the potential for liquefaction and associated hazards at numerous projects including large tract home developments where high liquefaction potential is known to exist, or is suspected. Projects included Simi Village, Tracts 4923, 5164 and 5113 (Simi Valley, California), North Shores at Mandalay Bay, Tract 4424 (Oxnard, California), Tract 44986 (Santa Clarita, California), Mission Bell Plaza Shopping Center and Tracts 5147 (Moorpark, California).

He provided extensive slope stability analyses for hillside developments that included landslides and required mitigation measures to comply with regulatory agencies requirements. One of the largest projects he managed and designed was Tract 46018, Plum Canyon area in the City of Santa Clarita, California. This project involved grading over 11 million cubic yards of soil as part of two deep landslide stabilization plans. Mr. Abdel-Haq has worked on other tract home developments that required landslide

analyses and mitigations efforts including Tract 48307 in Palmdale, California, Tract 5164 in Simi Valley, California, and Tract 35998 in Los Angeles County, California.

Mr. Abdel-Haq performed foundation investigations for a wide variety of projects including industrial buildings, Multi-story buildings and parking garages, bridges, water tanks, transmission and distribution, power lines and power substations, retaining walls, several rides at Six Flags Magic Mountain, Navy Facilities, evaluated foundation settlement due to noise vibration (Hush House), and airport facilities.

PUBLICATIONS

Abdel-Haq, A and Hryciw, R. D. (1998). "Ground Settlement in Simi Valley following the Northridge Earthquake." Journal of Geotechnical and Geoenvironmental Engineering, Vol. 124, No. 180-89.

STATEMENT OF QUALIFICATIONS

**GEOTECHNICAL AND ENVIRONMENTAL
CONSULTING SERVICES**



CONTACT INFORMATION

80 Long Court, Suite 2A
Thousand Oaks, California 91360

Tel: (805) 496-1222

Fax: (805) 496-1225

www.geodynamics-inc.com

January 2013

GeoDynamics Inc. (GDI) is a professional consulting firm with highly experienced staff specializing in geotechnical engineering services. The core group of staff within our firm is dedicated to providing our clientele with the professionalism that each project deserves. Our key personnel are dedicated to the idea that even the most difficult challenges can be solved through perseverance, hard work, industry experience, companionship, adaptability, and an attitude that each client is the “most important”. Our staff is determined to provide each client with sound engineering geology and geotechnical services by doing things the right way.

The introduction to our Statement of Qualifications (SOQ) summarizes our line of professional services, our mission and values. Section 2 describes our qualifications, experience, and key personnel. GDI’s geotechnical services and capabilities are described in Section 3.

Overview of GeoDynamics, Inc.

GDI is a southern California based company formed in 2005 by highly experienced principals in the practice of geotechnical engineering in general, and peer-review of geotechnical/engineering geologic reports in particular. Our primary goal is to provide high quality geotechnical consulting services to both our private and public sector based clientele. Our office is confident and proven in our abilities to work effectively and efficiently together on individual project needs. Our firm eagerly awaits the opportunity to provide you a focused approach to individual project needs. Our staff blends expertise, experience, and innovation in the geotechnical engineering field. Professional members consist of geologists, engineers, and field technicians. GDI’s target clientele includes design firms, water/wastewater authorities, local municipalities, State and Federal governmental agencies, and law firms.

GDI’s Mission and Values

GDI is committed to satisfying the needs and requirements of our clients, to maintaining the highest technical standards, and to excellence in our work product. Our success is measured by our ability to meet these commitments. Our business model is based on satisfied customers as a result of our commitment to quality, proven performance and the integrity of our practice. We look to establish long-term relationships with our clients by providing excellent technical services within the framework of a management approach that facilitates cost control and timely delivery.

GDI’s growth as a professional consulting firm will be based on a philosophy that emphasizes *quality* and *thoroughness*. We strive to serve clients who understand that *cost effective* consulting services are those that add value and cost savings to their projects rather than those that are the lowest cost.

GDI emphasizes a high professional standard for the professional and technical staff and have focused on perfecting and expanding our capabilities and experience in our primary practice areas. Our staff is known for their broad scope of knowledge associated with sophisticated projects. We are confident in our skills and our capabilities, and are committed to providing all of our clients with high quality, cost-effective services.

Professional Qualifications

All our staff are registered professionals. Most of our staff have advanced degrees in geotechnical disciplines. The practical experience of our professionals ranges up to 35 years, with an average experience level of over 20 years. Professional qualifications, academic background, registration and experience of key GDI personnel are presented as Table 1. Detailed resumes for key personnel are included in Appendix A.

Professional Development

Our staff is encouraged to take part in on-going professional development through individual efforts in self-improvement and participation in professional activities. GDI and its professionals are members of several professional organizations, including:

- ◆ American Society of Civil Engineers (ASCE)
- ◆ American Society of Foundation Engineers (ASFE)
- ◆ American Public Works Association (APWA)
- ◆ Association of Engineering Geologists (AEG)
- ◆ American Institute of Professional Geologists
- ◆ City and County Engineers Association (CCEA)
- ◆ Coast Geological Society (CGS)
- ◆ American Geophysical Union

TABLE 1
Qualifications and Experience Matrix for Key Personnel

PhD, Geological Science
M.S., Geological Science

NAME	TITLE	REGISTRATION(S)	EDUCATION	AREA(S) OF SPECIALIZATION	YEARS OF EXPERIENCE
Ali Abdel-Haq	Principal Engineer	Registered Civil Engineer Geotechnical Engineer	M.S., Geotechnical Engineering B.S., Civil Engineering	Geotechnical Engineering Municipal Review	29
Christopher J. Sexton	Principal Geologist	Certified Engineering Geologist Registered Geologist	M.S., Geology B.S., Geology	Engineering Geology Municipal Review	29
Franklin Fong	Associate Engineer	Registered Civil Engineer Geotechnical Engineer	M.S., Geotechnical Engineering B.S., Civil Engineering	Geotechnical Engineering Municipal Review	37
Larry Gurrola	Associate Geologist	Registered Geologist	PhD, Geological Science M.S., Geological Science B.S., Geological Science	Engineering Geology Forensic Studies Municipal Review	13
Bill Shofner	Senior Field Technician	California Registered Environmental Assessor	B.S., Geology	Soil Testing Grading Observation	21



provides comprehensive geology, geotechnical engineering and earth science services that span all phases of projects – from feasibility-level evaluations through the investigation, design, and construction phases. The following sections summarize GDI’s services and capabilities in our primary practice areas. Selected project descriptions are included in Appendix C for your review.

Geotechnical Per-Review Services

GDI specializes in providing engineering geology, geotechnical engineering and seismic hazard evaluation peer-review services. Our staff has provided this line of services for many years on behalf of over a dozen cities and counties in southern California. During that time we assisted numerous cities to establish effective peer-review processes and guidelines for technical reports. We take pride in assisting municipal agencies in their growing and changing roles of responsibility and sophistication.

From assisting in the establishment of policies and procedures to providing contract staff, designing forms and recommending fees, GDI is experienced and capable in performing design, review, and plan check services, participating in City Council and Planning Commission meetings, and serving as technical experts for litigation. We have a good knowledge of national, state and local code requirements. We are familiar with the evolution of the California Building Code (CBC), including significant geotechnical changes in the recently published 2010 version

Geotechnical Engineering Analysis and Design

GDI offers exceptionally strong analytical capabilities, in addition to an acquired extensive



hands-on project experience. Our staff has experience with a range of analytical computer programs used to assess conventional slope stability, settlement, and shoring-related routines, to a wide range of sophisticated linear and non-linear finite element and finite difference based computer programs for static and seismic soil/structure interaction analysis; static and dynamic response of deep and shallow foundations, embankments, or natural slopes; earthquake induced liquefaction potential and stability analysis.

GDI’s capabilities in some of our major practice areas are briefly summarized in the following sections. Listings and descriptions of some of the projects we have performed are presented in Section Four.

Geotechnical Design Services

GDI provides a variety of geotechnical design services that range from small commercial developments to large civil engineering and infrastructure projects such as bridges, tunnels, pipelines or transportation facilities. Our geotechnical design services encompass:

- ◆ Design recommendations for: shallow, deep, ring and mat foundation systems, retaining and revetment walls, and pipelines, tunnels and other buried structures;
- ◆ Roadways and pavements;
- ◆ Design of shoring or tieback retention systems;
- ◆ Design and evaluation of earth structures;
- ◆ Earthwork recommendations and specifications;
- ◆ Review of construction specifications, and;
- ◆ Ground improvement/modification techniques and specifications.

Slope Stability, Landslide Evaluation & Mitigation

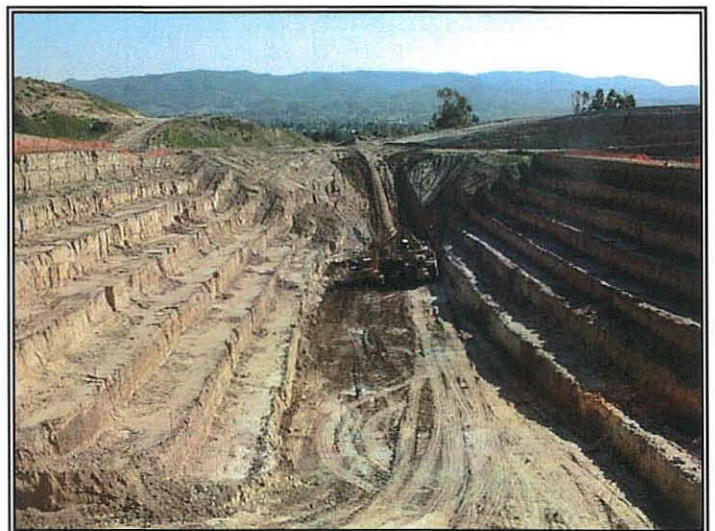
GDI staff has extensive experience in geologic evaluation and geotechnical analysis and design projects related to manmade and natural slopes and landslides. Our capabilities and services in this practice area include the following:

- ◆ Field investigation including geologic reconnaissance mapping
- ◆ Subsurface investigation including downhole logging and borehole geophysical methods
- ◆ Slope stability and deformation analyses using appropriate computer models
- ◆ Identification and evaluation of causative mechanisms
- ◆ Design and analysis of mitigation measures
- ◆ Installation and monitoring of instrumentation systems
- ◆ Implementation of remedial designs
- ◆ Monitoring and long-term maintenance

Seismic and Earthquake Engineering

GDI provides evaluations of seismic and earthquake hazards, provides experienced evaluations of damage, and offers cost-effective solutions to problems. GDI professionals have authored or co-authored technical papers or research reports related to seismic and geotechnical earthquake engineering.

GDI has the experience and capability to perform fault investigations, site and subsurface characterization of dynamic soil properties, laboratory testing, and engineering analysis necessary to evaluate the potential for earthquake hazards such as:



- ◆ Fault Rupture Studies
- ◆ Ground Shaking Potential
- ◆ Site (Soil) Response
- ◆ Soil-Structure Interaction
- ◆ Foundation Response
- ◆ Liquefaction
- ◆ Bearing Failure
- ◆ Lateral Spreading
- ◆ Retaining Wall Stability
- ◆ Earthquake-Induced Settlement
- ◆ Landslides
- ◆ Slope Deformation
- ◆ Dam And Dike Stability

GDI maintains a suite of computer analysis tools, including proprietary research, and commercial computer software, that can be used to evaluate the potential for seismic hazards, analyze potential effects of seismic hazards and evaluate cost-effective mitigation alternatives.



GDI professionals are experienced in providing recommendations and project specifications for soil improvement and other measures to mitigate seismic and earthquake hazards. Our experience includes evaluations for stone columns, dewatering, over-excavation, in situ soil mixing, grouting, soldier pile construction and deep dynamic compaction.

Municipal Services

GDI specializes in providing engineering geology, geotechnical engineering and seismic hazard evaluation peer-review services. Our staff has provided this line of services for many years on behalf of over a dozen cities and counties in southern California. During that time we assisted numerous cities to establish effective peer-review processes and guidelines for technical reports. We take pride in assisting municipal agencies in their growing and changing roles of responsibility and sophistication.

From assisting in the establishment of policies and procedures to providing contract staff, designing forms and recommending fees, GDI is experienced and capable in performing design, review, and plan check services, participating in City Council and Planning Commission meetings, and serving as technical experts for litigation. We have a good knowledge of national, state and local code requirements. We are familiar with the evolution of the California Building Code (CBC), including significant geotechnical changes in the recently published 2010 version





GDI also offers geotechnical investigation, design, and construction-related services to the engineering or public works departments of our municipal clients. We have provided services for new municipal buildings; wastewater treatment facilities; stormwater facilities; roadway repair, construction, or realignment; landslide analysis and remediation; slope repairs; and emergency evaluation services (i.e., earthquakes, landslides, floods, and landfills)

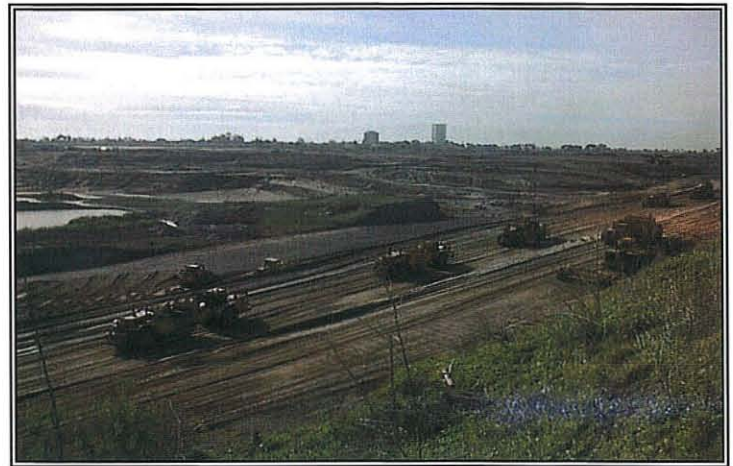
Table 2 provides contact information for City representatives that we deal with on a regular basis. The municipal list is attached as page 10 of this SOQ, preceding the list of resumes for key individuals working for our firm.

Construction-Related Services

GDI provides on-site and off-site support geotechnical services during construction phases. These services are normally provided on behalf of the owner or designer and include observation, documentation, field testing, and certification for grading and earthwork operations, excavation shoring, dewatering systems, pile jetting and driving, drilled shaft installation, site remediation, stone columns, grouting, soil improvement, and the installation and monitoring of a wide array of geotechnical instrumentation.

Geotechnical Instrumentation & Monitoring

GDI personnel provide expertise in a broad range of field instrumentation services. Our instrumentation capabilities are a direct result of our involvement in (1) construction monitoring; (2) post-construction performance monitoring; (3) forensic investigations and monitoring; and (4) research and development projects.



Forensic Engineering & Litigation Support

Over the years, our staff has developed experience in the area of forensic engineering that includes the verification of problems, identification of the source(s) of these problems, and the development and implementation of mitigative solutions. GDI staffs have experience in providing forensic engineering services on a wide variety of civil engineering projects involving building distress investigations, landslide investigations, and, earthquake-induced damage to buildings.

REPRESENTATIVE PROJECT EXPERIENCE

GDI's key personnel have extensive experience in geotechnical design and construction on a wide variety of civil engineering projects within the public works, commercial, industrial, and private sectors. Our project experience also includes forensic geotechnical studies for residential and commercial properties as well as larger civil works such as dams and roadways.

This section of our SOQ provides a listing of GDI's experience on projects related to the following practice areas and/or project types:

- ◆ Water Supply and Wastewater Pipelines and Facilities
- ◆ Municipal Services
- ◆ Landslides and Slope Stability Studies
- ◆ Dams and Reservoirs
- ◆ Commercial Development and Redevelopment
- ◆ Transportation
- ◆ Seismic and Geotechnical Earthquake Engineering
- ◆ Geotechnical input for landfill design and maintenance

Please refer to individual resumes following page 10 of the SOQ for other individual project experience.

TABLE 2 – 2013 MUNICIPAL CLIENT LIST
Geotechnical Peer Review and Related Services

MUNICIPAL CLIENT	CONTACT	TELEPHONE	GEOTECHNICAL SERVICES
CITY OF ROSEMEAD 8838 East Valley Boulevard Rosemead, California	Sheri M. Bermejo <i>Principal Planner</i>	• (626) 569-2144	• As-Needed Geotechnical Peer Review
CITY OF AGOURA HILLS 30001 Ladyface Court Agoura Hills, CA 91301	Mike Kamino <i>City Engineer</i>	(818) 597-7321	<ul style="list-style-type: none"> • Primary Geotechnical Peer Review • Specialty Geotechnical Design Projects • Grading and Construction Observations • Natural Hazard Emergency Response • City Representative at Project Meetings
CITY OF SIMI VALLEY 2929 Tapo Canyon Rd Simi Valley, CA 93063	Chris Oberender <i>Principal Engineer</i>	(805) 583-6849	<ul style="list-style-type: none"> • Primary Geotechnical Peer Review • Specialty Geotechnical Design Projects • Grading and Construction Observations • Natural Hazard Emergency Response • City Representative at Project Meetings • Forensic Work
CITY OF HIDDEN HILLS c/o Charles Abbott & Assoc. 6165 Spring Valley Rd. Hidden Hills, CA	Dirk Lovett <i>City Engineer</i>	(818) 888-9281	<ul style="list-style-type: none"> • Primary Geotechnical Peer Review • Specialty Geotechnical Design Projects • Grading and Construction Observations • Natural Hazard Emergency Response • City Representative at Project Meetings
CITY OF CALABASAS 100 Civic Center Way Calabasas, CA 91302	Maureen Tamuri <i>City Dev. Manager</i>	(818) 224-1701	• Specialty Geotechnical Design Projects
CITY OF SANTA CLARITA 23920 Valencia Blvd. Santa Clarita, CA 9-355-2196	Trolis Niebla <i>Associate Engineer</i>	(661) 255-4947	<ul style="list-style-type: none"> • Primary Geotechnical Peer Review • Specialty Geotechnical Design Projects • Grading and Construction Observations • Natural Hazard Emergency Response • City Representative at Project Meetings
CITY OF CAMARILLO 601 Carmen Drive Camarillo, CA 93010	Tali Tucker <i>City Engineer</i>	(805) 388-5343	<ul style="list-style-type: none"> • Secondary Geotechnical Peer Review • Specialty Geotechnical Design Projects • City Representative at Project Meetings
CITY OF PALMDALE 38250 Sierra Highway Palmdale, CA 93550	Michael Mischel <i>City Engineer</i>	(661) 267-5272	• Primary Geotechnical Peer Review
COUNTY OF SANTA BARBARA 123 East Anapamu Street Santa Barbara, CA 93101-2058	Anne Almy <i>Supervising Planner Planning and Development</i>	(805) 568-2053	<ul style="list-style-type: none"> • Geotechnical Peer Review • Geotechnical Design Projects
CITY OF SANTA PAULA 970 Ventura Street Santa Paula, California 93060	Jon Turner	(805) 524-4418	<ul style="list-style-type: none"> • Geotechnical Peer Review • Geotechnical Consulting Services
VENTURA REGIONAL SANITATION DISTRICT Noland Road Landfill	Mark Lawler	(805) 658-4642	<ul style="list-style-type: none"> • Geotechnical Evaluation • Grading & Maintenance Geotechnical Recommendations



APPENDIX A

KEY PERSONNEL RESUMES

EDUCATION

Advanced Courses in Environmental Engineering, UCLA, 1989-1991
M.S. Engineering (Geotechnical), University of Ohio, 1987
B.S. (Civil Engineering), Nottingham University-England, 1983
Advanced Level in Mathematics & Physics, Swindon College-England, 1980.

REGISTRATIONS

Geotechnical Engineer, California, GE#2308
Professional Engineer (Civil), California, CE#48989

PROFESSIONAL HISTORY

GeoDynamics, Inc., Thousand Oaks, Principal Engineer, 2005-present
Bing Yen & Associates, Inc., Camarillo, Principal Engineer, 2000-2005
Leighton and Associates, Inc., Westlake Village, Senior Project Engineer, 1999-2000
Gorian & Associates, Inc., Senior Project Engineer, 1997-1999
Burns & McDonnell, Senior Project Engineer, 1994-1997
Gorian & Associates, Inc., Senior Project Engineer, 1989-1994
Ensotech, Inc., Senior Project Engineer, 1987-1989

AFFILIATIONS

American Society of Civil Engineers (ASCE), Member

REPRESENTATIVE EXPERIENCE

Mr. Abdel-Haq has over 25 years of professional experience in geotechnical engineering in the State of California, and 3 years of experience on projects throughout the United States. His project experience includes field explorations, laboratory testing, engineering analyses, and construction observations, of various types of projects including hillside land development, commercial and industrial buildings, landslides, theme parks, schools, water tanks, airport facilities, wastewater treatment plants, transmission and distribution lines, and power generator facilities. Mr. Abdel-Haq has managed multiple projects with an emphasis on client and project management particularly on meeting project schedules and budgets.

Mr. Abdel-Haq has performed geotechnical engineering reviews for over 8 years for various projects for the cities of Simi Valley, Calabasas, Agoura Hills, Moorpark, Hidden Hills and Malibu. He also performed third party reviews of projects for private consultants. He has also served as a geotechnical engineer on several public work projects for municipalities in Southern California, and other parts of the United States including City of Laramie Waste Water Treatment Plant, City of Laramie-Wyoming, clay liner design for lime storage ponds, City of Liberty Waste Water Treatment Facility, Liberty-Missouri, and Doris Drain Channel Improvement, Ventura County, California.

He evaluated the potential for liquefaction and associated hazards at numerous projects including large tract home developments where high liquefaction potential is known to exist, or is suspected. Projects included Simi Village, Tracts 4923, 5164 and 5113 (Simi Valley, California), North Shores at Mandalay Bay, Tract 4424 (Oxnard, California), Tract 44986 (Santa Clarita, California), Mission Bell Plaza Shopping Center and Tracts 5147 (Moorpark, California).

He provided extensive slope stability analyses for hillside developments that included landslides and required mitigation measures to comply with regulatory agencies requirements. One of the largest projects he managed and designed was Tract 46018, Plum Canyon area in the City of Santa Clarita, California. This project involved grading over 11 million cubic yards of soil as part of two deep landslide stabilization plans. Mr. Abdel-Haq has worked on other tract home developments that required landslide

analyses and mitigations efforts including Tract 48307 in Palmdale, California, Tract 5164 in Simi Valley, California, and Tract 35998 in Los Angeles County, California.

Mr. Abdel-Haq performed foundation investigations for a wide variety of projects including industrial buildings, Multi-story buildings and parking garages, bridges, water tanks, transmission and distribution, power lines and power substations, retaining walls, several rides at Six Flags Magic Mountain, Navy Facilities, evaluated foundation settlement due to noise vibration (Hush House), and airport facilities.

PUBLICATIONS

Abdel-Haq, A and Hryciw, R. D. (1998). "Ground Settlement in Simi Valley following the Northridge Earthquake." Journal of Geotechnical and Geoenvironmental Engineering, Vol. 124, No. 180-89.

EDUCATION

M. S., Geological Sciences, California State University, Los Angeles, 1990
B. S., Geological Sciences, California State University, Northridge, 1983
Numerous Post-Graduate University Courses and Seminars

REGISTRATION

Registered Geologist, California, #4612
Registered Geologist, Idaho, #681
Certified Engineering Geologist, California, #1441
Certified Engineering Geologist, Oregon, #1148
Certified Professional Geologist #9198

PROFESSIONAL HISTORY

GeoDynamics, Inc., Thousand Oaks, Principal Geologist, 2005-present
Bing Yen & Associates, Inc., Camarillo, Senior Geologist, 1999-2005
Southwestern Engineering Geology, Fillmore, Owner, 1993-present
California State University, Los Angeles, Assistant Professor, 1994
West Coast Geotechnical, Westlake Village, Chief Geologist, 1991-1993
Leighton & Associates, Inc., Westlake Village, Project Geologist, 1990-1991
Allan E. Seward Engineering Geology, Inc., Newhall, Senior Project Geologist,
1983-1990
MESA², Inc., Marine and Environmental Sciences, Northridge, Staff Geologist,
1981 - 1982

AFFILIATIONS

Member, Association of Engineering Geologists
Member, American Geophysical Union
Member, American Institute of Professional Geologists
(Newsletter Editor 1994 and 1997 through 1999; President-elect, California
Section, 1994)
(President, California Section, 1995)

REPRESENTATIVE EXPERIENCE

Christopher Sexton, RG, CEG, will serve as a Reviewing Engineering Geologist. Mr. Sexton has 30 years of experience as an engineering geologist. As an independent consultant, Mr. Sexton has provided engineering, geology support to many geotechnical firms prominent in the southern California area. His unique experience allows first-hand familiarity with numerous different philosophies and approaches to the tasks inherent in completing geologic studies. During his career, Mr. Sexton has served as the principal investigator of landslides, active faults, studies of sea-cliff retreat rates, detailed assessments of development plans ranging from single lots to tracts with thousands of homes, slope instrumentation, road alignments, and in-grading slope stabilization. Mr. Sexton has extensive experience as a reviewing geologist. His extensive experience both as a consultant and as a reviewer fosters an ability to negotiate difficult review situations.

PUBLICATIONS

"An Overview of the Geology of the Soledad Basin, Northern Los Angeles County, California"; AEG Field Trip Guidebook; 1990.

"Investigation of a Low-Angle, Dip-Component, Translational Landslide, Haskell Canyon, Los Angeles County, California"; Proceedings of the 35th Annual Meeting of the Association of Engineering Geologists, Oct. 2-9, 1992.

"A Perspective on Standard of Care"; AEG News; Volume 41, Number 2; Spring 1998.

"Common Pitfalls in Reaching Geologic Conclusions for Small Residential Developments"; Program with Abstracts; 42nd Annual Meeting of the Association of Engineering Geologists; Presented September 27, 1999.

"Things Your Mother Never Told You: Post-Academic Skills and Knowledge Necessary to Survive as an Engineering Geologist"; Program with Abstracts; 43rd Annual Meeting of the Association of Engineering Geologists; Presented September 24, 2000.

"The California Alquist-Priolo Earthquake Fault Zoning Act – Challenges in Implementing State Policy at the Local Level"; Program with Abstracts; 50th Annual Meeting of the Association of Engineering Geologists; presented September 28, 2007

"Implementing the California Earthquake Fault Zoning Act– A Proposal for Change"; Environmental and Engineering Geoscience; February, 2008; Vol. 14, No. 1

"Newly discovered faults associated with ground cracks of the 1971 San Fernando earthquake"; Program with Abstracts, Seismological Society of America Annual Meeting, April 8-10, 2009.

From: kenhixon@pacbell.net [mailto:kenhixon@pacbell.net]
Sent: Thursday, December 14, 2017 9:35 PM
To: Peter Burgis
Cc: James O'Sullivan
Subject: SCH No. 2016081014, LACMA Building for the Permanent Collection

Dear Mr. Burgis,

On behalf of the Board of Directors of the Miracle Mile Residential Association attached below is a letter with our comments on the LACMA DEIR [SCH No. 2016081014, LACMA Building for the Permanent Collection, 5905 Wilshire Blvd. LA CA 90036].

Please acknowledge receipt of this letter via email.

Thank you,

Ken

Ken Hixon, Vice President
Miracle Mile Residential Association
kenhixon@pacbell.net
323-935-7227



December 14, 2017

Miracle Mile Residential Association
James O'Sullivan, President
P.O. Box 361295
Los Angeles, CA 90036-9495
Email: james.osullivan@miraclemilela.com

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012
Fax: (213) 626-7827
Via E-Mail: pburgis@ceo.lacounty.gov

**Re: SCH No. 2016081014, LACMA Building for the Permanent
Collection, 5905 Wilshire Blvd. LA CA 90036**

Dear Mr. Burgis

Thank you for the opportunity to comment on this DEIR on behalf of the Board of Directors of the Miracle Mile Residential Association (MMRA).

This project is enormously complex, not only because it bridges Wilshire Boulevard, but because it also bridges legal jurisdictions between Los Angeles County and the City of Los Angeles. The project appears to “cherry pick” jurisdictions to its advantage. The end result of this artful ambiguity is that the DEIR frequently implies two contradictory positions: that neither County or City rules apply to aspects of this project, but – on the other hand – if the rules *do* apply the project meets them.

Although the existing historic LACMA campus is on property owned by the County of Los Angeles, its western portion (known as LACMA West) is situated on property under the jurisdiction of the City of Los Angeles – as is all of the surrounding commercial and residential areas, including the Spaulding Lot which will anchor the southern leg of the project. The project proposes to exploit air rights over Wilshire

Boulevard which belong to the City of Los Angeles as well as construct a new parking garage on property located in the City, too. Common sense would have it that the rules and regulations of the City of Los Angeles should prevail over those of the County of Los Angeles on this project.

For these reasons the MMRA firmly believes that the project must comply with the Los Angeles Municipal Code (LAMC), the City's Framework Element, the Wilshire Community Plan, and the Miracle Mile Community Design Overlay (CDO); hence, this DEIR must be recirculated with the City of Los Angeles as the lead agency.

Despite this lack of clarity on which rule book this project plays by, there are issues and questions raised in the DEIR that we would like addressed.

The construction of a second Metro Purple Line Subway entrance on the north side of Wilshire Boulevard must be included in this project:

The MMRA strongly concurs with METRO that the DEIR should have included approvals for a second Metro Purple Line Subway entrance on the north side of Wilshire Boulevard, as requested by Metro in their scoping letter dated September 28, 2016 – a request that was not addressed in the DEIR.

The MMRA also raised this matter in our scoping letter dated August 25, 2016.

The MMRA unsuccessfully opposed LACMA's efforts to shift the Wilshire/Fairfax subway station from that actual intersection one block east to Orange Grove Drive and Wilshire Boulevard. To counter arguments against relocating the subway station LACMA made repeated public promises to construct (at their expense) a second entrance to the station on the north side of Wilshire Boulevard. The absence of this additional subway entrance in the DEIR is conspicuous and suggests that LACMA intends to renege on this promise.

The importance of including of a second subway entrance as part of this project is made readily apparent in METRO's scoping letter:

With a greater number of visitors coming to LACMA as a result of the subway and the new buildings and facilities, Metro notes that the LACMA Project Description does not include the environmental clearance of a second Metro Purple Line Subway entrance on the north side of Wilshire Boulevard. In 2012, LACMA publically stated the museum's intention to "commit, subject to the approval of our Board of Trustees, to raising the funds necessary to pay for the construction of a second entry portal to be located on the north side of Wilshire Boulevard, directly

across from the Orange Grove entrance.” LACMA further stated, “It is anticipated that this LACMA entry portal will be constructed concurrent with the Wilshire/Fairfax subway station and would not result in any increase in cost to the project.” This is evidenced in the staff report and presentation to the Metro Board of Directors and LACMA’s letter to Metro dated April 16, 2012 (all three documents are attached). Considering the breadth and timing of the changes to the LACMA campus anticipated in the Notice of Preparation, it is strongly recommended that the DEIR include the second, northern Purple Line Fairfax Station entrance previously committed to by LACMA for further evaluation and consideration.

Existing ambient noise levels:

According to the DEIR “existing ambient noise levels were monitored at the six representative off-site receptor locations in the vicinity of the Project Site. The baseline noise monitoring program was conducted on November 16–17, 2016 using a Quest Technologies Model 2900 and a Larson-Davis Model 870 Integrating/Logging Sound Level Meter.” [Page IV.I-14]

LACMA must clarify whether this monitoring program was implemented before or after METRO began operation of the ventilation system at the Odgen staging yard of for the underground construction of Wilshire/Fairfax subway station. This ventilation system operates 24 hours per day and has greatly increased ambient noise levels in the residential areas near the Odgen staging yard.

If the noise monitoring program occurred after the activation of METRO’s construction ventilation system it would misrepresent the ambient noise levels at off-site receptor locations by skewing them higher than what would be considered “normal” levels as the noise emanating from the ventilation system will cease following completion of the subway station.

Although the DEIR states that the “cumulative construction noise impacts associated with the Project and the Metro Purple Line Extension Project would be considered significant” [Page IV.I-49] it provides no substantial explanation of how the noise levels from the Odgen subway construction staging yard factored into measuring the noise impacts that would be generated by the construction and/or operation of the LACMA project. Further clarification is required.

Outdoor Amplified Sound Curfew:

The Petersen Museum and the Academy Museum have agreed that there shall be no outdoor amplified sound and/or music allowed at their facilities after 10 p.m. The

Academy Museum also agreed to periodic field inspections and to post a museum telephone number on their website and otherwise make it available for complaints during or in association with evening special events. They also agreed to keep records of any complaints. In addition, the Academy Museum specified that their sound engineers/technicians will calibrate the sound system/speaker arrangement prior to each outdoor event. [*Academy Museum FEIR, p. 4-22.*]

An outdoor amplified sound curfew for LACMA's project was referenced in the MMRA's scoping letter dated August 25, 2016, yet it was not addressed in the DEIR. LACMA must indicate whether or not they are willing to implement a 10 p.m. outdoor amplified sound curfew and noise monitoring practices.

Spaulding Lot:

Mitigating the impact of locating the southern anchor of the museum on the Spaulding parking lot next door to the Wilshire Galleria condominium complex and in close proximity to residential buildings that are part of the Miracle Mile Historic Preservation Overlay Zone is of paramount importance to the MMRA.

Prohibiting special and outdoor events at the Spaulding Lot is critical. The DEIR states that "No outdoor event programming is *anticipated* on the Spaulding Lot." The use of the word "anticipated" creates a loophole to allow such events in the future.

In fact, in its analysis of On-Site Stationary Noise Sources; Outdoor Areas [*Page IV.I-38*], the DEIR states that "up to 4,000 people could gather at the southern park area on the Spaulding Lot. These numbers are based on the maximum permitted occupancies allowed per Code."

Although the DEIR attempts to brush aside events of this size at the Spaulding Lot with a remark that the "number of people that would occupy these outdoor areas would be substantially smaller" the fact remains that the LAMC would allow for thousands of people to congregate outdoors at this location. This would have an extremely negative impact on nearby residents. Hence, LACMA must agree not to conduct any special or outdoor events on the Spaulding Lot and to cap maximum outdoor capacity at 350 persons. This number will more than accommodate the planned facilities at the pavilion located there, which include a café accommodating 38 people and a 300-seat theatre.

Under no circumstances should any outdoor amplified sound be allowed at any time on the Spaulding Lot.

Wilshire Galleria condominiums:

Museum construction on the Spaulding Lot has the potential to inflict damage to the Wilshire Galleria condominium complex located at 750 South Spaulding Avenue, yet LACMA makes no acknowledgement of this in the DEIR.

LACMA does acknowledge the potential damage risks to a five-story multi-family building adjacent to the planned Ogden Parking Structure and have made detailed plans to manage and or mitigate such risks:

“Mitigation Measure I-2: Prior to start of construction for the Ogden Parking Structure, the Applicant shall retain the services of a structural engineer or a qualified professional to visit the existing multi-family building structure on Ogden Drive adjacent to the Ogden Lot to inspect and document the apparent physical condition of the buildings’ readily-visible features.

“The Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring system capable of documenting the construction-related ground vibration levels at the off-site multi-family residential building during the site demolition and excavation for the Ogden Parking Structure, where heavy construction (e.g., large bulldozer and drill rig) would be operating within 12 feet of the multi-family residential building adjacent to the south. In the event that site access to the adjacent off-site multi-family residential building is not available for the vibration monitoring, vibration monitoring shall be conducted at a distance of 10 feet from the construction equipment (representative of the distance between the off-site building and the construction equipment). Vibration monitoring will include the following:

- a) The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in inch/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a warning level of 0.2 inch/second (PPV) and a regulatory level of 0.3 inch/ second (PPV) at the off-site building. The system shall also provide real-time alert when the vibration levels exceed the preset level.
- b) In the event the warning level of 0.2 inch/second (PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including, but not limited to,

halting/staggering concurrent activities and utilizing lower vibratory techniques.

c) In the event the regulatory level 0.3 inch/second (PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the building and have the structural engineer or a qualified professional visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart.” [Page IV.I-56]

LACMA should provide similar mitigations measures to Wilshire Galleria to ensure the well-being of its residents and their building.

No exemptions from LAMC work hours ordinance for nighttime or Sunday construction:

Construction of the Purple Line Subway Extension has had a great impact on the Miracle Mile. We have endured years of round-the-clock construction with many more years to come. In the DEIR LACMA acknowledges that “cumulative construction noise impacts associated with the Project and the Metro Purple Line Extension Project would be considered significant” [Page IV.I-49].

The DEIR also states: “In addition to the cumulative impacts of on-site construction activities, off-site construction haul trucks would have a potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul routes. Specifically, a significant cumulative impact would occur if the cumulative construction truck volumes from the Project and the related projects were to result in noise levels that exceed the existing daytime ambient noise level along the anticipated haul routes. As discussed above, the primary haul routes include Wilshire Boulevard and La Brea Avenue. As analyzed above, the estimated off-site noise levels from Project construction trucks would be below ambient noise levels along Wilshire Boulevard and La Brea Avenue by a minimum of 4.7 dBA during the peak period (grading/excavation). In order for the construction related noise to exceed the ambient noise levels, the truck trips would need to be increased by an approximately factor of 3 (i.e., increased from 42 trips per hour to 130 trips per hour). The estimated noise levels with 130 truck trips per hour would be approximately 72.4 dBA, which exceeds the significance threshold along Wilshire Boulevard. Since the Project would generate up to 42 truck trips during peak construction activities, it is conservatively assumed that truck traffic related to construction of the Project and other related projects would cumulatively add up to 130 or more hourly truck trips, along Wilshire Boulevard and La Brea Avenue. As such,

cumulative noise impacts from off-site construction would be cumulatively considerable and would be significant.” [Page IV.I-50]

Such construction noise at night would be intolerable to residents. For this reason LACMA must agree not to seek exemptions from the LAMC work ordinance for nighttime or Sunday construction under any circumstances.

Covenant Parking Spaces:

The use of LACMA West is contingent on parking covenants. According to the DEIR: “Some of the parking spaces currently located on the Spaulding Lot are subject to parking covenants because they are used to meet the parking requirements of the LAMC for uses on LACMA West, which is subject to LAMC requirements. The Project would replace the parking covenants for these spaces with new parking covenants for the spaces within the Ogden Parking Structure.” [Page IV.K-70]

The problem is that museum construction would begin in 2018 and the Ogden Parking Structure will not be completed until 2023, following the completion of subway construction. Which means that for several years LACMA West will lack the covenant parking spaces required for its operation. Yet LACMA intends to keep LACMA West open to the public during construction. The situation is further exacerbated by the fact that during construction of the project LACMA will experience an overall lack of parking:

“During construction activities, the on-site parking supply would be reduced by 260 parking spaces with the closure of the Spaulding Lot. The completion of the Ogden Parking Structure is not anticipated until completion of the Project in year 2023. However, it is anticipated that up to 126 additional temporary parking spaces would be provided for construction workers in LACMA West within the parcel adjacent to the northern boundary of the Academy Museum of Motion Pictures (Academy Museum) (“North Lawn”) and within the LACMA-operated surface parking lot at the southeast corner of Ogden Drive & Genesee Avenue (“Secondary Ogden Lot”). As detailed above, up to 352 parking spaces would be needed to accommodate the construction worker vehicles during the building structure construction phase. The peak parking demand of LACMA operations during the building structure construction phase is projected to occur at 1:00 P.M. on a weekday with a peak demand of 851 parking spaces and at 2:00 P.M. on a weekend with a peak demand of 833 parking spaces. Thus, both the weekday and weekend peak parking demand would exceed the available parking supply in the Pritzker Garage, as well as in the temporary construction parking spaces provided at the North Lawn and Secondary Ogden Lot.” [Page IV.K-48]

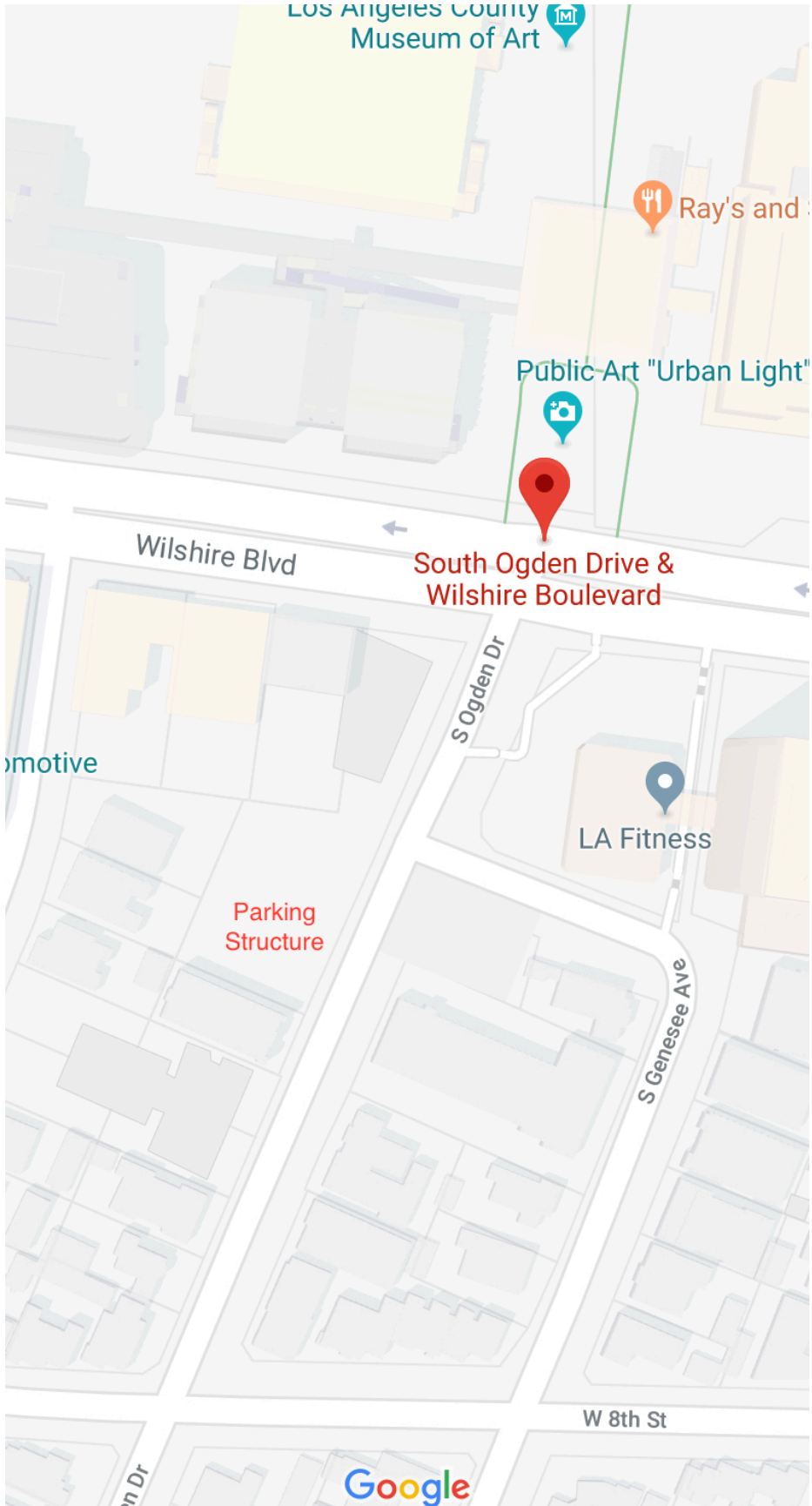
Absent the required covenant parking spaces it would be illegal under the LAMC for LACMA West to be open to the public. Although LACMA will most likely seek a variance to temporarily waive the covenant parking requirement [*see Page IV.H-33*], given the shortage of construction parking it is unreasonable for LACMA to keep LACMA West open to the public during construction and should devote their reduced parking capacity to accommodate all of their construction parking needs.

Ogden Parking Structure:

The DEIR describes the Ogden Parking Structure: “The Project also includes the construction of the Ogden Parking Structure, a new 260-space parking structure on the Ogden Lot that would replace the parking spaces currently on the Spaulding Lot. The Ogden Parking Structure would include up to five above-grade parking levels and up to two below-grade parking levels. The approximate height of the parking structure would primarily be 55 feet and would include an elevator tower at the northern portion of the structure which would extend an additional 10 feet for a maximum building height of 65 feet. The Ogden Parking Structure would also include approximately two rooftop light fixtures that extend up to 20 feet above the rooftop level. Access to the new parking structure would be provided from Ogden Drive. The hours of operation for the Ogden Parking Structure would be the same as the current hours of operation for the Pritzker Parking Garage and the Spaulding Lot.” [*Page IV.H-27*]

The DEIR also provides these additional details: “The Ogden Parking Structure has been intentionally designed to be located close to Wilshire Boulevard to reduce the number of vehicles traversing neighborhood streets. Signage and design elements would also be incorporated to restrict right-turn egress movements from the Ogden Parking Structure driveway to limit Project-related traffic traveling within the residential neighborhood.” [*Page IV.H-66*]

This propose garage presents a host of issues and problem for the surrounding residential area. See the accompanying map on the next page:



First, the entrance to the garage is not near Wilshire Boulevard, it will be located on the south end of the structure at mid-block on Ogden between Wilshire and 8th Street. Popular GPS-based applications such as WAZE will direct museum patrons to the Ogden garage via the easiest route: 8th Street to Ogden. This will increase cut-through traffic in the Miracle Mile.

Motorists will go to great lengths to avoid Wilshire Boulevard, this is both common sense and common knowledge. The dependence GPS-based applications is vastly underestimated in the DEIR in calculating neighborhood traffic intrusion.

The DEIR maintains that project related travel through the neighborhood will be limited by restricting right-turn egress when exiting the parking structure. But again, applications such as WAZE will circumvent the effectiveness of this tactic by directing exiting garage patrons desiring to turn right (or go south) to make a left-turn from the garage and immediately turn right onto South Genesee Avenue – which dog-legs into Ogden a quarter-block south of Wilshire Boulevard.

The DEIR ignores any potential impact on South Genesee Avenue from the Ogden Parking Structure and confidently states that Genesee will see no additional traffic [*see chart on Page IV.K-69*]. This is a glaring error as a review of the map will reveal. Genesee is also a very attractive route for southbound patrons because unlike the intersection of Ogden Drive and 8th Street, the intersection of Genesee and 8th is an all-ways stop.

Reexamination of the impact of project related travel through the neighborhood is required.

The DEIR maintains that the queue of vehicles entering or exiting the Ogden Parking Structure would not exceed one vehicle length [*Page IV.K-68*]. This, too, defies common sense and experience. Locating the garage entrance within several feet of a five-story multi-family building also defies logic.

The entrance and exit of the Ogden garage should be accessed via an alley or driveway on the north side of the facility, this will avoid all queuing problems as well as reduce noise and light intrusions on the adjacent multi-family buildings. This would also allow the structure to be ventilated by a mesh wall on the north side of the garage as opposed to a mesh wall on the Ogden Drive façade (or east side). Constructing a solid wall on the Ogden Drive side of the structure would greatly diminish noise disturbances to nearby residences.

An alley or driveway on the north side of the parking structure would also place the entrance/exit much closer to Wilshire Boulevard.

At present, it does not appear that the generic design of the parking structure conforms with the policies of the Miracle Mile CDO.

How will LACMA prevent subway patrons from utilizing the Odgen Parking Structure?

The *Westside Subway Extension Final Environmental Impact Report* carefully measured neighborhood parking spillover impact, it states: “The parking impact assessment for the Westside Subway Extension considered the potential for parking spillover to occur in residential neighborhoods surrounding potential station locations. Spillover potential was assessed because some riders of the Westside Subway Extension may still drive to stations to access the subway, even though park-and-ride facilities would not be provided. Without park-and-ride facilities, parking demand would be reduced, as more riders are picked-up or dropped-off, walk, bike, or take bus transit to access the subway. However, some riders with access to automobiles might still seek available unrestricted parking on neighborhood streets within a one-half mile walking distance of stations. The potential extent of riders who elect to park in station areas could be significant given the travel time, convenience, and reliability of rail service provided by grade-separated rail service to major employment areas. This contrasts with less reliable and congested traffic conditions in the Study Area along with parking charges at the destination end of the commute trip.” [*Westside Subway Extension FEIR Page 5-2*]

METRO concluded that the Wilshire/Fairfax subway station would not accommodate an estimated daily parking demand of 238 spaces. [*Westside Subway Extension FEIR Page 5-3*]

Given that the Odgen Parking Structure will be located immediately adjacent to the Wilshire/Fairfax subway station, which will create a great demand for daily parking, how will LACMA prevent subway patrons from utilizing the Odgen garage? We raised this issue in our scoping letter and its potential to create a serious shortage of parking for LACMA and the Academy Museum patrons requires an answer.

Sincerely yours,



James O'Sullivan, President

Miracle Mile Residential Association

From: kenhixon@pacbell.net [mailto:kenhixon@pacbell.net]
Sent: Friday, December 15, 2017 1:12 PM
To: Peter Burgis
Cc: David Ryu; Sarah Dusseault; Julia Duncan; James O'Sullivan
Subject: SCH No. 2016081014, LACMA Building for the Permanent Collection - Resubmital

Dear Mr. Burgis,

On behalf of the Board of Directors of the Miracle Mile Residential Association attached below is a letter with our comments on the LACMA DEIR [SCH No. 2016081014, LACMA Building for the Permanent Collection, 5905 Wilshire Blvd. LA CA 90036].

I sent this letter to you via email last night, Dec. 14, 2017, at 9:35 p.m., but have yet to receive an acknowledgement from you indicating that you have received this communication. I am resubmitting the MMRA's letter to you now and copying Councilmember David Ryu and his staff so that a public record will exist to demonstrate that the MMRA did submit its comments of this project in a timely manner.

Thank you,

Ken

Ken Hixon, Vice President
Miracle Mile Residential Association
kenhixon@pacbell.net
323-935-7227



December 14, 2017

Miracle Mile Residential Association
James O'Sullivan, President
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Los Angeles, CA 90036-9495
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Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012
Fax: (213) 626-7827
Via E-Mail: pburgis@ceo.lacounty.gov

**Re: SCH No. 2016081014, LACMA Building for the Permanent
Collection, 5905 Wilshire Blvd. LA CA 90036**

Dear Mr. Burgis

Thank you for the opportunity to comment on this DEIR on behalf of the Board of Directors of the Miracle Mile Residential Association (MMRA).

This project is enormously complex, not only because it bridges Wilshire Boulevard, but because it also bridges legal jurisdictions between Los Angeles County and the City of Los Angeles. The project appears to “cherry pick” jurisdictions to its advantage. The end result of this artful ambiguity is that the DEIR frequently implies two contradictory positions: that neither County or City rules apply to aspects of this project, but – on the other hand – if the rules *do* apply the project meets them.

Although the existing historic LACMA campus is on property owned by the County of Los Angeles, its western portion (known as LACMA West) is situated on property under the jurisdiction of the City of Los Angeles – as is all of the surrounding commercial and residential areas, including the Spaulding Lot which will anchor the southern leg of the project. The project proposes to exploit air rights over Wilshire

Boulevard which belong to the City of Los Angeles as well as construct a new parking garage on property located in the City, too. Common sense would have it that the rules and regulations of the City of Los Angeles should prevail over those of the County of Los Angeles on this project.

For these reasons the MMRA firmly believes that the project must comply with the Los Angeles Municipal Code (LAMC), the City's Framework Element, the Wilshire Community Plan, and the Miracle Mile Community Design Overlay (CDO); hence, this DEIR must be recirculated with the City of Los Angeles as the lead agency.

Despite this lack of clarity on which rule book this project plays by, there are issues and questions raised in the DEIR that we would like addressed.

The construction of a second Metro Purple Line Subway entrance on the north side of Wilshire Boulevard must be included in this project:

The MMRA strongly concurs with METRO that the DEIR should have included approvals for a second Metro Purple Line Subway entrance on the north side of Wilshire Boulevard, as requested by Metro in their scoping letter dated September 28, 2016 – a request that was not addressed in the DEIR.

The MMRA also raised this matter in our scoping letter dated August 25, 2016.

The MMRA unsuccessfully opposed LACMA's efforts to shift the Wilshire/Fairfax subway station from that actual intersection one block east to Orange Grove Drive and Wilshire Boulevard. To counter arguments against relocating the subway station LACMA made repeated public promises to construct (at their expense) a second entrance to the station on the north side of Wilshire Boulevard. The absence of this additional subway entrance in the DEIR is conspicuous and suggests that LACMA intends to renege on this promise.

The importance of including of a second subway entrance as part of this project is made readily apparent in METRO's scoping letter:

With a greater number of visitors coming to LACMA as a result of the subway and the new buildings and facilities, Metro notes that the LACMA Project Description does not include the environmental clearance of a second Metro Purple Line Subway entrance on the north side of Wilshire Boulevard. In 2012, LACMA publically stated the museum's intention to "commit, subject to the approval of our Board of Trustees, to raising the funds necessary to pay for the construction of a second entry portal to be located on the north side of Wilshire Boulevard, directly

across from the Orange Grove entrance.” LACMA further stated, “It is anticipated that this LACMA entry portal will be constructed concurrent with the Wilshire/Fairfax subway station and would not result in any increase in cost to the project.” This is evidenced in the staff report and presentation to the Metro Board of Directors and LACMA’s letter to Metro dated April 16, 2012 (all three documents are attached). Considering the breadth and timing of the changes to the LACMA campus anticipated in the Notice of Preparation, it is strongly recommended that the DEIR include the second, northern Purple Line Fairfax Station entrance previously committed to by LACMA for further evaluation and consideration.

Existing ambient noise levels:

According to the DEIR “existing ambient noise levels were monitored at the six representative off-site receptor locations in the vicinity of the Project Site. The baseline noise monitoring program was conducted on November 16–17, 2016 using a Quest Technologies Model 2900 and a Larson-Davis Model 870 Integrating/Logging Sound Level Meter.” [Page IV.I-14]

LACMA must clarify whether this monitoring program was implemented before or after METRO began operation of the ventilation system at the Odgen staging yard of for the underground construction of Wilshire/Fairfax subway station. This ventilation system operates 24 hours per day and has greatly increased ambient noise levels in the residential areas near the Odgen staging yard.

If the noise monitoring program occurred after the activation of METRO’s construction ventilation system it would misrepresent the ambient noise levels at off-site receptor locations by skewing them higher than what would be considered “normal” levels as the noise emanating from the ventilation system will cease following completion of the subway station.

Although the DEIR states that the “cumulative construction noise impacts associated with the Project and the Metro Purple Line Extension Project would be considered significant” [Page IV.I-49] it provides no substantial explanation of how the noise levels from the Odgen subway construction staging yard factored into measuring the noise impacts that would be generated by the construction and/or operation of the LACMA project. Further clarification is required.

Outdoor Amplified Sound Curfew:

The Petersen Museum and the Academy Museum have agreed that there shall be no outdoor amplified sound and/or music allowed at their facilities after 10 p.m. The

Academy Museum also agreed to periodic field inspections and to post a museum telephone number on their website and otherwise make it available for complaints during or in association with evening special events. They also agreed to keep records of any complaints. In addition, the Academy Museum specified that their sound engineers/technicians will calibrate the sound system/speaker arrangement prior to each outdoor event. [*Academy Museum FEIR, p. 4-22.*]

An outdoor amplified sound curfew for LACMA's project was referenced in the MMRA's scoping letter dated August 25, 2016, yet it was not addressed in the DEIR. LACMA must indicate whether or not they are willing to implement a 10 p.m. outdoor amplified sound curfew and noise monitoring practices.

Spaulding Lot:

Mitigating the impact of locating the southern anchor of the museum on the Spaulding parking lot next door to the Wilshire Galleria condominium complex and in close proximity to residential buildings that are part of the Miracle Mile Historic Preservation Overlay Zone is of paramount importance to the MMRA.

Prohibiting special and outdoor events at the Spaulding Lot is critical. The DEIR states that "No outdoor event programming is *anticipated* on the Spaulding Lot." The use of the word "anticipated" creates a loophole to allow such events in the future.

In fact, in its analysis of On-Site Stationary Noise Sources; Outdoor Areas [*Page IV.I-38*], the DEIR states that "up to 4,000 people could gather at the southern park area on the Spaulding Lot. These numbers are based on the maximum permitted occupancies allowed per Code."

Although the DEIR attempts to brush aside events of this size at the Spaulding Lot with a remark that the "number of people that would occupy these outdoor areas would be substantially smaller" the fact remains that the LAMC would allow for thousands of people to congregate outdoors at this location. This would have an extremely negative impact on nearby residents. Hence, LACMA must agree not to conduct any special or outdoor events on the Spaulding Lot and to cap maximum outdoor capacity at 350 persons. This number will more than accommodate the planned facilities at the pavilion located there, which include a café accommodating 38 people and a 300-seat theatre.

Under no circumstances should any outdoor amplified sound be allowed at any time on the Spaulding Lot.

Wilshire Galleria condominiums:

Museum construction on the Spaulding Lot has the potential to inflict damage to the Wilshire Galleria condominium complex located at 750 South Spaulding Avenue, yet LACMA makes no acknowledgement of this in the DEIR.

LACMA does acknowledge the potential damage risks to a five-story multi-family building adjacent to the planned Ogden Parking Structure and have made detailed plans to manage and or mitigate such risks:

“Mitigation Measure I-2: Prior to start of construction for the Ogden Parking Structure, the Applicant shall retain the services of a structural engineer or a qualified professional to visit the existing multi-family building structure on Ogden Drive adjacent to the Ogden Lot to inspect and document the apparent physical condition of the buildings’ readily-visible features.

“The Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring system capable of documenting the construction-related ground vibration levels at the off-site multi-family residential building during the site demolition and excavation for the Ogden Parking Structure, where heavy construction (e.g., large bulldozer and drill rig) would be operating within 12 feet of the multi-family residential building adjacent to the south. In the event that site access to the adjacent off-site multi-family residential building is not available for the vibration monitoring, vibration monitoring shall be conducted at a distance of 10 feet from the construction equipment (representative of the distance between the off-site building and the construction equipment). Vibration monitoring will include the following:

- a) The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in inch/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a warning level of 0.2 inch/second (PPV) and a regulatory level of 0.3 inch/ second (PPV) at the off-site building. The system shall also provide real-time alert when the vibration levels exceed the preset level.
- b) In the event the warning level of 0.2 inch/second (PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including, but not limited to,

halting/staggering concurrent activities and utilizing lower vibratory techniques.

c) In the event the regulatory level 0.3 inch/second (PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the building and have the structural engineer or a qualified professional visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart.” [Page IV.I-56]

LACMA should provide similar mitigations measures to Wilshire Galleria to ensure the well-being of its residents and their building.

No exemptions from LAMC work hours ordinance for nighttime or Sunday construction:

Construction of the Purple Line Subway Extension has had a great impact on the Miracle Mile. We have endured years of round-the-clock construction with many more years to come. In the DEIR LACMA acknowledges that “cumulative construction noise impacts associated with the Project and the Metro Purple Line Extension Project would be considered significant” [Page IV.I-49].

The DEIR also states: “In addition to the cumulative impacts of on-site construction activities, off-site construction haul trucks would have a potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul routes. Specifically, a significant cumulative impact would occur if the cumulative construction truck volumes from the Project and the related projects were to result in noise levels that exceed the existing daytime ambient noise level along the anticipated haul routes. As discussed above, the primary haul routes include Wilshire Boulevard and La Brea Avenue. As analyzed above, the estimated off-site noise levels from Project construction trucks would be below ambient noise levels along Wilshire Boulevard and La Brea Avenue by a minimum of 4.7 dBA during the peak period (grading/excavation). In order for the construction related noise to exceed the ambient noise levels, the truck trips would need to be increased by an approximately factor of 3 (i.e., increased from 42 trips per hour to 130 trips per hour). The estimated noise levels with 130 truck trips per hour would be approximately 72.4 dBA, which exceeds the significance threshold along Wilshire Boulevard. Since the Project would generate up to 42 truck trips during peak construction activities, it is conservatively assumed that truck traffic related to construction of the Project and other related projects would cumulatively add up to 130 or more hourly truck trips, along Wilshire Boulevard and La Brea Avenue. As such,

cumulative noise impacts from off-site construction would be cumulatively considerable and would be significant.” [Page IV.I-50]

Such construction noise at night would be intolerable to residents. For this reason LACMA must agree not to seek exemptions from the LAMC work ordinance for nighttime or Sunday construction under any circumstances.

Covenant Parking Spaces:

The use of LACMA West is contingent on parking covenants. According to the DEIR: “Some of the parking spaces currently located on the Spaulding Lot are subject to parking covenants because they are used to meet the parking requirements of the LAMC for uses on LACMA West, which is subject to LAMC requirements. The Project would replace the parking covenants for these spaces with new parking covenants for the spaces within the Ogden Parking Structure.” [Page IV.K-70]

The problem is that museum construction would begin in 2018 and the Ogden Parking Structure will not be completed until 2023, following the completion of subway construction. Which means that for several years LACMA West will lack the covenant parking spaces required for its operation. Yet LACMA intends to keep LACMA West open to the public during construction. The situation is further exacerbated by the fact that during construction of the project LACMA will experience an overall lack of parking:

“During construction activities, the on-site parking supply would be reduced by 260 parking spaces with the closure of the Spaulding Lot. The completion of the Ogden Parking Structure is not anticipated until completion of the Project in year 2023. However, it is anticipated that up to 126 additional temporary parking spaces would be provided for construction workers in LACMA West within the parcel adjacent to the northern boundary of the Academy Museum of Motion Pictures (Academy Museum) (“North Lawn”) and within the LACMA-operated surface parking lot at the southeast corner of Ogden Drive & Genesee Avenue (“Secondary Ogden Lot”). As detailed above, up to 352 parking spaces would be needed to accommodate the construction worker vehicles during the building structure construction phase. The peak parking demand of LACMA operations during the building structure construction phase is projected to occur at 1:00 P.M. on a weekday with a peak demand of 851 parking spaces and at 2:00 P.M. on a weekend with a peak demand of 833 parking spaces. Thus, both the weekday and weekend peak parking demand would exceed the available parking supply in the Pritzker Garage, as well as in the temporary construction parking spaces provided at the North Lawn and Secondary Ogden Lot.” [Page IV.K-48]

Absent the required covenant parking spaces it would be illegal under the LAMC for LACMA West to be open to the public. Although LACMA will most likely seek a variance to temporarily waive the covenant parking requirement [*see Page IV.H-33*], given the shortage of construction parking it is unreasonable for LACMA to keep LACMA West open to the public during construction and should devote their reduced parking capacity to accommodate all of their construction parking needs.

Ogden Parking Structure:

The DEIR describes the Ogden Parking Structure: “The Project also includes the construction of the Ogden Parking Structure, a new 260-space parking structure on the Ogden Lot that would replace the parking spaces currently on the Spaulding Lot. The Ogden Parking Structure would include up to five above-grade parking levels and up to two below-grade parking levels. The approximate height of the parking structure would primarily be 55 feet and would include an elevator tower at the northern portion of the structure which would extend an additional 10 feet for a maximum building height of 65 feet. The Ogden Parking Structure would also include approximately two rooftop light fixtures that extend up to 20 feet above the rooftop level. Access to the new parking structure would be provided from Ogden Drive. The hours of operation for the Ogden Parking Structure would be the same as the current hours of operation for the Pritzker Parking Garage and the Spaulding Lot.” [*Page IV.H-27*]

The DEIR also provides these additional details: “The Ogden Parking Structure has been intentionally designed to be located close to Wilshire Boulevard to reduce the number of vehicles traversing neighborhood streets. Signage and design elements would also be incorporated to restrict right-turn egress movements from the Ogden Parking Structure driveway to limit Project-related traffic traveling within the residential neighborhood.” [*Page IV.H-66*]

This propose garage presents a host of issues and problem for the surrounding residential area. See the accompanying map on the next page:



First, the entrance to the garage is not near Wilshire Boulevard, it will be located on the south end of the structure at mid-block on Ogden between Wilshire and 8th Street. Popular GPS-based applications such as WAZE will direct museum patrons to the Ogden garage via the easiest route: 8th Street to Ogden. This will increase cut-through traffic in the Miracle Mile.

Motorists will go to great lengths to avoid Wilshire Boulevard, this is both common sense and common knowledge. The dependence GPS-based applications is vastly underestimated in the DEIR in calculating neighborhood traffic intrusion.

The DEIR maintains that project related travel through the neighborhood will be limited by restricting right-turn egress when exiting the parking structure. But again, applications such as WAZE will circumvent the effectiveness of this tactic by directing exiting garage patrons desiring to turn right (or go south) to make a left-turn from the garage and immediately turn right onto South Genesee Avenue – which dog-legs into Ogden a quarter-block south of Wilshire Boulevard.

The DEIR ignores any potential impact on South Genesee Avenue from the Ogden Parking Structure and confidently states that Genesee will see no additional traffic [*see chart on Page IV.K-69*]. This is a glaring error as a review of the map will reveal. Genesee is also a very attractive route for southbound patrons because unlike the intersection of Ogden Drive and 8th Street, the intersection of Genesee and 8th is an all-ways stop.

Reexamination of the impact of project related travel through the neighborhood is required.

The DEIR maintains that the queue of vehicles entering or exiting the Ogden Parking Structure would not exceed one vehicle length [*Page IV.K-68*]. This, too, defies common sense and experience. Locating the garage entrance within several feet of a five-story multi-family building also defies logic.

The entrance and exit of the Ogden garage should be accessed via an alley or driveway on the north side of the facility, this will avoid all queuing problems as well as reduce noise and light intrusions on the adjacent multi-family buildings. This would also allow the structure to be ventilated by a mesh wall on the north side of the garage as opposed to a mesh wall on the Ogden Drive façade (or east side). Constructing a solid wall on the Ogden Drive side of the structure would greatly diminish noise disturbances to nearby residences.

An alley or driveway on the north side of the parking structure would also place the entrance/exit much closer to Wilshire Boulevard.

At present, it does not appear that the generic design of the parking structure conforms with the policies of the Miracle Mile CDO.

How will LACMA prevent subway patrons from utilizing the Odgen Parking Structure?

The *Westside Subway Extension Final Environmental Impact Report* carefully measured neighborhood parking spillover impact, it states: “The parking impact assessment for the Westside Subway Extension considered the potential for parking spillover to occur in residential neighborhoods surrounding potential station locations. Spillover potential was assessed because some riders of the Westside Subway Extension may still drive to stations to access the subway, even though park-and-ride facilities would not be provided. Without park-and-ride facilities, parking demand would be reduced, as more riders are picked-up or dropped-off, walk, bike, or take bus transit to access the subway. However, some riders with access to automobiles might still seek available unrestricted parking on neighborhood streets within a one-half mile walking distance of stations. The potential extent of riders who elect to park in station areas could be significant given the travel time, convenience, and reliability of rail service provided by grade-separated rail service to major employment areas. This contrasts with less reliable and congested traffic conditions in the Study Area along with parking charges at the destination end of the commute trip.” [*Westside Subway Extension FEIR Page 5-2*]

METRO concluded that the Wilshire/Fairfax subway station would not accommodate an estimated daily parking demand of 238 spaces. [*Westside Subway Extension FEIR Page 5-3*]

Given that the Odgen Parking Structure will be located immediately adjacent to the Wilshire/Fairfax subway station, which will create a great demand for daily parking, how will LACMA prevent subway patrons from utilizing the Odgen garage? We raised this issue in our scoping letter and its potential to create a serious shortage of parking for LACMA and the Academy Museum patrons requires an answer.

Sincerely yours,



James O'Sullivan, President

Miracle Mile Residential Association

From: Dawn McDivitt [mailto:dmcdivitt@nhm.org]

Sent: Friday, December 15, 2017 10:17 AM

To: Peter Burgis

Cc: Natural History Museum; Luis Chiappe; Cynthia Wornham; Emily Lindsey; Gary Takeuchi; Aisling Farrell

Subject: DEIR letter of support

Good Morning Peter,

Please see attached Natural History Museum's letter of support for the LACMA proposed project in response to the Draft EIR document.

Thank you

Dawn

Dawn McDivitt

Chief Deputy Director

Administrator, Page Museum and William S. Hart Museum

Natural History Museum of Los Angeles County

900 Exposition Boulevard

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December 14, 2017

Mr. Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012

Dr. Lori Bettison-Varga
President and Director

Dear Mr. Burgis:

**RE: LOS ANGELES COUNTY MUSEUM OF ART BUILDING
FOR THE PERMANENT COLLECTION**

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the above stated project.

The Natural History Museum of Los Angeles County (Museum) would like to thank the Los Angeles County Museum of Art (LACMA) for the collaboration that was extended during the design process and environmental document preparation. The Museum is supportive of LACMA's proposed project, and as designed, it successfully addresses possible impact concerns to the Tar Pits.

As documented in the DEIR, the Proposed Project adjoins the La Brea Tar Pits National Natural Landmark. The national designation was made in recognition of the richness of the paleontological record from this specific locality. To date, more than 5 million fossils representing over 600 species of animals and plants ranging in age from 3,000 to 55,000 years in age have been recovered from the La Brea Tar Pits, which has been designated the type locality of the Rancholabrean North American Land Mammal Age.

The Museum looks forward to continuing its collaboration with LACMA to mitigate the impact of any discovery of significant paleontological and archaeological resources. Mitigation of any impact should include careful monitoring of all subsurface excavations on the Proposed Project location, by appropriately qualified paleo mitigation monitors, the recovery of any paleontological or archaeological resources impacted by the construction, and the conservation and curation of the impacted resources in a designated repository where they would be held in the public trust in perpetuity. Comparable procedures have already been adopted by the Metropolitan Transit Authority with respect to the potential impact on paleontological and archaeological resources by the construction of the nearby Wilshire/La Brea and Wilshire/Fairfax stations for the Purple Line Extension Project.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Bettison-Varga". The signature is fluid and cursive, written over a white background.

Dr. Lori Bettison-Varga
President and Director

LBV:DMD:mg

December 11, 2017

Mr. Peter Burgis, Capital Projects
Los Angeles, County, Chief Executive Office
555 West Temple Street, Room 754
Los Angeles, CA 90012

By email: pburgis@ceo.lacounty.gov

Dear Mr. Burgis,

As a nearby neighbor of LACMA, I am writing to comment on the proposal for a new building to replace some of their existing facilities. I think the design of the new building will be a great addition to the neighborhood, and I welcome the new open space that will be created in Hancock Park and on the Spaulding property. We can certainly use more public park area.

I know that there will have to be a traffic management plan to deal with impacts to the streets during construction, and I hope that you will carefully consider those of us who live close by and have to navigate the streets while the project is built.

I look forward to the improvement park, the innovative building, and all of the new programs and exhibits we will be able to visit as soon as the project moves forward.

Thank you for your consideration.



Terry L. Karges
Executive Director

From: Jordan Sisson [mailto:jordan@gideonlaw.net]
Sent: Friday, December 15, 2017 4:56 PM
To: Peter Burgis
Subject: RE: DEIR Comments: LACMA Permanent Collection Project (SCH No. 2016081014):

Many thanks.

-JRS

From: Peter Burgis [mailto:pburgis@ceo.lacounty.gov]
Sent: Friday, December 15, 2017 4:54 PM
To: Jordan Sisson <jordan@gideonlaw.net>
Subject: RE: DEIR Comments: LACMA Permanent Collection Project (SCH No. 2016081014):

Confirming receipt of message.

=====
Peter Burgis, LA County - Chief Executive Office
Capital Projects/Debt Management
(213) 974-1417

From: Jordan Sisson [mailto:jordan@gideonlaw.net]
Sent: Friday, December 15, 2017 2:43 PM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Cc: 'Yelena Zeltser' <yzeltser@unitehere11.org>; 'Charles Du' <cdu@unitehere11.org>; 'Gideon Kracov' <gk@gideonlaw.net>
Subject: DEIR Comments: LACMA Permanent Collection Project (SCH No. 2016081014):

Mr. Burgis:

On behalf of UNITE HERE Local 11, Denise Edwards, and Kent Kormeyer (collectively "Commentors"), this Office respectfully submits to the County of Los Angeles the attached comment letter for the Draft EIR regarding the referenced LACMA Permanent Collection project. If you have any issues retrieving the document, please don't hesitate to contact me by phone.

Please confirm receipt of this message.

Many thanks,

Jordan R. Sisson
Law Clerk
Law Office of Gideon Kracov
801 S. Grand Ave., 11th Floor
Los Angeles, CA 90017
Office: 213-629-2071 ext. 295
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December 15, 2017

VIA EMAIL:

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012
pburgis@ceo.lacounty.gov

**Re: Unite HERE Local 11, Denise Edwards, and Kent Kormeyer Comments
LACMA Permanent Collection Project
Draft Environmental Impact Report (SCH No. 2016081014)**

Dear Mr. Burgis:

On behalf of UNITE HERE Local 11 ("Local 11"), Denise Edwards, and Kent Kormeyer (collectively "Commentors"), this Office respectfully provides the County of Los Angeles ("County") the following comments regarding the Draft Environmental Impact Report ("DEIR"), prepared for the referenced LACMA Permanent Collection development ("Project"), proposed by Museum Associates ("Applicant") located at and around the Los Angeles County Museum of Art ("LACMA"), within the City of Los Angeles ("City") planning jurisdiction. Specifically, potential concern related to compliance with the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.*, ("CEQA") and the Los Angeles County Code and Los Angeles Municipal Code (collectively "Code").

Here, the DEIR admits the Project will have significant, unmitigated air quality, noise, and traffic impacts. Furthermore, the DEIR fails to properly identify additional potentially significant impacts including aesthetic, historical, land use, construction-related impacts, and fails to analyze the Project's entire uses. More unsettling, the DEIR's alternatives analysis is fatally flawed in the same fashion as the project in *Los Angeles Conservancy v. City of Los Angeles* ("LA Conservancy") (LASC Case No.: BS166487 filed April 25, 2017), attached hereto as Exhibit A. Like there, Applicant here uses non-basic objectives to ignore environmentally superior alternatives, such as an historically-superior alternative that preserves the Ahmanson and Hammer buildings and Bing Center.

As discussed below, the DEIR fails to comply with CEQA and Cal. Code Regs. § 15000 *et seq.* ("CEQA Guidelines"), which therefore must be cured and recirculated to ensure meaningful public discussion and County decision-making. Furthermore, the Project as proposed would conflict with and violate applicable local laws and regulations, amounting to an abuse of discretion if approved. Therefore, Commentors respectfully urge the County to withhold all Project approvals until the issues raised herein are addressed in a CEQA-compliant DEIR, and the Project is modified to conform with the Code, including ***provisions that guarantee quality employment opportunities for highly trained workers during the operational phase at the Project.***



I. PROJECT BACKGROUND

LACMA is bounded by 6th St. (north), Wilshire Blvd. (south), Fairfax Ave. (west), and Curson Ave. (east) ("LACMA Campus"), which is bisected by the now-vacated Ogden Dr. running north/south between 6th St. and Wilshire Blvd. Property west of Ogden Dr. constitutes "LACMA West" (currently undergoing extensive improvements by the Academy Museum of Motion Pictures)¹ and property east of Ogden Dr. constitutes "LACMA East." LACMA East includes three distinct buildings constructed in 1965 (i.e., the Ahmanson Building, Hammer Building, and Bing Center) (collectively "1965 Complex") and a structure known today as the Art of the Americas Building constructed in 1986 ("Americas Building").

The Project includes demolishing the four abovementioned buildings and replacing them with 387,500 gross square feet ("SF") of building area comprised of seven, semi-transparent pavilions ("Pavilions") arranged in a continuous layout, whereby a massive bridge ("Bridge") would extend over Wilshire Blvd. to a two-acre parking lot on Spaulding Ave. ("Spaulding Lot"). As such, the 260 parking space currently on the Spaulding Lot would be replaced by a 260-space, seven-level parking structure at 715-731 S. Ogden Drive ("Ogden Lot").² (DEIR II-2, 12, 18, 25).

A five-year construction period is assumed, starting in the fourth quarter of 2018, with activities including grading, excavating, and exporting 151,140 cubic yards ("CY") of cut material and 37,400 CY of fill material, all requiring haul route approval from the City. (DEIR II-30-31).

I. STANDING OF COMMENTORS

Ms. Edwards is a Miracle Mile resident living approximately 0.5 miles from the LACMA Campus. As a senior citizen, she relies on public transportation and when frequenting the immediately adjacent area including neighborhood establishments like the Grove. Similarly, Mr. Kormeyer resides roughly 0.8 miles from LACMA West, relies on buses traveling on Wilshire Blvd., and exercises daily near the Project. Such geographic proximity, alone, is sufficient to establish standing under CEQA. *See Bozung v. LAFCO* (1975) 13 Cal.3d 263, 272 (plaintiff living 1,800 feet from annexed property has standing to challenge the annexation); *see also Citizens Ass'n for Sensible Dev. v. County of Inyo* (1985) 172 Cal.App.3d 151, 158 ("a property owner, taxpayer, or elector who establishes a geographical nexus with the site of the challenged project has standing."). Furthermore, absent adequate analysis and full mitigation of Project-related impacts, Commentors will be adversely affected by the Project such as construction-related, air quality, traffic, and aesthetic impacts. Hence, Commentors have a beneficial interest in the Project's compliance with CEQA. *See Braude v. City of Los Angeles* (1990) 226 Cal.App.3d 83, 87.

Local 11 represents more than 25,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Arizona. Members of Local 11, including dozens who live and work in the City of Los Angeles join together to fight for improved living standards and working conditions. As such, Local 11 is a stakeholder in this Project, and worker and labor organizations have a long history of engaging in the CEQA process to secure safe working conditions, reduce environmental impacts, and maximize community benefits.

¹ A 208,000-SF development approved in 2015 and anticipated to be completed in 2019. (DEIR I-8).

² *See also* Museum Associates (2016) Project Key Facts, available at <http://buildinglacma.org/project-key-facts>.

The courts have held that “unions have standing to litigate environmental claims.” *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

Furthermore, this comment letter is made to exhaust remedies under Pub. Res. Code § 21177 concerning the Project, and incorporates by this reference all written and oral comments submitted on the Project by any commenting party or agency. It is well-established that any party, as Commentors here, who participates in the administrative process can assert all factual and legal issues raised by anyone. See *Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875.

II. BRIEF BACKGROUND ON CEQA

CEQA requires lead agencies to analyze the potential environmental impacts of its actions in an environmental impact report (“EIR”). See, e.g., Pub. Res. Code § 21100; *Cmtys. for a Better Env’t v. S. Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310. The EIR is the very heart of CEQA. *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652. “The ‘foremost principle’ in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” *Cmtys. for a Better Env’t v. Cal. Res. Agency* (2002) 103 Cal.App.4th 98, 109.

Purpose: CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. See CEQA Guidelines § 15002(a)(1). To this end, public agencies must ensure that its analysis “stay in step with evolving scientific knowledge and state regulatory schemes.” *Cleveland National Forest Foundation v. San Diego Assn. of Governments (“Cleveland II”)* (2017) 3 Cal.5th 497, 504. Hence, an analysis which “understates the severity of a project’s impacts impedes meaningful public discussion and skews the decisionmaker’s perspective concerning the environmental consequences of the project, the necessity for mitigation measures, and the appropriateness of project approval.” *Id.*, on remand (“*Cleveland III*”) (Nov. 16, 2017, No. D063288) __ Cal.App.5th __ at 38; see also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564 (quoting *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392).

Second, CEQA requires public agencies to avoid or reduce environmental damage by requiring implementation of “environmentally superior” alternatives and all feasible mitigation measures. CEQA Guidelines § 15002(a)(2) and (3); see also *Citizens of Goleta Valley*, 52 Cal.3d at 564. If a project has a significant effect on the environment, the agency may approve the project only if it finds that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any significant unavoidable effects on the environment are “acceptable due to overriding concerns.” Pub. Res. Code § 21081; see also Guidelines § 15092(b)(2)(A) and (B).

Standard of Review for EIRs: Although courts review an EIR using an ‘abuse of discretion’ standard, that standard does not permit a court to “uncritically rely on every study or analysis presented by a project proponent in support of its position ... [.] [a] clearly inadequate or unsupported study is entitled to no judicial deference.” *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs.* (2001) 91 Cal.App.4th 1344, 1355 (quoting *Laurel Heights*, 47 Cal.3d at 409 n. 12). A prejudicial abuse of discretion occurs “if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.” *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722; see also *Galante Vineyards v. Monterey Peninsula Water Management Dist.*

(1997) 60 Cal.App.4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 946.

Substantial Evidence: Under CEQA, substantial evidence includes facts, a reasonable assumption predicated upon fact, or expert opinion supported by fact; not argument, speculation, unsubstantiated opinion or narrative, clearly inaccurate or erroneous evidence, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. *See e.g.*, Pub. Res. Code §§ 21080(e), 21082.2(c), and CEQA Guidelines §§ 15064(f)(5) & 15384. As such, courts will not blindly trust bare conclusions, bald assertions, and conclusory comments without the “disclosure of the ‘analytic route the . . . agency traveled from evidence to action.’” *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 404 405 (quoting *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515); *see also Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 568-569; *Cleveland III*, __ Cal.App.5th __ at 33 (agency “obliged to disclose what it reasonably can ... [or] substantial evidence showing it could not do so.”).

III. THE DEIR FAILS TO SATISFY CEQA REQUIREMENTS

A. Inaccurate Project Description

An “accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” *San Joaquin Raptor Rescue Ctr. v. Cnty. of Merced* (2007) 149 Cal.App.4th 645, 654-655 (quoting *Cnty. of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199), emphasis in original. As one court explained, “only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the ‘no project’ alternative), and weigh other alternatives in the balance.” *Citizens for a Sustainable Treasure Island v. City & Cnty. of San Francisco* (2014) 227 Cal.App.4th 1036, 1052. Hence, an accurate project description is an “indispensable component of a valid EIR.” *Western Placer Citizens for an Agr. and Rural Env’t v. Cnty. of Placer* (2006) 144 Cal.App.4th 890, 898.

Here, the DEIR understates the scope of the Project, its usage and its concomitant environmental impacts. First, the existing current building footprint is overstated which therefore understates the new Project’s impacts. – the existing 1965 Complex and Americas Building total 383,571 SF of actual building space,³ not 392,871 SF which is inflated by including the “outdoor-covered area” and citation to AIA regulations not adopted by the County or City. (DEIR II-2, IV.A-49). In truth, the Project’s new footprint spans approximately 880 feet from northwest corner (near rotunda/observation tower) to the southwest corner of the Project (on Spaulding Lot) – 57 percent bigger than LACMA East’s current building footprint (560 feet).⁴ (DEIR IV.C-72; APP-A 14).

The DEIR claims that the Project will have only a modest increase in use based on purported reduced square-footage (DEIR I-18), but this ignores the sharp rise in attendance in recent years,

³ Calculated by adding the stated actual building square-footage. (DEIR II-2).

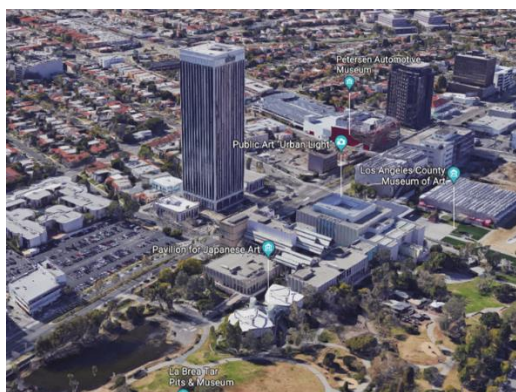
⁴ Calculations based on measurements from Google Maps.

which includes a doubling of patrons between 2007 and 2013 (1.2 mil.),⁵ and currently estimated at 1.6 mil. patrons a year⁶—a growth rate between seven and ten percent per year.

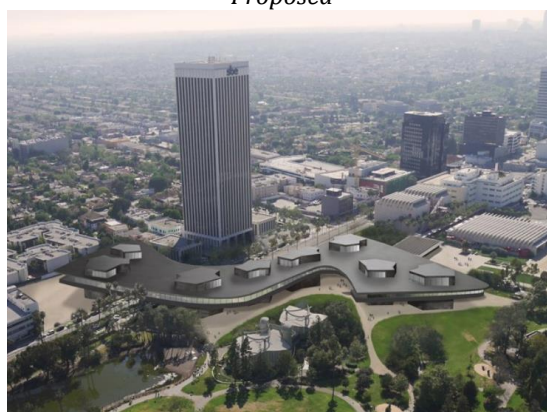
An accurate project description, consistent with the DEIR's approach of including outdoor-covered area, would include square-footage of all areas covered by the Pavilions and capture the recent growth in attendance. It defies logic that the DEIR does not anticipate that a nearly \$600 million investment would not induce substantially more patrons. (APP-A 3).

Failure to properly identify the realistic usage of this Project is a fatal flaw that infects all impact determination based on the Project's square-footage including traffic, air-quality, and GHG impacts caused by mobile source emissions. These and other similarly defective assessments must be reanalyzed assessing the entire square-footage under the Pavilions as depicted below:⁷

Current



Proposed



B. Aesthetic Impacts

Notwithstanding SB-743, aesthetics must be considered to assess compliance with applicable zoning affecting aesthetic plans, ordinances, guidelines, and thresholds. Courts have found that such aesthetic impacts are significant for CEQA purposes. *See e.g. Ocean View Estates Homeowners Assoc., Inc. v. Montecito Water District* (2004) 116 Cal.App.4th 396; *Oro Fine Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 882.

It defies credulity that aesthetic impacts and views will not be impacted by this Project design. Here, the DEIR describes architect Peter Zumthor's design as a continuous, meandering gallery with an elevated transparent main-exhibition level having its ceilings and facades covered in glass ("*Design*"). (DEIR IV.A-50-51, 93). Others have described the Project Design as a sinuous oil-slick inspired structure; amorphous; floating mass; and an expensive, equally insensitive, and a

⁵ LACED (2014) The Transformation Of LACMA-An Economic Impact Analysis, p. 11, available at http://www.lacma.org/sites/default/files/LAEDC%20Report_FINAL_0.pdf.

⁶ LACMA (Jun. 7, 2017) Board of Trustees Policy on Diversity, p. 2 available at http://www.lacma.org/sites/default/files/Board_Diversity_Policy.pdf.

⁷ IMAGE SOURCE: Google Maps and The Journal Of The American Institute Of Architects (Aug. 16, 2016) LACMA Building for the Permanent Collection, available at http://www.architectmagazine.com/project-gallery/lacma-building-for-the-permanent-collection_o.

functionally-problematic mega-blob.⁸ Contrary to DEIR claims (DEIR I-37-39), the Project Design would drastically transform the whole LACMA East site by removing the 1965 Complex. Currently, pedestrians and motorists traveling down Wilshire Blvd., a designated scenic highway, enjoy this unique part of Miracle Mile commonly referred as Museum Row.⁹ The public flocks to this area to enjoy the existing rich tapestry of the tar pits, urban light artwork, and the 1965 Complex (arguably historically significant), which are all impacted by the Project Design. Additional flaws in the aesthetics analysis include:

- *SB-743 Not Applicable*: DEIR claims SB-743 exempts aesthetic impacts (DEIR IV.A-1), but the Project falls outside Pub. Res. Code § 21099(a)(1) given the majority of the Project is on LACMA Campus (zoned PF) and the Bridge above Wilshire Blvd. (public right-of-way).
- *Land Use Impacts*: Notwithstanding its claim of intergovernmental immunity (DEIR I-11-12, IV.H-5),¹⁰ aesthetic impacts can constitute a significant land use impact if they conflict with applicable zoning plans or policy. For example, the Project provides only 300 seats as compared to 716 seats currently serving the public on LACMA East for live theater events, including the 450 annual free events at the Bing Center. (DEIR I-9, 14-15, IV.H-19). This is contrary to the multiple goals and policies identified in the DEIR's aesthetic consistency matrix. (DEIR, IV.A-83-90). Nor does the land use consistency matrix address this, or the other issues raised herein. (DEIR IV.H-35-49, 54-73, 76-83, 87-88, 91-101). Furthermore, the DEIR analysis is inconsistent when it first claims the Project is exempt from City zoning, then proceeds to cherry pick zoning regulations as it sees fit (e.g., views, light, glare, etc.). (DEIR IV.A-2).
- *Cumulative Impact*: The LACMA Campus has already experienced substantial aesthetic impacts by intruding modern-designed related projects. (DEIR IV.A-109). On LACMA West, the Academy Museum is currently facing construction delays and cost overruns due the

⁸ See e.g., World Architecture Community (Apr. 7, 2017) Peter Zumthor Proposes Sand-Colored Structure And Smoother Edges In Revised Plans Of LACMA, available at https://worldarchitecture.org/articles-links/cvppe/peter_zumthor_proposes_sandcolored_structure_and_smoother_edges_in_revised_plans_of_lacma.html; LACurbed (Apr. 7, 2017) LACMA redesign: Here are the newest renderings, available at <https://la.curbed.com/2017/4/7/15223578/lacma-redesign-renderings-images-zumthor>; ArchDaily (Apr. 10, 2017) New Renderings Show Major Changes to Zumthor's LACMA Redesign, available at <https://www.archdaily.com/868898/new-renderings-show-major-changes-to-zumthors-lacma-redesign>; The Journal of The American Institute of Architects (Oct. 4, 2016) Which William Pereira Buildings Are Worth Preserving?, available at http://www.architectmagazine.com/design/urbanism-planning/which-william-pereira-buildings-are-worth-preserving_o.

⁹ LA Tourist (2017) Museum Row on Miracle Mile, available at <https://www.latourist.com/index.php?page=museum-links-row>.

¹⁰ Intergovernmental immunity is questionable given the Applicant is a non-governmental body, using land not entirely within County jurisdiction, where the County has duty to consider public health legal findings when approving discretionary permits. See e.g., *Smith v. County of Los Angeles* (1989) 211 Cal.App.3d 188, 210-212; 40 Ops Cal. Atty. Gen. 243, 244 (1962); 68 Ops. Cal. Atty. Gen. 114, 119-20 (1985).

very difficult geometry posed by the soap-bubble, spaceship design.¹¹ Just south of that, the recent Petersen Automotive Museum reopening was met with similar criticism.¹²

- **Limited Views:** The view depictions provided in the EIR are strictly from sidewalk vantage points at great distances from the Project (DEIR IV.A-29-40), which ignore the fact that this scenic highway is traveled by numerous drivers a day. Missing from the DEIR are any images and analysis of views lost from individuals within a block of the Bridge and Pavilions. It defies logic that views and aesthetics will not be impacted by this Project.¹³



C. Cultural/Historical Impacts

Under Pub. Res. Code § 21084.1, a project may have a significant effect on the environment if it causes a substantial adverse change in the significance of an historical resource. The fact a resource is not listed in a state or local register or identified in a survey does not preclude a lead agency from determining a resource is historically significant. See CEQA Guidelines § 15064.5(a)(4). A historical resource is “materially impaired when a project ... [d]emolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion” as a state or local historic resource. *Id.*, subd. (b)(2)(C). This is significant under CEQA. See *e.g.*, Pub. Res. Code § 15064.5(b); *Ocean View Estates v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 401; *Quail Botanic Gardens v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1603-1605. Here, the County General Plan notes the importance of historic and cultural resources as non-renewable and irreplaceable (DEIR IV.C-13), yet the DEIR fails to assess historic impacts transparently:

1. **Flawed Feasibility Study:** The building/feasibility evaluation (“*Feasibility Study*”) in Appendix Q is severely flawed. The DEIR provides only 7 of the 61 pages, the survey included only visual inspections, had only conclusory claims of “major issues and deficiencies” based on vague descriptions of the state of disrepair (e.g., extensive water intrusion, numerous cracks, cracking and spalling in several locations, significant rusting, wide range of ADA-related improvements, utilities should be replaced) (pp. 7-8). No images, comps, estimates, or numeric basis to substantiate degree of damage or estimated costs are provided. The evaluation fails to substantiate the “significant energy savings benefits with a complete mechanical system modernization,” nor provides the

¹¹ <https://la.curbed.com/2014/10/9/10037046/academy-museum-architect-i-dont-think-it-will-be-that-bad>; <http://variety.com/2017/film/news/academy-museum-trouble-dawn-hudson-1202032947/>

¹² <http://beta.latimes.com/entertainment/arts/la-et-cm-petersen-automotive-museum-review-20151124-column.html>; <http://beta.latimes.com/entertainment/arts/miranda/la-et-cm-petersen-automotive-museum-gloriously-bad-20150923-column.html>;

¹³ Archinect (Oct. 26, 2017) New renderings of Peter Zumthor's \$600-million LACMA redesign, available at <https://archinect.com/news/article/150035301/new-renderings-of-peter-zumthor-s-600-million-lacma-redesign>.

energy savings expected from a renovation alternative. Hence, there is no way to determine the marginal efficiency gains expected from: a) demo/new-construction alternative versus a b) renovation alternative. For example, what is the cost for the marginal efficiency gains achieved from replacing low water-use plumbing with ultra-low water-use plumbing, as opined in the DEIR? Nevertheless, the Feasibility Study demonstrates that a new construction would cost between \$1,034 and \$1,296/SF while refurbishing costs would be \$634/SF – roughly 60 to 50 percent cheaper. This is based on the Applicant's own estimates which is lower than the \$600 mil. price tag quoted in the media and does not account for overruns and complications due to the complex geometry of the Project Designs—like the Academy Museum discussed above. At minimum, based on what is contained in the DEIR, it is impossible to claim Alternative 2 is not financially feasible.

2. Inadequate Criteria Analysis: The 1965 Complex is an example of William Pereira's New Formalism style and is admittedly eligible under Criteria A. (DEIR IV.C-38, 45). Under Criteria B, the DEIR claims that none of the namesake donors deserve special attribution because they all were equally important community leaders and philanthropists. (DEIR IV.C-47). However, this overlooks the unique quality of these buildings being designed together as the foundation of LACMA – this is not a case where three buildings were haphazardly erected at different time periods, under different circumstances, and featuring different designs. Under Criteria C, the DEIR dismisses the 1965 Complex's significance to architect Pereira and New Formalism style, citing bad reviews, Pereira's other works, and the 1980's construction of the Americas Building that disrupted the site plan. (DEIR IV.C-49-51). Ironically, the proposed Project Design here has elicited similar negative reviews (discussed above). Additionally, experts in historic preservation have noted that Pereira-designed buildings are increasingly at risk with the threat of losing the appreciation of this architect's contributions to Southern California.¹⁴ No inventory of existing Pereira buildings is provided to ensure other examples of the architect's work are readily available. Furthermore, no mention is given to the possibility of removing the Americas Building.

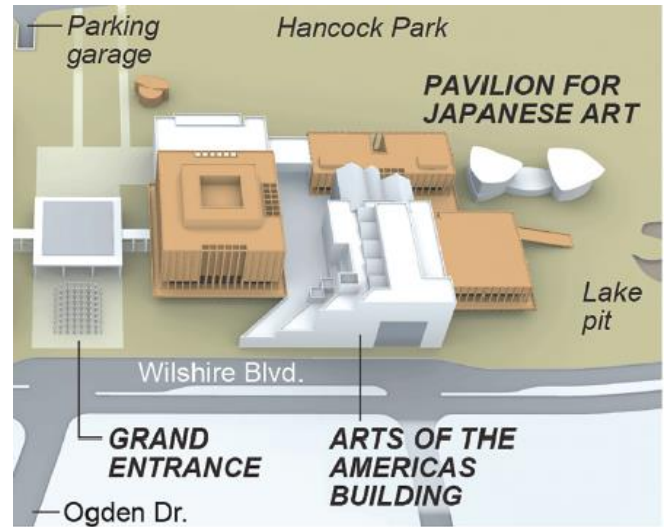
3. Strict Integrity Analysis: Admittedly, the 1965 Complex retains three of the criteria for integrity (e.g., location, material, workmanship). (DEIR IV.C-52). Claims that the material has been compromised is refuted by the Feasibility Study that confirms most of the architectural elements of the buildings dates back from the original construction. (APP-Q 5). There is no reason why this cannot be repaired or replaced with appropriate historic materials consistency with the New Formalism style. Furthermore, the other elements (i.e., setting, design, feeling, association) could be restored by removing the Americas Building and restoring the LACMA East to convey its relationships to its historic contexts for the period of 1965 to 1969.

4. Cumulative Impacts: As previously discussed, Pereira-designed buildings are under increasing attack of being lost. Since the 1980's, the LACMA Campus has slowly chipped away at Pereira's New Formalism vision, first with the Americas Building, and most recently with the Petersen and Academy Museums at/near LACMA West. Again, rather than seeking a historically-sensitive design, Applicant is pushing forward with yet another different design approach.

¹⁴ The Architects Newspaper (Sep. 26, 2016) Time is running out for William Pereira's modernist legacy, available at <https://archpaper.com/2016/09/william-pereira-preservation-legacy/>

5. Enhanced-Preservation Alternative:

By removing the Americas Building, the 1965 Complex could reclaim its full historical integrity. Besides the Americas Building, the Complex's other additions are minor and positioned behind the three buildings. For example, the 35,000 SF addition to the Ahmanson Building accounts for only 20 percent of the buildings current size and leaves the building's main facades completely viewable from Wilshire Blvd. Likewise, the bridge between the Hammer and Ahmanson buildings is also relatively small and not obstructing chief views from Wilshire Blvd. Furthermore, both additions were designed by the original architect and, therefore, presumptively sensitive to the New Formalism design. (DEIR II-2, IV.C-34, 42-43). Admittedly, the South and West elevations have not been significantly altered (near the Ahmanson Building) and the Bing Center (South and East elevation) has been altered the least among the LACMA East buildings. (DEIR IV.C-43-44). Hence, by merely removing the Americas Building, Applicant could reverse the historically-insensitive actions taken by LACMA in the 1980's and completely restore the 1965 Complex to its original setting, design, feeling, and association.



D. Inadequate Mitigation Measures

CEQA disfavors formulation of mitigation measures to post-approval studies with no performance standards to guide the mitigation. *See e.g.*, CEQA Guidelines § 15126.4(a)(1)(B); *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92-93. A lead agency may only defer the formulation of mitigation measures when it possesses “meaningful information’ reasonably justifying an expectation of compliance.” *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 308 (quoting *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 77 fn. 5); *see also Sacramento Old City Association v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1028-29 (mitigation measures may be deferred only “for kinds of impacts for which mitigation is known to be feasible”).

CEQA requires lead agencies to “craft mitigation measures that would satisfy enforceable performance criteria.” *City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362, 407. Imposition of specific, performance-based mitigation measures helps “[e]nsure the integrity of the process of decisionmaking by precluding stubborn problems or serious criticism from being swept under the rug.” *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935; *see also Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 280-281. Nor may a lead agency rely on mere compliance with existing laws or unrealistic mitigation measures of uncertain efficacy/feasibility. *See e.g., Cleveland III*, ___ Cal.App.5th ___ at 21 (“none of these measures had any probability of implementation, their inclusion in the EIR was illusory.”); *Californians for Alternatives to Toxics v. Department of Food and Agriculture* (2005) 136 Cal.App.4th 1, 17 (“[c]ompliance with the law is not enough to support a finding of no significant impact under the CEQA.”); *Kings County Farm Bureau*, 221 Cal.App.3d at 727 (finding groundwater purchase agreement inadequate mitigation because there was no evidence that replacement water was available).

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Here, the DEIR fails to correctly identify impacts on aesthetics, land use, historic resources, or correctly identify the Project's uses that underlie the DEIR's analysis of traffic, air quality, and GHG impacts. As such, the DEIR is wholly inadequate and must be cured to correctly identify impacts, proceed to fully mitigate with performance-based measures, and consider an adequate range of alternatives that would reduce unavoidable significant impacts. Other flaws to be avoided are reliance on illusory mitigation measures, like GHG mitigation measure PD E-2 that does not actually commit to installing 20 percent electric stations (capable of, is not the same as actually will be installed). (DEIR IV.E-40).

E. Improper Project Objectives & Insufficient Alternatives

The discussion of mitigation and alternatives is "the core of an EIR," requiring a lead agency to select a reasonable range of alternatives for evaluation guided by a clearly written statement of objectives. *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564-65; see also CEQA Guidelines § 15124(b). Defining objectives too narrowly or too broadly or artificially limiting the lead agencies' ability to implement reasonable alternatives by prior contractual commitments has the potential to result in a legally deficient range of alternatives. See e.g. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1447; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736. Instead, a "reasonable range of alternatives" should be:

- "capable of being accomplished in a successful manner" (Pub. Res. Code § 21061.1);
- "attain most of the basic objectives of the project" (*Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1509 (citing CEQA Guidelines § 15126.6(a) and (f)); and
- achieve the project's "underlying fundamental purpose" (*In re Bay-Delta* (2008) 43 Cal.4th 1143, 1164-1165 (citing CEQA Guidelines § 15124(b)).

While alternatives must implement the most basic project objectives, they need not implement all of them. See *California Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 991; see also *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 488-489. The discussion must "focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be costlier." *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 873; see also CEQA Guidelines § 15126.6(a); *Cleveland III*, __ Cal.App.5th __ at *25 (EIR discussion deficient where no alternative was considered that significantly reduced total vehicle miles traveled and where the alternatives labeled 'transit emphasis' was a "misnomer" given they only advanced certain rapid bus projects, left rail/trolley projects largely unchanged, and provided no increased transit projects/services).

Instructive is the recent opinion in *LA Conservancy*. There, the applicant proposed demolition the historic Lytton Savings Bank Building¹⁵ and replacing it with a pedestrian-friendly mixed-use development (249-residential units and 65,000 SF of commercial space). The City rejected as 'infeasible' a historical-sensitive alternative based, *inter alia*, (1) aesthetic consideration opined by renowned project architect, (2) pedestrian-orient objectives having no impact on the physical environment, and (3) a feasibility study stating the alternative would reduce the project's profitability. *LA Conservancy*, pp. 34-40. The court rejected this as substantial evidence where the

¹⁵ The same Lytton that founded LACMA's 1965 Center. (DEIR IV.C-39)

project's underlying basic objective was redeveloping the site with an economically-viable, mixed-use project that included low-income housing – **the project's beneficial social-byproducts and "non-basic objectives" had no potential impact on the environment and therefore irrelevant to the analysis.** *Id.* at 27, 34-36.

Here, like in *LA Conservancy*, the Applicant has pre-committed itself to the Project Design:

1. ***Objectives Selectively Narrow:*** The stated underlying purposes are too narrow. The underlying purpose or function of this Project is to provide an adequate space to house LACMA's permanent collection, while also meeting the future needs of LACMA patrons in an energy-efficient structure. (DEIR II-15). This can be achieved in a variety of alternatives, but the Applicant artificially constrains itself by pre-committing to specific design features masked as objectives:

- Must replace 1965 Complex and Americas Building with new building.
- Must include main exhibition level.
- Must have horizontal layout.
- Must have a single level.
- Must provide a sense of transparency.
- Must have artwork visible from the exterior.
- Must have surrounding environment visible from the interior.

2. ***Reliance on Non-Basic Objectives:*** As in *LA Conservancy*, the DEIR includes relatively few underlying functional objectives, but includes numerous non-basic objectives that favor demolition/new-construction strategies, incorporate architect-driven design features, numerous claims of beneficial social byproducts, and goals promoting transit/pedestrian oriented development. The Project objectives here mirror those involved in *LA Conservancy*, which are improperly used to reject Alternative 2 as an environmentally superior alternative that meets the underlying Project objectives. (DEIR V-59-60). For example, the Project objective to “[r]eplace **inefficient**, deteriorating buildings with a new, **environmentally sustainable** building that incorporates **state-of-the-art** resource management and technology,” mimics the Lytton Saving Project objective to “revitalize an **aging and underutilized commercial site** ... [i]mprove the **energy efficiency** of on-site uses.” (*Compare* DEIR II-15-16 with *LA Conservancy*, 19:3-20:12) (emphasis added). Again, Project objective “[i]mprove the **pedestrian environment** ... locate new development in a manner that enhances public areas with greater open space and **pedestrian connectivity** ... [m]aximize use of existing and future **mass transit infrastructure**” parallels Lytton Saving Project objective to “support and **encourage the use of nearby public transit lines** and **promote the use of bicycles** as well as walking ... [e]nhance **pedestrian activity** ... [c]apitalize on the site's location ... promote the use of **public transportation** and **reduce vehicle trips and infrastructure costs.**” (*Id.*) (emphasis added). Similarly, the Project objectives to provide art “**visible from the exterior** ... providing **transparency and greater public access to art** and **open space areas**” are analogous of the design features and beneficial social byproducts discussed in the Lytton Saving Project objective of improving “the **visual character** ... **high quality architectural design** ... **vibrant urban** living development ... **attractive retail face** along street frontages.” (*Id.*) (emphasis added).

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3. Unsubstantiated Feasibility Claims: Like in *LA Conservancy*, Applicant prepared a Feasibility Study purporting to show major/substantial deficiencies in the 1965 Complex and recommending demolition. (DEIR I-27, V-28-29; APP-Q). The Feasibility Study demonstrates that Alternative 2 is cheaper than new construction and therefore feasible. Furthermore, the Study does not provide any evidence that the alternative would be financially impossible.

4. Alternative 2 Analysis Ignores Impacts and Relies on Non-Basic Objectives: The DEIR admits Alternative 2 is environmentally superior to the Project in various areas (e.g., historical, archaeological, hydrology/water quality/groundwater, traffic, tribal). (DEIR V-8-12, 38). However, the DEIR relies on false assumptions to inflate the alternative's other impacts as compared to the Project, for example:

- DEIR claims aesthetic impacts are worse under this alternative because it does not provide as much open space as the Project. (DEIR V-31). Yet, this ignores the Project's aesthetic, loss of public seating, and historical impacts. Furthermore, like *LA Conservancy*, open-space is a non-basic objective in this circumstance.
- DEIR claims that this alternative has a larger footprint because it is taller and bulkier than the Project. (DEIR V-32). However, this is misleading given the 1965 Complex and America Buildings span a smaller area on LACMA East, as compared to the Project that spans 860-feet throughout LACMA East, Wilshire Blvd., and Spaulding Lot. Furthermore, the alternative maintains substantial views of the 1965 Complex,¹⁶ and only distant views to the north are currently blocked by this smaller footprint. In comparison, by spanning a larger distance, the Project's blocks views from every vantage point.¹⁷
- DEIR claims that the alternative would have greater height and massing impacts compared to the Project (DEIR, V-33), but this a comparison to the Project Design which is a non-basic objective and ignores the aesthetic and historic value of the 1965 Complex.
- DEIR claims alternative would have greater shadow impacts from the presumptively 12-story structure placed on Spaulding Lot (DEIR V-35), yet that assumes maximum development, which is not a foreseeable outcome. Nor is a mixed-use development including office/residential mandatory. Given the Project already envisions museum-uses on Spaulding Lot, it is more likely LACMA will develop the site with parking provided at the Ogden Lot. As such, more of Spaulding Lot site could be utilized and thereby reduce the need for greater height—thus reducing any potential shadow impacts. This inaccurate presumption that the Spaulding Lot will be built to a maximum 12-story height, with its inflated traffic-generating mixed-uses, infects other impact determinations, which are made worse by the DEIR's overemphasis on non-basic objectives (e.g., light/glare, paleontological, land use, noise, public services, traffic, utilities). (DEIR V-33-34, 39, 48, 49-51, 53-58).

¹⁶ Ahmason Building's easterly and southerly facades and Bing Center's westerly and southerly facades remain largely unaffected by Americas Building.

¹⁷ The Bridge blocks easterly and westerly views from pedestrians and motorist traveling on Wilshire Blvd., the Bridge and structures on Spaulding Lot block southerly viewing from Wilshire Blvd., and the remaining structures on LACMA East block northerly views from Wilshire Blvd.

- DEIR claims that the construction duration would be the same and, therefore, aesthetic impacts related to construction would be the same under this alternative. (DEIR V-30). However, the DEIR fails to identify the construction-equipment fleet associated with renovation (Alternative 2) versus a demolition/new-construction (Project). Hence, the Project would require more heavy equipment (e.g., bulldozers, excavators, cranes, etc.) and present greater staging challenges, which would be avoided and/or substantially reduced for a mere renovation job. This error infects other impact comparisons to the Project including localized air quality, toxic air contaminants, and noise. (DEIR V-35-36, 49).
- DEIR claims the alternative’s greater square-footage and potential mixed-use project on Spaulding Lot would generate greater mobile-emissions and thereby induce greater air quality impacts related to operations. (DEIR V-36-37). Yet this is predicated on the misleading project description that overestimates LACMA East’s existing building square-footage, improperly assumes that Spaulding Lot can only be developed as a mixed-use project, and ignores the traffic generated by new patrons attracted to the site based on attendance growth rates.
- DEIR claims that the alternative would have greater GHG impacts than the Project (DEIR V-40), yet this is based on the same flaws discussed above. Furthermore, neither the DEIR nor the Feasibility Study (APP-Q) quantify the expected efficiency gains from retrofitting LACMA East versus new construction under the Project. This critical information is missing from the DEIR despite this alternative being discounted substantially for supposed efficiency reasons. The Applicant must show its work.

5. *Failure to Consider Reasonable Range of Alternatives:* The analysis fails to examine a denser, more compact design that would provide sufficient square-footage (“*Compact-Design*”) alternative, as suggested by architects during the Notice of Preparation comment period. (APP-A 193-196). Nor was a historically superior option considered whereby the Americas Building is removed and a new building constructed on the Spaulding Lot (“*Enhanced Preservation*”), which would restore the 1965 Complex to its New Formalism design. Although the DEIR acknowledges the Spaulding Lot could be developed with a 436,000 SF mixed-use building (DEIR V-29), more than four-times the size of the 107,650-SF Americas Building (DEIR II-2), it only considers 115,000 SF of museum-related spaces in Alternative 4—claiming development is restricted based on existing zoning regulations. (DEIR I-30). This is utterly contradictory to the DEIR’s claim of intergovernmental immunity and that the Spaulding Lot is not subject to City zoning regulations. (DEIR I-11-12, IV.H-5, 14). Both the Compact-Design and Enhanced Preservation alternatives would provide adequate space to house LACMA’s permanent collection, while meeting the future needs of LACMA patrons, all in an energy-efficient structure. Additionally, each would reduce the impacts the DEIR fails to properly identify/analyze (e.g., aesthetics, construction-related, land use impacts, air quality, etc.).

F. Statement of Overriding Consideration

The DEIR admits, at a minimum, that the Project will have significant, unmitigated traffic, air quality and noise impacts. So too, Commentors are concerned about potentially significant aesthetics, land use, historic, and other impacts discussed herein. Notwithstanding intergovernmental immunity, the Project fails to impose all feasible mitigation measures or identify a CEQA-compliant statement of overriding considerations (discussed above). *See Lawler v. City of Redding* (1992) 7 Cal.App.4th 778 (vacating city’s approval of a sports facility on city-owned land in an unincorporated area until adopting measures to sufficient mitigate noise impacts).

When approving a project that will have significant environmental impacts not fully mitigated, a lead agency must adopt a “statement of overriding considerations” (“*SOC*”) finding that the project’s benefits outweigh its environmental harm. See CEQA Guidelines § 15043; see also Pub. Res. Code § 21081(b); *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222. A SOC expresses the “larger, more general reasons for approving the project, such as the need to create new jobs, provide housing, generate taxes and the like.” *Concerned Citizens of S. Central LA v. Los Angeles Unif. Sch. Dist.* (1994) 24 Cal.App.4th 826, 847. The SOC must fully inform and disclose the specific benefits expected to outweigh environmental impacts, supported by substantial evidence. See CEQA Guidelines §§ 15043(b), 15093(b); see also *Sierra Club*, 10 Cal.App.4th at 1223. Furthermore, an agency may adopt a SOC **only after** it has imposed all feasible mitigation measures to reduce a project’s impact to less than significant levels. See CEQA Guidelines §§ 15091, 15126.4. Hence, lead agencies may not approve a project with significant environmental impacts when feasible mitigation measures can substantially lessen or avoid such impacts. See Pub. Res. Code § 21002; see also CEQA Guidelines § 15092(b)(2).

Moreover, in addition to imposing all feasible mitigation, to the extent that overriding considerations are needed, key among the findings that the lead agency County must make is that:

Specific economic, legal, social, technological, or other considerations, including the provision of **employment opportunities for highly trained workers**, make infeasible the mitigation measures or alternatives identified in the environmental impact report... [and that those] benefits of the project outweigh the significant effects on the environment.

Pub. Res. Code § 21081(a)(3) and (b) (emphasis added).

Here, the DEIR makes meagre attempt to determine whether new jobs created by the Project, in either the construction phase or the operational phase, will be for “highly trained workers,” and what the likely salary and wage ranges of these jobs will be. Without this information, the County lacks substantial evidence to make any statement of overriding considerations.

The County should require payment of prevailing wages for all construction phase workers, and living wages for all operational phase workers. Such a requirement will ensure that the Project provides “employment opportunities for highly trained workers” in accordance with the mandates of CEQA. Without such requirements, the Project may actually depress wage rates and fail to provide high quality job opportunities.

In short, the County cannot find that the economic benefits of the Project outweigh the environmental costs if it does not know what the economic benefits will be. A revised DEIR is required to provide this information. This issue of job quality is critically important to Local 11.

G. DEIR Recirculation is Required

CEQA requires a lead agency to re-circulate an EIR when significant new information is added to the EIR following public review but before certification. See Pub. Res. Code § 21092.1. New information is significant if “the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project” including, for example, “a disclosure showing that ... [a] new significant environmental

impact would result from the project.” CEQA Guidelines § 15088.5. Here, the issues raised present significant CEQA issues that must be cured and re-vetted by the public via recirculation of the DEIR.

IV. CONCLUSION

To summarize, Commentors are concerned with the various CEQA issues, including the Project’s significant, unmitigated air quality, noise and traffic impacts, which will require an adequate statement of overriding considerations. To that end, the County should ensure provisions are included to guarantee quality employment opportunities for highly trained workers at LACMA.

Commentors reserve the right to supplement these comments at future hearings and proceedings for this Project. *See Cmtys. for a Better Env’t*, 184 Cal.App.4th at 86 (EIR invalidated based on comments submitted after Final EIR completed); *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 (CEQA litigation not limited only to claims made during EIR comment period).

Finally, on behalf of Commentors, this Office requests, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. *See* Pub. Res. Code §§ 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f) and Gov. Code § 65092. Please send notice by electronic and regular mail to: Gideon Kracov, Esq., 801 S. Grand Avenue, 11th Fl., Los Angeles, CA 90017, gk@gideonlaw.net (cc: jordan@gideonlaw.net).

Thank you for consideration of this inclusive of these comments. We ask that this letter and attachments are placed in the administrative record for the Project.

Sincerely,



Gideon Kracov
Attorney for Local 11 and Commentors

ATT: Exhibit A: *Los Angeles Conservancy v. City of Los Angeles*

EXHIBIT A

FILED
Superior Court of California
County of Los Angeles

APR 25 2017

Sherril R. Carter, Executive Officer/Clerk
By Fernando Becerra, Jr., Deputy

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

LOS ANGELES CONSERVANCY, a non-
profit corporation)

Petitioner,)

vs.)

CITY OF LOS ANGELES, *et al.*,)

Respondents)

AG-SCH 8159 SUNSET BOULEVARD)

OWNER L.P., et al.,)

Real Parties in Interest)

Case No.: BS166487

Order Granting Petition for Writ of Mandate as
to Rejection of Preservation Alternatives and
otherwise Denying Petitions for Writ of
Mandate.

Dept. 86
Hearing: April 19-20, 2017

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1 This order addresses numerous challenges to a large mixed use development (“project”)
2 that Real Party proposes to construct in the City of Los Angeles on Sunset Boulevard. The project
3 as designed by architect Frank Gehry (Alternative 9) promises to be an iconic architectural addition
4 to the City’s landscape that will transform and revitalize the neighborhood by adding additional
5 housing, open space, and commercial outlets. The project contemplates 249 new residential units
6 (of which 30 are luxury condominiums, 26 are affordable housing units, and 12 are workforce
7 housing units) and 65,000 feet of commercial space on a 2.56 acre parcel. The proposed project
8 also requires demolition of a 1960 modernist bank building (“bank building”) notwithstanding its
9 historical significance.

10 Several parties opposed to the project have filed petitions for writ of mandate seeking a
11 court order invalidating the City’s approval of the project: Los Angeles Conservancy (LAC) (Case
12 No. BS166487); JDR Crescent LLC and IGI Crescent LLC (collectively JDR Crescent) (Case No.
13 BS166525); Fix the City, Inc. (Case No. BS166484) and Susan Manners as Trustee (Case No.
14 166528). As explained below, the Court finds merit in only one of the challenges. The Court
15 interprets CEQA to require the City to make specific additional findings supporting its rejection
16 of alternatives preserving the historic bank building and to support the findings with substantial
17 evidence. On that issue alone, the Court remands the matter for further proceedings. The Court
18 rejects all other challenges to the project.

19 **I. The City’s Approval Complied with Local and State Laws**

20 Petitioners argue the City’s approval violated various laws relating to affordable housing,
21 planning, zoning, street vacations and seismic activity. The Court’s standard of review on these
22 allegations is whether the City proceeded in accordance with law and whether its findings are
23 supported by substantial evidence. (*Wollmer v. City of Berkeley* (2009) 179 Cal.App.4th 933,
24 939.)

1 **A. *The City's Approval Is Consistent with Land Use Laws***

2 **1. Petitioners Density Challenges as to "Off Menu" Items Are**
3 **Timely**

4 Petitioners Fix the City and JDR Crescent argue the City's approvals of density bonuses
5 were unlawful. The City dismisses these arguments as barred by the statute of limitations, Govt.
6 Code § 65009(c)(1) which requires service of a challenge within 90 days and LAMC § 12.22
7 A.25(g)(3)(i)(b) which provides the decision "of the City Planning Commission shall be final."
8 Based on the Planning Commission's August 17, 2016 Letter of Determination, the City argues
9 that Petitioners' challenges to "off-menu housing incentives" are untimely because they were filed
10 after November 15, 2016. Petitioners rely on LAMC § 12.22.A.25.(g)(3)(ii) which provides, "For
11 Housing Development Projects requesting the waiver or modification of any development
12 standard(s) not included on the Menu of Incentives in Paragraph (f) above, and which include other
13 discretionary applications . . . a. The applicable procedures set forth in Section 12.36 of this Code
14 shall apply." Petitioners also rely on LAMC § 12.36.C.1(b) which provides, "[Notwithstanding
15 any provision of this Code to the contrary, the following shall apply for projects requiring multiple
16 approvals:] . . . The City Council shall decide all appeals of the City Planning Commission's
17 decisions or recommendations as the initial decision-maker on projects requiring multiple
18 approvals."

19 The Court agrees with Petitioners that the latter section controls here. LAMC 12.22
20 A.25(g)(3)(i) governs Housing Development Projects that include a request for an off menu
21 incentive and "are not subject to other discretionary applications." On the other hand, LAMC
22 12.22 A.25(g)(3)(ii) governs Housing Development Projects that include a request for an off menu
23 incentive as well as "other discretionary applications." In this case, the project included requests
24 for two off menu incentives as well as a discretionary application for a Master Conditional Use
25

1 Permit for the sale of alcoholic beverages.¹ Thus, LAMC §§ 12.22 A.25(g)(3)(ii) and 12.36.C.1(b)
2 permitted Petitioners to appeal the Planning Commission’s entire decision, including its decision
3 on off menu incentives, to the City Council. Accordingly, because the statute of limitations did
4 not begin to run until the City Council’s approval of the Project was final, Petitioners’ claims are
5 not time barred.

6 **2. The City Has Discretion to Provide Off Menu Incentives**

7
8 LAMC § 12.22.A.25(f)(4)(ii) includes an “on menu” incentive allowing a 3:1 FAR (floor
9 area ratio) for Housing Development Projects if (among other things) 50% of the commercially
10 zoned parcel is within 1500 feet of a transit stop. In this case, the project did not qualify for that
11 incentive because it is 1560 feet from the nearest transit stop. Petitioners argue the City had no
12 discretion to allow a density bonus that did not meet the terms of an item specified in the “Menu
13 of Incentives” which provides, “Housing Development Projects that meet the qualifications of
14 Paragraph (e) of this subdivision may request one or more of the following Incentives as applicable
15” (12.22.A.25(f).) The City points out that the language in LAMC 12.22.A.25(f)(4)(ii) is not
16 exclusive and further the Density Bonus Law giving rise to that ordinance specifically empowers
17 a city to approve “[o]ther regulatory incentives or concessions proposed by the developer.” (§
18 65915)k(1), (k)(3).)

19 The Court agrees with the City that the ordinance is not reasonably interpreted as limiting
20 the City’s discretion to provide incentives to the items listed in the Menu. The plain language
21 stating that projects “may request” an Incentive is directed to the developers of the projects and
22 places no restrictions on the City’s discretion to grant other incentives.
23

24 ¹ LAMC § 16.05.B.2 defines “Discretionary Approval” as “An approval initiated by a property
25 owner or representative related to the use of land including, but not limited to, a: . . . (d) conditional
use approval;”

1 **3. The City Did Not Have to Change Zoning, Amend the General**
2 **Plan or Engage in Any Other Legislative Act to Approve the**
3 **Density Bonus**

4 The City cites the State Density Bonus law, Govt. Code §§ 65915(j)(1) as authority for its
5 discretion to award density bonuses without changing the zoning or amending the general plan.
6 The Density Bonus Law was enacted in 1979 and requires local governments to provide density
7 bonuses (from 5 percent to 35 percent) to projects incorporating low income or senior housing.
8 Section 65915(j)(1) states, “The granting of a concession or incentive shall not require or be
9 interpreted in and of itself to require a general plan amendment, local coastal plan amendment,
10 zoning change, study or other discretionary approval.” The Court agrees with the City that this
11 provision controls and reflects the State’s very strong policy in favor of increasing the supply of
12 housing. The City therefore did not have to change zoning or amend the general plan in order to
13 award density bonuses.

14 Petitioners argue that the City’s density bonuses violated D limitations. LAMC §
15 12.32.G.4 defines “D Development Limitations” explaining that the necessary findings the
16 Council must make to designate an area “D Development.” The City argues that the mandatory
17 nature of the Density Bonus Law necessarily overrides procedures for changing a D Development
18 designation based on language in the implementing ordinance, LAMC § 12.22.A.25(c)
19 (“Notwithstanding any provision of this Code to the contrary, the following provisions shall apply
20 to the grant of a Density Bonus for a Housing Development Project. . .”) and LAMC
21 § 12.22.A.25(e)(1) (“In addition to the Density Bonus and parking options identified in Paragraphs
22 (c) and (d) of this subdivision, a Housing Development Project that qualifies for a Density Bonus
23 shall be granted the number of Incentives set forth in the table below.”) The City also cites the
24 mandatory nature of the Density Bonus Law which directs that cities “shall grant” the specified
25 density bonuses (§ 65915(b)(1)) and *Latinos Unidos del Valle de Napa y Solano v. County of*
Napa (2013) 217 Cal. App. 4th 1160, 1169 (which invalidated an ordinance conditioning a bonus

1 on the construction of more units than the number specified in the Density Bonus Law) as authority
2 for the proposition that the provisions of the Density Bonus Law preempt any conflicting
3 ordinance.

4 The Court notes that Section 65915(e)(1) mandates, “In no case may a city . . . apply any
5 development standard that will have the effect of physically precluding the construction of a
6 development meeting the criteria of subdivision (b)” This provision and the law cited by the
7 City make application of the Density Bonus Law mandatory and preemptive. The Court therefore
8 concludes the City could approve the project without taking any action with respect to the D
9 Development zoning designation.

10 **4. The City’s Calculation of the Density Bonus Was Not an Abuse of**
11 **Discretion**

12 Fix the City argues the City improperly calculated the amount of the density bonus award
13 to Petitioners because it failed to use the General Plan or Zoning as the baseline and because
14 commercial square footage was improperly included in the calculus. It contends the City
15 calculated residential density based on the C4-1D zone “ignoring the limitations in the Hollywood
16 Community Plan” which limited density on the site to 1:1 FAR while parcels located in Height
17 District 1 were allowed a 1:5 FAR. Fix the City fails to demonstrate that the City’s bases for
18 calculating FAR were an abuse of discretion. As the City points out, its determination that the
19 EIR’s designation of C4 was appropriate and allows for a wide range of mixed use projects. (Opp.
20 p. 40.) Fix the City has similarly failed to demonstrate the City’s determination that the 45-foot
21 height limit for residentially zoned properties does not apply to this mixed use project. (*Id.*)
22
23
24
25

1 **5. Petitioners Failed to Raise at the Administrative Level Their**
2 **Argument that the Vesting Tentative Map Conflicts with a 1976**
3 **DWP Easement**

4 Fix the City and JDR Crescent contend the Tentative Map is not consistent with the general
5 and specific plans and argue the approval violates Gov. Code § 66474.61(g) by failing to evaluate
6 whether the project conflicts with a 1976 DWP easement that was never disclosed in the approval
7 process. (AR 65228.) The City objects that Petitioners waived this argument by failing to raise it
8 during the administrative proceedings. (*Sierra Club v. City of Orange* (2008) 163 Cal.App.4th
9 523, 536 [“The petitioner bears the burden of demonstrating that the issues raised in the judicial
10 proceeding were first raised at the administrative level.”].) In reply, Fix the City and JDR Crescent
11 fail to cite evidence in the record showing that this issue was raised at the administrative level.
12 Accordingly, the Court finds that Petitioners waived this argument.

13 In any event, the Court finds that the City’s approval of the Tentative Map did not violate
14 Gov. Code § 66474.61(g), which states that an agency must deny approval of a tentative map if
15 “the design of the subdivision or the type of improvements will conflict with easements, acquired
16 by the public at large, for access through or use of property within the proposed subdivision.” The
17 City points out and the Court agrees that the 1976 DWP easement was an exclusive easement “for
18 the use of the department of water and power of the City of Los Angeles,” not an easement acquired
19 by the public at large for access through or use of the property. (Lake Decl., Exh. 3, p. 5, ¶ 5.)

20 **6. The Project Does Not Violate the Hollywood Community Plan’s**
21 **Density Policies**

22 Fix the City asserts the project violates Hollywood Community Plan Policies against
23 increased density by subdivision, noting that increased density exacerbates traffic and
24 compromises emergency response times. JDR Crescent points out that with a proposed FAR three
25 times greater than would be permitted under the Hollywood Community Plan, the project is
fundamentally inconsistent with the “down zoning” contemplated in the Plan. It is true that the

1 project site is zoned as “C4-1D,” the 1D designating a maximum floor area ratio of 1:1 (the total
2 floor area of all buildings may not exceed one times the buildable area of the lot). As discussed,
3 however, because the project creates low income housing units, the State’s Density Bonus Law
4 permits such a “density increase over the otherwise maximum allowable residential density under
5 the applicable zoning ordinance and/or specific plan” (L.A.M.C. § 12.22.A.25(b).)
6 Furthermore, as stated in the EIR, the project is consistent with a number of other objectives in the
7 Hollywood Community Plan including: “furthering the development of Hollywood as a major
8 center of population, employment, and retail services, providing land uses at densities required to
9 accommodate future growth in the area, and providing housing for a variety of income levels while
10 preserving and enhancing the residential character of the community.” (AR 565.) The project also
11 supports the Plan’s objectives of promoting economic well-being, improving transportation
12 infrastructure, and creating public and private open spaces and recreational opportunities. (AR
13 565-567.)

14 ***B. The City Properly Converted Traffic Lanes to Pedestrian Use***

15 Fix the City and CDR argue that withdrawal of the right turn lane on Crescent Heights
16 Boulevard was the vacation of a street under Streets & Highways Code § 8309 which defines
17 “vacation” as “the complete or partial abandonment or termination of the public right to use a
18 street, highway, or public service easement” subject to proceedings for petitions to vacate set forth
19 in Streets & Highways Code § 8320 et seq.

20 The City argues that the issue of street vacation is not ripe because “the only Project
21 approvals that are subject to this action are those that were appealed from the Planning
22 Commission to the City Council” and that such appeals did not address the B permit which has not
23 yet been issued. (p. 51.)
24
25

1 The Court agrees with the City that this issue is improperly raised at this juncture and that
2 it is not evidence of any CEQA violation.

3 ***C. The City Properly Reconfigured City Property***

4 Fix the City argues the City’s reconfiguration of a traffic island (9,345 square feet
5 purchased by the city in the 1960s) into open space was a gift of land that violated City Charter §
6 385 (stating that “any real . . . property owned by the City that is no longer needed may . . . be sold
7 under terms and conditions prescribed by ordinance”) and the implementing procedures under Los
8 Angeles Administrative Code §§ 7.21 et seq.

9 The City counters by arguing the relocation of the traffic island in order to expand the plaza
10 does not require a sale of property or dedication of any easement because the property remains
11 under the ownership and control of the City as it is improved and maintained by Real Party. (See
12 AR 753 [“This improvement would not require the dedication of an easement or purchase of the
13 traffic island property; rather, the existing travel lane and traffic island would remain under the
14 ownership and control of the City, but would be improved and maintained as public space by the
15 Project applicant.”].) The Court agrees that, as structured, the reconfiguration of the traffic island
16 does not violate the City Charter.

17 ***D. The City’s Approvals Did Not Violate the Alquist-Priolo Act.***

18 The project is located within an official Alquist-Priolo Earthquake Fault Zone established
19 by the California Geological Survey for the Hollywood fault. The Fault Zone “shows a trace of
20 the Hollywood fault north west of the site.” (AR 56754.) Fix the City complains the project
21 violates Cal. Code Reg. tit. 14 § 3603(a) which states, “No structure for human occupancy . . .
22 shall be permitted to be placed across the trace of an active fault” or within 50 feet of an active
23 fault as such area is presumed to be underlain by active fault branches unless proven otherwise by
24 a geologic report. It takes issue with the conclusion of the City’s disregard of the 50 foot setback
25

1 citing a statement by the City engineer in a 2014 memorandum to City Planning that “[t]here are
2 too many epistemic and aleatory uncertainties regarding the Hollywood fault to warrant
3 disregarding the required setback.” (AR 56755.)

4 The City argues Petitioners overstate the reach of the Alquist-Priolo Act pointing out that
5 it only applies to structures built across the trace² of an active fault as opposed to structures in the
6 vicinity of active faults. (Pub. Resources Code, § 2621.5.) According to the City, there is no 50
7 foot setback requirement because the project is not located within 50 feet of an active fault; the
8 geologists concluded the nearest fault trace lies more than 100 feet northwest of the site.
9 (AR14213, 14220, 14229-34.)

10 The City cites substantial evidence supporting its conclusion that no active faults underlie
11 the project. (OB p. 57.) It also correctly points out Petitioners offer no contrary evidence.
12 Petitioners argue the City abused its discretion by failing to investigate whether there are any off
13 site faults that may impact the project. While the City argues that no off site investigation is
14 necessary under the Alquist-Priolo Act, Petitioners argue there is “a presumption that a surface
15 fault trace exists where an area has not been investigated” and that the City acknowledged this
16 presumption. (Reply p. 6.) However, the record cited in support of this argument (AR56755 and
17 AR 14159) does not support the allegation of presumption. These documents indicate that in lieu
18 of requiring Real Party to examine the area 50 feet to the northwest of the project to ascertain
19 whether there was an active fault, the City’s Grading Division Chief was willing to compensate
20 for that possibility by accepting a design modification (a reinforced foundation). (AR 14159,
21 14256-57 [“Alternately, according to the City geologist, in lieu of undertaking additional borings

22
23
24
25 ² Cal. Code Regs., tit. 14, § 3601(b) defines a “fault trace” as “that line formed by the intersection
of a fault and the earth’s surface, and is the representation of a fault as depicted on a map, including
maps of earthquake fault zones.”

1 or providing a 50-foot setback, an acceptable off-fault surface rupture mitigation measure is, within
2 the 50-foot setback area, to design [a reinforced foundation].”.)

3 Petitioners also cite an article published by the California Geological Survey setting forth
4 guidelines to “assist geologists who investigate faults relative to the hazard of surface fault
5 rupture.” (AR 27296.) The article recommends that fault investigations evaluate data “obtained
6 both from the site and outside the site area” (AR 27296) and that fault investigation reports should
7 include findings about the “[I]ocation and existence (or absence) of hazardous faults on or adjacent
8 to the site” (AR 27298). In this case, Real Party’s consultant, Golder Associates, did in fact
9 perform boring and cone penetration tests inside and outside of the site boundary. (AR 14220.)

10 The Court finds no abuse of discretion in any alleged failure to conduct further off site
11 investigation.

12 ***E. No Violation of AB 32***

13 Mannors contends the project fails to meet the 19 percent reduction in greenhouse gases
14 mandated under AB 32 citing *Center for Biological Diversity v. California Dept. Fish and Wildlife*
15 (2016) 62 Cal.4th 204 (*Biological Diversity*) (holding that evidence of a project’s decrease in
16 greenhouse gases by 29% is not necessarily evidence of compliance with AB 32 which requires a
17 29% reduction statewide). In that case, the question was whether an EIR for a large residential
18 development validly determined there was no significant impact caused by discharge of
19 greenhouse gases. The court held the lead agency’s reliance on AB 32 as a criterion of significance
20 was legally permissible but the criterion was not properly applied. In this case, the City did not
21 rely on AB 32 to determine the criterion of significance.

22 *Biological Diversity* is distinguishable because the project at issue in that case was
23 estimated to increase annual emissions by 269,053 metric tons of CO₂ equivalent. In this case, the
24 EIR estimates a decrease in annual emissions. Moreover, Mannors offers no evidence countering
25

1 the City’s conclusion that there is no non-speculative way to estimate the cumulative effects of
2 this project on statewide GHG emissions. (AR 0084-85.) The Court finds no abuse of discretion
3 relating to AB 32.

4 ***F. No Violation of Right to Appeal***

5 Manners argues that CEQA allows an appeal to an agency’s elected decision making body
6 citing Guidelines § 15025(b)(1) (“(b) When an EIR is certified by a non-elected decision-making
7 body within a local lead agency, that certification may be appealed to the local lead agency’s
8 elected decision-making body, if one exists.” Manners contends the City violated due process by
9 delegating this appeal to a committee of five city council members (“PLUM”). In support of this
10 argument, Manners cites LAMC § 17.06(A)(4) and Guidelines §§ 15090(2), (3). LAMC
11 § 17.06(A)(4) provides that an “interested person adversely affected by the proposed subdivision
12 may appeal any action of the Appeal Board with respect to the tentative map . . . to the City
13 Council.” (§ 17.06(A)(4).) “The City Council shall hear the appeal within 30 days after it is filed
14” (*Ibid.*) “At the time established for the hearing, the Council **or its Committee** shall hear
15 the testimony of the subdivider, the appellant, the Advisory Agency and any witnesses on their
16 behalf.” (*Ibid.*, emphasis added.) Because the statute expressly states that a Committee may hear
17 an interested party’s appeal, the Court finds that the City Council did not violate Manners’ due
18 process by delegating the appeal to the PLUM committee.

19 Manners’ citation to Guidelines § 15090 is also unavailing. Section 15090(2), (3) provides
20 that prior to approving a project, the lead agency must certify that: “[t]he final EIR was presented
21 to the decisionmaking body of the lead agency,” “the decisionmaking body reviewed and
22 considered the information contained in the final EIR prior to approving the project,” and “[t]he
23 final EIR reflects the lead agency's independent judgment and analysis.” Nothing in Section
24
25

1 15090(2), (3) requires the City Council to hold appeal hearings or prohibits the City Council from
2 delegating appeal hearings to a committee.

3 **G. No Unlawful Bias**

4
5 Manners asserts that contributions to LACC tainted the approval process citing Ethics
6 Omission reports showing that RPI's "lobbyist" expended "close to \$94,676 on the [City Council]
7 and the Planning Department" for the fourth quarter of 2015. (OB p. 10.) Manners cites what
8 appear to be excerpts from Quarterly Lobbying Reports by the Ethics Commission showing
9 payments by the entity Townscape Partners to Paul Hastings and Marathon Communications for
10 lobbying services on the 8150 Sunset Boulevard Project. (See, e.g., <[http://ethics.lacity.org/pdf/
11 lobbying/QRSummaries/2015-Q4.pdf](http://ethics.lacity.org/pdf/lobbying/QRSummaries/2015-Q4.pdf)> at p. 14.) These reports show payments by clients to
12 lobbyists. Manners fails to cite any evidence of payments made by Townscape Partners or any
13 lobbyists directly to members of the City Council. The Court rejects Manners' argument that the
14 mere act of lobbying City Council creates an unlawful bias on the part of the City Council.³

15 Manners also contends that the hearing officer, William Lamborn, had a conflict of interest
16 because he "works for the City." (OB p. 8.) "To prevail on a claim of bias violating fair hearing
17 requirements, [a plaintiff] must establish 'an unacceptable probability of actual bias on the part of
18 those who have actual decisionmaking power over their claims.' [Citation.]" (*Breakzone Billiards*
19 *v. City of Torrance* (2000) 81 Cal.App.4th 1205, 1236.) According to Manners, Lamborn had a
20 conflict of interest because he conducted the hearing on whether the approve the Vesting Tentative

21 ³ L.A.M.C. § 48.02 defines "lobbying activities" to include the following conduct when that
22 conduct is related to a direct communication to influence municipal legislation: "(1) engaging in,
23 either personally or through an agent, written or oral direct communication with a City official; (2)
24 drafting ordinances, resolutions or regulations; (3) providing advice or recommending strategy to
25 a client or others; (4) research, investigation and information gathering; (5) seeking to influence
the position of a third party on municipal legislation or an issue related to municipal legislation by
any means, including but not limited to engaging in community, public or press relations activities;
and (6) attending or monitoring City meetings, hearings or other events.

1 Tract Map, issued a decision approving the Tentative Map on June 23, 2016 (AR 59204-59415),
2 issued an Appeal Recommendation Report to the Planning Commission on July 28, 2016 (AR
3 60550-60782), and appeared and testified before the Planning Commission and PLUM. The Court
4 finds that Lamborn’s employment by the City and involvement in the appeals process is not
5 evidence of any actual bias on Lamborn’s part as a hearing officer. Manners’ citation to *Haas v.*
6 *County of San Bernardino* (2002) 27 Cal.4th 1017, 1020 is inapposite. In that case, the Supreme
7 Court held that a private attorney selected to be a temporary administrative hearing officer “has a
8 pecuniary interest requiring disqualification when the government unilaterally selects and pays the
9 officer on an ad hoc basis and the officer's income from future adjudicative work depends entirely
10 on the government's goodwill.” (*Id.* at 1024.) In this case, as Manners points out, Lamborn was
11 a full-time employee of the City. As a result, he did not have the same pecuniary interest in
12 deciding the matter a certain way so as to be selected for future adjudicative work.

13 ***H. Manners’ Alleged Easement Provides No Basis for Relief***

14 As an adjacent property owner, Manners asserts that the elimination of the turning lane
15 unlawfully takes away a private easement that she and other residents have historically enjoyed.
16 Manners has failed to persuade the court that she and other residents have an enforceable easement
17 interest or that the alleged violation of easement rights provides a basis for issuing a writ of
18 mandate. Manners’ remedy for alleged impingement of a valid easement is an action for damages
19 rather than a petition for writ of mandate.
20

21 ***I. The City’s Reconfiguration of the Right Hand Turn Lane Was***
22 ***Lawful under the Streets & Highways Code***

23 Fix the City argues that the Public Streets, Highways, and Service Easements Vacation
24 Law (Streets & Highway Code Sections 8300 et seq.) requires cities to follow certain requirements,
25 including notice and a public hearing, before a street is abandoned or partially abandoned or the

1 public's right to use a street is terminated. JDR Crescent contends that the City's approval of the
2 project without street vacation procedures also violated LAMC 12.36 which requires all
3 applications for approvals to be filed simultaneously. (RJN Exh. 11.) The City asserts this
4 argument is premature because the Planning Commission is not the entity that will approve the
5 proposed conversion of the right hand turn lane into a public plaza. The City's Department of
6 Public Works is the entity that will issue a B Permit authorizing the work to proceed.

7 The Court agrees that this issue is not ripe because Department of Public Works has not
8 yet acted. It is also not properly before this Court because the Planning Commission did not
9 approve this aspect of the project.

10 The Court also agrees with the City that, as a matter of law, the vacation procedures do not
11 apply to the situation at hand. In this case, the project does not terminate the public's right of
12 access to the area, it merely transforms the nature of the access from vehicular to pedestrian.

13 14 **II. CEQA Challenges to Historical Resources**

15 **A. *The City's Arguments Undermining the Historic Significance of the*** 16 ***Bank Building Are Not Relevant to Infeasibility***

17
18 The City argues at considerable length that LAC overstates the historical significance of
19 the bank building. The City also offers evidence the bank building's historic importance is
20 diminished by remodels and by the availability of similar architectural examples. (RB 60-63.)
21 These arguments are not relevant to the determination of infeasibility under Section 21081(a)
22 because, in this case, the City conceded in its Findings that demolition will have a significant
23 environmental effect. (AR 00133.) Under CEQA, the City's rejection of more protective
24 alternatives has consequences. Having found a significant impact, the City must, under CEQA,
25 withhold approval of demolition unless it properly finds substantial evidence the preservation

1 alternatives are unreasonable or infeasible and further concludes that the benefits of the approved
2 project outweigh the significant environmental effect of demolition.

3 ***B. The City’s Findings Rejecting the Preservation Alternatives as***
4 ***Infeasible Are Not Compliant with CEQA or Supported by***
5 ***Substantial Evidence***

6 **1. The City’s Findings of Infeasibility**

7 The City’s Findings (AR 27793-95) conclude “none of the historic preservation
8 alternatives, including Alternative 6, are feasible.” (AR 27793.) After acknowledging the “Draft
9 EIR determined that Alternative 6 met, or could partially meet, all of the objectives of the project,”
10 the City concluded that “under CEQA, ‘the decision makers may reject as infeasible alternatives
11 that were identified in the EIR as potentially feasible,’” citing *San Diego Citizenry Group v.*
12 *County of San Diego* (2013) 219 Cal.App.4th 1, 18. Alluding to “numerous public comments
13 raising concerns about the overall massing and design concept,” and concerns the alternatives
14 “would not enhance the quality of the neighborhood, would be visually unappealing, would
15 obstruct views [and] would not be pedestrian-friendly,” the City found the preservation alternatives
16 “would concentrate development of the remaining project site and would create a large and flat
17 monolithic design that would not allow for views through the project site, which were a primary
18 concern from the public.” (AR 27794.) The City also opined the preservation alternatives “would
19 result in a disjointed design to sidewalks, project accessibility and would not be as visually
20 appealing or pedestrian friendly” as Alternative 9.

21 The City further found that the preservation alternatives failed to achieve six of the
22 developer’s stated “project objectives” (noted in bold font below) referring to the Statement of
23
24
25

1 Project Objectives⁴ in the DEIR identifying 15 “objectives the applicant seeks to achieve.” (AR
2 264-65.)

3 **[1] Redevelop and revitalize an aging and underutilized commercial site and surface**
4 **parking lot with a more efficient and economically viable mix of residential and**
5 **commercial uses.**

6 [2] Provide housing to satisfy the varying needs and desires of all economic segments of
7 the community, including very low income households, maximizing the opportunity for
8 individual choices and contributing to Hollywood’s housing stock.

9 [3] Increase the number of affordable rental housing units in the westernmost area of
10 Hollywood.

11 [4] Capitalize on the site’s location in Hollywood by concentrating new housing density
12 and commercial uses, thereby supporting regional mobility goals to encourage
13 development around activity centers, promote the use of public transportation and reduce
14 vehicle trips and infrastructure costs.

15 **[5] Build upon the existing vitality and diversity of uses in Hollywood by providing a**
16 **vibrant urban living development along a major arterial and transit corridor.**

17 [6] Create new living opportunities in close proximity to jobs, public transit, shops,
18 restaurants and entertainment uses.

19 **[7] Provide high quality commercial uses to serve residents of the westernmost area**
20 **of Hollywood in a manner that contributes to a synergy of uses and enhances the**
21 **character of the area.**

22 [8] Bring convenient neighborhood-serving commercial uses within walking distance of
23 numerous apartments and single-family residences in the westernmost area of Hollywood.

24 **[9] Create a development that complements and improves the visual character of the**
25 **westernmost area of Hollywood and promotes quality living spaces that effectively**

⁴ Although the Guidelines § 15124(b) directs that an EIR should include a “statement of the objectives sought by the proposed project” and that the “statement of objectives should include the underlying purpose of the project,” none of the DEIR’s 15 stated objectives identifies which of the 15 states “the underlying purpose of the project.”

1 **connect with the surrounding urban environment through high quality architectural**
2 **design and detail.**

3 **[10] Enhance pedestrian activity and neighborhood commercial street life in the**
4 **westernmost area of Hollywood.**

5 **[11] Provide an attractive retail face along street frontages.**

6 [12] Provide improvements that support and encourage the use of nearby public transit
7 lines and promote the use of bicycles as well as walking.

8 [13] Improve the energy efficiency of on-site uses by creating a master planned
9 development that meets the standards for Leadership in Energy and Environmental Design
10 (LEED) certification.

11 [14] Provide housing that supports the economic future of the region in an area in which
12 the necessary infrastructure is already in place.

13 [15] Maintain and enhance the economic vitality of the region by providing job
14 opportunities that attract commercial and residential tenants.

15 (AR 27794-95.) The City explained it was approving Alternative 9 “because it addresses these
16 concerns and achieves the above-listed Project Objectives” and because “Alternative 9 would not
17 be feasible if it incorporated a preserved bank building.” (AR 27795.)

18 Notwithstanding the “significant and unavoidable impact incurred from demolition of the
19 Bank,” the City concluded “Alternative 9 achieves a design that is significantly more accessible to
20 the City in its provision of publicly accessible open space, affordable housing, green building and
21 iconic architecture that will significantly transform Sunset Boulevard [making it a] destination
22 City for residents and tourists alike.” The City concurred with Gehry Partners’ March 24, 2016
23 letter opining it was “not feasible to meet [Project Objectives] with a design that preserved the
24 bank,” quoting language from the letter:

25 “It does not provide street front engagement along Sunset Boulevard, it turns its back to
Havenhurst Drive, and it impedes pedestrian access to the project from Havenhurst and
Sunset. The size and layout of the building limits the number of types of tenants that could
occupy the space. We do not believe this building has the flexibility to adapt to a new

1 usage, which would severely limit the programming of that building The bank
2 consumes a sizable portion of the available property, which if preserved, would leave
3 insufficient space to design buildings with comparable function to the ones that we would
4 have to abandon.” (AR 57731.)

5 **2. Analysis**

6 There is no dispute, in this case, the FEIR identified demolition of the bank building as a
7 “significant effect” on the environment. In its Findings, the City rejected preservation alternatives
8 as “infeasible” under Pub. Res. Code Section 21081(a)(3), approving the project notwithstanding
9 the significant environmental effect of demolition. It is also undisputed the City’s findings of
10 infeasibility contradicted the DEIR which identified preservation alternatives (Alternative 5 and
11 Alternative 6) as potentially feasible. The question for this Court is whether, as a matter of law,
12 the City’s findings supporting its rejection of preservation alternatives complied with CEQA and
13 whether the findings were supported by substantial evidence.

14 **a) An Agency May Reject Protective Alternatives that Are** 15 **Infeasible and May Reject Unreasonable Alternatives that** 16 **Fail to Meet the Project’s Basic Project** 17 **Objectives/Fundamental Purpose**

18 Several provisions in CEQA and in the Guidelines address the rejection of proposed
19 alternatives as *infeasible*. Sections 21002 and 21002.1 articulate California’s substantive public
20 policies underlying CEQA specifying that an agency should not approve a development project
21 causing environmental impacts where feasible alternatives would mitigate those impacts. An
22 agency should not reject a more protective alternative unless the alternative is infeasible,
23 considering relevant economic, social, or other *conditions* at hand:

24 21002. The Legislature finds and declares that it is the policy of the state that public
25 agencies **should not approve projects as proposed if there are feasible alternatives** or
feasible mitigation measures available which would substantially lessen the significant
environmental effects of such projects, and that the procedures required by this division
are intended to assist public agencies in systematically identifying both the significant
effects of proposed projects and the **feasible alternatives** or feasible mitigation measures

1 which will avoid or substantially lessen such significant effects. The Legislature further
2 finds and declares that in the event **specific economic, social, or other conditions make**
3 **infeasible such project alternatives** or such mitigation measures, individual projects may
4 be approved in spite of one or more significant effects thereof.

5 21002.1 In order to achieve the objectives set forth in Section 21002, the Legislature
6 hereby finds and declares that the following policy shall apply to the use of environmental
7 impact reports prepared pursuant to this division:

8 (a) The purpose of an environmental impact report is to identify the significant effects on
9 the environment of a project, to **identify alternatives** to the project, and to indicate the
10 manner in which those significant effects can be mitigated or avoided.

11 (b) Each public agency shall mitigate or avoid the significant effects on the environment
12 of projects that it carries out or approves whenever it is feasible to do so.

13 (c) If **economic, social, or other conditions make it infeasible to mitigate** one or more
14 significant effects on the environment of a project, the project may nonetheless be carried
15 out or approved at the discretion of a public agency if the project is otherwise permissible
16 under applicable laws and regulations.

17 [(d) and (e) omitted.]

18 (Pub. Resources Code, §§ 21002 and 21002.1, emphasis added.) This Court regards the reference
19 to “conditions” in these provisions as significant because “conditions” connotes existing
20 circumstances external to the design characteristics of the proposed alternative. The Legislature’s
21 use of the word “conditions” in its statements of policy provides guidance as to the intended
22 meaning of “considerations” in Section 21081(a)(3).

23 Consistent with the policies articulated in Sections 21002 and 21002.1, Section 21081
24 prohibits approvals of a projects causing environmental impacts over feasible and more protective
25 alternative but uses slightly broader language. Section 21081(a)(3) specifies how a lead agency
should determine the feasibility of proposed alternatives with reference to specific economic and
social “considerations” rather than economic and social “conditions.” It also expands the scope of
permissible considerations to include “legal,” “technological” and “other” considerations and
identifies “employment opportunities” as an appropriate consideration:

1 21081. Pursuant to the policy stated in Sections 21002 and 21002.1, no public agency shall
2 approve or carry out a project for which an environmental impact report has been certified
3 which identifies one or more **significant effects** on the environment that would occur if the
4 project is approved or carried out **unless both** of the following occur:

5 (a) The public agency makes one or more of the following findings with respect to each
6 significant effect:

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

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

12 (3) **Specific economic, legal, social, technological, or other considerations,**
13 **including considerations for the provision of employment opportunities** for
14 highly trained workers, **make infeasible the . . . alternatives** identified in the
15 environmental impact report.

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

20 (Emphasis added.) The requirement under Section 21081 that, before rejecting an alternative the
21 agency must make two findings (a finding of infeasibility under subd. (a)(3) *and* a policy
22 determination that the benefits of the approved project override the persisting environmental
23 effects), suggests the Legislature reserved policy considerations for the latter finding and that the
24 determination of infeasibility is a prerequisite to the weighing process contemplated in subd. (b).

25 Consistent with Section 21081(a)(3), the discussion of adequate findings in Guidelines, §
15091(a)(3), suggests, as a possible finding of infeasibility, a determination that “(3) [s]pecific
economic, legal, social, technological, or other *considerations* including the provision of
employment opportunities for highly trained workers, make infeasible the . . . project alternatives
identified in the final EIR.” The factors identified in Guidelines, § 15126.6(f)(1), as “factors to be

1 taken into account when addressing the feasibility of alternatives” are consistent with the reference
2 to *conditions* in Sections 21002 and 21002.1 because they all describe circumstances or conditions
3 external to the design of the proposed alternative: “site suitability, economic viability, availability
4 of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional
5 boundaries (projects with a regionally significant impact should consider the regional context),
6 and whether the proponent can reasonably acquire, control or otherwise have access to the
7 alternative site....” The nature of these factors further suggests that the lead agency’s focus in
8 assessing feasibility should be on macroeconomic conditions (such as a need for employment),
9 wide-ranging social conditions, and existing government “plans” and policies rather than, for
10 example, an alternative’s aesthetics or other undesirable design characteristics.

11 **b) An Agency May Reject an Alternative as Unreasonable if**
12 **It Fails to Meet the Project’s Basic**
13 **Objectives/Fundamental Underlying Purpose**

14 Although in this case, the City rejected the preservation alternatives as “infeasible” because
15 they failed to meet project objectives, CEQA and the Guidelines authorize rejection of an
16 alternative that fails to meet objectives as unreasonable (rather than infeasible). The notion that a
17 failure to meet objectives renders an alternative “infeasible” is not supported by any language in
18 CEQA or the Guidelines. CEQA Section 21081 and the Guidelines (§§ 15091(a)(3) and
19 15126.6(f)) do not authorize a finding of “infeasibility” based on the alternative’s failure to meet
20 project objectives. The only discussion of objectives in connection with rejection of protective
21 alternatives is in Guidelines § 15126.6(a) which requires an EIR to identify “*reasonable*
22 *alternatives* . . . which could feasibly attain most of the *basic objectives* of the project”

23 The Guidelines, § 15126.6(c), which identifies three alternative bases for excluding a
24 proposed alternative from an EIR, distinguishes between infeasibility and a failure to meet basic
25 project objectives:

- 1 (i) failure to meet *most of the basic project objectives*,
- 2 (ii) *infeasibility*, or
- 3 (iii) inability to avoid significant environmental impacts.

4 (Emphasis added.) The “rule of reason” in Guidelines § 15126.6(f) is consistent with this
5 distinction. After stating that an EIR needs “to set forth only those alternatives necessary to permit
6 a *reasoned* choice,” it explains that the “EIR need examine in detail only the [alternatives] that . . .
7 . could *feasibly* attain most of the *basic objectives* of the project.” (Emphasis added.)

8 These provisions in § 15126.6 strongly suggests that an EIR (and, presumably an approving
9 agency) may reject alternatives that fail to meet *basic* project objectives because they are
10 *unreasonable* (as opposed to *infeasible*) alternatives. The fact that Guidelines § 15126.6(f)(1) does
11 not list “failure to meet basic objectives” as a “[factor] that may be taken into account when
12 addressing the *feasibility* of alternatives” is consistent with the analytical distinction in 15126.6(c)
13 between a failure to meet basic objectives and infeasibility.

14 It makes sense to distinguish between alternatives that are infeasible and alternatives that
15 are not reasonable because CEQA defines “feasible” as “capable of being accomplished in a
16 successful manner within a reasonable period of time taking into account economic,
17 environmental, social and technological factors.” (Pub Resources Code, § 21081.1.) It therefore
18 follows that “infeasible” under Section 21081(a)(3) means *incapable* of being accomplished within
19 a reasonable period of time taking into account economic, environmental, social, technological
20 and/or existing policy considerations. An alternative’s inability to meet basic project objectives
21 does not necessarily speak to its feasibility. If the underlying purpose is to build a shopping center,
22 a proposed alternative to build an office building may be entirely feasible and profitable based on
23 the nature of the site, the zoning, and similar considerations, but it is not a *reasonable* alternative
24 for a developer whose basic objective is to build a shopping center.

1 The Supreme Court's analysis in *In re Bay-Delta* (2008) 43 Cal.4th 1143, 1165-66
2 recognizes the distinction between infeasibility and a failure to meet basic project goals, stating
3 "an EIR need not study in detail an alternative that is infeasible or that the lead agency has
4 reasonably determined cannot achieve the project's **underlying fundamental purpose.**" (*Id.* at
5 1165.) (Emphasis added.) The project under consideration in that case was a long term
6 comprehensive plan for a consortium of federal and state agencies to collectively address pollution
7 problems in the Bay-Delta region. One of the stated purposes was to reduce conflicts by providing
8 a solution the various competing interests could support. The Supreme Court upheld the lead
9 agency's decision not to include, in the EIR, a detailed study of an alternative that would have
10 exacerbated the conflicts that the plan was designed to eliminate.

11 "Although a lead agency may not give a project's purpose an artificially narrow definition,
12 a lead agency may structure its EIR alternative analysis around a reasonable definition of
13 **underlying purpose** and need not study alternatives that cannot achieve **that basic goal.**
14 For example, if the **purpose** of the project is to build an oceanfront resort hotel [(*Citizens*
15 *of Goleta Valley v. Board of Supervisors of Santa Barbara County* (1990) 52 Cal.3d 553,
16 561)] or a waterfront aquarium (*Save San Francisco Bay Assn v. San Francisco Bay*
17 *Conservation etc. Com.* (1992) 10 Cal.App.4th 908, 924-925), a lead agency need not
18 consider inland locations. (See also *Sequoyah Hills Homeowners Assn. v. City of Oakland*
19 (1993) 23 Cal. App. 4th 704, 715 [lead agency need not consider lower density alternative
20 that would defeat primary purpose of providing affordable housing].)" (Emphasis added.)

21 The Supreme Court's presumption that the relevant "purpose" is the *proponent's* purpose, whether
22 the proponent is a government agency as in *In re Bay-Delta*, or a private developer building a
23 resort hotel, an aquarium or a mixed use project on Sunset Boulevard, is instructive. The court's
24 emphasis on evaluating the reasonableness of proposed alternatives in light of a project's
25 "fundamental underlying purpose" is consistent with the Guidelines' reliance on "**basic project**
objectives" as the basis of comparison.

1 It is also consistent with Guidelines, Section 15124, which mandates that an EIR should
2 identify “the objectives sought by the proposed project,” including the project’s “underlying
3 purpose,” without supplying unnecessary additional information:

4 “A description of the project should contain the following information but *should not*
5 *supply extensive detail beyond that needed for evaluation and review of the*
6 *environmental impact.*

7 (a) [location and boundaries;]

8 (b) A statement of *the objectives sought by the proposed project* [to] help the lead
9 agency develop a reasonable range of alternatives in the EIR The statement of
10 objectives should include the *underlying purpose* of the project.

11 (c) A general description of the project’s technical, economic, and environmental
12 characteristics, considering the principal engineering proposals if any and
13 supporting public service facilities. . . .” (Emphasis added.)

14 In other words, the project description, which should articulate the stated objectives and specify
15 the underlying purpose, should be limited to the information necessary to evaluate the project’s
16 impacts on the environment mindful that CEQA defines “environment” as “the physical conditions
17 which exist within the area which will be affected by a proposed project, including land, air, water,
18 minerals, flora, fauna, noise, objects of historic or aesthetic significance.” (§ 21060.5.) Based on
19 this definition, the physical parameters of a project and a description of its intended uses should
20 be sufficient to identify the potential impacts on air quality, noise, objects of historic value etc.
21 According to Section 15124, the EIR “should not supply extensive detail beyond that.”

22 In this case, the 15 objectives listed in the FEIR went far beyond what was required.
23 Although the FEIR did not specify which one was the “fundamental underlying purpose” of the
24 development, it listed 15 “objectives” that described various beneficial social byproducts of the
25 project (e.g., revitalization, aesthetic appeal, increased jobs, increased affordable housing,
promotion of public transportation etc.). The Court recognizes that identifying such benefits as

1 “objectives” may facilitate the political process of garnering public support and government
2 approvals, such “objectives” do not speak to the potential environmental impacts and do not state
3 the proponent’s “basic project objectives” or its “fundamental underlying purpose.” Such non-
4 basic objectives therefore do not provide appropriate bases for rejection of more protective
5 alternatives as unreasonable.

6 Notwithstanding the Supreme Court’s analysis in *In re Bay-Delta* and the language in
7 Guidelines Section 15126.6(c) recognizing a failure to meet the project’s fundamental underlying
8 purpose/basic objectives is a basis for rejecting *unreasonable* alternatives that is distinct from a
9 finding of infeasibility, there is language in several cases (discussed below) suggesting that a
10 failure to meet *any* project objective may support a finding of *infeasibility*. Because this Court
11 cannot find any reported case actually holding that any inconsistency with any of a developer’s
12 stated objectives is, *ipso facto*, a ground for finding infeasibility, the Court regards this language
13 as dicta that is inconsistent with the Guidelines and *In re Bay Delta, supra*.

14 For example, the decision in *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490,
15 1505-06 (*Sierra Club*) has been cited for the proposition that a failure to meet project objectives
16 supports a finding of infeasibility even though it nowhere states that proposition. The court’s
17 holding in *Sierra Club*, affirming rejection of an alternative that failed to meet the developer’s
18 objective of consolidating operations, is consistent with *In re Bay-Delta, supra*, and the rule of
19 reason deeming alternatives that fail to meet *basic* objectives unreasonable. (Guidelines §
20 15126.6(f).) In *Sierra Club*, a large winemaker sought to improve efficiency by constructing a
21 new 1,424,400-square-foot warehousing and storage facility in order to consolidate operations
22 from six existing facilities (“a facility of [such] size and layout . . . to meet our fundamental
23 business needs of operational efficiency and consolidation, which is the justification for this large
24 and expensive project”). (*Ibid.*) Conservationists proposed an alternative design that cut the size
25 of the proposed facility in half. The court found substantial evidence supporting the lead agency’s

1 “ultimate decision [rejecting the alternative based on] economic *feasibility*” noting the half-size
2 alternative “would not achieve the *objective* of consolidating the winery’s operations.” (*Sierra*
3 *Club, supra*, 121 Cal.App.4th at pp. 1506, 1508.)

4 In *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437 (*Save Round*
5 *Valley*) the court affirmed a finding of economic infeasibility, citing *Sierra Club* in a footnote
6 discussing “*basic objectives*.” Without citing Guidelines 15126.6(f), the court stated, “We do not
7 suggest that an economic analysis is necessarily required in order to address the feasibility of the
8 land exchange alternative. . . . If, for example, the County concludes the *basic objectives* of the
9 project cannot be achieved regardless of economic feasibility, an analysis of economic viability
10 may not be necessary.” (*Id.*, at fn. 13, citing *Sierra Club*, emphasis added.)

11 Unfortunately, the court in *SPRAWLDEF v. San Francisco Bay Conservation and*
12 *Development Commission* (2014) 226 Cal.App.4th 905, 918–19 (*SPRAWLDEF*) overstated the
13 content of the *Save Round Valley* footnote. Instead of quoting the footnote’s reference to “*basic*
14 *objectives*,” the court noted that an alternative (which was rejected based on economic and legal
15 considerations) “fail[ed] to achieve *project goals*.” (*Id.* at 922, emphasis added.) There is similar
16 dicta in *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704
17 (affirming the city’s rejection of a decreased density alternative as economically infeasible and
18 legally infeasible under Govt. Code § 65589.5 and commenting that the alternative “would defeat
19 the *project objective* of providing ‘the least expensive single family housing for the vicinity’”).
20 (Emphasis added).

21 Dicta in *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401 (*Del Mar*) has
22 added to the confusion. Although *Del Mar* did not reject alternatives based on a failure to meet
23 any stated developer objectives, the court in *Rialto Citizens for Responsible Growth v. City of*
24 *Rialto* (2012) 208 Cal.App.4th 899, 949 (*Rialto*) cited *Del Mar* for the proposition that “a lead
25 agency may reject an alternative *as infeasible* because it cannot meet *project objectives*.”

1 (Emphasis added.) In *Rialto*, the developer’s purpose (basic objective) was to construct a Walmart
2 Supercenter and four commercial outparcels designed for restaurant and retail tenants. The City
3 rejected a “reduced density alternative” that eliminated the four commercial outparcels. The court
4 affirmed the lead agency’s finding noting that “excluding the four outparcels . . . would not have
5 satisfied the *project objective* of providing a mix of retail and restaurant tenants, thus providing
6 residents with additional shopping and eating options.” (*Id.* at 948, emphasis added.)

7 Although the cases cited above mention *project objectives* in the context of affirming
8 rejection of proposed alternatives as *infeasible*, the facts adjudicated are consistent with Guidelines
9 § 15126.6(f)’s directive that a lead agency need not consider an alternative that fails to meet “*basic*
10 *objectives*” and with *In re Delta-Bay*’s rejection of an alternative that was inconsistent with the
11 project’s fundamental purpose. The Court finds no case holding or suggesting that a mere
12 inconsistency with a non-basic project objective (an objective that fails to identify project elements
13 having an impact on the environment) justifies rejection of a more protective alternative. Indeed,
14 such a rule would turn CEQA’s substantive mandate on its head by allowing private and public
15 proponents to articulate objectives that no proposed alternative could match. For example, Real
16 Party in this case could have articulated an objective of “constructing a mixed-use development
17 designed by architect Frank Gehry” thereby rendering any proposed alternative not approved by
18 Mr. Gehry infeasible. On the other hand, a failure to meet the *basic objectives/fundamental*
19 *purpose* justifies the rejection of an alternative as unreasonable under the rule of reason articulated
20 in Guidelines § 15126.6 (f): “The EIR need examine in detail only the [alternatives] that the lead
21 agency determines could feasibly attain *most of the basic objectives* of the project.”

22 As explained in greater detail below, the City’s criteria for rejection of the more protective
23 alternatives in this case are not consistent with CEQA and the Guidelines because the City relied
24 on a failure to meet non-basic objectives and on considerations not embraced by the criteria for
25 infeasibility identified in Section 21081(a)(3).

1 c) **The City Failed to Make Appropriate Findings**
2 **Supporting Its Rejection of Protective Alternatives and**
3 **Failed to Support Its Findings with Substantial Evidence**

4 The Court agrees with the City that a lead agency examining infeasibility under Section
5 21081(a)(3) is not bound by the EIR’s determination of potential feasibility and may reject the
6 EIR’s determinations in that regard. As explained in *California Native Plant Society v. City of*
7 *Santa Cruz* (2009) 177 Cal.App.4th 957, 981:

8 The issue of feasibility arises at two different junctures: (1) in the assessment of alternatives
9 in the EIR and (2) during the agency’s later consideration of whether to approve the project.
10 [Citation.] But differing factors come into play at each stage. [Citation.] For the first phase
11 – inclusion in the EIR – the standard is whether the alternative is potentially feasible.
12 [Citation.] By contrast, the final decision on project approval – the decision-making body
13 evaluates whether the alternatives are actually feasible. [Citation.] At that juncture, the
14 decision-makers may reject as infeasible alternatives that were identified in the EIR as
15 potentially feasible. [Citation.]

16 Nevertheless, a lead agency that rejects alternatives identified as potentially feasible in the EIR
17 must do so in accordance with relevant provisions of CEQA including Section 21081(a)(3). In
18 this case, the City based its rejection of the preservation alternatives on criteria not embraced by
19 the language of Section 21081(a)(3) or the relevant Guidelines.

20 As the basis for its finding that alternatives 5 and 6 were infeasible, the City identified
21 numerous project-specific characteristics of the alternatives that generally fall into three
22 categories: (1) aesthetic considerations (“massive,” “monolithic” and “visually unappealing”
23 buildings that do not allow for views through the site); (2) pedestrian traffic considerations
24 (“disjointed design to sidewalks” affecting project accessibility, a less “pedestrian friendly” layout
25 that “turns its back” on Havenhurst); and (3) reduced profitability of commercial space (a layout
that “limits the number and types of tenants” and lacks “flexibility” to adapt to new usage, and the
presence of a sizable bank building leaving “insufficient space to design buildings with comparable
function” to the buildings in Alternative 9).

1 In reviewing the City’s findings, the first question for this Court is whether, as a matter of
2 law, the findings articulate “considerations” rendering the alternatives infeasible under Section
3 21081(a)(3) or demonstrate a failure to meet the underlying purpose/basic project objectives that
4 renders the alternatives unreasonable. If the City relied on proper criteria to find the alternatives
5 were infeasible or unreasonable, the Court must then examine whether the findings are supported
6 by substantial evidence, mindful that the Court may not disturb properly made findings that are
7 supported by substantial evidence.

8 Addressing the first question requires the Court to interpret the language of Section
9 21081(a)(3). The City argues that “given the generality of the categories of ‘social’ or ‘other’
10 considerations,’ the matters decisionmakers might take into account are broad and diverse.” (Opp.
11 p. 70.) While it is true that, aside from *Dusek v. Anaheim Redevelopment Agency* (1985) 173
12 Cal.App.3d 1029 (*Dusek*) (which is inapposite⁵), the cases cited by the City involve diverse bases
13 for rejecting alternatives, it is also true that, in every case, the lead agency’s finding of infeasibility
14 identified a specific economic, legal, or social consideration or an existing governmental policy or
15 plan that rendered implementation of the alternative impractical to construct.

16 For example, in *Del Mar, supra*, the court of appeal affirmed the agency’s approval based
17 on an existing government plan and specific social and economic considerations: “[i]n point of
18 fact, San Diego considered and reasonably rejected the [alternatives] as infeasible in view of the
19 social and economic realities of the region” noting that San Diego’s existing growth management
20 plan accommodated the “economic, environmental, social and technological factors” identified in
21 CEQA’s Section 21081. (133 Cal.App.3d at 417.) In *Sierra Club v. Gilroy City Council* (1990)

22
23
24 ⁵ In *Dusek*, the agency approved the demolition of a mansion located on public property. Because
25 the petitioners in *Dusek* did not challenge any finding that any alternative was infeasible it is
inapposite and its dicta in the context of discussing overriding considerations is irrelevant.

1 222 Cal.App.3d 30, the court affirmed the agency’s approvals citing economic infeasibility, and
2 the city’s dire need for additional housing (a social condition). Similarly, in *Foundation for San*
3 *Francisco v. City and County of San Francisco* (2002) 106 Cal.App. 3d 893 the court affirmed an
4 agency’s rejection of alternatives based on legal considerations (a failure to meet building code
5 requirements) and economic considerations (an additional \$1.5 to \$4 million in construction costs).
6 (*Id.* at 913-14.) Thus, the cases cited by the City stand for the proposition that the courts have
7 consistently identified economic, social, and legal considerations under Section 21081(a)(3) or
8 existing policies (“plans” under Guidelines § 15126.6(f)(1)) as the bases for finding infeasibility.
9 (See generally Remy et al., Guide to CEQA (2007 Ed.), p. 384 (“When making a finding that an
10 environmentally superior alternative is infeasible, an agency may be entitled to rely on evidence
11 that the alternative would . . . fail to implement planning policies already in place.”))

12 The findings in the cited cases also appropriately focused on the characteristics or impact
13 of the more protective alternatives as mandated under Section 21081. As noted above, CEQA
14 defines “feasible” as “capable of being accomplished” The proper focus for determining
15 whether a proposed alternative is “infeasible” is therefore whether the proposed alternative is
16 *incapable* “of being accomplished” The salient question for infeasibility is the nuts, bolts and
17 dollars inquiry whether a proposed alternative can be built on the site for a reasonable price
18 (relative to potential profitability) and within a reasonable period of time, in view of existing
19 governmental policies and relevant economic, legal, social and/or technological constraints.

20 However, in this case, the City focused on the comparative benefits or superior
21 characteristics of the approved project rather than practical considerations affecting
22 implementation of the alternatives. The superior qualities of the approved project are not relevant
23 to the feasibility of a proposed alternative. Such benefits may be relevant to the agency’s
24 determination under Section 21081(b), which directs a lead agency to consider whether “specific
25 overriding economic, legal, social, technological, or other *benefits* of the project outweigh the

1 significant effects on the environment,” but they are not relevant to the threshold determination
2 whether an alternative is infeasible or unreasonable.

3 The City also relied on non-basic objectives as a basis for rejecting the more protective
4 alternatives. In this case, the EIR listed 15 multipart “objectives that the applicant seeks to achieve
5 for the Project,” most of which identify social benefits rather than aspects of the project that will
6 impact the environment. (AR 265.) While there is nothing in the record suggesting the City
7 identified the “underlying purpose” of the project or made any formal determination which of the
8 stated objectives are the “basic project objectives,” it is apparent that the only stated objectives
9 potentially impacting the environment are objectives [1] and [3] to “[r]edevelop . . . [an]
10 economically viable mix of residential and commercial uses” while providing additional low
11 income housing units. To the extent the City based its rejection of more protective alternatives on
12 objectives having no potential impact on the environment, it improperly relied on non-basic rather
13 than basic objectives.

14 At the April 19, 2017 hearing in this matter, counsel for the Real Party argued the City’s
15 determination that six of the stated objectives were not met by the alternatives was effectively a
16 determination those six objectives are “basic project objectives.” However, aside from the
17 description of the project as a “mix of residential and commercial uses” in the first stated objective,
18 the six objectives identify various social benefits rather than elements of the project *that potentially*
19 *impact the environment*. Because these potential social benefits do not state the project’s
20 fundamental underlying purpose or its “basic objectives,” they are not appropriate grounds for
21 rejection of more protective alternatives under CEQA or the Guidelines.

1 e.g., *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957 [upholding
2 rejection of alternative based on legal and social considerations including rights of disabled
3 persons and the City’s policy of promoting disability access]; *Flanders Foundation v. City of*
4 *Carmel-By-the-Sea* (2012) 202 Cal.App.4th 603 [upholding rejection of alternative based on a
5 specific social considerations including the perpetuation of a financial drain on the City’s
6 resources]; see also, *Del Mar, Gilroy and Foundation* [discussed *infra*.])

7 The City’s reliance on aesthetic considerations is troubling for an additional reason. As
8 LAC points out, Pub. Resources Code, § 21099(d)(1) specifically states, “Aesthetic . . . impacts of
9 a . . . mixed-use residential . . . project on an infill site within a transit priority area shall not be
10 considered significant impacts on the environment.” Because Alternatives 5 and 6 proposed
11 residential mixed use projects under that provision, aesthetic concerns are not a viable basis for
12 rejecting them.

13 Aesthetic considerations also fail to support a finding the alternatives are unreasonable.
14 Such considerations are not “basic project objectives” because they do not, per se, have an impact
15 on the physical environment. While the Court recognizes the City’s reliance on aesthetic
16 considerations was motivated by a desire to respond to community concerns, such considerations
17 are not a valid basis for rejecting Alternatives 5 and 6 as unreasonable.

18 (2) ***The City’s Finding of Infeasibility Based on Aesthetic***
19 ***Concerns Is Not Supported by Substantial Evidence***

20 The City’s finding of infeasibility based on aesthetic concerns is also not supported by
21 substantial evidence or by evidence the City independently evaluated the issue. With respect to
22 aesthetics, the City cites Frank Gehry’s March 24, 2016 letter to Councilmembers explaining that
23 using models, he “tried dozens of massing options for this project to arrive at the best solution”
24 including options “using the bank building and without the bank building” and his conclusion
25

1 “having done [his] homework . . . [that he] really do[es] not believe that [he] can design a
2 successful project while keeping the bank on the site.” (AR40985; RB 69.)

3 It is, of course, perfectly reasonable for an architect to opine, in essence, that the distinctive
4 but dated existing bank building does not fit with his modern, cutting edge design. However, the
5 issue for determining feasibility is whether, on a practical basis, the alternative can be constructed,
6 not whether it can be accomplished in an aesthetically pleasing manner. The architect’s opinion
7 is not substantial evidence of infeasibility under CEQA because it does not address the relevant
8 considerations.

9 **(3) Pedestrian Traffic Is Not a Social or Other**
10 **Consideration Affecting Feasibility or a Basic Project**
11 **Objective/Fundamental Purpose.**

12 The Court has similar difficulty finding that an alternative’s supposedly compromised
13 pedestrian traffic renders it infeasible under Section 21081(a)(3) and/or Guidelines §
14 15126.6(f)(1). As noted above, the determination of infeasibility requires a very practical inquiry
15 into whether a more protective alternative can be constructed for a reasonable price and within a
16 reasonable time frame. Pedestrian traffic issues do not, in and of themselves, prevent construction
17 of Alternatives 5 and 6 for a reasonable price within a reasonable time frame. Pedestrian traffic
18 *per se* is also not a cognizable social or other condition/consideration contemplated under Section
19 21081(a)(3).⁶

20
21 ⁶ This is not to say that the promotion of free flowing pedestrian traffic could never be relevant to
22 any social, economic or existing plans/policy considerations under Section 21081(a)(3).
23 Conceivably, a lead agency could demonstrate that the economic impact from the compromised
24 flow of pedestrian traffic so adversely impacts the developer’s prospective commercial rental
25 income that no prudent investor would proceed with the project. Alternatively, a lead agency could
identify existing government plans or policies for pedestrian mobility and determine that the
marginal impact on pedestrian mobility under the alternative design undermines that policy. Or,
a lead agency could identify highly congested local automobile traffic as a social consideration
that could be alleviated by a design providing pedestrian access to nearby shops and services.

1 Although enhanced pedestrian traffic is identified as one of the developer's project
2 objectives, it is not an element of the project that potentially impacts the environment or a
3 "fundamental underlying purpose" of the project under *In re Bay-Delta*, supra. Any supposed
4 inconsistency between the pedestrian traffic aspects of the proposed alternatives and the objective
5 of promoting pedestrian traffic is therefore not a legitimate basis for rejecting the alternative as
6 unreasonable under Guidelines § 15126.6.

7 **(4) The City's Findings re Pedestrian Traffic Are Not**
8 **Supported by Substantial Evidence**

9 Moreover, the City's findings with respect to supposed diminution of pedestrian traffic in
10 Alternatives 5 and 6 are not supported by substantial evidence. The City relies on Gehry Partners
11 LLP's unsigned March 24, 2016 letter which expresses opinions, e.g., that the bank building "does
12 not provide street-front engagement along Sunset Boulevard," "turns its back to Havenhurst Drive,
13 impedes pedestrian access to the project from Havenhurst and Sunset," and has a "nonporous
14 façade . . . at odds with the vision for a pedestrian-friendly development." (AR57731; RB 68.)
15 These opinions are not supported by drawings identifying any impediments, estimates of the
16 volume or timing of anticipated pedestrian flow on Sunset or the adjacent streets or analysis of
17 how or the extent to which the bank building alternatives marginally impact such traffic. The
18 evidence the bank building was designed for a "car culture with its ample parking lot, rear entrance,
19 drive-up teller, and Zigzag folded plate concrete roof . . . created to draw drivers off the road and
20 into the bank" does not speak to pedestrian traffic in the proposed alternatives. (AR2136; RB 68.)

21
22
23 However, identifying that social consideration would not end the agency's obligations under
24 CEQA. To support a finding that a less pedestrian friendly alternative is *infeasible*, the lead agency
25 would need substantial evidence local residents' errand driving significantly exacerbates the
traffic, substantial evidence such driving could be abated by a pedestrian friendly arrangement,
and substantial evidence that the marginal difference between pedestrian traffic in the more
protective alternatives and Alternative 9 is significant enough to vitiate the alternatives' positive
impact on automobile traffic.

1 Evidence as to the superior design features of Alternative 9 (its “expanded 12-foot sidewalks,”
2 “garden areas,” “publicly accessible internal pedestrian network”) are not relevant to the question
3 whether the alternatives are feasible under Section 21081(a)(3). (AR27854, 27824, 990; RB 69).

4 The City’s findings also apparently rest on characteristics of the bank building in its current
5 condition rather than rehabilitated as proposed in alternatives 5 and 6. The architect’s March 24,
6 2016 letter makes no reference to Alternatives 5 and 6 and apparently comments on the bank
7 building in its current condition. For example, the reference to the “nonporous façade” appears to
8 be a comment about the bank in its present state because Alternatives 5 and 6 propose to replace
9 “the exterior ground floor walls on the south and east elevations with new compatible windows,
10 to improve transparency and views through the windows” and to replace existing false clerestory
11 windows with “new compatible windows to allow natural light . . . and provide views through the
12 new clerestory windows of the folded plate roof.” (See, e.g., AR948, 951.)

13 The City’s required showing of substantial evidence is also undermined by contrary
14 evidence suggesting that Alternatives 5 and 6, in fact, promote pedestrian access. Both alternatives
15 include design features that appear to facilitate pedestrian traffic: wider sidewalks, off-street
16 parking, and a reconfiguration of a traffic island into landscaped public open space. (AR 966.)
17 The EIR describes alternatives 5 and 6 as “consistent with the City’s *“Walkability Checklist”*
18 because they “would link pedestrians to a landscaped plaza, extend the pedestrian environment to
19 the retail businesses and residential access points . . . and include numerous design features to
20 enhance the neighborhood character and pedestrian environment.” (AR 966.)

21 The Court therefore concludes that the City’s pedestrian related findings are not consistent
22 with CEQA and not supported by substantial evidence. There is also a dearth of evidence the City
23 independently analyzed pedestrian traffic issues. While the City may rely on studies or data
24 generated by Real Party, CEQA requires the City to independently analyze that information.
25

1 (5) ***Reduced Profitability of Commercial Space Is***
2 ***Potentially a Basis for Finding Infeasibility but the***
3 ***City's Findings Are Not Supported by Substantial***
4 ***Evidence***

5 Reduced profitability is an appropriate basis for rejecting Alternatives 5 and 6 as
6 unreasonable because the project's basic objective/fundamental purpose is to construct an
7 "economically viable" project. It is also an appropriate basis for finding infeasibility under Section
8 21081(a)(3) which identifies "economic . . . considerations" as appropriate considerations bearing
9 on infeasibility. However, there is ample case law confirming that mere evidence of reduced
10 profitability is not "substantial evidence" of economic infeasibility under Section 21081(a)(3). To
11 render an alternative infeasible, the reduced profitability must be "sufficiently severe to render it
12 impractical to proceed with the project." (*Citizens of Goleta Valley v. Board of Supervisors* (1988)
13 197 Cal.App.3d 1167, 1181.) Ultimately, "the question is ... whether the marginal costs of the
14 alternative as compared to the cost of the proposed project are so great that a reasonably prudent
15 [person] would not proceed with the [altered project]." (*Uphold Our Heritage v. Town of*
16 *Woodside* (2007) 147 Cal.App.4th 587, 600, 54 Cal.Rptr.3d 366 (*Woodside*).

17 The City cites no evidence demonstrating that the preservation alternatives will so severely
18 impact commercial rental income that no reasonably prudent person would proceed with the
19 development. Instead, the City relies on an October 31, 2016 letter from Real Party's consultant,
20 Paul Silvern of HR&A Associates Advisors, Inc. (HR&A). (AR40971-976.) Silvern's letter
21 evaluates financial feasibility based on "two investment return metrics commonly used in the real
22 estate industry" and measures them against a "minimum" developer profit margin of 12.5 % which,
23 in HR&A's experience, "is a typical threshold for Los Angeles development projects (i.e.,
24 midpoint of a 10-15 percent range)". (AR 40971.) Based on these and other assumptions and
25 estimates, Silvern concludes that the more protective alternatives will yield profits below the
HR&S designated "minimums" (a 5.1% return on cost versus a minimum of 5.7% and a 7.6%

1 developer profit margin (\$20,754,135) versus a 12.5% minimum (described as the “midpoint of a
2 10-15% range”). Silvern’s letter fails to address the pertinent question whether Alternatives 5 and
3 6 will compromise commercial rental income so severely that no reasonably prudent investor
4 would proceed with such a project. The other evidence cited by the City, e.g., Mr. Gehry’s opinion
5 that other commercial uses will not work within the confines of the existing bank structure
6 (AR27795; RB 69) is also insubstantial.

7 While there is no requirement for “any particular analysis or any particular kind of
8 economic date,” there must be “some context that allows for economic comparison.”
9 (*SPRAWLDEF* 226 Cal.App.4th at 918 citing *Woodside, supra*, 147 Cal.App.4th at pp. 600–601.)

10 As the *SPRAWLDEF* court noted:

11 The ‘feasibility of ... alternatives must be evaluated within the context of the proposed
12 project. “The fact that an alternative may be more expensive or less profitable is not
13 sufficient to show that the alternative is financially infeasible. What is required is evidence
14 that the *additional* costs or lost profitability are sufficiently severe as to render it
15 impractical to proceed with the project.” ’ [Citations.] Thus, when the cost of an alternative
16 exceeds the cost of the proposed project, ‘it is the magnitude of the difference that will
17 determine the feasibility of this alternative.’ ” (*Center for Biological Diversity v. County
18 of San Bernardino* (2010) 185 Cal.App.4th 866, 883, 111 Cal.Rptr.3d 374.) Ultimately,
19 “the question is ... whether the marginal costs of the alternative as compared to the cost of
20 the proposed project are so great that a reasonably prudent [person] would not proceed with
21 the [altered project].” (*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th
22 587, 600, 54 Cal.Rptr.3d 366 (*Woodside*).)

19 (*Id.* at 918–19; see also *Kings County* at 736 [reversing agency approval based on insufficient
20 “quantitative, comparative analysis” for a reasoned decision].)

21 The Court is also unable to find substantial evidence the City undertook any independent
22 analysis of economic feasibility notwithstanding the extensive case law underscoring the City’s
23 obligation to do so. The sparse record in this case is in stark contrast to the record in *San
24 Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102
25 Cal.App.4th 656 (*San Franciscans*). In that case, preservationists argued for restoration of a highly

1 dilapidated and outdated former department store, the Emporium Building. (*Id.* at 707.) To
2 support its rejection of the full restoration alternatives in favor of partial restoration of certain
3 historic aspects, the agency relied on studies and economic analyses prepared by two independent
4 consulting firms. (*Id.* at 693) Both studies concluded that no prudent person would develop a
5 project that fully restored the Emporium Building, pointing out that complete restoration would
6 have a substantial social and economic impact, requiring the public to contribute an additional \$59
7 to \$82 million in public funds.

8 In contrast to *San Franciscans*, the showing of financial infeasibility in this case is vague
9 and rests on opinions rather than facts. For example, the assertion that the protective alternatives
10 limit the number of tenants and compromise “flexibility” is vague in meaning and not supported
11 by evidence of any calculable or estimated financial impact. There is no evidence, for example,
12 that the size or configuration of the commercial space in the alternatives is less attractive to
13 potential tenants or that the alternatives will garner lower rents.

14 The rejection of a similarly unsubstantiated showing in *Preservation Action Council v. City*
15 *of San Jose* (2006) 141 Cal.App.4th 1336 (*PAC*) is instructive. In *PAC*, preservationists
16 challenged the City Council’s approval of demolition of a historic IBM plant to build a “big box”
17 Lowe’s warehouse store. The court of appeal concluded the agency’s decision was not supported
18 by substantial evidence noting that the agency’s findings (based on Lowe’s unsubstantiated
19 opinions that the reduced size alternative would be “more expensive to build,” “operationally
20 infeasible,” and would place Lowe’s at a competitive disadvantage) were not sufficient because
21 they were not supported by any analysis. (*Id.* at 1355-56.) The *PAC* court pointed out the record
22 “contain[ed] no facts, independent analysis or ‘meaningful detail’ to support Lowe’s claim that
23 ‘San Jose market demands of product selection/variety’ and the need to ‘stock the appropriate
24 amount of inventory’ rendered the reduced size store [infeasible].” (*Id.* at 1357, citing *Kings*
25 *County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 736 (*Kings County*).

1 The City in this case has similarly failed to demonstrate it fulfilled its obligation “to
2 independently participate, review, analyze and discuss alternatives in good faith” and failed to
3 explain the basis for its finding of infeasibility “in meaningful detail.” (*PAC, supra*, 141
4 Cal.App.4th at 1357 [citing *Laurel Heights Improvement Association v. Regents of the University*
5 *of California* (1988) 47 Cal. 3d 376, 405].)

6 **III. The Court Rejects All other CEQA Challenges**

7 **A. No CEQA Violation based on the EIR’s Consideration of Fire and** 8 **Emergency Services**

9
10 Petitioner Fix the City argues the EIR “fails to properly discuss a significant impact to
11 LAFD emergency response services in and around the Project” noting the average response times
12 are below appropriate standards. (OB p. 7-8.) Based on *City of Hayward v. Trustees of California*
13 *State University* (2015) 242 Cal.App.4th 833 (*City of Hayward*), the City argues that impacts on
14 fire and emergency services are not “environmental effects” covered under CEQA.

15 In *City of Hayward*, opponents of a proposed expansion of a university campus contended
16 the EIR was inadequate because, among other things, it failed to address the “adverse effect on
17 [the safety of] people and property” caused by the diminution in the condition of fire and
18 emergency services (from adequate to inadequate). (*Id.* at 841-842.) The court of appeal rejected
19 the argument concluding “the obligation to provide adequate fire and emergency medical services
20 is the responsibility of the city” (citing Cal. Const. art. XIII, § 35, subd. (a)(2)) and “not an
21 environmental impact that CEQA requires a project proponent to mitigate.” (*Id.*) The court
22 pointed out that the CEQA guidelines (§ 15382) defines “significant effect on the environment” as
23 an “adverse change in any of the physical conditions within the area including land, air, water,
24 minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.” (*Id.* at
25 843.)

1 Consistent with *City of Hayward*, this Court finds that impacts on emergency response
2 times are not “environmental impacts” covered under CEQA. The EIR’s alleged failure to
3 adequately analyze response times is therefore not a violation of CEQA.

4 Fix the City additionally argues that the EIR did not adequately disclose the project’s
5 impact and cumulative effect on emergency response services pointing out that the disclosures
6 regarding response times were more extensive in *City of Hayward* than in the present case and that
7 such disclosures are necessary to allow a determination whether the project will have a cumulative
8 effect on emergency services. Petitioner, however, cites no authority for the proposition that a
9 factor that does not qualify as an environmental impact under CEQA can somehow qualify as a
10 cumulative environmental impact. The Court is therefore not persuaded by this argument.

11 The Court finds that the EIR appropriately analyzes the project’s impact on fire protection
12 in terms of whether the project will require the construction of a new fire station or expansion of
13 existing facilities, which would result in a substantial adverse physical impact on the environment.
14 (AR 666; CEQA Guidelines, Appendix G, part 14; *City of Hayward, supra*, 242 Cal.App.4th at
15 841-43.) The EIR concludes that “[t]he Project would not require the addition of a new fire station
16 or the expansion, consolidation, or relocation of an existing fire station to maintain service” and
17 that as a result “[i]mpacts would be less than significant.” (AR 667.) Fix the City argues that this
18 conclusion is in “direct conflict” with a statement from LAFD to the City Planning Department
19 concerning the project. The Court disagrees. The LAFD statement merely projects that “[t]he
20 development of this proposed project, *along with other approved and planned projects* in the
21 immediate area, *may* result in the need for . . . (1) Increased staffing for existing facilities. (2)
22 Additional fire protection facilities. (3) Relocation of present fire protection facilities.” (AR 2991.)
23 Petitioners contend that at current service levels, the stations nearest to the project site fail to meet
24 the National Fire Protection Association (“NFPA”) standard of responding to fires within 5:20,
25 90% of the time. (OB p. 8.) Yet, Petitioners fail to cite any evidence that failure to meet this

1 standard requires construction of additional fire protection facilities.⁷ On the contrary, an e-mail
2 from Fire Marshall Luke Milick dated September 19, 2013 merely states that the LAFD's "goal is
3 to reach all fires within 5:20 90% of the time." (AR 2983.) Moreover, despite failing to meet the
4 NFPA standard, the LAFD admitted in its statement that "[a]t present there are no immediate plans
5 to increase Fire Department staffing or resources in those areas, which will serve the proposed
6 project." (AR 2990.)

7 Accordingly the Court finds that the EIR adequately analyzes the project's impact on fire
8 protection and emergency medical services.

9 ***B. The EIR Did Not Improperly Ignore the D Limitation Zoning***
10 ***Restriction***

11 Petitioners JDR Crescent and Fix the City argue that the City violated CEQA by ignoring
12 a D limitation on zoning. They argue the limitation should restrict the project's floor area ratio to
13 1:1 and was not properly disclosed as a baseline condition. They further contend the EIR to the
14 1988 Hollywood Community Plan was designed to "down zone: property in the area to encourage
15 small scale rather than large scale developments including a "permanent "D" Limitation" limiting
16 FAR to 1:1. (OB p. 5.) According to petitioners, the City cannot disregard this mitigation measure
17 without "a statement of reasons with substantial evidence."

18 The City points out the D limitation was fully disclosed, citing passages from the DEIR
19 that describe it. (RB 94.) The City disputes Petitioners' characterization of the D limitation as a
20 CEQA mitigation measure noting that the Hollywood Community Plan does not identify the
21 environmental effects it would purport to mitigate or characterize it as a CEQA mitigation
22 measure. (RB 95.)

24
25 ⁷ Even if the Project did require the construction of new fire protection facilities, Petitioners fail to
cite any evidence that construction of such facilities would have a substantial adverse physical
impact on the environment.

1 The Court agrees with the City that its disclosure was adequate and finds there is no
2 substantial evidence the D limitation was a CEQA mitigation measure imposing any obligations
3 under CEQA to make additional findings in this case. Such findings were also unnecessary
4 because the City's approval of increased density constituted a lawful waiver of the limitation
5 pursuant to the State Density Bonus law.

6 Petitioners rely on the decision in *Napa Citizens for Honest Government v. Napa County*
7 *Board of Supervisors* (2001) 91 Cal.App.4th 342, where the petitioners challenged the lead
8 agency's deletion of a CEQA traffic mitigation measure adopted in a general plan. The court of
9 appeal upheld the lead agency's deletion based on its articulation of a legitimate reason supported
10 by substantial evidence. The court's conclusion that the lead agency essentially had to find the
11 existing mitigation measure infeasible (make findings supported by substantial evidence) makes
12 sense because deleting a mitigation measure leaves a specified environmental effect in place. As
13 with any other finding of infeasibility, the lead agency's decision to approve a project
14 notwithstanding that effect must be supported with findings and evidence.

15 By contrast, the "mitigation measure" Petitioners identify in the Hollywood Community
16 Plan fails to identify the environmental effect it purports to mitigate. Without evidence of an
17 environmental effect that will persist if the "mitigation measure" is waived or deleted, there is no
18 reason for the City to make findings under CEQA.

19 **C. *The EIR Did Not Fail to Analyze Land Use Consistency***

20 JDR Crescent argues the project conflicts with several "fundamental and clear objectives
21 of the Hollywood Community Plan" to "down zone" development in favor of small scale
22 neighborhood oriented commercial projects that are consistent with infrastructure capacity and
23 mitigate adverse effects of transportation, public services and infrastructure. (OB p.
24 8.) Guidelines § 15125 requires an EIR to "discuss any inconsistencies between the proposed
25

1 project and applicable general plans, specific plans and regional plans.” As discussed, the Court
2 finds that the project is exempt from the Hollywood Community Plan’s FAR limitation because
3 the project qualifies for a density bonus under the State Density Bonus Law. Petitioners fail to
4 point out any other inconsistency between the project and the Hollywood Community
5 Plan. Accordingly, the Court finds that the EIR did not fail to analyze land use consistency.

6 ***D. The FEIR Did Not Have to Be Recirculated***

7
8 Petitioners argue the FEIR should have been recirculated because the errata disclosed new
9 information, i.e., that the traffic signal at Fountain Avenue and Havenhurst Drive is under the
10 jurisdiction of the City of West Hollywood rather than the City of Los Angeles. Respondents
11 counter this argument by pointing out the record (AR 3019, 3017 and 3146) fully disclosed the
12 fact that West Hollywood had jurisdiction over the traffic light. The Court agrees that the draft
13 EIR disclosed that “[n]o other feasible improvements to the intersection of Fountain
14 Avenue/Havenhurst Drive have been identified. . . and should the City of West Hollywood
15 determine that it does not wish to install a new traffic signal at this location, the project’s impacts
16 would remain significant and unavoidable.” (AR 3019.) The fact that the traffic light was in West
17 Hollywood was not “significant new information” requiring recirculation of the EIR pursuant to
18 Guidelines § 15088.5.

19 ***E. Alleged Violation of ELDP Is Not a Basis for Invalidating the City’s***
20 ***Approval***

21 Manners argues the project “fails” because its ELDP status is invalid. She contends the
22 changes in the project reflected in Alternative 9 disqualify it from ELDP status because it no longer
23 provides the jobs, reduced greenhouse gas emissions or improved transportation efficiency
24 required for ELDP status under Section 21183(b). Because Alternative 9 is smaller than the
25 certified project, Manners argues it will necessarily provide fewer permanent jobs. She also takes

1 issue with the City's contention it need not demonstrate a 10% reduction in transportation trips
2 because Havenhurst is a "pass through" street that will reduce vehicle trips. (AR 56445-56.)

3 Manners provides no law supporting the proposition that a failure to meet the ELDP criteria
4 is grounds for reversing approval of a project. Because the primary benefit of the ELDP is
5 expedited processing, the remedy for any supposed failure to qualify for ELDP would be
6 elimination of the expedited processing rather than rejection of project approval. The Court
7 declines to issue a writ of mandate based on alleged failure to meet the ELDP criteria.

8 ***F. The EIR Did Not Have to Identify Alternative Sites***

9 Manners argues the City violated CEQA by not identifying alternative locations. (AR
10 30130 PC; 30234 PC.) (AR 62960 WEHO.) The applicable Guideline, § 15126.6(f)(2) states an
11 EIR "must consider a reasonable range of alternatives to the project, or to the location of the
12 project." The Court interprets this language, written in the disjunctive, as requiring an EIR to
13 include a range of alternatives that may or may not include an alternative proposing a different
14 location. The Court does not find that the Guideline is reasonably interpreted to always require an
15 alternative that identifies a different location. Moreover, Manners has failed to identify any
16 feasible alternative sites owned by Real Party or available to Real Party for purchase. Without
17 evidence of an available alternative location that is suitable for the project, the notion that there is
18 a feasible alternative location is "remote and speculative" and need not be addressed. (*Bowman v.*
19 *City of Petaluma* (1986) 185 Cal.App.3d 1065, 108384; Guideline § 15126.6; see also, *Citizens of*
20 *Goleta v. Bd. Supervisors* (1990) 52 Cal.3d 553, 566.)

21 ***G. The EIR Did Not Fail to Analyze Transportation and Circulation***

22 Fix the City and JDR Crescent argue the EIR did not adequately analyze the impacts of the
23 intersection at Fountain/Havenhurst and other nearby intersections. Manners argues that the
24 Traffic Impact Analysis Report underlying the EIR's transportation analysis is flawed.
25

1 **1. The EIR Adequately Analyzed the Project's Impact on the**
2 **Fountain/Havenhurst Intersection**

3 The EIR includes a Traffic Impact Analysis Report ("TIA") performed by Hirsch/Green
4 Transportation Consulting, Inc. ("Hirsch/Green"), which analyzed existing (2013) and future
5 (2018) conditions at a total of 14 signalized intersections and one unsignalized intersection in the
6 project vicinity. (AR 3027.) The Report concluded the project will generate a net increase of
7 approximately 1,077 site-related trips per day, including a net increase of 216 trips during the PM
8 peak hour. (AR 761, 3016.) Based on this level of net new trip generation, the Report found no
9 significant impacts to any of the 14 signalized intersections, but concluded that "a significant
10 impact could potentially occur at the unsignalized intersection of Fountain Avenue and Havenhurst
11 Drive." (AR 3016.) Based on the Report, the EIR recommended installing a traffic signal at the
12 Fountain/Havenhurst intersection, which would reduce the significant impact at that intersection
13 to a less than significant level (Mitigation Measure TR-1). (AR 787-788.) The EIR acknowledged
14 that because the Fountain/Havenhurst intersection is located in the City of West Hollywood,
15 "should the City of West Hollywood determine that it does not wish to install a new traffic signal
16 at this location, the project's potential impact would remain significant and unavoidable." (AR
17 788.) The EIR also found that "[n]o other feasible improvements to the intersection of Fountain
18 Avenue/Havenhurst Drive have been identified at this time." (*Ibid.*)

19 When the FEIR was issued on May 13, 2016, the City believed that West Hollywood might
20 approve the installation of the traffic signal. (Opp. p. 76.) In its June 21, 2016 letter to West
21 Hollywood, however, the City acknowledged that West Hollywood had decided against approving
22 the proposed traffic signal installation. (AR 58987.) In its appeal letter to the City Planning
23 Commission, West Hollywood explained "the intersection is not capable of accommodating the
24 addition of a left-turn lane and the equipment necessary to make this a feasible option" and
25 installation of a traffic signal would result in cut-through traffic on Havenhurst. (AR 26030.) In

1 June 2016, the City issued an errata to the FEIR, adding language to consistently state throughout
2 that because the Fountain/Havenhurst intersection is within West Hollywood, a decision by West
3 Hollywood not to install the proposed traffic signal would result in significant and unavoidable
4 impacts to that intersection. (AR 15309-10.) The City considered the project’s impact on the
5 Fountain/Havenhurst intersection in its Statement of Overriding Considerations, but concluded the
6 project’s benefits outweighed its significant unavoidable impacts. (AR 28372.)

7 JDR contends that by issuing an errata, the City violated CEQA Guidelines § 15088.5,
8 which requires a lead agency to recirculate an EIR when “significant new information” is added
9 to the EIR. The Court finds that the City did not violate this provision because the additional
10 language added by the City, was already present in Section 4.J Transportation and Circulation of
11 the DEIR. (See AR 788, 3019.)

12 JDR also argues that the City failed to fully explore available mitigation measures as
13 required by Pub. Res. Code § 21002.1 because after the City realized that West Hollywood would
14 not approve the installation of the traffic signal, the City made no efforts to identify other feasible
15 mitigation measures. The City responds that it explored other options, but found that aside from
16 installing a traffic signal, “[n]o other feasible improvements to the intersection of Fountain
17 Avenue/Havenhurst Drive have been identified” (AR 788.) The record shows that the City
18 reached out to its consultant concerning this very issue of alternative mitigation measures. (AR
19 26659-60.) Hirsch/Green responded that “limited rights-of-way on both sides of [Fountain and
20 Havenhurst] generally restrict the ability to implement meaningful roadway widenings” (AR
21 26659.) As a result, mitigation measures are limited to (1) implementation of a Transportation
22 Demand Management (“TDM”) Program; (2) restriping the roadway within the existing rights-of-
23 way to create additional lanes; or (3) installation of a traffic signal. (*Ibid.*) The proposed project
24 includes the implementation of a TDM Program, which will aim to reduce the overall number of
25 vehicle trips by encouraging cycling, carpooling, and ridesharing. (See AR 754, 26660.)

1 Hirsch/Green explored the possibility of restriping to create new left-turn lanes in both directions
2 on Fountain Avenue, but determined that this measure would not reduce the project’s potential
3 impact to less-than-significant levels and could also create secondary impacts in the project
4 vicinity due to the removal of on-street parking. (AR 26660.) Hirsch Green concluded that
5 installation of a traffic signal was the “only feasible mitigation measure to reduce the Project’s
6 impact at the intersection . . . to less-than-significant levels.” (*Ibid.*) Given that Petitioners have
7 failed to identify any additional mitigation measures that the City should have considered, the
8 Court finds that the City complied with its obligations under Pub. Res. Code § 21002 to explore
9 available mitigation measures.

10 JDR’s citation to *City of San Diego v. Board of Trustees of California State University*
11 (2015) 61 Cal.4th 945 is distinguishable. In that case, petitioners challenged the California State
12 University’s (“CSU”) EIR certification and approval of a campus expansion project. In the EIR,
13 CSU found that the proposed project would contribute significantly to cumulative traffic
14 congestion at several locations off-campus. (*Id.* at 951.) Citing to *City of Marina v. Board of*
15 *Trustees of the California State University* (2006) 39 Cal.4th 341, CSU determined that these
16 impacts were significant and unavoidable because CSU could not guarantee that the State
17 Legislature would appropriate funds for the identified mitigation measures. (*Id.* at 954.) The
18 Supreme Court held that the *Marina* decision did not justify CSU’s position that it could
19 “contribute funds for off-campus environmental mitigation only through an appropriation
20 designated for that specific purpose, i.e., an earmarked appropriation.” (*Id.* at 959.) The court
21 explained that “[i]n mitigating the effects of its projects, a public agency has access to all of its
22 discretionary powers . . . includ[ing] such actions as adopting changes to proposed projects,
23 imposing conditions on their approval, adopting plans or ordinances to control a broad class of
24 projects, and choosing alternative projects.” (*Ibid.*) The court also pointed out that “mitigation
25

1 costs “could appropriately be included in the project’s budget and paid with the funds appropriated
2 for the project.” (*Id.* at 960.)

3 In this case, unlike in *City of San Diego*, the City is not the proponent of the project and is
4 not making its recommended mitigation measures contingent on an appropriation from the
5 Legislature. On the contrary, the City considered nine project alternatives and adopted numerous
6 changes and conditions of approval to reduce the project’s impact. The City specifically
7 considered measures to mitigate the project’s impact to the Fountain Avenue/Havenhurst Drive
8 and determined that the only effective mitigation measure would be to install a traffic signal.
9 Because West Hollywood has sole discretion over whether to authorize a signal at that intersection,
10 the City properly concluded that the project’s impact at that intersection is significant and
11 unavoidable absent West Hollywood’s approval. (See *City of Marina v. Board of Trustees of the*
12 *California State University* (2006) 39 Cal.4th 341, 367 [Some mitigation measures cannot be
13 purchased, such as permits that another agency has the sole discretion to grant or refuse.”].)

14 2. The EIR Adequately Analyzed the Project’s Impact on Project 15 Access

16 JDR argues that the EIR also fails to adequately analyze the project’s impact on the
17 intersections nearest to the project site. JDR cites the L.A. CEQA Thresholds Guide, which
18 presents two sets of criteria to evaluate project impacts: the screening and significance criteria.
19 “The screening criteria provide assistance in responding to Initial Study Checklist questions, and
20 can help determine when further study is needed to decide whether a significant impact could
21 potentially occur. ... The significance threshold identifies the level of impact over which
22 mitigation (or a Statement of Overriding Considerations, if mitigation is not feasible) is required.”
23 (CEQA Thresholds Guide p. 3) The CEQA Thresholds Guide provides criteria for analyzing a
24 project’s impact on various aspects of transportation including a project’s impact on “Project
25

1 Access,” which relates to “the provision of access to and from the project site.” (*Id.* at p. L.5-1.)

2 The Thresholds Guide defines the “Significance Threshold” for project access as follows:

3 A project would normally have a significant project access impact if the intersection(s)
4 nearest the primary site access is/are projected to operate at LOS E or F during the a.m. or
5 p.m. peak hour, under cumulative plus project conditions.

6 (Thresholds Guide p. L.5-2; AR 776-777.) With respect to this Significance Threshold, the EIR
7 found that “The Project operational characteristics, expected minimum driveway capacities, and
8 the projected peak hour driveway traffic volumes of the Project would provide adequate capacity
9 to accommodate the maximum vehicular demands” and that as a result “the Project would result
10 in less than significant impact with regard to access.” (AR 777.) JDR argues that the EIR failed
11 to adequately analyze impacts on nearby intersections because Table 4.J of the EIR shows that
12 eleven of the fifteen intersections near the project site are projected to operate at an LOS E or F
13 during peak hours. (AR 767-769.) Petitioners conclude that based on this data the “only
14 reasonable conclusion” is that the project poses a significant impact to access. However, the
15 Project Access Threshold is a criteria used to determine a project’s impact on access to the site,
16 not a project’s impact on nearby intersections.⁸ The Project Access Threshold identifies conditions
17 under which a project “would normally have a significant project access impact.” (Thresholds
18 Guide p. L.5-2.) In this case, based on Hirsch/Green’s Traffic Impact Analysis Report, the EIR
19 concluded that the three driveways leading to the project provide adequate capacity to
20 accommodate entering and exiting traffic and provide sufficient on-site vehicle queuing space
21 “such that no significant vehicular queuing or disruption of either pedestrian or vehicular traffic

22
23
24 ⁸ Thresholds TR-2A and TR-2B analyzed the Project’s impact on nearby intersections and
25 determined that the Project “would result in nominal incremental changes in the CMA or vehicular
delays at most of the study intersections during the A.M. and P.M. peak hours, with the exception
of the unsignalized Fountain Avenue/Havenhurst Drive intersection.” (AR 766.)

1 flows on the Project Site-adjacent streets would occur.” (AR 778.) Accordingly, the Court finds
2 that the City properly analyzed the project’s impact on project access.

3 **3. The Traffic Impact Analysis Report Properly Calculated Project**
4 **Traffic Generation**


5 Manners argues in summary fashion that “the traffic impact study is full of assumptions
6 and not valid” based on the fact that the TIA utilized certain adjustment factors in calculating
7 project traffic generation. The TIA estimated the net amount of traffic that would be generated by
8 the proposed project by calculating the number of trips generated by each residential, retail, and
9 commercial component of the existing site and proposed project site. (AR 3034-3035.) The TIA
10 adjusted its project traffic generation estimate by taking into account existing trips on the roads
11 near the Project site, which may make an interim stop at the Project site. (AR 3037.) For example,
12 using LADOT’s recommended pass-by trip reduction factors, the TIA assumed that the retail
13 components of the existing site experienced a 50 percent pass-by trip reduction and that the retail
14 and supermarket uses of the proposed project would experience a 40 percent pass-by reduction.
15 (AR 3037.) The TIA adjusted its estimates for *both* the existing site as well as the proposed project
16 site. (AR 3037-3038, 27152.) The Court finds that the TIA properly relied on these adjustment
17 factors in calculating the net amount of traffic generated by the project.

18
19 **IV. Conclusion**
20

21 Aside from concerns with the City’s articulated findings addressing the rejection of
22 preservation alternatives (and substantial evidence supporting such findings) addressed above, the
23 Court rejects all challenges to the City’s approvals of the project.
24
25

1 The Court grants LAC's (and the joining parties') petition for writ of mandate as to the
2 City's findings rejecting the non-demolition alternatives (only) and otherwise denies all petitions.
3 The Court remands for further proceedings consistent with this decision.

4
5 Dated: APR 25 2017



6 AMY D. HOGUE

7 JUDGE OF THE SUPERIOR COURT
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From: Eduardo Agurcia [mailto:eiagurcia@gmail.com]
Sent: Friday, December 15, 2017 4:20 PM
To: Peter Burgis
Cc: Christopher Hawthorne; Eduardo Agurcia
Subject: LACMA ENVIRONMENTAL IMPACT REPORT

HELLO PETER BURGIS

I AM A LONGTIME LACMA MEMBER. I LIVE IN SANTA MONICA. I AM WRITING TO ASK YOU TO PLEASE DISAPPROVE REJECT THE LACMA ENVIRONMENTAL IMPACT REPORT FOR THE FOLLOWING REASONS

1) EVERYONE EXCEPT MICHAEL GOVAN AND HIS CRONIES HAVE BEEN EXCLUDED FROM THIS PROJECT. THIS IS A VANITY PROJECT....PHARAOH ERECTING A PYRAMID TO HIMSELF.....

LACMA MEMBERS.....THE MEDIA....ARCHITECTURAL CRITICS....THE CULTURAL LEADERS OF LA COUNTY....THE POLITICAL LEADERS OF LA COUNTY....THE GENERAL PUBLIC.....EVEN IT SEEMS

THE TRUSTEES OF THE MUSEUM OF LA COUNTY....HAVE BEEN RELEGATED TO BEING OBSERVERS AND APPLAUDERS OF THIS PROJECT. MICHAEL GOVAN AND HIS INNER CIRCLE

HAVE ERECTED A CHARMING SMILING CORDON SANITAIRE AROUND THE LONGTERM NEEDS AND PLANS FOR LACMA. THEY PLAN.....THEY DECIDE.....EVERYONE ELSE IS INFORMED

AFTER THE DECISIONS. I HAVE ATTENDED THE LAST TWO PUBLIC MEETINGS HELD AT LACMA. AT EACH MICHAEL GOVAN SPOKE AND THEN WITH A SMILE RUSHED AWAY REFUSING

TO ALLOW QUESTIONS AND REFERRING EVERYONE TO VOLUNTEERS AT NINE TABLES.....AT THE LAST MEETING AN INDIGNANT MAN STOOD UP AND SHOUTED AT THE RAPIDLY

DISAPPEARING MR GOVAN: "WHAT IS ALL THIS GOING TO COST????!!!! WITHOUT BREAKING EXITING STRIDE MR GOVAN REPLIED: "YOU CAN ASK ALL YOUR QUESTIONS AT THE NINE

TABLES WE HAVE PROVIDED FOR YOU.....!!!!"" NO MR GOVAN.....WE WANT TO TALK TO YOU....WE WANT TO ASK YOU THE QUESTIONS....WE WANT TO CHALLENGE YOUR CONCLUSIONS...

IN FACT WE WANT MR GOVAN TO GO BACK TO SQUARE ONE AND HOLD MEETINGS WITH THE DIFFERENT LACMA SHAREHOLDERS SO TO SPEAK....WITH THE MANY DIFFERENT INDIVIDUALS WHO ARE KEENLY

INTERESTED IN THE LONGTERM HEALTH AND DIRECTION OF LACMA...INCLUDING LACMA MEMBERS.....WE WANT MR GOVAN TO CRAFT A CONSENSUS OF ALL THEIR WISHES AND CONCERNS AND THEN MOVE FORWARD....

WE CERTAINLY DO NOT WANT TO BE RELEGATED TO THE CITY SQUARE WHERE WE ARE EXPECTED TO APPLAUD EL JEFE ON THE BALCONY ABOVE. MR GOVAN TALKS ABOUT DEMOCRACY AND INCLUSION

AND TRANSPARENCY BUT HIS ACTIONS ARE THE REVERSE.

2) WHY WASN'T AN INTERNATIONAL COMPETITION HELD FOR THE DESIGN OF THE NEW BUILDING...???? WHY WEREN'T AMERICAN ARCHITECTS AND FIRMS ALLOWED TO BID FOR THE DESIGN????

WHY WAS A EUROPEAN ARCHITECT CHOSEN INSTEAD OF AN AMERICAN ARCHITECT.....???

THE AMERICANS WERE SHUT OUT FROM THE GETGO.....WHY WAS THE ULTIMATE DESIGN DECISION

MADE BY MR GOVAN SHUTTING OUT EVERYONE ELSE??? WERE THERE PRIVATE PERSONAL OR BUSINESS LINKS BETWEEN MR GOVAN AND MR ZUMTHOR WHICH LED TO THE CHOICE

OF THE ZUMTHOR DESIGN AND THE ABORTION OF AN INTERNATIONAL COMPETITION...???

3) .WHY WASN'T FRANK GEHRY INVITED TO SUBMIT A DESIGN PROPOSAL BOTH FOR THE BUILDING AND ALSO FOR THE CAMPUS AND ITS LONGTERM NEEDS....????? OF COURSE GEHRY WON'T

PARTICIPATE IN COMPETITIONS....HE HAS TO BE ASKED...HE HAS TO BE PRESSURED/COURTED....HE DOESN'T LIKE BEING REJECTED.....I HEARD HIM SAY SO RECENTLY IN PERSON AT LACMA....

TO ME IT SEEMS VERY STRANGE THAT OUR CELEBRATED LOS ANGELENO WORLD WIDE ACCLAIMED RESIDENT ARCHITECT GENIUS GEHRY WASN'T CONSIDERED OR COURTED.....

4) WHY WAS A LOUSY BORING UGLY DESIGN CHOSEN? THE ZUMTHOR BUILDING DESIGN LOOKS LIKE AN AIRPORT TERMINAL...OR AN OFFICE BUILDING IN A BUSINESS PARK.....

THERE IS NOTHING THRILLING OR INSPIRING OR BEAUTIFUL OR INNOVATIVE ABOUT THE DESIGN.

5) AT THE TWO PUBLIC MEETINGS WHICH WERE HELD IN THE LAST YEAR TO PROVIDE THE ILLUSION OF INCLUSION OF LACMA MEMBERS AND THE GENERAL PUBLIC, MR GOVAN

STATED THAT IT WAS IMPORTANT TO BUILD ZUMTHOR'S ONE FLOOR BUILDING BECAUSE A ONE FLOOR BUILDING IS MORE DEMOCRATIC. MR GOVAN STATED THAT BUILDINGS

WITH MULTIPLE STORIES EVOKE/HONOR OPPRESSION.....THE ABOVE OPPRESSING THE BELOW..... MR GOVAN STATED THAT MULTISTORY BUILDINGS ARE SYMBOLS OF HIERARCHIES

AND HIERARCHIES EVOKE/ HONOR OPPRESSION.....AND SINCE LACMA IS TO BE A PLACE THAT REJECTS RENOUNCES HIERARCHIES REJECTS RENOUNCES

OPPRESSION THEN ZUMTHOR'S ONE STORY DESIGN HAS TO BE APPROVED. MY FIRST REACTION WAS LAUGHER AND INCREDULITY. MR GOVAN....YOU MEAN THE HIERARCHY

OF EXPERIENCE BEING HIGHER THAN INEXPERIENCE IS TO BE REJECTED...???.Maturity OVER IMMATURITY IS TO BE REJECTED....??? WISDOM OVER IGNORANCE IS TO BE

REJECTED...??? BUT THEN I REALIZED I SHOULD TAKE HIM SERIOUSLY AND TAKE A GOOD CLOSE LOOK AT HIS STATEMENTS....AND WHEN I DID SO WHAT CAME INTO VIEW VERY CLEARLY

WAS THAT VERY OLD UTOPIAN IDEAL OF THE CLASSLESS SOCIETY..... YES.....THE ONE FLOOR ZUMTHOR DESIGN IN FACT TAKES US RIGHT BACK INTO THE UTOPIA OF A CLASSLESS

SOCIETY... THE PROBLEM OF COURSE BEING THAT WE'VE BEEN THERE DONE THAT.....MR GOVAN DO YOU MEAN THE EXPERIENCE OF 70 YEARS OF THE HORRORS AND MENDACITIES OF

CLASSLESS SOCIETY IN RUSSIA WASN'T ENOUGH TO CURE YOU OF YOUR ADMIRATION FOR THE IDEALS OF CLASSLESS SOCIETIES...???? HMMM...HOW ABOUT ROMANIA...???.HMMM... HOW

ABOUT CUBA...???? HMMM...HOW ABOUT NORTH KOREA...??? MR PETER BURGIS.....ARE YOU AND ALL THE RESIDENTS OF LA COUNTY AND ALL THE MOVERS AND SHAKERS OF THIS

CITY AWARE THAT MR GOVAN AND MR ZUMTHORN HAVE RAMMED THROUGH A DESIGN THAT IS DELIBERATELY INTENDED TO HONOR AND EMBODY THE IDEALS OF CLASSLESS SOCIETIES.....???

THAT THIS DESIGN INVITES US LUCKY LOS ANGELENOS TO GIVE A COLLECTIVE FINGER TO THE YOKE OF CAPITALIST OPPRESSION AND EXPLOITATION...?????.....THAT THIS DESIGN INVITES US

LUCKY LOS ANGELENOS TO COME TO LACMA IN FUTURE TO REVEL IN AND RENDER HOMAGE TO THE MORAL SUPERIORITY OF THE IDEALS OF THE DICTATORSHIP OF THE PROLETARIAT....???

THE ZUMTHOR GOVAN DESIGN IS BASED ON AESTHETICS WHICH ARE POLITICAL.....THE DESIGN IS A POLITICAL DESIGN. THE POLITICS ARE MARXISM LENINISM....

6) MR BURGIS....YOU AND YOUR COLLEAGUES ARE BEING ASKED TO APPROVE A MUSEUM WHICH WILL STRADDLE AND CROSS WILSHIRE BL. IN FACT THERE ARE NO PRACTICAL

REASONS FOR THIS. THE REASONS ARE IDEOLOGICAL. MR GOVAN AND MR ZUMTHOR WILL NOT BUILD UP BECAUSE THAT WOULD CREATE HIERARCHY AND CLASS OPPRESSION.

THEY THEREFORE INSIST THE STRUCTURE CAN ONLY EXTEND SIDEWAYS.... MUST STRADDLE AND CROSS WILSHIRE BL.

7) IF THE ZUMTHOR GOVAN PLAN IS APPROVED AND BUILT, THE PRESENT LACMA COURTYARD WOULD BE DEMOLISHED. THIS TRAGEDY MUST BE STOPPED. IN MY VIEW THE PRESENT

COURTYARD IS A MASTERPIECE OF PUBLIC SPACE. FOR ME IT IS NOT ONLY ONE OF THE MOST BEAUTIFUL PUBLIC SPACES IN OUR CITY BUT ALSO IN THE NATION AND IN THE WORLD.

WHEN I STAND THERE IN THAT MAGICAL SPACE AND LOOK UP.....ESPECIALLY AT NIGHT WITH THE WONDERFUL SUBTLE LIGHTINGI FEEL AS IF I AM IN A GOTHIC CATHEDRAL WITH THE

SKY AS THE ROOF. THE INTERESTING THING ABOUT THAT SPACE IS THAT ONE DOES NOT FEEL DWARFED.....IT IS AN INTIMATE SPACE WHICH ENHANCES ONE'S HUMANITY

LIKE THE MOVIE "CASABLANCA" IT IS A MASTERPIECE THAT WAS NOT PLANNED...IT HAPPENED....IT IS ONE OF OUR CITY'S ARCHITECTURAL JEWELS...WE MUST PROTECT IT SO WE

CAN KEEP ON ENJOYING IT.....THERE IS NOTHING MORE WONDERFUL THAN SITTING AT ONE OF THOSE TABLES HAVING COFFEE WATCHING THE PASSING PARADE OF

MUSEUM GOERS AND STARING UP AT THE LOVELY STRUCTURE AND SKY ABOVE.....

8) THE PROPOSED ZUMTHOR BUILDING WILL DEMOLISH BING AUDITORIUM. ONCE UPON A TIME, PRIOR TO MR GOVAN'S ARRIVAL, THE LACMA FILM SCREENING PROGRAM WAS AMONG

THE BEST IN THE NATION....WHICH....GIVEN THAT THE LOS ANGELES TIMES REFERS TO LOS ANGELES AS "THE FILM CAPITAL OF THE WORLD" WAS ENTIRELY APPROPRIATE.. FOR MANY YEARS

IAN BERNIE RAN WONDERFUL REGULAR FRIDAY AND SATURDAY FILM SCREENINGS WHICH DREW FILMLOVERS AND FILMMAKERS WHO CAME TO IMMERSE THEMSELVES IN FILMS FROM ALL OVER

THE WORLD, FROM THE BEGINNINGS OF CINEMA UNTIL THE PRESENT.....BERGMAN.....ANTONIONI....FELLINI....KUROSAWA....FORD.....WELLES.....RAY....."BLACK ORPHEUS""400 BLOWS""THE MAGNIFICENT

AMBERSONS" ETC ETC.....FOR MANY OF US CINEPHILES IT WAS ATTENDING A GRADUATE SCHOOL OF CINEMA....WHEN HE ARRIVED ONE OF MR GOVAN'S FIRST DECISIONS WAS TO FIRE MR BERNIE

WITHOUT EVEN A GOODBYE CEREMONY AND THEN EVENTUALLY GET RID OF THE FRIDAY AND SATURDAY SCREENINGS CLAIMING PUBLICLY THAT THERE WASN'T ENOUGH MONEY TO PAY FOR THEM.

THE TRUTH....I BELIEVE...IS THAT MR GOVAN FEELS SERIOUS ART IS PAINTING AND SCULPTURE.....MODERN SCULPTURE ESPECIALLYHENCE MR GOVAN'S ATTEMPT TO HOIST A GIANT KOONS

LOCOMOTIVE ATOP LACMA. ACCORDING TO MR GOVAN THERE WAS PLENTY OF MONEY FOR THAT. THE PROBLEM IN MY VIEW IS THAT MR GOVAN DOES NOT BELIEVE THAT CINEMA IS GREAT ART...

FOR HIM CINEMA IS ENTERTAINMENT. IT IS WHAT THE RUBES ENJOY..... OF COURSE HE DOES NOT DARE COME OUT AND SAY SO HONESTLY BUT HIS ACTIONS REVEAL HIS PREFERENCES. HERE WE ARE

IN WHAT IS REFERRED TO AS "HOLLYWOOD"THE FILM CAPITAL OF THE WORLD.....OUR COUNTY MUSEUM SHOULD THEREFORE IN THE FIRST INSTANCE BE A TEMPLE DEDICATED TO THE WORSHIP.

OF CINEMA AS GREAT ART.....TO THE STUDY AND SCREENING AND PRESERVATION OF CINEMA.....YET...STRANGELY...INCREDIBLY.....ON MICHAEL GOVAN'S WATCH THE PUBLIC FILM SCREENING PROGRAM

HAS SHRIVELLED TO WHAT IS NOW B STATUS... IT IS NO LONGER A GRADUATE SCHOOL OF CINEMA.....THIS DESPITE THE BROUHAHA CAUSED BY MR GOVAN CHASING FILM TITANS TO JOIN THE BOARD OF

TRUSTEES...THIS DESPITE THE MANY SMILING PHOTOGRAPHS OF MR GOVAN POSING WITH SAID FILM WORLD LUMINARIES..... IN MY VIEW THE ERASURE OF BING AUDITORIUM IS PART OF MR GOVAN'S

LONG RANGE PLAN TO WASH LACMA'S HANDS OF CINEMA AS GREAT ART.....IN MY VEW THE RAZING OF BING SUMS UP MR GOVAN'S PERSONAL DISPARAGEMENT OF CINEMA AS GREAT ART. AND/OR HIS LACK OF

PERSONAL INTEREST IN CINEMA AS GREAT ART ON A PAR WITH SCULPTURE AND PAINTING.....IT IS THE FINAL DAGGER INTO THE HEART OF PUBLIC FILM SCREENINGS AT LACMA. THIS IS A BETRAYAL OF

THE IMPORTANCE OF FILMS AND FILMMAKING IN OUR CITY PLEASE MR BURGIS AND COLLEAGUES....PLEASE DO NOT PERMIT MR GOVAN TO SUCCEED IN BETRAYING HIS STEWARDSHIP OF CINEMA AS

GREAT ART BY RAZING BING.....

MR BURGIS...FOR THE SAKE OF OUR CITY AND THE LONGTERM HEALTH AND WELFARE OF OUR BELOVED LACMA I URGE YOU AND YOUR COLLEAGUES FOR ALL THE PREVIOUSLY MENTIONED REASONS

TO REJECT LACMA'S ENVIRONMENTAL IMPACT REPORT.

THANK YOU FOR YOUR ATTENTION

EDUARDO AGURCIA
1443 11TH ST APT 1
SANTA MONICA CA 90401

[310 393 2493](tel:3103932493)

eiagurcia@gmail.com

From: Josh Albrektson [mailto:joshraymd@gmail.com]
Sent: Wednesday, December 13, 2017 9:13 PM
To: Peter Burgis
Subject: LACMA Redesign

I wanted to give a public comment on the redesign. I live at 750 S Spaulding Ave, #120, directly across the street from LACMA and on the same bloc where LACMA will span Wilshire.

I am STONGLY in support of the redesign. I think it will add a great public benefit to my neighborhood, make my own specific block so much nicer from the addition of the park, and provide a tourist attraction where people will take pictures from LACMA all around through the elevated glass windows.

I am one of the people who would be most affected by this, and I hope that there is almost no large changes to the current design. Thanks.

Josh Albrektson

Sharona Alperin
822 So. Dunsmuir Ave.
sharonaalperin@gmail.com

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

Dec.13,2017

From A Member of Miracle Mile

Dear Mr Burgis,

As a resident of Miracle Mile, I want to express my wholehearted support for the new LACMA project.

Preserving the obsolete 1960s buildings, at a cost of over \$250m, is clearly an unattractive option, and removing the current ugly entrance is a priority.

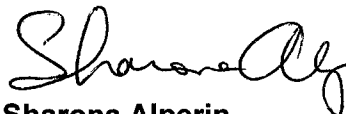
The reasons for the horizontal exhibition space have been well articulated by LACMA's management, and the resulting accessibility and equality among the exhibits will be welcome and refreshing. Spanning Wilshire is a reasonable solution to achieving that horizontal space, and it gives the added benefit of five more acres of landscaping and outdoor art.

In spite of the adjacent Metro, the Ogden parking structure means that the number of parking spaces will remain the same, which I believe will be ample for future needs.

Although there will be inevitable disruption from construction, I am confident that the proposed traffic management plan will mitigate its effects.

Above all, I am confident that the good-looking new building, with its glass sides and the resulting interaction between the art inside and the surrounding streets and parks, will be an asset to our community.

Kind regards



Sharona Alperin

Architecturally it will be Amazing and we will be a cultural center for the entire country. It's a necessary and real upgrade.

822 SO. DUNSMUIR AVE
LA CA 90036

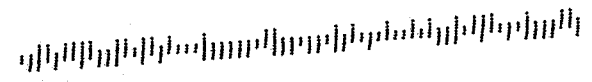
LOS ANGELES CA 900

16 DEC 2017 PM 3 L



MR. Peter Burgis
Capital Projects County of LA.
500 West Temple St. Room 154
Los Angeles, Calif
90012

50012-270079



From: Mehmet Berker [mailto:mehmetikberker@gmail.com]
Sent: Wednesday, December 13, 2017 5:45 PM
To: Peter Burgis
Cc: renee@advocacy.la; Emilia Crotty
Subject: LACMA DEIR Comments

Dear Mr. Burgis,

Please find attached my comments on the LACMA DEIR.

Thank you,

Mehmet

--

Mehmet Berker
Cartography // GIS // Graphic Design

mehmetikberker@gmail.com
mehmetberker.com
c.651.470.8605

Comments on the LACMA DEIR from Mehmet Berker
mehmetikberker@gmail.com
651-470-8605

- 1. LACMA should seek to co-locate, to the extent possible, its bike parking with Metro's new Wilshire/Fairfax subway portal.**

At present a privately-owned parcel lies between the proposed Ogden Parking Structure and the future Wilshire/Fairfax station. While long-term spots for employees, docents, and other regular attendees can and should be provided in any parking structure that LACMA constructs, it may be more valuable to the public to locate a portion of the short-term spaces at the future subway station.

- 2. Any bike parking placed in the Ogden Parking Structure should be accessible via a non motor-vehicle entrance.**

It is uncomfortable, and potentially hazardous, for people biking to enter and exit a parking structure through motor-vehicle ingress/egress points--mainly due to the presence of control arms. Any bike parking located in the Ogden Parking Structure or any other parking structure, should be accessible by a separate bike or bike/ped entrance.

- 3. The LACMA/AMPAS campus should be open to pedestrian traffic during the same hours of operation that the future Metro Wilshire/Fairfax subway station will be operating, daily.**

The new subway station will be an important hub for people walking in the neighborhood. If the LACMA/AMPAS campus does not allow pedestrian access during operating hours of the subway station, users would have to walk potentially more circuitous routes to point north and northeast.

- 4. Short term bike parking should be added near all new pedestrian site access points.**

In addition to existing short term bicycle parking at the LACMA campus, new short term bike parking should be added at all new, and all existing and enhanced, pedestrian site access points. This will provide people biking to LACMA with the easiest and most convenient place to park their bikes. All short-term bike parking should adhere to the City of Los Angeles Bike Parking Guidelines.

- 5. The Spaulding Lot should not be fenced in.**

Since there are no scientific operations set to occur on the Spaulding Lot, there doesn't seem to be a need to fence in the lot. The building security should suffice for that entrance. Eliminating the fence on the Spaulding lot would enable the open space to be of use to the community more readily and more freely.

- 6. LACMA should work with Metro, the City of Los Angeles, and JC Decaux to move the current Metro 20 line bus stop on the corner of Curson and Wilshire to Spaulding and Wilshire.**

Currently, the Metro 20 line has stops at Masselin, Curson, and Fairfax westbound on the north side of Wilshire. With the proposed entrance to be near Spaulding on the north side of Wilshire, LACMA should work with Metro to re-locate the stop currently at Curson to Spaulding to be as close as possible to the new entrance. This would also help space stops more efficiently, as

Masselin and Curson are only one block from one another. The stop could, ideally, be placed on the near side of Spaulding (in other words, the east side of Spaulding, where there is currently a red curb, as this would enable the bus to stop in the current peak hour bus lane, without needing to pull into a curb cut, which lowers dwell times and improves rider experience and transit efficiency.

LACMA should work with the city of Los Angeles and Metro to site the stop, and should work with JC Decaux to provide a shelter with seating for the stop. LACMA could have an opportunity to make an artistic, or aesthetically unique bus stop.

7. LACMA should work with Metro, the City of Los Angeles, and JC Decaux to improve the current Metro 20 line stop on the south side of Wilshire at Wilshire and Spaulding.

Currently, the bus stop at Spaulding and Wilshire, on the south side of Wilshire, consists of a trash can and two benches. LACMA should seek to improve the bus stop with the addition of a shelter. Furthermore, this corner offers a great opportunity for expanded pedestrian space as it is one of the two pedestrian site access points to the Spaulding lot. An improved bus stop would therefore improve the pedestrian experience.

8. The southeast corner of Spaulding and Wilshire should be expanded to create a pedestrian plaza that leads into the pedestrian access point from that corner into the Spaulding lot.

In figure II-5 (Conceptual Site Plan), the southeast corner of Spaulding and Wilshire is shown as having a pedestrian access point with the fencing around the Spaulding lot nearly coming all the way to the curb. This corner should be a large, and more spacious welcoming space that would better bridge the gap between the public right-of-way and the museum's Spaulding lot open space, and new building entrance. This can most readily be achieved by pushing the fencing in towards the center of the lot by 20' - 30' (roughly the disabled blue hash travel space in place currently). The space could also be slightly expanded through a curb extension across Spaulding.

9. All street corners within the project scope should receive the following improvements to the extent feasible for pedestrian safety and comfort:

a. Perpendicular ADA-compliant curb ramps.

Currently, the curb ramps on the south side of Wilshire at Spaulding and Ogden are diagonal, or in other words they direct users into the middle of the intersection. They should, rather, have curb ramps that direct users to the other side of the crosswalk, perpendicular to the street they are crossing. See examples at:

<https://nacto.org/publication/urban-street-design-guide/intersection-design-elements/crosswalks-and-crossings/conventional-crosswalks/>

b. Curb extensions or corner radius tightening.

Currently the corners of Ogden and Wilshire, and Spaulding and Wilshire, have relatively well designed corners as it pertains to pedestrian safety. LACMA should make sure that they either maintain those good dimensions (mainly in not having large corner radii to facilitate automobile turns) or improve it for heightened pedestrian safety and comfort.

Curb extensions, for example, could likely be placed at the corners of Wilshire/Ogden and Wilshire/Spaulding across Ogden and Spaulding, respectively. If curb extensions are not feasible, it may be feasible to tighten the corner radii to induce automobiles to make slower, safer, turns. See examples at: <https://nacto.org/publication/urban-street-design-guide/intersection-design-elements/corner-radii/> and <https://nacto.org/publication/urban-street-design-guide/street-design-elements/curb-extensions/>

10. Pedestrian refuge islands should be placed at appropriate medians at Ogden and Spaulding intersections

Currently, there are no pedestrian refuge islands at the intersections of Ogden/Wilshire and Spaulding/Wilshire, even though there are medians present on Wilshire at both intersections. The existing three crosswalks across Wilshire at those two intersections should receive pedestrian refuge islands. In practical terms, that would mean building “noses” on the side of the crosswalk across from the existing median, as well as installation of ADA-compliant truncated domes and pedestrian signal request stanchions. See example at: <https://nacto.org/publication/urban-street-design-guide/intersection-design-elements/crosswalks-and-crossings/pedestrian-safety-islands/>

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Currently there is no crosswalk on the east side of Ogden at Wilshire. To the extent possible, LACMA should work with LADOT and other City of Los Angeles agencies to install a crosswalk there.

12. The drop off lane on the north side of Wilshire between Ogden and Spaulding should be shortened so that it exists between any crosswalks across Wilshire.

Currently, the crosswalks across Wilshire at Spaulding also have to cross the drop off lane on the north side of Wilshire, which adds about another 11’ to the distance it takes to cross Wilshire for a pedestrian. It is good that, according to the DEIR and testimony from LACMA representatives at a public meeting held on 12/5/2017 at the Mid City West Community Council Planning & Land Use Committee special meeting on LACMA, the drop off lane is to be shortened to begin *west* of the west leg crosswalk at Spaulding. However, the western end of the drop off lane, as per Figure II-5 (Conceptual Site Plan), is proposed to remain as is, extending west, past the west leg crosswalk at Ogden. The drop off lane should rather terminate *east* of the east leg crosswalk at Ogden (if installed) or the east edge of the Ogden intersection in order to facilitate a shorter, and safer pedestrian crossing of Wilshire as well as expanded pedestrian space in front of LACMA’s most popular attraction, Urban Lights.

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Comments on the LACMA DEIR from Mehmet Berker
mehmetikberker@gmail.com
651-470-8605

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From: Alan Berman [<mailto:aldberman@yahoo.com>]
Sent: Sunday, December 3, 2017 9:06 AM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Subject: LACMA DEIR comments

I am very concerned about the proposed parking for the museum on Ogden Dr. The residential blocks on Ogden are already excessively congested with cut-through traffic to Olympic, and a parking structure on Ogden will exacerbate this. The only way that this can work is if Ogden, like Genesee and Spaulding, gets closed at Olympic, so that traffic uses main arteries Wilshire and Fairfax. Academy Museum of Motion Pictures and Metro station will already dramatically increase traffic in the area, inevitably on surrounding residential streets, and proposed LACMA parking on Ogden will go too far. I oppose the proposed plans with parking on Ogden.

The DEIR is flawed in that it ignored the highly problematic intersection of Ogden and Olympic (reference IV.K and Figure IV.K-1). The City Council has already initiated attempts to improve the severe congestion and danger at this intersection, and the proposed parking on Ogden will exacerbate the situation.

Sincerely,

Alan Berman

From: Gideon Blumstein [mailto:gideonblumstein@gmail.com]
Sent: Wednesday, December 13, 2017 10:56 PM
To: Peter Burgis
Cc: henryvanmoyland@gmail.com
Subject: Proposed LACMA project

Dear Mr. Burgis,

Attached is my letter of support for the proposed Zumthor LACMA expansion. Please feel free to contact me with any questions and thank you for your time.

Sincerely,

Gideon Blumstein MD. MS.

Gideon Blumstein MD. MS.
902 South Burnside Avenue
Los Angeles, CA 90036
gideonblumstein@gmail.com

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

12.12.2017

From A Member of Miracle Mile Forward

Dear Mr Burgis,

I am writing to support the new planned LACMA project. As a long-time resident of Miracle Mile, I have witnessed the positive effects of the opening of the BCAM and Resnick Pavillion on our neighborhood. With the renewed interest in the museum following these additions, we saw new business development and much-needed renovation of previously vacant buildings throughout the neighborhood.

With the future opening of the Metro purple line extension and the Academy museum, our neighborhood is poised to become a major hub for culture and entertainment in the city and I believe the proposed Zumthor plan will be an invaluable part of that development.

I have been a member of LACMA for many years and believe it has one of the best permanent collections in the country. However, this is unfortunately contrasted by what I find to be the worst flow and gallery space design of any major museum I have seen. On a recent visit with my father, who uses an assistive device for walking, and my young son in a stroller, I was struck by how much time we spent waiting for elevators, trying to navigate narrow hallways and getting separated within the vast array of jumbled galleries.

Of course, my visits are always worth it because the art is truly incredible but I believe this art deserves to be showcased in a building that is equal to it in beauty and functionality, with easy accessibility for visitors in all stages of life. The proposed new building with the vast horizontal space and unique spanning section across Wilshire will provide that experience and function as a gateway into Miracle Mile, marking the entrance in to our unique and cherished neighborhood.

And just like the disruptions in traffic due to Metro construction currently ongoing, I am willing to accept short-term inconvenience for the prospect of a project that will benefit Los Angeles and Miracle Mile in the long run.

Sincerely,



Gideon Blumstein MD. MS.

From: Michelle Buchmeier [mailto:m.buchmeier@gmail.com]
Sent: Wednesday, December 13, 2017 10:56 AM
To: Peter Burgis
Subject: Comment to LACMA Draft EIR

Dear Sir:

I am a homeowner of a condominium at the corner of 8th and Ogden and one of several mothers with small children that live in this neighborhood. My neighbors and myself appreciate the walkability of our neighborhood as well as the close proximity to LACMA and its wonderful cultural offerings. When I received the notice that the Draft Environmental Report for the expansion project was available, I reviewed it, curious to see how the museum's proposed future plans would affect our family. One aspect of the project surprised and concerned me: the proposed shift of parking from the lot on Spaulding to the proposed Ogden Parking Structure. Such a shift could have a permanent negative impact on the safety and quality of life for my neighbors and myself thorough an increase in traffic and an increase in greenhouse gases. In addition, constructing a parking structure on land directly adjacent to the future Fairfax station of the Purple Line is a missed opportunity for transit oriented project that could benefit the community for generations to come.

Although the overall traffic impact to the surrounding vicinity caused by the expansion project may not be "significant", the impact to the block of Ogden between 8th and Wilshire by the shift in parking location certainly would be significant and negative. The Draft EIR acknowledges that the proposed Ogden Parking Structure would shift the traffic currently accessing the existing parking lot on Spaulding to the proposed Ogden Parking Structure. (Draft EIR pages D IV.K-34 and 35). According to the report prepared by Gibson Transportation Consulting, the shift would likely result in an average daily increase of 167 car trips on Ogden Drive between 8th and Wilshire. (Draft EIR Table IV.K-10). Although the Draft EIR mentions the mitigation measure of signage directing traffic to reduce the impact on the residential neighborhood, unless a barrier were erected to cars traveling between the proposed structure and 8th Street, it is reasonably foreseeable that many of these cars would continue to access and leave the garage from the residential portion of Ogden Drive between the structure and 8th Street in order to avoid Wilshire. However, the Draft EIR fails to study traffic impacts to the intersection of 8th St. and Ogden Drive and does not consider whether a traffic calming measure at that intersection, such as a stop sign, street light or bump out, might be appropriate to mitigate negative impacts on the surrounding neighborhood caused by members of the general public passing through this intersection. Adding many more cars to the circulation on Ogden without significant traffic calming improvements could likely create hazards for pedestrians and pets and would impact our ability to enter and exit our residences.

Additionally, the EIR does not address greenhouse gas impacts on the residential neighborhood on Ogden both during and following construction. An increase in motor vehicles would likely result in an increase in vehicle exhaust and the extent of this impact and potential for mitigation measures should be studied.

Finally, the plan to move the parking from its current location on Spaulding and Wilshire to the proposed location on Ogden would be a permanent missed opportunity for transit oriented development in the block where the Fairfax Purple Line station will soon open. There is currently an opportunity to design a project that would complement the future public amenity of the trail station - a parking structure for the museum's use would have no complimentary qualities at all with the rail station. I urge the proponents of the LACMA expansion to consider the highest and best use for the land

uniquely situated directly adjacent to the future rail station and how to optimize positive community impacts through the land's development.

Thank you for your attention to my comments.

Sincerely,

Michelle Acosta

Sent from my iPhone

From: Flavia Carrozzi [mailto:fcarrozzi@gmail.com]
Sent: Thursday, December 14, 2017 9:18 AM
To: Peter Burgis
Subject: LACMA

Dear Mr Burgis,

As a resident of Miracle Mile for 13 years, I want to express my complete support for the new LACMA project. I think the proposed design is beautiful and will give the MM a much needed focal point. The beauty of the design is that it brings the outside in, making the Los Angeles landscape a major part of the experience. The city and art will live symbiotically in a architectural structure. It's a win win for all of us in the long run.

Sincerely,

Flavia Carrozzi

Sent from my iPhone

From: Montrese Chandler [<mailto:montrese.chandler@gmail.com>]
Sent: Friday, December 15, 2017 5:38 PM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Subject: LACMA New Project

Montrese Chandler
5321 West 8th Street
Los Angeles, California 90036
montrese.chandler@gmail.com

Mr. Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

December 15, 2017

Dear Mr Burgis,

As a resident of Miracle Mile, I would like to express my general support for the new LACMA project.

On November 16th, I had an opportunity to attend LACMA's Public Meeting to unveil the Draft Environmental Impact Report for the new Peter Zumthor-designed building. Overall, I support the project and believe that it will be an asset to the Miracle Mile community. I am particularly enthusiastic about the plans to exhibit in an open glass design that creates an open and equitable environment. It is an architectural style that seems to be trending in the Los Angeles area, such as at the Beverly Center, and I am excited to see a similar "open" designed concept in our neighborhood.

As with other people in our community and the bordering areas, traffic and parking is of grave concern. I trust that any potential impact within the community will be mitigated in a meaningful way. Additionally, I am sensitive to any concerns that my neighbors may have as it relates any negative impact to their properties and urge your office to address and resolve any potential issues or concerns.

Thank you for your time and attention to residents' input concerning the new project.

Kindest regards,

Montrese Chandler

From: Robert C [mailto:cdila1@gmail.com]

Sent: Friday, December 15, 2017 10:11 AM

To: Peter Burgis

Subject: LACMA Building for the Permanent Collection; Comments regarding the Draft EIR

As the owner of investment residential property within one block of the proposed LACMA Museum, I have great concerns as to the adverse effect of said development on the surrounding neighborhood. The Draft Environmental Impact Report for LACMA over-Wilshire gallery design, stated; ". . . An average 1.2 million people visit LACMA annually, according to the Draft EIR. Except in its debut stage, the number is not expected to rise since the new 387,500-square foot museum is 5,375 square feet less than the four buildings it will replace. . ." What the DEIR failed to mention, which was confirmed by LACMA Senior Director of Communications, Miranda Carroll in her November 20, 2017 email to me, is that the 30,000 square feet of museum warehouse space in the existing museum is going to be moved to another location. Therefore, the claim in the Draft EIR that the number of visitors is not expected to rise because the proposed new museum is 5,375 square feet smaller is deceptive to say the least! In fact, based on the removal of the 30,00 square feet of warehouse space, the proposed museum, which will also have restaurants, cafes, retail and office space, will be 25,000 square feet larger, which would require additional parking. Yet, no additional parking is being proposed, and no mention of this is made in the Draft EIR? The Academy Museum, which is now being built next door, will include a one-thousand seat theater, restaurants, retail, office space and a museum, and was approved with ZERO additional parking. It looks like LACMA is hoping for the same with this project, irregardless of the negative impact on the surrounding neighborhood! The Draft EIR also made no mention of the devastation that will be caused to the small businesses on Wilshire Blvd. during the months/years that Wilshire Blvd. will be closed while the proposed "bridge" is being built? After I brought this up at the December 5, 2017 Mid City West Neighborhood Council Land Use Committee Public Hearing, LACMA Director Michael Govan claims that Wilshire Blvd. will only be closed for two weekends while the bridge is being constructed. I find it hard to believe that the City of Los Angeles would ignore the safety hazard of allowing the construction of this bridge over a major street, while allowing vehicles to continue to travel underneath? These small businesses have been a part of our community for decades, and many if not most, will be forced out of business during the duration of the construction of the bridge! The Draft EIR also made no mention of the plan to keep the museum open during construction, and to eliminate the 260 parking spaces at the Spaulding parking lot when construction begins. Where will all the museum patrons park during the four years until the new Ogden parking structure is built? what will be the impact on the available street parking in the surrounding residential neighborhood? The Draft EIR also made no mention of the 3.5 acres of proposed increased park space, which would also require more parking, to avoid further impact on the surrounding residential neighborhood.

At the December 5, 2017 Mid City West Community Council Land Use Committee Public Hearing. LACMA Director Michael Govan stated that they plan another expansion in the next twenty years, without any regard for the impact on the surrounding neighborhood. Mr. Govan went on to state that "doubling attendance and space is good. and might not need the existing parking." Mr. Govan also stated that it would "cost at least three-hundred million dollars to renovate the existing museum buildings, and that no one even knows what it would cost for the "retrofitting" In the November 20, 2017 email I received from Miranda Carroll, LACMA Senior Director of Communications, she contradicts LACMA Director Govan by stating a much lower cost of "\$246 million which appears to include retrofitting. Ms. Carroll also stated to me that; "No funding is available since the private donors and trustees and the County were not willing to provide funds for a retrofit." There was criticism by nearby residents at the December 5, 2017 Mid City West Public Hearing that most of the required repairs needed for the existing museum building should have been budgeted and completed over the years, rather than deferring necessary maintenance, suggesting mismanagement by Director Govan and his predecessors. Director Govan responded by admitting that building maintenance had been deferred over the years, but gave no further explanation. Nearby residents also stated that "Lot Full" signs can be regularly seen in front of both of the existing parking lots for the museum. My tenants regularly complain that especially on weekends, the busiest time for LACMA, they can't find anywhere to park on the street anywhere near their residences. Yet, Director Govan insisted that everyone will be using public transportation, including the subway, so "parking is no longer a problem for the surrounding area." When I arrived on December 5, 2017 at the Mid City West Public Hearing, I saw Director Govan getting out of a car in the parking lot where the hearing was being held. The meeting was

held on Fairfax Avenue, a very short bus ride from LACMA. Yet, Director Govan, who claims that we are all going to use public transportation, drove to the hearing? Director Govan's own actions clearly indicate that residents of Southern California continue to prefer to drive their own cars, rather than use public transportation, and the impact on the neighborhood surrounding, LACMA, without any additional parking, will be devastating!

The City of Los Angeles Wilshire Community Plan "is intended to further refine the General Plan, and is intended to promote an arrangement of land uses, streets and services which will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live and work in the community, and is intended to guide development by informing the general public of the City's planning goals, policies and development standards with the objective of creating a healthy and pleasant environment." The Wilshire Community Plan calls for accommodating more affordable housing and child care facilities. The Draft EIR and LACMA Director Michael Govan statement at public meetings allegedly imply the threat to the surrounding neighborhood that if you don't let us build this proposed project, a massive mixed use apartment high-rise will be built on the Spaulding property. More affordable housing is exactly what the Wilshire Community Plan calls for, to meet the growing demand for housing in the Miracle Mile. The Wilshire Community Plan also states; "improved land use transitions are needed between commercial uses and single family and multiple family areas." The Plan also calls for "better cohesiveness, diversity and continuity of complementary uses along commercial frontage." The design of the proposed project clearly does not improve land use transitions between the proposed commercial use and adjacent single family and multiple family uses. Instead, it overwhelms the entire neighborhood and rather than complementing the existing commercial uses, it does just the opposite, and separates the commercial districts east and west of the proposed project into to separate business districts on Wilshire Blvd. The Plan also calls for "new commercial development need to be compatible with existing buildings in terms of architectural design, bulk and building heights." The architectural design and bulk of the proposed project is not compatible with existing building on Wilshire Blvd, especially the inclusion of a bridge across Wilshire Blvd. The Plan also Requires each new building to have a pedestrian-oriented ground floor, and maximize the building area devoted to ground level display windows and display cases, store front glass, doors, windows and other transparent elements on front facades to afford pedestrian views to retail, office, and lobby space." The proposed project has no ground floor.

Los Angeles Ordinance No. 176.332; Miracle Mile Community Design Overlay District, places specific requirements on new buildings in the Miracle Mile area. The Community Design Overlay Districts requires that "all new developments or major exterior renovations to existing development make an 'aesthetically compatible' contribution to the existing built environment. No building permit shall be issued for any project, unless the project complies with the adopted Guidelines and Standards for the Community Design Overlay District. In Commercial areas, the emphasis is on the provision and maintenance of the VISUAL CONTINUITY OF STREETSCAPES" Museum Associates dba Los Angeles County Museum of Art, is proposing a new 387,500 square foot museum building which would extend over Wilshire Boulevard. The north part of the building is proposed to be built at 5905 Wilshire Blvd. I have confirmed with a Los Angeles Department of Planning Planner that this property is exempt from said ordinance because it is County property. However, I also confirmed with a Los Angeles City Planner that the property located on South Spaulding Avenue, which the building is to extend to over Wilshire Blvd., is located in the City of Los Angeles and is not exempt. I also confirmed with a Los Angeles City Planner that the proposed new parking garage to be located at 715-731 Ogden Avenue is also not exempt. The Los Angeles Department of Planning has yet to get back to me as to who has jurisdiction over Wilshire Blvd. where the proposed bridge is to be built. As indicated in said Ordinance, there is a requirement that said buildings be built to the sidewalk of Wilshire Boulevard and adjacent cross street . . . Small setbacks from the sidewalk no greater than fifteen feet in depth to accommodate building entries. . . Ground floor façade of all buildings shall be comprised of a minimum of 60% glazing, a parking structure adjacent or across the street or alley from a residential zone or use shall install 5-foot solid decorative walls along the sides of the structure adjoining the residential areas to block light and noise . . . Parking areas adjacent to a public right-of-way shall be separated from the sidewalk with a 5 foot landscape buffer. . . The design of the proposed museum on the Spaulding property clearly does not meet some of if not most of these requirements. I have not been able to obtain any architectural renderings of the proposed Ogden parking structure, and none were presented at a neighborhood council public meeting last week, so I have no idea if the requirements of the Ordinance are being followed?

Numerous calls to LACMA Director Govan and his senior staff to get answers to questions I had pertaining to the proposed project were ignored until I contacted Los Angeles County Supervisor Kuehl's office . In her November 20, 2017 email, LACMA Senior Director of Communications Miranda Carroll only answered three of my several questions, and I have great concerns as to the accuracy of her answers. Peter Burgis, County of Los Angeles, Chief Executive Office, Capital Projects, told me that the reason they had not responded to the rest of my questions was because "they were waiting to receive all the questions from the public before responding, so that all the answers would be 'CONSISTENT'". I then asked Mr. Burgis that if all the answers to public questions were truthful, why there would be any concern about being consistent? Unfortunately, Mr Burgis would not give me an answer. I then contacted Los Angeles County, Acting Manager, Chief Executive Office, Amir Alan, who assured me that I would receive an email from Mr. Burgis in the next couple of days, with answers to all my questions. Said email was never sent, and to this day I have never received any response from the County to the following questions:

"What is the time frame that Wilshire Blvd. will have to be closed during the construction of the "bridge" of the proposed new complex?"

"What effect will closing Wilshire Blvd. have on the small businesses in the surrounding Wilshire Blvd. neighborhood?"

"Where is the required additional parking for the three-and-a-half acres of proposed new park area?"

"Where is the temporary 260 parking spaces going to be, to make up for the Spalding parking lot elimination during construction, while the museum is continuing to operate, and until the new Ogden parking structure is completed?"

"Where is the additional parking for the retail and restaurant/cafes planned for the new complex?"

"What effect will the new restaurants/cafes have on the existing adjacent restaurants on Wilshire Blvd. that have been in the community for decades?"

"What is the estimate of increase in attendance if the new complex is built?"

"Why is the construction of the proposed new complex planned to take place during the construction of the two subway stations in the immediate area, rather than waiting until they are completed, to not further burden the surrounding neighborhood?"

Since the County of Los Angeles owns the 5905 Wilshire Blvd. property, there is a clear conflict of interest involved with them deciding on the impact to the surrounding neighborhood! Should the owners of the property be deciding if the project will have a impact on the surrounding community? Certainly no private developer owning County land would be allowed to decide on the impact to the community for their projects, so why should the County? Why is the Environmental Impact Report being conducted by the County, when I have been advised by a Los Angeles City Planner that both the Spaulding and Ogden properties are not owned by the County of Los Angeles, but are instead owned by Museum Associates dba Los Angeles County Museum of Art, and are therefore located within the City of Los Angeles? Should a new museum even be built, which will include \$125 million in County taxpayer funds, because for years, the Los Angeles County Museum of Art has been allegedly mismanaged, and required maintenance and updating of the existing museum buildings has allegedly been negligently deferred? No doubt, as with the adjacent Academy Museum, the desires of the wealthy and famous, like David Geffen, who will have the proposed museum named after him, in exchange for his \$150 million donation, are far more important than the devastating effect the proposed project will have on the surrounding community,. In addition, it appears that Museum Associates dba Los Angeles County Museum of Art, with the assistance of the County of Los Angeles, is allegedly hoping to get an exemption from the City of Los Angeles Wilshire Community Plan and the Miracle Mile Community Design District, which every other property owner in the district is required to follow!

Best,

Robert Chernow
Land Use Specialists, Inc.

From: Robert C [mailto:cdila1@gmail.com]
Sent: Friday, December 15, 2017 1:45 PM
To: Peter Burgis
Subject: LACMA Building fort the Permanent Collection

Mr. Burgis:

I just received a phone call from a senior Los Angeles Planning Department Planner, informing me that I was misinformed about the Spaulding Ave. property, it is in fact owned by the County of Los Angeles. Please disregard my comments as to the Wilshire Community Plan and Miracle Mile Community Design Overlay District in association with the Spaulding property. I am still waiting for a response from the Los Angeles Bureau of Engineering as to jurisdiction over the section of Wilshire Blvd., where the bridge is proposed.

Best,

Robert Cherno

December 13, 2017

Mr. Peter Burgis, Capital Projects
Los Angeles County, Chief Executive Office
555 West Temple Street, Room 754
Los Angeles, CA 90012
Shared via email: pburgis@ceo.lacounty.gov

Dear Mr. Burgis:

As a nearby and longtime neighbor of LACMA, I'm writing to comment on the proposal for a new building to replace some of their existing facilities. I am in support of the project. I think the design of the new building will be a great addition to Miracle Mile, and I welcome the new open spaces that will be created in Hancock Park and on its Spaulding property. Our neighborhood certainly needs and will benefit from more public park areas. Additionally, with this project, LACMA will continue to grow its high-quality arts and cultural offerings to the neighborhood and Angelenos everywhere.

Concurrently, I know that there will be a traffic management plan to deal with impacts to the streets during construction and other plans to mitigate noise and construction; and I trust that you and the County will carefully consider those of us who live close by and have to navigate the streets, the construction, etc. while the project is being built.

If LACMA so desires, I hope the museum will reconsider and increase the seating capacity of the new theater space it will have on the Spaulding property. It's targeted for 300 seats; however, I think the capacity should be more like 500 seats to further serve its members and visitors.

In closing, I look forward to the improved park areas, the innovative building by architect Peter Zumthor, and all of the new LACMA programs and exhibits we will be able to visit as soon as the project moves forward.

Thank you for your consideration.

Very Truly Yours,



Karen Constine
750 S. Spaulding Avenue
Los Angeles, CA 90036
Email: karenconstine@yahoo.com

From: Tracy Abbott [mailto:trabot@ca.rr.com]
Sent: Thursday, December 14, 2017 10:57 AM
To: Peter Burgis
Subject: LACMA -- Comment Review

Hello Peter,
I live near LACMA. I used to live in Park La Brea so I am very familiar with the
Ins&Outs of LACMA.

My concern is what is LACMA's plan regarding security in the new buildings?
I am concerned about graffiti on the new buildings especially on the south side of
Wilshire, what is the plan?
And then there is the homeless camp issue? How will this prevented?

Currently the security is minimal and I am unclear what their plan is going forward?
Minimal probably not the right answer.

Thank you
Tracy Cook
323 459-9717

From: Francine Dorsey [<mailto:francine.dorsey@gmail.com>]
Sent: Tuesday, December 5, 2017 2:05 AM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Subject: LACMA

LEAVE IT ALONE!!! SEND HIM HOME-----PERMANENTLY!!!

Evalena Easter
5405 West 9th Street, Los Angeles 90036
mszena@ca.rr.com

Mr. Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West Temple Street, Room 754
Los Angeles CA 90012

December 9, 2017

From A Member of Miracle Mile Forward

Dear Mr. Burgis,

As a resident of Miracle Mile, I want to express my wholehearted support for the new LACMA project.

Preserving the obsolete 1960s buildings, at a cost of over \$250m, is clearly an unattractive option, and removing the current ugly entrance is a priority.

The reasons for the horizontal exhibition space have been well articulated by LACMA's management, and the resulting accessibility and equality among the exhibits will be welcome and refreshing. Spanning Wilshire is a reasonable solution to achieving that horizontal space, and it gives the added benefit of five more acres of landscaping and outdoor art.

In spite of the adjacent Metro, the Ogden parking structure means that the number of parking spaces will remain the same, which I believe will be ample for future needs.

Although there will be inevitable disruption from construction, I am confident that the proposed traffic management plan will mitigate its effects.

Above all, I am confident that the good-looking new building, with its glass sides and the resulting interaction between the art inside and the surrounding streets and parks, will be an asset to our community. In the past, my Child, grandchildren, and Great Grand Children have benefitted from our City's museums. This has been a labor of love, financial support from many, and more importantly the thousands volunteers who for many years have give tirelessly of themselves. Who better understand the need that the enhanced appearance and viability of our Miracle Mile Museum community is so essential? As a past docent of the Page Museum, I have physically been a part of this growth in my community and want my family and others to benefit from the proposed architectural genius and insight that has been put forth to provide us with such a wonderful improvement..

Please, please look forward and ensure that our Museum is a future "New Wonder of Los Angeles" that can be a gift to our City's posterity, as well as it would be a wonderful creative gift of beauty we can give to our State.

Kind regards

Evalena Easter
24 year Miracle Mile Homeowner/Resident (owner/resident since December 8, 1993)

From: Leonard Frayman [<mailto:lfspirit@gmail.com>]
Sent: Sunday, December 10, 2017 10:25 AM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Subject: New LACMA

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

12/10/17

Dear Mr Burgis,

The major reason we moved to the Miracle Mile in July of 2016 to be close to our favorite museum – LACMA. This is why we want to express our wholehearted support for the new LACMA project.

Preserving the obsolete 1960s buildings, at a cost of over \$250m, is clearly an unattractive option, and removing the current ugly entrance is a priority.

The reasons for the horizontal exhibition space have been well articulated by LACMA’s management, and the resulting accessibility and equality among the exhibits will be welcome and refreshing. Spanning Wilshire is a reasonable solution to achieving that horizontal space, and it gives the added benefit of five more acres of landscaping and outdoor art.

In spite of the adjacent Metro, the Ogden parking structure means that the number of parking spaces will remain the same, which I believe will be ample for future needs.

Although there will be inevitable disruption from construction, we believe that the proposed traffic management plan will mitigate its effects.

Above all, we are confident that the good-looking new building, with its glass sides and the resulting interaction between the art inside and the surrounding streets and parks, will be an asset to our community.

Kind regards,

Nina Brody,
Leonard Frayman
908 S. Dunsmuir Ave.
Los Angeles, CA 90036
lfspirit@gmail.com

From: Craig Gartner [mailto:craig@gartnergreen.com]
Sent: Thursday, December 14, 2017 7:50 PM
To: Peter Burgis
Subject: Zumthor design // lacma

i live in miracle mile and think this “flyover” Wilshire is a terrible idea. while i’m all for expanding LACMA - regarding this design in particular, wilshire and miracle mile in general have become overrun with homelessness and i don’t want the neighborhood looking like a bridge underpass on the way to downtown. i can imagine everyone and their mother camped out there at night. all the vagrants who now hang out in and around the tar pits and tar pit museum will never leave the area and will just permanently move in. not to mention it does not at all look aesthetically congruent with the art deco vibe of wilshire. that heinous peterson museum is an eyesore to begin with and i have NO idea how that was ever approved. anyway, my two cents.

CRAIG GARTNER
GARTNER | GREEN
entertainment
craig@gartnergreen.com
323.633.2000

From: Rosanne [<mailto:artrage@sbcglobal.net>]
Sent: Friday, December 8, 2017 10:20 PM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Subject: Comments regarding LACMA building proposal-EIR report

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012

Regarding the proposed new building for LACMA's permanent art collection, I have a few concerns.

The extension over Wilshire Boulevard:

Any structure that provides shade and shelter quickly turns into a homeless encampment in Los Angeles. Just blocks away from LACMA, at Venice Boulevard and La Cienega where there is a freeway overpass, there is a dense encampment, a Hooverville, if you will, on both sides of the street. Tents, shopping carts and men take up the sidewalks on both sides the boulevard 24 hours a day. What would prevent that from happening at LACMA? How much money will it cost to provide 24 hour security and lighting all night, to prevent the LACMA extension from becoming a magnet for panhandlers and the homeless? Add in the Metro station into the mix and the tenor of the neighborhood will change dramatically.

I also worry about emergency vehicles being slowed down by this extension overhead. I'm not thrilled about the visual blockage it will create, and I would hate to be anywhere near it during an earthquake. Covering Wilshire Blvd, seems like a really bad idea.

Exhibition space and theatre reduction:

The new building would reduce space for exhibiting art. The reasoning behind spending such an obscene amount of money to rebuild the museum so it will have LESS space to show art escapes me. The world class art collections are what make LACMA the gem that it is, not it's buildings. There is no point to have a fancy building if we can't see the artworks we have grown to love. There is also the issue of having concrete like walls and windows throughout the building which would make hanging and protecting artwork from sunlight a challenge. The cost of cooling the museum and maintaining temperature and humidity control will be massive. The museum experience is one of contemplation, hopefully of the silent nature. I'm afraid this attraction where the art takes second place to the architecture would turn the museum experience to a selfie stop and not much else.

Some donors are promising their collections to LACMA if it can raise the money to rebuild. But where will the art be shown? How can the museum grow it's collection (and isn't that every museums goal) if it doesn't have the space to show the artwork? How can you spend a billion dollars (let's be realistic about the budget here) for a new building but have to keep a substantial portion of your collection in storage?

The idea that this one building would unify the museum campus and bring a new dimension to viewing art is also unrealistic. People would have to exit the new building in order to view anything at the Japanese Pavilion, the BCAM, the Resnick Pavilion, *Urban Light*, *Levitated Mass*, Alexander Calder's *Hello Girls*, or the sculpture gardens. The new LACMA will be just as disjointed as it is today.

The theater would be reduced to less than half the seats it provides now. The film program at LACMA used to be part of the museum. Now you have to join a special Film Club to get priority just to purchase tickets. Sometimes regular museum members or members of the public can't get tickets to film events because they sell out to the subscribers first. The museum is supposed to be inclusive not exclusive. The reduction of theatre seats would guarantee that films, concerts, lectures and other productions would be reserved for those with more money. Again, why tear down a theater to make it smaller?

Jobs:

If it takes five years to complete the construction of this project—and just look next door at the Academy which is a year or so behind schedule and over budget—literally hundreds of people will lose their jobs with no guarantee that they will be hired back. The economy is terrible and people will lose their jobs over a building that will bring more traffic to the neighborhood and display less art. Unlike the excellent art collection at LACMA, that is in poor taste.

R. Gold

From: Purvi Goor [mailto:psgoor@gmail.com]
Sent: Wednesday, December 13, 2017 9:29 PM
To: Peter Burgis
Subject: LACMA

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

December 13, 2017

From A Member of Miracle Mile Forward

Dear Mr Burgis,

As a long-time resident of Miracle Mile, I want to express my wholehearted support for the new LACMA project.

Preserving the obsolete 1960s buildings, at a cost of over \$250m, is clearly an unattractive option, and removing the current ugly entrance is a priority.

The reasons for the horizontal exhibition space have been well articulated by LACMA's management, and the resulting accessibility and equality among the exhibits will be welcome and refreshing. Spanning Wilshire is a reasonable solution to achieving that horizontal space, and it gives the added benefit of five more acres of landscaping and outdoor art.

In spite of the adjacent Metro, the Ogden parking structure means that the number of parking spaces will remain the same, which I believe will be ample for future needs.

Although there will be inevitable disruption from construction, I am confident that the proposed traffic management plan will mitigate its effects.

Above all, I am confident that the good-looking new building, with its glass sides and the resulting interaction between the art inside and the surrounding streets and parks, will be an asset to our community.

LACMA has contributed so much to my family's experience in Los Angeles. I am delighted at idea that it will be an even more wonderful place with fantastic design to carry our community and the rest of LA forward.

Kind regards,
Purvi Goor

Sent from my iPhone

From: Simone Gordon [<mailto:simonegordon1131@gmail.com>]
Sent: Sunday, December 10, 2017 8:40 PM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Cc: 'Henry Van Moyland' <henryvanmoyland@gmail.com>
Subject: LACMA PROJECT - SUPPORT

Simone Gordon
1131 S Ridgeley Dr - Los Angeles, CA 90019
simonegordon1131@gmail.com

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West Temple Street, Room 754
Los Angeles CA 90012

December 10, 2017

From A Member of Miracle Mile Forward

Dear Mr Burgis,

As a resident of Miracle Mile, I want to express my wholehearted support for the new LACMA project.

It's an amazing project and will revitalize the Miracle Mile area.

Preserving the obsolete 1960s buildings, at a cost of over \$250m, is clearly an unattractive option, and removing the current ugly entrance is a priority.

The reasons for the horizontal exhibition space have been well articulated by LACMA's management, and the resulting accessibility and equality among the exhibits will be welcome and refreshing. Spanning Wilshire is a reasonable solution to achieving that horizontal space, and it gives the added benefit of five more acres of landscaping and outdoor art.

In spite of the adjacent Metro, the Ogden parking structure means that the number of parking spaces will remain the same, which I believe will be ample for future needs.

Although there will be inevitable disruption from construction, I am confident that the proposed traffic management plan will mitigate its effects.

Above all, I am confident that the good-looking new building, with its glass sides and the resulting interaction between the art inside and the surrounding streets and parks, will be an asset to our community.

Kind regards

Simone Gordon

From: Regina Griffin [mailto:reginagriffin@mac.com]
Sent: Friday, December 15, 2017 1:12 PM
To: Peter Burgis
Subject: Draft EIR / LACMA

Dear all,

I do not live in LA, but have loved watching it evolve during the past few decades while visiting from NYC. LA has become more vibrant and lively in its streets + outdoors--it was always a great city, but is getting better and better.

One significant contribution to that is the increasing variety of different buildings in different styles juxtaposed next to one another, adding energy + vitality to the street scape.

Wouldn't it be better for the city if LACMA renovated + repurposed what it already has, saving the HHPA work?

It could add an exciting "Complexity and Contradiction" to your cityscape.

Sent from my iPhone

From: Joseph Grover [mailto:joeagrover@gmail.com]
Sent: Thursday, December 14, 2017 9:51 PM
To: Peter Burgis
Cc: info@buildinglacma.org
Subject: Zumthor designs

Good morning Mr. Burgis

I live in Los Angeles, in the 90038 district. I used to live in Miracle Mile, and then moved to the Melrose Fairfax district. LACMA has always been one of my favorite points of interest. When I heard about the proposed designs for LACMA I was very excited. But, I understand that there is now some push back. Please allow me to share my support for the Peter Zumthor design with you. I hope your department will carefully review the public comments before making a decision. This is a very exciting opportunity that would be a shame to pass on.

Thank you for your time

Joseph Grover
310-384-6635
712 1/2 N Van Ness Ave
LA CA 90038

From: Haight Work [mailto:martha.haight@gmail.com]
Sent: Wednesday, December 13, 2017 8:59 PM
To: Peter Burgis
Subject:

Martha Haight
[808 S Dunsmuir Ave.](#)
[Los Angeles](#)
[CA 90036](#)

To Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
[500 West Temple Street, Room 754](#)
[Los Angeles CA 90012](#)

From a Member of Miracle Mile Forward

Dear Mr Burgis,

As a neighbor, I want to express my wholehearted support for the new LACMA project.

I love the new design with views from all sides. The pass over Wilshire will be beautiful for both the museum goers and the people down below in cars and on foot. We live in the neighborhood and we welcome the expansion and the tourism it will attract.

LACMA is our community's greatest single amenity, and this revamp, with its galleries, restaurant, cafes and store, looks set to keep it so.

Kind regards

Martha Haight

From: Linda Hammonds [mailto:linda@concipliant.net]
Sent: Wednesday, December 13, 2017 1:27 AM
To: Peter Burgis
Subject: Comments regarding the Draft EIR

I'm an administrator of the Facebook So Cal Historic Architecture group. I realize this design is not popular with many, but I see something in it that they apparently don't. I would love to have the original museum back if that were possible, but that is not an option. Since that's the case, I like this design from what I see. The bridge itself reminds me of the modern bridges that used to cross the Pennsylvania Turnpike in the 1950s. The museum buildings, in part, remind me of some of the nicest Robinson's department stores that once graced Southern California. I think it does represent this area well.

Best Regards,

Linda Hammonds

Aaron Harberts
922 S. Dunsmuir Ave.
Los Angeles, CA 90036
aaronharberts@me.com

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

12/13/17

From A Member of Miracle Mile Forward

Dear Mr Burgis,

As a resident of Miracle Mile, I want to express my wholehearted support for the new LACMA project.

Preserving the obsolete 1960s buildings, at a cost of over \$250m, is clearly an unattractive option, and removing the current ugly entrance is a priority.

The reasons for the horizontal exhibition space have been well articulated by LACMA's management, and the resulting accessibility and equality among the exhibits will be welcome and refreshing. Spanning Wilshire is a reasonable solution to achieving that horizontal space, and it gives the added benefit of five more acres of landscaping and outdoor art.

In spite of the adjacent Metro, the Ogden parking structure means that the number of parking spaces will remain the same, which I believe will be ample for future needs.

Although there will be inevitable disruption from construction, I am confident that the proposed traffic management plan will mitigate its effects.

Above all, I am confident that the good-looking new building, with its glass sides and the resulting interaction between the art inside and the surrounding streets and parks, will be an asset to our community.

Kind regards

Aaron Harberts

From: Julie Hebert [mailto:julieabear@me.com]
Sent: Thursday, December 14, 2017 5:44 PM
To: Peter Burgis
Cc: info@buildinglacma.org
Subject: LACMA Design

Peter Burgis, Capital Projects
Los Angeles County, Chief Executive Office
[500 W. Temple Street, Rm 754](#)
LA 90012

Dear Mr. Burgis:

I support the new LACMA design as presented. I am a longtime LACMA member and a longtime resident of the neighborhood and I strongly support this innovative design that will elevate the museum, enhance the community, the city and the county of Los Angeles.

Sincerely,

Julie Hébert
[1016 South Hudson Ave](#)
[LA CA 90019](#)

From: Alan Hess [mailto:alanhes@gmail.com]
Sent: Wednesday, December 13, 2017 11:17 PM
To: Peter Burgis
Subject: Comments on LACMA DEIR

ALAN HESS
ARCHITECT
4991 CORKWOOD LANE
IRVINE, CA 92612
949 551 5343
alan@alanhess.net

December 13, 2017

Peter Burgis, Capital Projects
County of Los Angeles, Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, CA 90012
[E-Mail: pburgis@ceo.lacounty.gov](mailto:pburgis@ceo.lacounty.gov)

re: comments on LACMA DEIR

Dear Mr. Burgis:

The Cultural Resources section of the DEIR's Environmental Impact Analysis (IV.C.) is insufficient to support its conclusions that 1) the existing LACMA campus is not eligible for the National Register of Historic Places, and 2) that they no longer retain integrity. A more thorough assessment is needed in order to determine the actual environmental impact of the proposed project.

The DEIR fails to utilize current scholarship on the work of architect William Pereira. This is a significant deficiency. For several decades, proper documentation of the architecture of LACMA and Pereira has been sorely lacking; recent research and analysis, however, presents these buildings in a broader context in architectural history and reveals their real significance. This sort of reassessment of the reputation of architects is common in architectural history, of course, which is why it was incumbent on the DEIR to search out and incorporate these new views in order to make an accurate judgment.

I make this assessment as an architect, architectural historian, and author of nineteen books, including many on the architecture of California in the twentieth century, LACMA's period of significance. I have written on Pereira specifically in PlacesJournal.com, and in the catalog for the 2013 exhibit on his work at the Nevada Museum of Art.

To provide a more accurate assessment of LACMA and Pereira's architecture, I would recommend including, among others, the following sources absent from this section of the DEIR:

Abrahamson, Eric John. *Building Home: Howard F. Ahmanson and the Politics of the American Dream* (Berkeley: University of California Press, 2013.)

Robertson, Colin, ed. *Modernist Maverick: The Architecture of William L. Pereira* (Reno: Nevada Museum of Art, 2013.)

Steele, James, ed. *William Pereira* (Los Angeles: USC Guild Press, 2002.)

Hines, Thomas. *Architecture of the Sun: Los Angeles Modernism 1900-1970* (New York: Rizzoli International, 2010.)

Hess, Alan. "Discovering Irvine," [PlacesJournal.com](https://secure-web.cisco.com/1Hvx5ofikmxkRZAKNBUFEvO2kTT7Zuj3ATIGhcVTXXR-SP5xsEMMCsb0qeh18Z1BMxLZmHK81HHqEsynIFq_tUb-gvLA2DwSr5MHRpAk29ffsyev-Fb505D3vb-T6l5r0tfwRAnNxHVbZHsuixztExAQEIbR0bwcR6o5qQlxXLFa5NpX_UtV5j6GosCEAUThQT2nj3DCIAWhDVSNKsDX-lyUUuGT109scnl93RNqWVFYCVd1uVXteW2GTBUKE4mHXaWyCAVeiePYWjR51cjah00-7riM29GYEuJ2MYLbufxkq9B3PNxBFMF6UkOPhPfx2c4SajU6-nrKh3th8HCC_cjxqbyO8az3CeO8V1Q-usGRwMtJ6yLiDdvF4055-YDR/https%3A%2F%2Fplacesjournal.org%2Farticle%2Fdiscovering-irvine%2F) Oct 2014
https://secure-web.cisco.com/1Hvx5ofikmxkRZAKNBUFEvO2kTT7Zuj3ATIGhcVTXXR-SP5xsEMMCsb0qeh18Z1BMxLZmHK81HHqEsynIFq_tUb-gvLA2DwSr5MHRpAk29ffsyev-Fb505D3vb-T6l5r0tfwRAnNxHVbZHsuixztExAQEIbR0bwcR6o5qQlxXLFa5NpX_UtV5j6GosCEAUThQT2nj3DCIAWhDVSNKsDX-lyUUuGT109scnl93RNqWVFYCVd1uVXteW2GTBUKE4mHXaWyCAVeiePYWjR51cjah00-7riM29GYEuJ2MYLbufxkq9B3PNxBFMF6UkOPhPfx2c4SajU6-nrKh3th8HCC_cjxqbyO8az3CeO8V1Q-usGRwMtJ6yLiDdvF4055-YDR/https%3A%2F%2Fplacesjournal.org%2Farticle%2Fdiscovering-irvine%2F

Hess, Alan. "Erasing Pereira," *Orange Coast Magazine*, June 30, 2014.

http://secure-web.cisco.com/1HsuFeUIrk9Lj6lSRTDZopb7O2lodC6yFdRsvFUaVKaBejDeR2EGe5vS2pl3O9Bs9r9Sdi4TUjhU1OE_YgQspB6h3rFD3WyTabG6JEgW1F6m7q11gprvCUJNuWNTYmKelP6uADPI_XrEPI-DzlxhBI9A64EiwAGm0Xj2F79vypI0ETsKBHDwqRXrnYO0ji9NiYrPPsubPYVh_Lvxvf2SZQixaXcWFPC97Q_HNTMlnVF703Bcd6AvHjyv14PG-9fD40xnvkucS7PD6X81CJzNk9w98HggJNrU-cuvP-qjivpUA4ONiqzWwI7_R20CW6ywOJsGi_daEdTVMa1_UWLym8a4Rf_OvBNLJs6YOMNAwONhxFe8Jgs5I91twzkyD3pN/http%3A%2F%2Fwww.orangecoast.com%2Ffeatures%2Ferasing-pereira%2F

Based on these and my own research, I offer the following analyses of these subjects:

WILLIAM PEREIRA'S SIGNIFICANCE

The DEIR is incomplete in its description of LACMA's role in the long and influential career of William Pereira. LACMA stands at the center of an extremely innovative and productive phase of his career as he broke away from the International Style in his search for a new Modernism which, though based on Modern principles, was shaped by the culture and progress of Los Angeles. In this context, the LACMA campus, Pereira, and Howard Ahmanson all played significant roles in Los Angeles culture in this fertile period.

Missing from the DEIR, for example, is an analysis of LACMA vis-à-vis the other major buildings Pereira was working on at the same time in developing a vivid new direction for Modernism and Southern California. These include LAX and its Theme building, the Metropolitan Water District with its expression of structure and integration of passive solar elements responding to the Southern California climate, major buildings at USC, the campus of the University of California, Irvine, and the master planned city of Irvine. They express, together with LACMA, a distinctive and significant aesthetic ideal which represents an important part of Los Angeles' design innovation. Without placing LACMA in the context of these other buildings in Pereira's career, it is impossible to make an accurate assessment of its significance or integrity. Without this assessment, it is also impossible to assess the actual impact of the proposed project on this historical resource.

HOWARD AHMANSON'S INFLUENCE ON LACMA ARCHITECTURE

In the DEIR's discussion of Ahmanson and other major donors, it states "there is no evidence to suggest that the original LACMA complex was more important or more directly associated with them than their other causes." (C-47) In Ahmanson's case, this is a faulty conclusion.

As Eric John Abrahamson's biography shows, Ahmanson's role in selecting LACMA's architect was much greater than simply being a donor; he held and actively supported aesthetic views that were an important facet of Southern California Modern architecture in the midcentury. These ideas were deeply rooted in Southern California culture, with a faith and confidence in the artists and architects working there; notably, their work was often in contrast with the prevailing International Style of architecture. His interest in the arts was acquired in mid-life, after he had become wealthy. He then developed his views (under the tutelage of noted Southern California artist Millard Sheets) that lead directly to his involvement with LACMA, and his role in determining the new campus' architect. Ahmanson's deep

interest in architecture favored not only New Formalists like Edward Durell Stone and William Pereira but also Southern California architects such as Lloyd Wright and Millard Sheets, an artist whom Ahmanson avidly encouraged to develop his architectural ability in a series of commercial commissions that melded art and architecture in a unique Southern California blend; in fact, Ahmanson initially wanted Sheets to design LACMA. Together these architects, for whom Ahmanson acted as a knowledgeable patron, represent a significant chapter in California Modern architecture which, unfortunately, has been often neglected by historians. It nonetheless relates directly to LACMA.

Thus the fascinating story of the selection of LACMA's architect (originally a choice between European Modernist Ludwig Mies van der Rohe or American Modernist Edward Durell Stone) takes on a larger cultural import. Ahmanson's role in this aesthetic decision is crucial and represents an important aspect of Los Angeles architecture.

Though Ahmanson favored Stone, the final decision to hire Pereira was not a disappointment; both Ahmanson and fellow LACMA board member Norton Simon selected Pereira for other major commissions around this time, at USC and Hunt Foods headquarters. The selection of Pereira, as a New Formalist, was entirely in keeping with Ahmanson's aesthetic intentions.

The DEIR overlooks this important aspect of Ahmanson's contribution which directly shaped LACMA's architecture — and its significance. It is therefore inaccurate to state that "While [Ahmanson's] attempts to influence the choice of architect and his naming of one building are well documented, his preferred architect was not selected, and his influence on the buildings themselves was limited." (C-4)

CRITERION C

In the DEIR's discussion of Criterion C (C-49), its failure to draw on current scholarship leads to several mistaken conclusions. It states "Historically, the original LACMA complex has not been popular with architecture critics and historians. It has been both deliberately ignored and criticized over time." (C-49) This analysis does not, however, include more recent commentaries on LACMA and Pereira's work which see them in a very different light; the DEIR should have referenced more recent opinions from critics, artists and historians such as Paul Goldberger, Ed Ruscha, Elizabeth A. T. Smith, Thomas Hines, and myself; see the catalog to the *Maverick Modernist* catalog listed above.

The LACMA campus deserves a fresh analysis, not a rehash of the initial criticism. Goldberger, for example, writes that Pereira's "buildings did as much as those of any architect to give modern architecture a public face, and to make it the symbol of the new world taking form in California in the nineteen-forties, fifties and sixties. His work looks more compelling with every passing year. It is very much time to give his career the serious analysis it has never actually had." Such recent critiques of Pereira's work, missing from the DEIR, are essential to give a properly balanced judgment of the campus's significance.

For instance, the original negative criticism of LACMA was not due to New Formalism being "new" (as the DEIR asserts), but to being heretical to the International Style which dominated academic criticism then. This is clear when one studies the larger context of the academic architectural community and the pointed criticism of the work of Edward Durell Stone, Minoru Yamasaki and William Pereira, among others, at the time. That distorted lens should be removed today so that we can get a clearer view of LACMA's true significance.

This recent historiography should be weighed in the DEIR to provide a balanced and current assessment of the LACMA campus. It establishes a very different perspective on LACMA's architecture which supports the conclusion that it is indeed eligible under Criterion C for the National Register of Historic Places.

INTEGRITY

I also contest the DEIR assertion that "While portions of the individual pavilions still resemble their New Formalism origins, the site plan as a whole was too heavily altered to be evaluated as such. The total

reorganization of the entrance sequence and plaza and the incompatible intrusions of the Art of the Americas Building and the Times Central Court created a completely new composition for the site and rendered the original design intent difficult to recognize.” (C-50)

In so stating, however, the DEIR fails to recognize that Pereira’s key stylistic, spatial, planning, and compositional concepts remain to be seen and experienced by any visitor today. It is not “a completely new composition.”

While the Arts of the Americas building is indeed an intrusion (reflecting the then-reigning bias against New Formalism), the original Pereira structures, concept, and spaces are exceedingly easy to recognize today as an ensemble composition. The circulation may have changed, but the materiality, volumes, and details of the original buildings are entirely readable anywhere across the campus. It is correct for the DEIR to note the changes, but the conclusion that the original architecture has lost its character does not follow from this. It is still a representative example of New Formalism.

This is especially true of Pereira’s concept of outdoor public space, which remains intact. Though the forecourt is altered, the three main buildings still define a strong negative space between them. This is a key Pereira concept drawn directly from his knowledge of Southern California life in everything from residential patios to open air shopping centers. Though the design has changed with additions, the concept remains and is still one of the most appealing and popular aspects of the campus. This public space is now filled with tables, a cafe, a glass-fronted bookstore, and conveniently accessed plazas to enjoy the sun, as originally intended. Significantly this space was never roofed over and enclosed, as were many open air shopping centers. These facts substantially contradict the DEIR assertion that “on the whole the dramatic changes to the property dominate and outweigh the remnants of the original design.” (C-53)

For the same reasons, we should not accept the DEIR claim that “The original LACMA complex does not retain integrity of feeling, which is defined in *National Register Bulletin 15* as ‘a property’s expression of the aesthetic or historic sense of a particular period of time’.” (C-53)

Nor has the DEIR justified this conclusion: “Just like it no longer conveys the feeling of a late postwar, New Formalism–style museum, it no longer adequately conveys its associations with the contexts of twentieth century art exhibition and the postwar arts scene in Los Angeles from 1965 to 1969.” (C-54)

Instead, the original LACMA complex does appear to be significant under Criterion C in its current state.

CONCLUSION

If the DEIR had included the new research, analysis and criticism referenced above, its conclusion would have affirmed LACMA’s eligibility for the National Register. I have qualified many midcentury Modern buildings (including a New Formalist building) for the National Register, and I am quite confident that LACMA does qualify.

As a result, the demolition of the original LACMA campus would result in the loss of a significant historic resource. An alternative including the adaptive reuse of the historic buildings is the preferable solution.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Hess". The signature is fluid and cursive, with a large initial "A" and "H".

Alan Hess

From: Toby Horn [mailto:thorn626@gmail.com]
Sent: Friday, December 15, 2017 4:59 PM
To: Peter Burgis
Subject: LACMA DEIR

Mr. Burgis,

Thank you for the opportunity to submit my comments about the LACMA DEIR.

Last week at the Mid City West Community Council Planning and Land Use Committee, Michael Govan too briefly skimmed over the figure that a combined 700+ seat capacity of the two existing LACMA auditoriums are proposed to be combined into ONE 300 seat auditorium. This is a recipe for disaster, as frequently, the larger Bing Auditorium is easily more than half full for Sunday concerts, and even more so for movie screenings. Even the LACMA Costume Council has more than half filled the Bing for its fashion presentations. The proposed auditorium capacity will be inadequate by far.

As our community has too often seen, developers present their projects and pledge that there is plentiful parking for the space. Again, the issue of parking has been touched upon, but is always skimmed over. If you have been to LACMA for openings or on always busy weekend afternoons, you have seen that the underground parking space is always filled, and that cars circle and circle, waiting for someone to leave.

Green space - ah, green space. Yet another inaccuracy. The local neighborhood was promised open green space behind the May Company when it became LACMA's property. The space was significantly eroded (good pun!) when the Levitated Mass, aka, "The Rock" installation was installed. The surrounding grass was changed to decomposed granite (DG) which erodes, blows about in the wind, washes into storm drains, tracks onto visitors' shoes, and has raised the surrounding ambient temperature considerably more than was the promised grassy space. The abrupt transition from the green park to the brown DG surface cannot be good. To further compound the theft of greenery from the neighborhood, the space behind the Movie Museum was green and is now DG.

Look very, very closely at the access points to the proposed projec. ADA compliance will be limited to elevators and stairwells that are too far apart for convenience, much less comfort to the mobility impaired. Look very, very closely.

The inequality of these dog and pony shows is that the presenter, i.e developer, is allowed generous time in which to present their visions for their projects, and we, the community who are most directly affected are allotted only two to three minutes to state our case.

I strongly suggest that the architect Zumthor's track record be very, very thoroughly researched, as a European project of his was removed, and another design proposal was turned down by the local constituency.

The current director of LACMA is on fast track to head the vacated post at the MET or at the Boston Museum of Art, and we the City of Los Angeles will be stuck with his "vision" and a most impractical installation that will defy correction or modification in years to come.

Please incorporate my comments into the record. Thank you.

Toby Horn
146 South Fuller Avenue

90036
(323)934-5611
thorn626@gmail.com

From: PAUL HUNTER [mailto:paul.hunter@mac.com]
Sent: Thursday, December 14, 2017 6:17 PM
To: Peter Burgis
Cc: info@buildinglacma.org
Subject: LACMA design

Dear Mr. Burgis,

I support the Zumthor LACMA design as presented. I've been going to LACMA for over 40 years and this step forward is both needed and in the right direction.

I live in Larchmont Village and having this institution nearby has been wonderful. I enjoy the jazz and concerts during the summers and go often to special exhibits.

This is what the neighborhood needs.

Thanks,

Paul Hunter

From: Linda Kakish [mailto:lindahkakish@gmail.com]
Sent: Thursday, December 14, 2017 4:00 PM
To: Peter Burgis
Subject: LACMA

Mr. Burgis,

Good afternoon. I hope this email finds you well. As a nearby neighbor of LACMA, I'm writing to comment on the proposal for a new building to replace some of their existing facilities. I think the design of the new building will be a great addition to the neighborhood, and I welcome the new open space that will be created in Hancock Park and on the Spaulding property. We can certainly use more public park area.

I know that there will have to be a traffic management plan to deal with impacts to the streets during construction, and I hope that you will carefully consider those of us who live close by and have to navigate the streets while the project is built.

I look forward to the improved park, the innovative building, and all of the new programs and exhibits we will be able to visit as soon as the project moves forward.

Thank you for your consideration.

Best Regards,

Linda Kakish
656 South Ridgeley Drive #301
Los Angeles, CA 90036

From: Scott Kelsey [<mailto:SKelsey@COArchitects.com>]
Sent: Sunday, December 10, 2017 5:09 PM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Cc: Henry Van Moyland <henryvanmoyland@gmail.com>
Subject: Letter regarding LACMAS DEIR

Dear Peter:

Enclosed please find my letter of December 10, 2017.

Thank you.

Scott

Scott P. Kelsey - FAIA
Managing Principal



5055 Wilshire Boulevard, 9th Floor
Los Angeles, California 90036
tel 323.525.0500 x5350, fax 323.525.0955
SKelsey@coarchitects.com
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Scott and Georgette Kelsey
816 South Dunsmuir Ave
Los Angeles, California

Skelsey@coarchitects.com

December 10, 2017

Mr. Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

From A Member of Miracle Mile Forward

Dear Mr Burgis,

As a resident of Miracle Mile, I want to express my wholehearted support for the new LACMA project.

I am an Architect and a Fellow of the American Institute of Architects, although I do not formally speak for the AIA. I have lived in the Miracle Mile, with my wife and daughter for over 20 years. I care about the Miracle Mile Community and I also believe our cultural neighbors need to profoundly evolve to continue to be world class institutions. I do not see these ideas as mutually exclusive.

The revised design - developed and refined since 2014 effectively addresses most of the challenges of the original "all north of Wilshire original design solution".

In my view, the important considerations are:

1. An acknowledgement to the Page Museum and Hancock Park / Rancho La Brea as one of the largest collection of ice age fossils in the US. - and a very active research site. The new design respects hundreds of research pits, sightlines, circulation and open space. This design creates 5-acres of new park in a dense urban setting.
2. I believe this new design successfully creates a "symbiosis" between the New museum, the pavilion for Japanese art and the Page Museum – in ways that do not currently exist.
3. The elimination of the current east-west "street wall" along Wilshire Blvd - in favor of a lifted, horizontal, elegant, engaged, expression - wherein the site becomes open and connected from Ogden to Spaulding streets to the north and south – across the park.

Letter to Burgis
December 10, 2017

4. The development of public park, café and museum entrance on the current Spaulding parking lot. This in lieu of the real potential for a large commercial tower, which is its current permissible zoning is more than permissible.
5. No increase in square footage and no net loss of parking as a result of this new development.

And finally - the potential for an extraordinary, world class piece of architecture emblematic of an institution of the stature of LACMA. I believe this project is progressive, responsible and right for our community. For that reason, I am fully supportive of the good work completed to date.

Kind regards

Scott P. Kelsey FAIA

From: Cornelia Kiss [mailto:cornelia.kiss@gmail.com]
Sent: Friday, December 15, 2017 5:01 PM
To: Peter Burgis
Cc: info@buildinglacma.org
Subject: LACMA

Hello,
I'm a LACMA member and seen many shows there.
I strongly support the new design!
It's high time this museum is moving into the 21st century.
Keep up the good work.
Cornelia Kiss

--

Cornelia Kiss

cornelia.kiss@gmail.com

323-646-2332

<http://secure->

[web.cisco.com/1C2cIyBW294UW_00IedZlGhq1epRA9CVIUWHQtfTTwZI3jOqn1jDi7RKCnrrVe1INvgvLG6Q1QRj0_KU2YL9XI0Oshf4A7sJulm_ZS4J2K7bEbur5BtFzYHyLRxlMvQTebwIm3Lv4xnPfmVj7SwPGM47Hvxu2qF-WYwbYC6-TIGEhrvNEv37iEBuiBx78Rq6cgPfTSwDk7KAT-xyxti2FQ4q995OieYdnpD4HasOwntGFG_epLLYIiVqoBk5mGWtYjvRN5Z69w7lmB9Wwt2RVgZx4FFyK1-cHBdwoGOjBMIEsJVkigXQVIOBpPmUbZfPW5efgIhc3PseqRwByegJ-5yEIRrbD1S3j_eMEzTA0cSDQZnSu2WqtK0qfaG3RyXVnQbjlmzqSVaAv5O8h8umEA/http%3A%2F%2Fwww.corneliakiss.com](http://secure-web.cisco.com/1C2cIyBW294UW_00IedZlGhq1epRA9CVIUWHQtfTTwZI3jOqn1jDi7RKCnrrVe1INvgvLG6Q1QRj0_KU2YL9XI0Oshf4A7sJulm_ZS4J2K7bEbur5BtFzYHyLRxlMvQTebwIm3Lv4xnPfmVj7SwPGM47Hvxu2qF-WYwbYC6-TIGEhrvNEv37iEBuiBx78Rq6cgPfTSwDk7KAT-xyxti2FQ4q995OieYdnpD4HasOwntGFG_epLLYIiVqoBk5mGWtYjvRN5Z69w7lmB9Wwt2RVgZx4FFyK1-cHBdwoGOjBMIEsJVkigXQVIOBpPmUbZfPW5efgIhc3PseqRwByegJ-5yEIRrbD1S3j_eMEzTA0cSDQZnSu2WqtK0qfaG3RyXVnQbjlmzqSVaAv5O8h8umEA/http%3A%2F%2Fwww.corneliakiss.com)

From: Coley Laffoon [<mailto:Coley@coleylaffoon.com>]
Sent: Monday, December 11, 2017 10:39 AM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Subject: letter in support of LACMA

Dear Mr. Burgis,

As a local Realtor and real estate investor working primarily in Miracle Mile and the immediate surroundings, I want to express my wholehearted support for the new LACMA project.

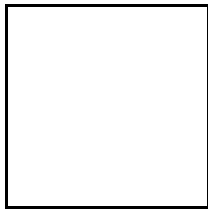
As a someone working at ground-level with Buyers and Sellers in the area, I see EVERYDAY the support and excitement for the project and injection of world class architecture and development to this area of our vibrant city.

I understand there are widely differing opinions on the matter but as someone invested as a homeowner, development investor and local businessman I meet and hear regularly from people who love the neighborhood not for what it has been, but for what it can be in the rapidly changing face of LA.

I would appreciate any chance to meet with you in person and invite you to my office, 8124 WW 3rd St, or at the site of my renovation development at 6116 Warner Dr, just a stones throw from LACMA. I know you will be inspired by what we are doing in the area.

Sincerely,

--



COLEY LAFFOON
Director of Residential Sales
& New Development
o 323.746.4033 | m 323.702.5551

8124 W. 3rd Street, Suite 200
Los Angeles, CA 90048

http://secure-web.cisco.com/1JYI116jCT818sE8j8rES45n00Qa-y2vpawq6s5iZ4aOTVLOfs3thEjy08j9LV8k7leVAdtKDsXySV5WjK_cVDxRGg432jnDtZqFxFxKw3OD4Wb9wwOBJNqsvYEeY08Er6stHcEOEDoY4Hps5IE_whuyFYPZeYnFEj5K-I3dALd4hxxemXQ0sWlwZM0fJZa4nqhCvvJV4CSGCbIci8qHMTMzrvpJCW4fhEdgPdBUT4sWI_1Kr-zfX5zlmBCs3zTQYdMiaBRkWQf5kOrtBMyr156Fv6yr4z2el45jEEMkU5zCodoQeW0Ysb_asQ1oSWz0_79D08g_-VBw4MaqVMmDRNVkN_yzppAXTvccW0UUY7JWLRFFTkKqOJwABI0ydrXGsqWfIRghXQ1puk6Hq_IRLQ_1xg/http%3A%2F%2Fwww.mercervine.com
calbre# 01836162

From: info@hydrantvalve.com [mailto:info@hydrantvalve.com]
Sent: Tuesday, December 12, 2017 10:59 PM
To: Peter Burgis
Cc: info@buildinglacma.org
Subject: LACMA EIR

Dear Peter,

A letter regarding my support of the new LACMA building is attached to this email.

Best regards,
Hannah Levy

HYdrant VALVE LOS ANGELES 1.323.371.4010

Hannah Levy
PO Box 86864
Los Angeles, CA 90086
info@hydrantvalve.com
1 323 371 4010

December 12, 2017

Dear Mr. Burgis,

I consider LACMA one of the main amenities of LA County. I live on the west end of Wilshire Boulevard and I consider myself a stakeholder in what is happening at LACMA. Particularly in that I am an architectural designer and someone who has dedicated a great deal of her life to participating in art and design.

The current building is unwelcoming in many respects. The large stark wall that faces Wilshire cuts the building off from the activity on the street and disconnects it from the city. The more recent additions on the west side of the LACMA campus, (including the central canopy, restaurant and "Urban Light" sculpture), have brought a greater degree of engagement from the local community. The spaces between the buildings create beautiful open public areas that seamlessly transition between the building and the street in a way that is very welcoming. On nights when jazz concerts and other events are happening you can see that the open space is an incredible asset to the community. In a similar way, the open space around the new building will create more opportunities for this type of engagement. The design of the new building is incredibly public. You will be able to walk around the building and see the art and everything that is happening inside. Driving under the building and viewing this glass box filled with beauty during a daily commute will bring an entirely new level of interaction, outreach and inspiration.

The new building will be an outstanding international attraction for the city of LA. It will give us a space with cultural value that provides an increased sense of dignity. The civic function of this modern building is similar to an ancient Greek temple - the art museum offers an outlet for meaningful dialogue that elevates us as humans. Refining this space will give us the opportunity to reach our full potential as Angelinos.

Best regards,

Hannah Levy

From: Steven Luftman [mailto:sluftman@yahoo.com]
Sent: Friday, December 15, 2017 4:54 PM
To: Peter Burgis
Subject: LACMA Draft EIR Comments

Dear Mr. Burgis,

As a life long Angeleno these are my comments on the DEIR for the new permanent collection building of the Los Angeles County Art Museum, located in Hancock Park, Los Angeles.

Wilshire Boulevard is a Designated Scenic Highway. As noted by renowned architecture critic, Reyner Banham Wilshire is the first linear downtown. How will the new building not violate this unique treasure of Los Angeles and why isn't this addressed in the DEIR?

In today's era of terrorism having a building set over Wilshire seems an unneeded risk. What precautions are being taken to keep a semi loaded with explosives from being driven underneath the building?

As a regular attendee of the Film Independent Screening Series in the Bing Theater, I find the screenings are often filled to their 600 seat limit. How will the new 300 seat theater accommodate this series?

LACMA has let the current buildings deteriorate. Will there be funds dedicated to the upkeep of the new building that were non-existent in past years?

It seems to me that alternatives 2 and 4 offer greater creative solution for a museum that is a great asset to the future of Los Angeles County. Additionally they seem more financially responsible.

In Los Angeles's current housing shortage the Spaulding building could be a mixed residential and office high rise. This would eliminate the need to rent office space for the museum staff and build both affordable housing with luxury housing to help finance the project.

Thank you

Steven Luftman
Mid City West Community Council Board Member Los Angeles CA

From: Robin Menken [<mailto:yansa@aol.com>]
Sent: Wednesday, December 6, 2017 8:58 AM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Cc: eiagurcia@gmail.com
Subject: Urgent re LACMA

Alas LACMA is riding rouighshod over LA's cultural history and classic neighborhood

Destroying the original camus is an insult to the history of Cultural fund raising and giving and the history of the cultural visionaries who made the museum a reality. Although the County pays , i believe , at least 30% of it's budget, It is a blind gift, completely un-transparent, the funds disappear into a corporate structure. Often funds earmarked for particular projects or departmenta are shifted to other departments/ projects (Monies to the original film department vanished and false or second books were used to tarnish Ian Burnie's' department, opening the door to the ACADEMY'S take over of what was a beloved, long standing pubic program.)

I mention this to explain that the County tax payers are left entirely out of the loop

If you remember the installation used to sell the former NEW design to the public. they tarnished or called into question the science under the Paige museum construction, perhaps an overture to grab more land.

This awful design, Goven's Pyramid, essentialy OCCUPIES the Miracle Mile and will cause traffic nightmares in perpetuity

Please stop the narcissistic madness

As reference may i suggest a tutorial in the form of the brilliant film THE ART OF THE STEAL which details the destruction and moving of the remarkable museum the Barnes Foundation and parenthetically the corporate theft of art endowments in general

The Art of the Steal is a 2009 documentary film directed by Don Argott, about the controversial move of the Barnes Foundation, generally considered to be the world's best collection of post-Impressionist art and valued in 2009 to be worth at least \$25-billion, from Merion, Pennsylvania to Philadelphia.

Robin Menken
1208 N Hilldale Ave LA CA 90068

From: KEITH B NAKATA [mailto:keithnakata@earthlink.net]
Sent: Friday, December 15, 2017 2:22 PM
To: Peter Burgis
Subject: RE Draft EIR Comments

Mr. Burgis,

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Museum Building of the Los Angeles County Art Museum, LACMA located in Hancock Park, Los Angeles.

I am writing to you as a long time and nearby resident of the area and I've had the opportunity to attend community meetings on the Draft Report.

The premise of the environmental document was that there was no increase in square footage, in fact a reduction and no anticipated increase in attendance over the long term.

This strikes me either as a missed opportunity to expose more new people to LACMA's permanent collection and theater events, or an attempt to have the appearance of no additional environmental impacts with the proposed Project, despite the projected increase in population and tourism in the County over the next 10 years. I am not sure which is worse for the people of the County and in this County funded facility. The Bing Theater has always been at capacity when I have attended events there in the past and seems to justify being maintained at it's current size.

The proposed Project also does not provide with it's design and materials, the opportunity for it's growth at this location into the future.

Many urban museums have successfully overcome the argument for the desire to have all of it's gallery space on one floor, including LACMA's own BCAM Building.

I would also recommend stronger consideration of Alternative 4, Museum Building North and South of Wilshire Boulevard with No Street Crossing.

This alternative, while weak in details, would address a couple of issues that are problematic with the proposed project.

First is the need for more housing in the County of Los Angeles, specifically affordable housing near transit stations. The Spaulding parking lot property would be an incredible opportunity for the County to develop more housing and more affordable housing near a transit station as well as providing office space for LACMA, which will be removed with the demolition of the existing facility. It does not seem like responsible financial leadership to rent space for the staff functions of the museum when it could be accomplished with Alternative 4. This Alternative also addresses one of the County's most serious immediate needs and goals for the area.

Also planners are always telling us to prepare for densification and the need for vertical growth in our urban areas. The proposed Project offers neither, while Alternative 4 addresses both.

Respectfully,

Keith Nakata

From: Mattia Nuzzo [mailto:mattian@gmail.com]
Sent: Monday, November 13, 2017 10:40 AM
To: Peter Burgis
Subject: LACMA EIR Comment

Hi Peter -

My overall comment on this project is that it's one of the most exciting new cultural projects in the world, and we are so lucky to have the experience and insight of Michael Govan in leading this project. I truly believe the new museum will revolutionize the way we view and appreciate art from across time periods and continents.

The only concerns I have possibly relating to the EIR are the plans for the garden/landscaping beneath and around the museum, as well as the new parking structure being erected. As for the landscaping, very little has been mentioned beyond the idea that it be drought tolerant. I'm all for this, but I hope that it will be cooling for the area as well, and hopefully not as rigid in design as the current landscaping by Irwin on the LACMA grounds.

The parking structure I just hope that it will receive the same architectural attention that the museum is getting. I hope either a young local firm, or a firm of prominence can be called on to do the designs. Parking structures are such wonderful canvases for interesting architectural invention and I hope this one won't be driven solely by cost benefits, but have a design that can stand alongside that of the Zumthor.

Thank you, and I can't wait for this museum to be built!

Mattia Nuzzo
613 1/2 S. Dunsmuir Ave.
Los Angeles, CA 90036

From: Tara Perry [mailto:taraperryemail@gmail.com]
Sent: Wednesday, December 13, 2017 11:08 PM
To: Peter Burgis
Cc: henryvanmoyland@gmail.com
Subject: Letter in Support of LACMA Proposal

Dear Mr. Burgis,

See my attached letter in support of the proposed Zumthor LACMA design. Please let me know if you require further local resident input on the topic at hand as I am happy to meet with you to discuss.

Thank you for your time and consideration.
Kind regards, Tara

--

Tara Perry, OTD, OTR/L

Occupational Therapy
Keck Medical Center of USC

Assistant Professor of Occupational Therapy
University of Southern California
Division of Occupational Science and Occupational Therapy
Los Angeles, CA 90033

Tara A. Perry
902 South Burnside Ave
Los Angeles, CA 90036
taraperryemail@gmail.com

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

Wednesday, December 13, 2017

From A Member of Miracle Mile Forward

Dear Mr Burgis,

As a resident of Miracle Mile for the past 14 years, I want to express to you my enthusiastic support for the proposed LACMA project.

While the proposed Zumthor designs will easily be the most anticipated project along Museum Row, other nearby institutions such as Academy of Motion Picture Arts & Sciences and the Peterson Museum have moved forward with making their own milestone improvements for modernization which have drawn and will continue to draw many thousands of viewers and patrons to the area and remarkably revitalized decrepit spaces.

I fully support the redesign of the existing outdated buildings, entrances, parking, and gallery spaces of LACMA to coincide, or follow, the opening of the Purple Line's Wilshire/Fairfax Station. With the added addition of metro accessibility to the area, Miracle Mile and Museum Row are situated to be a true landmark destination for national and international visitors traveling to Los Angeles. I strongly support measures to modernize and make more accessible the grounds of LACMA to match what will be a world-class art museum.

I am easily able to envision the forward thinking proposal Zumthor has put forward with the gallery pedestrian bridge spanning over Wilshire Blvd as a unique and architecturally stunning feature drawing LA citizens and tourists alike to Museum row. I look forward to touring and joining in membership the newly redesigned LACMA.

The character of our beloved Miracle Mile is a blend of new and historic urban life. The institutions that live on Wilshire Blvd. must grow and metaphor with the changing needs of this section of Los Angeles.

Kind regards


Tara A. Perry

From: Tim Pollock [mailto:timmpo1@gmail.com]
Sent: Wednesday, December 13, 2017 9:26 PM
To: Peter Burgis
Subject: Lacma

Tim Pollock
901 S. Sierra Bonita Ave.
LA, CA 90036
[Timmpo1@gmail.com](mailto:timmpo1@gmail.com)

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

12/13/17

Dear Mr Burgis,

As a resident of Miracle Mile, I want to express my wholehearted support for the new LACMA project.

Preserving the obsolete 1960s buildings, at a cost of over \$250m, is clearly an unattractive option, and removing the current ugly entrance is a priority.

The reasons for the horizontal exhibition space have been well articulated by LACMA's management, and the resulting accessibility and equality among the exhibits will be welcome and refreshing. Spanning Wilshire is a reasonable solution to achieving that horizontal space, and it gives the added benefit of five more acres of landscaping and outdoor art.

In spite of the adjacent Metro, the Ogden parking structure means that the number of parking spaces will remain the same, which I believe will be ample for future needs.

Although there will be inevitable disruption from construction, I am confident that the proposed traffic management plan will mitigate its effects.

Above all, I am confident that the good-looking new building, with its glass sides and the resulting interaction between the art inside and the surrounding streets and parks, will be an asset to our community.

Kind regards

Tim Pollock

From: CYNTHIA M PUSHECK [mailto:cpush@mac.com]
Sent: Thursday, December 14, 2017 4:24 PM
To: Peter Burgis
Subject: Support

Hello – As a LACMA member and a long time LA resident, I support this new change!
Please, keep the fly-over. It's really fantastic.

Thanks,

Cynthia Pusheck

Los Angeles

From: Ann Rubin [<mailto:emailamr@aol.com>]
Sent: Wednesday, December 6, 2017 10:31 PM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Subject: LACMA building plans

Dear Mr. Burgis,

I encourage the powers to consider rejecting LACMA's proposal to span Wilshire Blvd with their new building.

Wilshire Blvd is a grand and historic boulevard. Please leave that history intact, even as Los Angeles modernizes once again and moves to mass transit.

Bi-secting the boulevard is akin to driving a freeway through a neighborhood.

Why do we need another hovering, hunk of concrete? Another freeway overpass!

Save our vista.

Thanks you,

Ann Rubin
6524 Commodore Sloat
Carthay Circle
90048

From: Jay Evan Schoenfeldt [mailto:jay@brickandmortarinc.com]
Sent: Thursday, December 14, 2017 4:54 PM
To: Peter Burgis
Subject: In favor of LACMA Project
Importance: High

Please see attached, signed letter stating that I am in favor of the proposed LACMA project as a resident of Miracle Mile.

Best,

Jay Evan Schoenfeldt
Brokerage & Acquisitions
310.497.8100 **Tel**
323.663.6606 **Fax**
Jay@brickandmortarinc.com
BRE 01898245



Jay Evan Schoenfeldt

5482 Wilshire Blvd, #1540. • Los Angeles, CA 90036 • Tel 310.497.8100 • Fax 323.663.6606

Mr. Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West Temple Street, Room 754
Los Angeles CA 90012

December 12, 2017

From A Member of Miracle Mile Forward

Dear Mr. Burgis,

As a resident of Miracle Mile, I want to express my wholehearted support for the new LACMA project.

Preserving the obsolete 1960s buildings, at a cost of over \$250m, is clearly an unattractive option, and removing the current ugly entrance is a priority.

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Above all, I am confident that the good-looking new building, with its glass sides and the resulting interaction between the art inside and the surrounding streets and parks, will be an asset to our community.

Sincerely,



Jay Schoenfeldt

From: Houman Sedaghat [<mailto:houmansedaghat@gmail.com>]
Sent: Sunday, October 29, 2017 8:28 PM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Subject: PUBLIC COMMENT Re: New LACMA Building

Hi,

As a resident of the Miracle Mile on Wilshire Boulevard, I would like to state that the Los Angeles County Museum of Art has my full support for the construction of the new LACMA Building for the Permanent Collection. I would also like to thank the County Board of Supervisors for their help in this project. The building which I live in is located on the corner of Ogden Street and 8Th Street and I have no objection to any construction related to this project.

Houman Sedaghat

From: Ray Simmons [mailto:rayinla@aol.com]
Sent: Friday, December 15, 2017 2:37 PM
To: Peter Burgis
Subject: LACMA - Proposed New Zumthor Campus

As a longtime LACMA member and resident of the Miracle Mile area, I am very excited about the proposed new Zumthor redesign of the Los Angeles County Museum of Art.

Together with the bold new look of the Petersen Museum and the new Motion Picture Academy Museum, this new showcase facility further cements Los Angeles status as a world-class city for both Art and Architecture.

Thank you.

Ray Simmons
821 S Mansfield Ave
Los Angeles CA 90036

From: Karen Smalley [mailto:karen.smalley@gmail.com]
Sent: Friday, December 15, 2017 4:56 PM
To: Peter Burgis
Subject: LACMA Draft EIR comments

Dear Mr. Burgis,

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the proposed LACMA building.

As a Los Angeles resident who has spent twenty years living less than two miles from the museum, I take a keen interest in the project and have twice viewed the DEIR and heard Michael Govan and others speak of the proposal.

On page 1-18, the DEIR states:

Because the proposed Museum Building would replace existing museum facilities that currently perform the same functions, the improvements to LACMA that would be implemented are not anticipated to increase the average amount of programming, hours or the daily or annual attendance levels

So for more than half a billion dollars, there will be no increase in attendance or programming. Instead, there will be a proposed reduction in square footage. (Meanwhile, the existing buildings which the county owns, have been allowed to deteriorate as an excuse for new construction.)

How can this be the best of the 5 proposed projects?

On page 1-13, the DEIR states this project will:

Provide a new museum building for LACMA's permanent collection that is transparent and accessible, with a main exhibition level designed in a horizontal layout within a single level that offers every art culture an equal focus.

At a time when LA is growing rapidly and the need for density is being espoused by developers and city planners alike, why is it necessary to have a museum on one story? (Again, with a reduction in square footage.)

"Democratization" of art can be achieved in multi-story buildings by choosing not to place the art of lesser-known cultures on higher floors, unlike the current LACMA arrangement. MOMA, The Whitney, and The New Museum in NYC all have recent construction featuring multiple floors. This call for "horizontal" is just a buzzword being thrown about.

Transparency is also mentioned - generally museums expand to be able to exhibit more art. Much of the new design features glass walls, with art that is susceptible to light damage relegated to the interior spaces.

I also question a building that does not allow for future expansion. Where will we be in 30-55 years, the age of the buildings proposed to be demolished?

I also disagree with reducing the capacity of the theater to 300 seats - less than half. I attend events and screenings at the Bing Theater regularly and find it always to be 3/4 filled or at capacity. There seems to be a fuzzy plan of using the Academy Museum's theater without any actual agreement to do so.

And I question moving all office personnel from the site - requiring more money on an annual basis.

But my greatest objection is to the vacating of the airspace above Wilshire Boulevard. The DEIR states that there will be no significant change in Aesthetics, specifically light/views/glare/shading. How can this be when a large - is it 176 feet? - structure is placed over one of LA's most historic boulevards? What about the shading under the

building as traffic heads east and west? And what about glare from light as the sun rises and sets? Non-reflective glass is not a cure-all.

Page 1-39:

While the Project would alter focal views in the area, including views that involve visual and historical resources, potential historical resources, or presumptive historical resources, it would not adversely affect a scenic vista or obstruct views of visual resources

How can you just brush off the altered views of historical resources, current and future, by saying there is no significant impact?

And there is an elevation change even from one side of Wilshire to the other - the building will be 25' on one side 20' on the other. But it is stated that there will be no significant change to the view on Wilshire.

Also, I do not believe the issue of security is properly addressed - what is to stop a truck from detonating explosions from under the museum as it spans the road? There is no way to protect or blockade this highly visible target from terrorists.

To conclude, my greatest objection is to the spanning of Wilshire Boulevard, and because of this, I do not believe that Alternative 4 has been looked at as closely as it deserves.

Sincerely,

Karen Smalley
1212 S. Orlando Ave
LA, CA 90035
karen.smalley@gmail.com
310-994-2515

From: wsong2216 [<mailto:wsong2216@gmail.com>]
Sent: Thursday, October 26, 2017 12:30 PM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Subject: I support LACMA's expansion

I'm writing in enthusiastic support for the expansion of LACMA. The DEIR concludes that there are no significant long term impacts. Yay! We are fortunate to have a first rate museum in our beautiful city. It's hands down the best museum in Los Angeles. It's offerings are wide ranging, cutting edge, thought provoking and inclusive.

Wansun Song

Resident of Los Angeles

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Rhonda Steffen
839 S. Curson Ave.
Los Angeles, CA 90036
rjsteffen@yahoo.com

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

12/14/17

From A Member of Miracle Mile Forward

Dear Mr Burgis,

As a resident of Miracle Mile, I want to express my overwhelming support for the new LACMA project.

Preserving the obsolete 1960s buildings, at a cost of over \$250m, is clearly an unattractive option, and removing the current ugly entrance is a priority.

The reasons for the horizontal exhibition space have been well articulated by LACMA's management, and the resulting accessibility and equality among the exhibits will be welcome and refreshing. Spanning Wilshire is a reasonable solution to achieving that horizontal space, and it gives the added benefit of five more acres of landscaping and outdoor art.

In spite of the adjacent Metro, the Ogden parking structure means that the number of parking spaces will remain the same, which I believe will be ample for future needs.

Although there will be inevitable disruption from construction, I am confident that the proposed traffic management plan will mitigate its effects.

Above all, I am confident that the good-looking new building, with its glass sides and the resulting interaction between the art inside and the surrounding streets and parks, will be an asset to our community.

Kind regards,

Rhonda Steffen

From: Alex Stemkovsky [mailto:astemkovsky@yahoo.com]
Sent: Thursday, December 14, 2017 9:45 AM
To: Peter Burgis
Subject: To Peter Burgis re. LACMA project

Mr. Burgis,

Please see attached letter in support of LACMA.

Thanks very much for your time.

Alex Stemkovsky
839 S. Curson Ave. 90036
astemkovsky@yahoo.com

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

12/14/17

From A Member of Miracle Mile Forward

Dear Mr Burgis,

As a resident of Miracle Mile, I want to express my wholehearted support for the new LACMA project.

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Kind regards

Alex Stemkovsky

From: Charlie Stratton [mailto:cstratton@me.com]
Sent: Thursday, December 14, 2017 5:22 PM
To: Peter Burgis
Cc: info@buildinglacma.org
Subject: BUILDING LACMA PROJECT

December 14, 2017

Mr Peter Burgis, Capital Projects
Los Angeles County, Chief Executive Office
500 W Temple Street Room 754
Los Angeles, CA 90019

Dear Mr Burgis,

I attended a Mid-City West Community meeting last week where representatives from LACMA spoke about the building project that is in the process of being reviewed. I was completely impressed by the overall reimagining of the LACMA property. The concept and design are exceptional. The entire campus is more accessible and inviting instead of the current fortress-like warren of buildings. I love how it reaches across Wilshire Blvd adding additional scale and drama without height. It's a terrific addition to the Peterson and The Academy Museum. This section of Wilshire Blvd promises to be extremely impressive stretch within the coming years.

Myself and several of my friends take part in LACMA's programming – from the film series to Friday night jazz. LACMA's cultural contributions to the city and county are unparalleled. It's time it had a building that matched.

I fully support the project and encourage Los Angeles County to support it as well. It is well past time that this world-class institution address its future.

Thank you.
Charlie Stratton

From: Armand Tatis [mailto:armandtatis@gmail.com]
Sent: Tuesday, December 12, 2017 8:40 AM
To: Peter Burgis
Cc: Henry van Moyland
Subject: Public Support - New LACMA project

TO: Peter Burgis
RE: New LACMA Project

Please see the attached.

Armand Tatis/Debra Haas
800 S. Dunsmuir Ave., LA 90036
armandtatis@gmail.com

Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West temple Street, Room 754
Los Angeles CA 90012

Dec. 12, 2017

From A Member of Miracle Mile Forward

Dear Mr Burgis,

As residents of Miracle Mile now for seven years, we want to express our wholehearted support for the new LACMA project.

We embrace change and are looking forward to this new remarkable design. Preserving the obsolete 1960s buildings, at a cost of over \$250m, is clearly an unattractive option, and removing the current ugly entrance is a priority.

The reasons for the horizontal exhibition space have been well articulated by LACMA's management, and the resulting accessibility and equality among the exhibits will be welcome and refreshing. Spanning Wilshire is a reasonable solution to achieving that horizontal space, and it gives the added benefit of five more acres of landscaping and outdoor art.

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Above all, I am confident that the good-looking new building, with its glass sides and the resulting interaction between the art inside and the surrounding streets and parks, will be an asset to our community.

Kind regards

Armand Tatis / Debra Haas

From: Henry Van Moyland [<mailto:henryvanmoyland@gmail.com>]
Sent: Sunday, December 10, 2017 2:19 PM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Subject: In support of the New LACMA Project

Henry van Moyland
808 S Dunsmuir Ave.
Los Angeles
CA 90036

To Mr Peter Burgis
Capital Projects County of Los Angeles
Chief Executive Office
500 West Temple Street, Room 754
Los Angeles CA 90012

From a Member of Miracle Mile Forward

Dear Mr Burgis,

As a neighbor, I want to express my wholehearted support for the new LACMA project.

The reasons for the horizontal exhibition space have been well articulated by LACMA's management, and for a cultural institution, I find the the arguments for equality and accessibility compelling. Elevating the building over Wilshire is a reasonable solution to achieving that horizontal space without crowding the tar pits. From a local perspective, demolishing the ugly and uninviting Art of the Americas facade on Wilshire is a priority.

Further, the new design has a lightness of touch which the dark gray one lacked. I do not see how the views down Wilshire will be seriously interrupted. I very much appreciate the visibility of the galleries from Wilshire, and the visibility of Wilshire from the galleries. I cannot help feeling that the transparency of the sides will encourage local drop ins, and further enhance LACMA as a local meeting point and asset, as will the additional cafe.

The Ogden parking structure means that there is no net loss in parking spaces. In fact my greatest concern is that, with the coming of autonomous vehicles and the subway, that structure may be redundant.

LACMA is our community's greatest single amenity, and this revamp, with its galleries, restaurant, cafes and store, looks set to keep it so.

Kind regards

Henry van Moyland

From: Jennifer Warren [mailto:jlwrsing@gmail.com]
Sent: Friday, December 15, 2017 3:10 PM
To: Peter Burgis
Cc: nfo@buildinglacma.org
Subject: Zumthor LACMA Designs

Mr. Peter Burgis,

Los Angeles is my home and I am proud of it.

LACMA hold a warm spot in my soul. I have found comfort from the world there when I really needed it.

I am in full support of the designs as now presented by Mr. Zumthor and hope that they will be implemented. I understand that changes have been made to reflect the community. They look just beautiful.

I look forward to seeing them in person.

Thank you,
Jennifer Leigh Warren

"To create one's own world in any of the arts takes courage." ~Georgia O'Keeffe

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From: Valeri [mailto:wired2go@aol.com]
Sent: Friday, December 15, 2017 1:19 PM
To: Peter Burgis
Cc: info@buildinglacma.org
Subject: LACMA

Peter Burgis, Capital Projects
Los Angeles County, Chief Executive Office
500 W. Temple Street, Room 754
Los Angeles, CA 90012
pburgis@ceo.lacounty.gov

December 15, 2017

Dear Peter,

Because LACMA is such an important cultural asset to the City of Los Angeles, I am in support of their new building additions and design by a world class Swiss architect which will bring a particular prominence to the city.

The new open space that will be created in Hancock Park is a welcome addition to the neighborhood as public parks are always in demand and an enhancement to those who live nearby.

I'm excited about the promise of new programs, exhibits, the improved parks, and a futuristic design of the new LACMA.

Cordially,

Valeri Ann Young
1887 Greenfield Avenue
Condo 109
Los Angeles, CA 90025

From: Lori Zimmerman [<mailto:lori@lorizimmerman.com>]
Sent: Thursday, November 9, 2017 11:59 AM
To: Peter Burgis <pburgis@ceo.lacounty.gov>
Cc: Lori Ann Zimmerman <lori@lorizimmerman.com>
Subject: LACMA EIR Comments

Hi,

I live adjacent to the Spaulding Lot and attending the public meeting on November 7th. I am concerned about the construction so close to my home and have some comments about the community programming aspects of the new building.

I assume that the construction period will be noisy and cause some vibrations to close neighbors. I hope that construction will be limited to work hours and the utmost care is taken to prevent any structural problems with our building. I think our HOA should be invited to a meeting to hear more about what measure will be taken. I have lived close to construction before and know there will be vibrations. I think close communication with our HOA will reduce our anxiety and provide an avenue for easy communication. Our HOA Board need a hot line in case we see cracks or other problems that may be caused by the construction.

I hear that this most recent version of the plans includes a smaller footprint on the Spaulding Lot. I'm in favor of this given my concerns above. I like the fact that there will be community spaces such as a café on this site. I am concerned that in the future LACMA will put an art's feature on the Spaulding Lot that will draw the constant crowds that City Lights draws. Something a bit quieter as the new LACMA building will be so close to residential property.

On the other hand, I was disappointed to learn that the theater will be smaller than the present theater. I know this contradicts my approval of the small footprint. I think we need more mid-size theater spaces in Los Angeles and the larger space works well for free programming. I really enjoy the Sunday concerts and I also enjoy the fact that I don't have to worry about getting a seat. I also attend free programming at Central Library and unless I register the same day that the programs are announced there is no way to get a reservation ticket. Free programming should be truly accessible to all members of the community.

I also enjoy the Friday evening jazz concerts in the summer and hope that those community offerings will continue during construction. I think it would be sad if the programs were discontinued for five years and then have to find a new audience once the construction is complete.

Thanks for providing as easy avenue for comments.

Lori Zimmerman
750 S. Spaulding Ave, Unit 130
Los Angeles, CA 90036



County of Los Angeles

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Written Comment Form

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Name: Alex Israel
Address: 5030 W. Pico Blvd.
Los Angeles, CA 90069

Strongly
I SUPPORT THE PROJECT 😊 !



County of Los Angeles

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Name: James Jaquet
Address: 885 N. Croft Ave #5
West Hollywood, CA
90048

1. Auditorium space for film club is being reduced. Could have negative impact for Film Independent + interest of filmmakers with allowing their films to be screened at LACMA
2. Will new color match BCAM + Resnick or only complement?
3. Will the exhibition space increase so that unseen work in permanent collection will be viewable or available to be seen instead of in storage? New museum should increase visible exhibition space
4. Will there be any community service space so that organizations like Kaiser Permanente could sponsor LACMA?



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Name: Jehannie KWON
Address: 750 S. Spaulding Ave #216
Los Angeles, CA 90036

Im very dissapointed in this new unnecessary
project. I live here for the main reason
for peace & quiet and now I have to
hear constant construction noise for
4 years!!! Im soon attending nursing
school, Im very upset. my room
faces the parking lot on wilshire. This is
very selfish.



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Name: Tae Y KWON
Address: 750 S. spaulding Ave #214
LOS Angeles, CA 90036

Could a disruption in the under-ground water table cause flooding in our garage?

Could a disruption in under-ground fat and methane result in dangerous seepage into the garage or 100-level units?

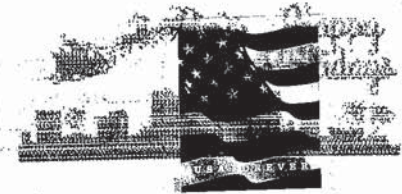
Could construction vibration possibly damage the building's foundation or cause cracks in the walls, flooring or pool?

What will be done to insure the block won't be overrun with foot traffic at all hours of the day and night as is the case with LACMA's Urban Light installation?

From; Tae Kwon
Jeannie Kwon
750 S. Spaulding Ave #216
Los Angeles, CA 90036

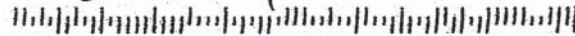
LOS ANGELES CA 900

11 DEC 2017 PM 3 L



TO; Peter Burgis
Capital Programs, Chief Executive
office
County of Los Angeles
Kenneth Hahn Hall of Administration
500 West Temple Street, Rm 754
Los Angeles, CA 90012-2700

90012-270079





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Name: Linda Sallas

Address: lindasallas@gmail.com

Is it possible to build more underground parking?

would you reconsider increasing size of theatre?

I don't know if either of these are directed at the EIR or should be placed of LACMA.

Thank you.



**COUNTY OF LOS ANGELES
LACMA BUILDING FOR THE PERMANENT COLLECTION
PUBLIC MEETING
NOVEMBER 7, 2017**

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Name	Organization (if any)	Address	E-mail
Jo CARMEN	-	5631 W. 6TH. ST. LA CA 90036	Jo.CARMEN@ATT.NET
MARIANNA BLACK	NEIGHBOR	478 S. OGDEN DR LOS ANGELES, CA 90036-2120	
Robert Chernow	neighbor		P.O. Box 480812 90048 cdilca7@gmail.com
RICHARD BAR	-	1624 RIDGEWAY DRIVE GLENDALE CA 91202	richardbar@alum.calarts.edu
Ilene Friedland	-	750 S. Spaulding Los Angeles 90036	Friedland@aol.com
John Friedland	-	750 S Spaulding LA CA 90036	jfriedland47@aol.com
Clemi Boubli	member	3878 Roble Vista Dr. Los Angeles CA 90027	ok4jk2@mac.com
BERNIE CLINCH	NEIGHBOR	PLBTRA	P29510WT@PLBTRA.ORG
CARL JOHNSON	NEIGHBOR	1723 S. ORANGE GROVE DR	carl.johnson@hdk.com
Rich Newcome	Neighbor	6206 Lindenhurst Ave LA, CA 90048	newkra@att.net



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Name	Organization (if any)	Address	E-mail
Donald Harris	PLIBRA	401 S. Burnside Ave Los Angeles, CA 90036	plbra@ca.rh.com
Charles Lindenblatt	MCWCC stakeholder		ndisc7@hotmail.com
Sam Hakim	Prop-owner.	6100 - 6200 Wilshire Blvd.	shakim@onyxtowerlax.org
ALICIA ZAAVER	Valerio Architects	5858 Wilshire Blvd #200 LA 90036	AZaayer@valerioinc.com
LYNN EASLEY		1723 S. ORANGE GROVE	lynn.easley@mac.com
ALAN HESS		4991 CORKWOOD, IRVINE	alan.hess@gmail.com
Mark Erwin		4204 Lindenhurst	
Alex Valenzuela	LACMA	5905 WILSHIRE BLVD	AVALENZUELA@LACMA.ORG
EARMEN S GARD		3833 CARROLLWOOD AVE CA CA 90008	earmen@carrollwood.com
Sam Hoelscher	CLARK CONSTRUCTION	18201 Von Karman Ste 800 Irvine, CA 92612	Sam.Hoelscher@clarkconstruction.com



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Name	Organization (if any)	Address	E-mail
EDUARDO AGUIRRE		1443 117A ST. #1 SMO 90401	EIA@ALCIDA 2.GMAIL.COM
Tae Kwon	WFOA	750 S Spaulding Ave LA CA 90036	taeyim323@aol
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Shafiq Jones-Hilson	AECOM		Shafiq.jones-hilson @aecom.com
PHILIP DANER	AECOM		PHILIP.DANER@AECOM.COM
Shary Ross	WFOA	750 S Spaulding	sharyross2@gmail.com
AUSTIN BAKER	HDCCO HATHAWAY DINKWIDDLE	211 Wilshire Blvd. Los Angeles 90017	bakera@hdcco.com
Tiffani Shin	County LA		tshin@cnrd.lacounty.gov
Justin Strzelecki	Clark Construction	18201 Von Karman Irvine CA	justin.strzelecki@clarkconstruction.com
STEVE DEYER	CLARK CONSTRUCTION	18201 VON KARMAN IRVINE, CA	STEVE.DEYER@CLARKCONSTRUCTION.COM



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Name	Organization (if any)	Address	E-mail
MANRESE CHANDLER	Resident,	W. 8th St	MANRESE310@gmail.com
KERRI MEENAN	CLARK CONSTR	18201 VON KARMEN IRVINE CA.	Kerri.Meenan@CLARKCONSTRUCTION.COM
MIKE MONTAGUE	CLARK Construction	18201 VON KARMEN Irvine CA	MIKE MICHAEL.MONTAGUE@CLARKCONSTRUCTION.COM
Josh Albrektson	MP	650 S. Spaulding #120 LA CA 90031	joshraymo@gmail.com
Nathan Jenkins	DDP	911 Emerson St	nathan@dotdoflash.com
Dennis Hiebert	Wildfire Galleria	750 S. Spaulding #229	dennishiebert@gmail.com
O/GA SOFFER			O-SOFFER@ILLINOIS.EDU
SHARON KEYSER	CARUSO	101 The Grove Dr. LA 90036	SKEYSER@CARUSO.COM
SWH KEVSEY	RESIDENT	816 S. DUNSMUIR LA.	SKEYSEY@COMPUTERS.com
Alex Israel	Neighbor/Resident	5030 Pico Blvd - LA, CA 90069	alex@freewayeyewear.com



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Name	Organization (if any)	Address	E-mail
Robert Buscemi	Bldg Trades Council	1026 Beverly Blvd.	rbuscemi@gmail.com
Anahayun		44 Lincoln St of G.	
James Jacquet	Kaiser Permanente	4733 Sunset #130 Los Angeles, CA 90027	James Jacquet james.m.jacquet@kp.org
Evalena Easter	Resident Resto	5405 W. 9th St LA 90036	
Lori Zimmerman		750 S. Spaulding Av #130 90036	lori@ lorizimmerman.com
BARBARA GOLD	KEMRON AKA	901 KENISTON C.H. 90019	BARBARA@BEAETHLINK.NET
Rick Cherry	Academy Museum	5900 Wilshire	rcherry@osears.org
Aliya Cohen	Citizen	1151 Armada Dr. 91103	acohen@ngkf.com
Mursalin Machado	SUBUD	5828 Wilshire Blvd, % SUBUD	mistermursalinmachado@ yahoo.com
KEITH NAKATA	MCWCC		k.nakata@midcity west.org



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Name	Organization (if any)	Address	E-mail
PAM PORTLOCH		718 CARSON LA CA	p@dotdashdash.10
Alvaro Martinez-Fonts	Citizen	921 N. Sweter	martinez.fonts@gmail.com
FELIX MUSSENDEN	NEIGHBOR	733 S. OGDEN Dr #301	FAMUSSENDEN@GMAIL.COM
SHARON ALPERIN	neighbor	822 S. DUNSMuir AVE.	SHARONALPERIN@GMAIL.COM
Hermi van Muijen	MIRACLI MILE AZORES	808 S. DUNSMuir Ave	HERMIVANMUIJEN@GMAIL.COM
Curt Lukert		PO Box 36532 90036	CLukert@aol.com
LON SANDER	JHS Co	5757 WILSHIRE 90036	LON SANDER@GMAIL.COM
Steven Brown	JHS Co	5757 Wilshire 90036	sbrown34@gmail.com
Ross Cerny		841 Alandale Ave 90036	rosssearch@yahoo.com
Stephanie Sykes	Academy Museum	8949 Wilshire Blvd. 90211	ssykes@oscars.org

