DRAFT ENVIRONMENTAL IMPACT REPORT

for

Campus Plan 2002

Los Angeles Trade-Technical College

Clearinghouse No. 2003031103

May 2003

PCR

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Prepared For:

Los Angeles Trade-Technical College
400 W. Washington Boulevard
Los Angeles, California 90015

Prepared By:

PCR Services Corporation
233 Wilshire Boulevard, Suite 130
Santa Monica, California 90401
TEL 310.451.4488
FAX 310.451.5279

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I. SUMMARY

The Los Angeles Community College District ("District") in collaboration with the Los Angeles Trade-Technical College ("College") propose to implement the *Campus Plan 2002,* 5-year plan (the "Project") of development for the College campus located at 400 W. Washington Boulevard, Los Angeles, California. Currently the campus encompasses approximately 23 acres bounded by Washington Boulevard, Grand Avenue, 23rd Street and Flower Street. Regional access to the site is provided either from the Harbor Freeway or Santa Monica Freeway to Grand Avenue or Flower Street. Figure S-1 on page 3 depicts the Project site in a regional and local context.

This Draft Environmental Impact Report (EIR) evaluates the Project's environmental effects pursuant to the California Environmental Quality Act (CEQA) and the District's implementing guidelines. The EIR analyzes the Project's short-term and long-term impacts, as well as its contribution to cumulative regional effects consistent with CEQA Section 15146.

A. INTRODUCTION

The College is faced with the need to expand and improve its facilities in order to fulfill its educational mission and better serve its growing student body. In 2001, a Bond measure (Proposition A) was approved by the voters of Los Angeles County for the remodeling, renovation and new construction of facilities at the campuses of the District. Funds from this bond, $138 million, will be made available to the College with the expectation that these funds be expended within a 5-year period.

In response to this opportunity, the College has developed *Campus Plan 2002*, a 5-year master plan (the "Project") and 30-year vision for the campus. The 5-year plan identifies those projects to be funded through Proposition A. The 30-year vision presents possible future projects, though no funds are yet available or identified for the realization of this long-term vision.

The 5-year plan includes specific construction, demolition, renovations and other facility improvements that, as a defined project, is subject to the CEQA and therefore is assessed in this Draft EIR. The 30-year vision included in the *Campus Plan 2002* represents a conceptual future perspective for the College that helps to explain the intent of the transformations proposed in the 5-year plan. In years to come, this vision may blossom into subsequent specific improvement

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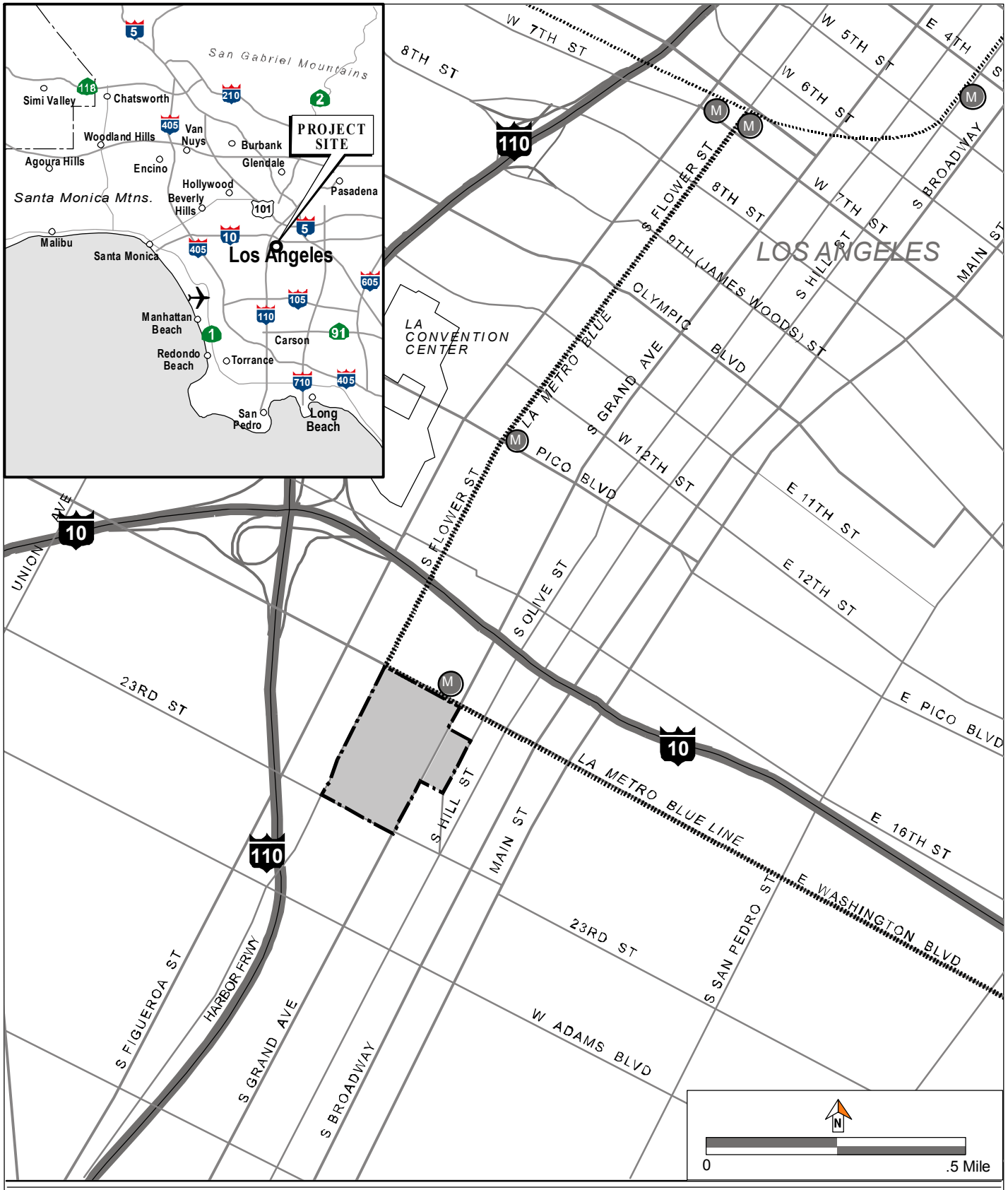

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Project Site

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Figure S1
Regional and Project Vicinity Map

Source: PCR Services Corporation, 2003

projects that would themselves be subject to CEQA but it is not appropriate at this time to evaluate potential impacts of this vision in its current speculative form.[1]

In compliance with CEQA Guidelines (21080.4), the District circulated a Notice of Preparation (NOP) for the Draft EIR notifying responsible agencies and interested parties of the proposed Project and soliciting their comments. As part of the NOP, an Initial Study, including an Environmental Checklist, was prepared to identify those environmental factors that would not be impacted by the proposed Project and which would not need to be further analyzed in the Draft EIR. The NOP/Initial Study was circulated from March 19, 2003 to April 21, 2003. It is included in this document as Appendix A. The following environmental factors as evaluated in the Initial Study would not be affected by the proposed Project:

- Aesthetics
- Agricultural Resources
- Biological Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

[1] *Topanga Beach Renters Association v. Department of General Services, (1976) 58 Cal. App. 3d 712: "Evaluation of future environmental effects must await the future decisions that could cause the effects."*

B. PROPOSED PROJECT

The Project involves three distinct elements: 1) the expansion, renovation, modernization, and demolition of existing buildings (Building Projects); 2) the increase in open space (Landscaping and Open Space Plan); and 3) the implementation of non-structural upgrades (Utilities and Infrastructure Projects). The Project also involves the acquisition of property for additional building construction. Implementation of the Project would increase the total building gross square feet (GSF) on the campus from 780,000 GSF to 850,600 GSF (including new central receiving areas), and increase the amount of open space from 355,316 SF to 682,344 SF. Figure S-2 on page 7 presents the existing campus site plan and Figure S-3 on page 9 presents the proposed campus site plan, highlighting the existing and proposed new buildings, parking facilities, and landscape features. A statistical summary of the proposed changes is presented in Table S-1 on page 7. A more detailed description of the buildings affected and new buildings proposed is presented in Section II of this Draft EIR.

1. Building Projects

There are seven individual building projects identified that encompass multiple components: 1) South Campus; 2) North Quad; 3) F-Ramp; 4) Building H; 5) Building K; 6) Building D; and 7) Olive Avenue Parking Garage and Child Development Center.

The South Campus building project includes the construction of two new five-story buildings: the Technology Building (or South Building) and the Student Services Center (or the North Building). The Technology Building would allocate approximately 68,950 GSF to such programs as visual communication, architectural technologies/multi-media digital, computer information systems, and electronic technology while the Student Services Center would allocate approximately 57,765 GSF to support administration, business and student service programs for a total of 126,715 GSF. Implementation of this building project would involve the demolition or removal of the PTA building, the Apffel's Coffee Company building, the existing track and athletic field, Parking Lot B, and the 21st, Hope, and 22nd Streets vehicular loop off of Grand Avenue. The project also would construct a new track and athletic field positioned on a north-south alignment in the center of the South Campus. The remaining buildings within the South Campus—Building G (Gymnasium), Building J (Fitness Center) and Building B (Construction Technology)—also would be targeted for renovation and modernization. The associated construction of a new underground parking structure and the removal of existing parking would result in a net gain of 688 parking spaces within the South Campus.

The North Quad project involves the renovation and modernization of Building L (Learning Resource Center) and the creation of a centralized open space or North Quad area located on the North Campus. Renovation and modernization of Building L would involve the addition of approximately 14,280 SF of new space by enclosing the ground floor areas of the

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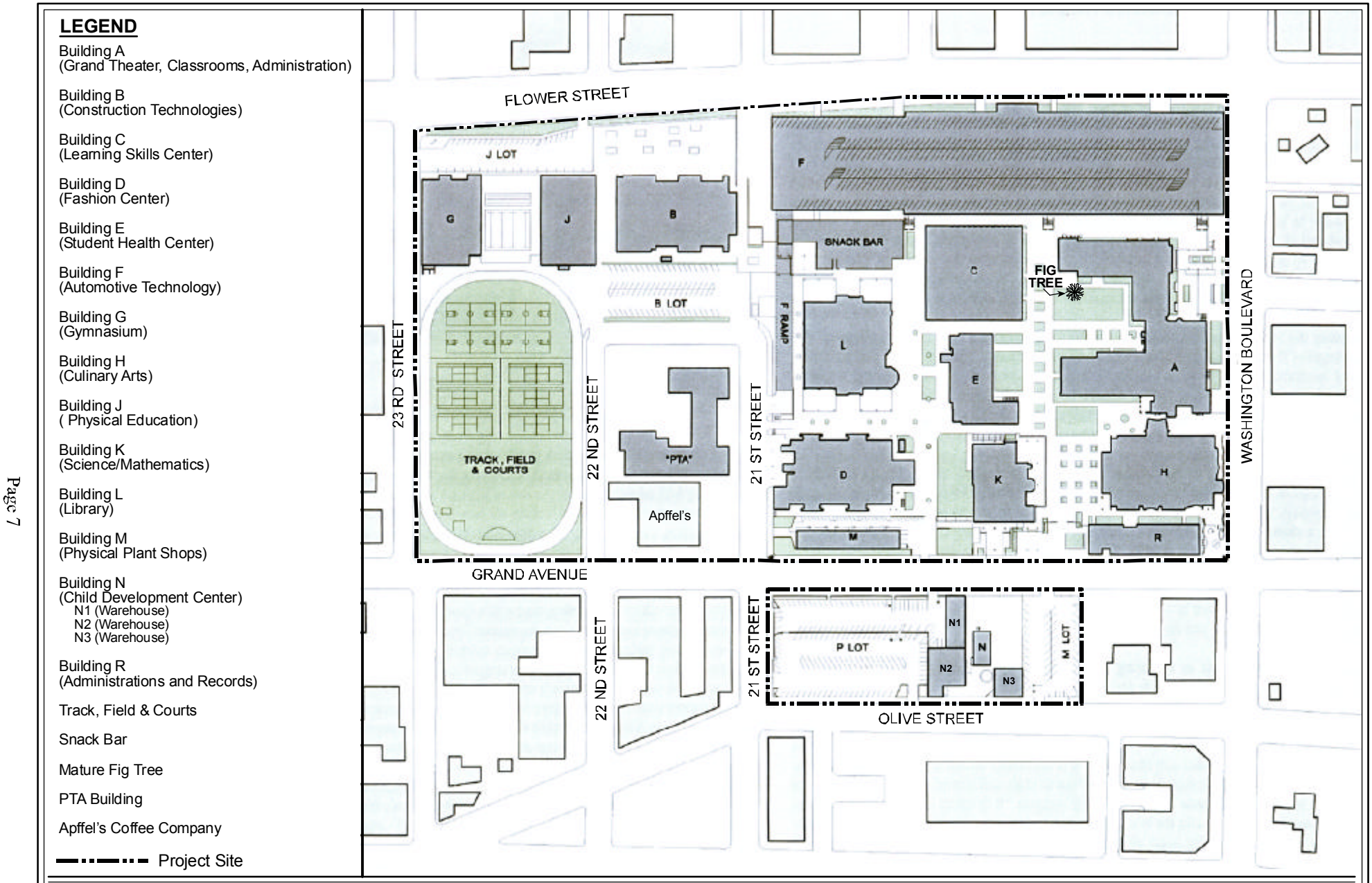

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Source: MDA Johnson Favaro, 2003

Figure S2
Existing Site Plan

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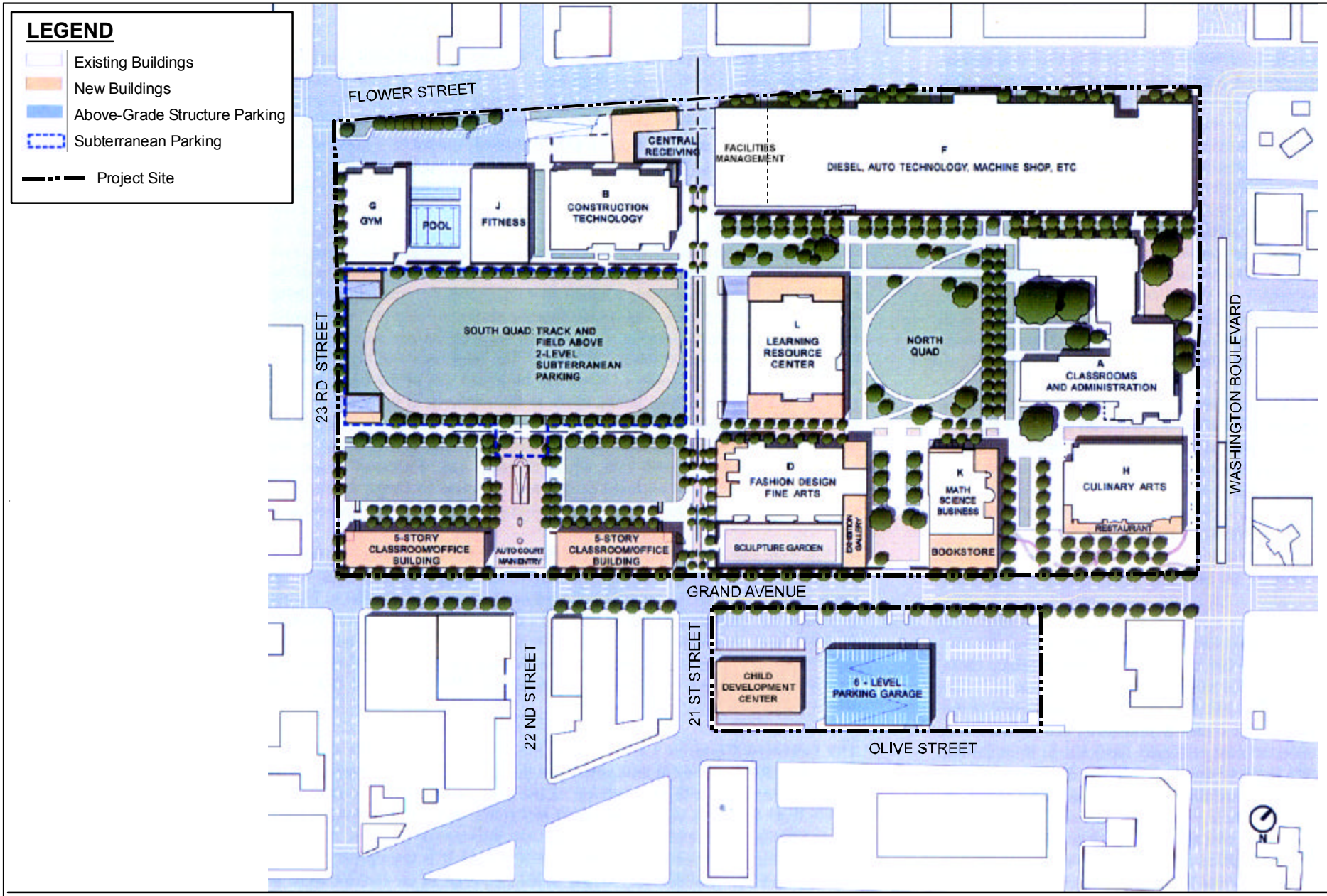

Figure S3
Proposed Site Plan

Source: MDA Johnson Favaro, 2003

Table S-1

SUMMARY OF PROPOSED NEW BUILDINGS, ADDITIONS AND BUILDING REMOVALS AT THE LOS ANGELES TRADE-TECHNICAL COLLEGE CAMPUS

Building	Net square feet	Proposed height
New Buildings		
North Building	57,765 SF	75 feet
South Building	68,950 SF	75 feet
Subterranean Parking	268,632 SF	Two levels subterranean
Parking Structure (Olive Avenue)	132,300 SF	60 feet
Child Development Center	14,000 SF	30 feet
Total New	541,647 SF	
Additions To Existing Buildings		
Building D	9,261 SF	Existing
Building H	4,617 SF	Existing; 87-foot Tower Addition
Building K	12,493 SF	Existing
Building L	14,280 SF	35 feet
Total Additions	40,651 SF	
Demolition Of Existing Buildings		
Removed – Building C	(35,728) SF	-
Removed – Building E	(42,727) SF	-
Removed – Building M	(7,340) SF	-
Removed – Building N	(1,800) SF	-
Removed – Building R	(10,106) SF	-
Removed – PTA Building	(56,000) SF	-
Removed – Apffel's Coffee Company	(14,293) SF	-
Total Demolition	(167,994) SF	-
Renovation of Existing Buildings		
Building A	0 SF	Existing
Building B	0 SF	Existing
Building F	0 SF	Existing
Building G	0 SF	Existing
Building J	0 SF	Existing
TOTAL NET CHANGE IN BUILDING AREA		
Parking	400,932 SF	
Facilities, Programs And Offices	70,600 SF	

Source: Los Angeles Trade-Technical College Campus Plan 2002; *MDA Johnson Favaro, November 2000*.

four corners of the building and adding new first and second floor area at the existing east and west entries of the building. Building L would ultimately support such programs and services as the library, media center, information technology center, learning skills center, writing center, orientation and assessment center, disabled student services, and English as a Second Language.

To create the new North Quad open space, Buildings C and E would be removed entirely. This North Quad would be at the heart of the entire campus, surrounded by buildings containing most of the disciplines offered by the College.

The F-Ramp building project proposes to relocate this ramp from its existing location on the south of Building L, to a new location parallel to Flower Street and connecting to the Building F roof-top parking. The new F-Ramp would be equipped with an automated control gate for entry and exit, and rise to 20-feet. Access would be from Flower Street at 22nd Street. In relocating the existing ramp, other appurtenant facilities would need to be removed including the 'Snack Bar' and patio area underneath the ramp, an auto storage yard and parking area for the Automotive Technology Program. The new ramp would occupy the area currently utilized as the construction technology yard. To accommodate the new ramp, the construction technology yard would be relocated to College-owned property at the northeast corner of Washington Boulevard and Flower Street.

The Building H project involves the modernization, renovation and expansion of Building H (Culinary Arts Building). Specific improvements include the construction of a façade with a sign or multi-media message board on the north and east side and a tower reaching a height of about 87 feet. The main façade would be situated parallel with Grand Avenue and the tower would be situated at the northeast corner of the building. Approximately 4,617 SF of new space would be constructed as part of this building, supporting a restaurant and bakery shop. The open space resulting from the removal of Building R as part of the South Campus building project would be developed into a new piazza.

The Building K project involves both renovation and expansion of Building K (Math Science Business Building). The total floor area for the addition is approximately 12,493 SF to be achieved through the enclosure of the ground floor along Grand Avenue and the north and west side of the building. The proposed uses within this building would include: bookstore, coffee shop, loading dock, mortgage and finance operations, community planning/economic development operations, science and mathematics, nursing programs, student government operations, Student Union and copy center. The basement space also would be renovated to support warehouse and storage use, as well as science and mathematics labs. A college and bookstore identification sign would be added to the building's west and northwest sides with direct line of site to Grand Avenue.

The Building D project would involve the removal of Building M (Physical Plant) located along Grand Avenue just east of Building D (Fashion and Fine Arts Building) with the resulting new space transformed into a Sculpture Garden. The southwest corner of Building D would be enclosed thereby eliminating existing parking and loading area. This project includes expansion of the existing indoor Exhibition Gallery, renovation of the third floor classroom

space modifications to 13,560 SF of existing basement space to accommodate the Plant Facilities and Sheriff's Department.

The Olive Avenue Parking Garage and Child Development Center project is located directly east of the main campus and north of 21st Street, between Grand Avenue and Olive Avenue. It involves the construction of a six-level 400-car parking structure reaching a height of about 60 feet and an adjoining parking lot that would accommodate 150 cars. The new parking structure would be approximately 132,300 SF and the surface parking lot would encompass 54,000 SF. Demolition of Building N, miscellaneous adjacent buildings and the existing P and M Lots would be required. There would be a net gain of 557 parking spaces as a result of this building project. As Building N currently provides for child development and care services, a new 14,000 SF Child Development Center would be constructed at the northwest corner of Olive Street and 21st Street.

The proposed Project would involve the implementation of a Landscape and Open Space Plan that identifies landscape projects that are linked to the individual building projects. The landscaping improvements associated with each of the building projects would involve to some extent the planting of trees along perimeter streets of the campus, and along walkways interior to the campus grounds, providing campus connectivity. Piazzas and courtyards are incorporated into the design plans to provide welcoming gateways. Other landscape design features include 'quads,' lawns, fields, and gardens located strategically throughout the campus.

2. Utilities and Infrastructure Projects

The proposed Project also involves improvements to the campus' utility, mechanical, electrical and plumbing systems. The construction of additional sanitary sewer lines, storm drains, and water lines within the campus. Each additional utility line would be connected to an existing off-site public line.

C. PROJECT LOCATION

Since 1959, the College has been located at 400 W. Washington Boulevard, the site of the former Los Angeles Polytechnic High School and encompassing 23 acres. Regional access to the campus is provided by the Santa Monica Freeway (I-10) and of the Harbor Freeway (I-110). Washington Boulevard, Grand Avenue, 23rd Street, and Flower Street form the campus boundary. The campus is within the Southeast Los Angeles Community Plan Area and is indicated on that community plan as a public facility surrounded by industrial uses. The campus area is zoned Multi-Family Residential [R4], Commercial [C2] and Industrial [M1].

The location of 21st Street roughly divides the existing campus into a northern area and a southern area. The northern area is densely developed with about eleven buildings linked by pedestrian courtyards. The southern area is more open with only four buildings plus two surface parking lots and athletic fields and courts. The Project includes the property on the west side of Grand Avenue between 21st and 22nd Streets, which contains the Apffel's Coffee Company. The College, as part of a separate action, will acquire this property along with additional properties on the east side of Grand at 21st Street that are not part of the Project. Outside of the main campus area, on the east side of Grand Avenue between Washington Boulevard and 21st Street, is the Child Development Center and a pair of parking lots. Additional offsite parking is located under the raised Santa Monica Freeway a block north of Washington Boulevard. In total, the existing College campus includes approximately 780,000 GSF of building floor area, 355,316 SF of open space, and 1,381 parking spaces.

D. PROJECT BACKGROUND

The College is a comprehensive public community college that is part of the District. Through an intellectually rigorous, technologically current and socially relevant curriculum, the College places an emphasis on developing technical skills and work experience necessary for students to succeed in the job market and to provide students with a foundation for further advanced education. The various programs of study are designed to culminate in a certificate of completion, a skills certificate or an associate degree. Enrollment is expected to grow within the next five years. The *Campus Plan 2002* and this Draft EIR are based on the assumption student enrollment (currently 15,000 students) would increase to 21,300 students by 2007, a 47 percent increase in the student body.

Instruction is currently offered in over 65 different occupational areas including accounting; architecture and design technology; automotive repair and related technology; business administration; child development; construction technologies; computer applications and information systems; computer repair; cosmetology; culinary arts; electronics; English; fashion design; management and marketing; finance, journalism; machine tools; and nursing. In addition to classroom instruction, the College offers non–traditional formats including apprenticeship training, cooperative work experience programs, and directed study. The College also offers opportunities for participation in intercollegiate athletics, campus clubs and other student organizations.

E. AREAS OF CONTROVERSY

Potential areas of controversy specific to the proposed Project include the following:

- Demolition of known historic structures on the College campus.
- Traffic-related impacts.

F. ALTERNATIVES TO THE PROPOSED PROJECT

Consistent with the requirements of Section 15126.6(a) of the CEQA Guidelines, a range of alternatives to the proposed Project were considered and evaluated in this Draft EIR. These alternatives, which were developed in the course of project planning and environmental review, consist of:

- Alternative 1 - No Action/No Project
- Alternative 2 - Full Retention of Building C
- Alternative 3 - Reduced Future Enrollment

The purpose of describing and analyzing Alternative 1-No Action/No Project is to allow the decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the Project. Alternative 2-Full Retention of Building C was selected for detailed evaluation because it would achieve some of the basic objectives of the proposed Project while reducing impacts on cultural resources. Alternative 3-Reduced Future Enrollment was selected for detailed evaluation because it would achieve most of the basic objectives of the proposed Project while reducing impacts on air quality, noise, and transportation and circulation.

G. SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

This Draft EIR has been prepared to analyze the potential significant environmental impacts associated with the Project. The Initial Study prepared for the Project determined that potential significant impacts could be experienced relative to air quality, cultural resource, noise, and transportation and circulation. These impact areas are evaluated in this EIR and mitigation measures are proposed with respect to each identified significant impact. A summary of the identified significant environmental impacts, proposed mitigation measures, and level of significance after mitigation is provided in Table S-2 on page 15.

Table S-2

SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Potential Environmental Impacts	Proposed Mitigation Measures	Level of Significance After Mitigation
AIR QUALITY		
Construction-period emissions of NO_x would exceed SCAQMD thresholds.	· Exposed pits (i.e., gravel, soil, dirt) with 5 percent or greater silt content shall be watered twice daily, enclosed, covered or treated with non-toxic soil stabilizers according to manufacturers' specifications. · All other active sites shall be watered as often as necessary to remain visibly moist. · All grading activities shall cease during second stage smog alerts and periods of high winds (i.e., greater than 25 mph) if soil is being transported to off-site locations and cannot be controlled by watering. · All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer). · All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equip.m.ent, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite, or shall be paved. · Streets shall be swept hourly if visible soil material has been carried onto adjacent public paved roads. · Construction equip.m.ent shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary. · Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces. · Traffic speeds on all unpaved roads shall not exceed 15 mph. · All equip.m.ent shall be properly tuned and maintained in accordance with manufacturer's specifications. · General contractors shall maintain and operate construction equip.m.ent so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would be kept with their engines	Mitigation measures would reduce and control construction related emissions. However, Project construction would continue to generate NOx emissions in excess of SCAQMD thresholds. Impact would remain significant and unavoidable.

Table S-2 (Continued)

SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Potential Environmental Impacts	Proposed Mitigation Measures	Level of Significance After Mitigation
	off, when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.	
During operational phase, emissions of NO_x and CO would exceed SCAQMD thresholds.	No mitigation measures are considered feasible.	Impact would remain significant and unavoidable.
HISTORICAL RESOURCES		
Renovation of the exterior and interior of the Building A.	Rehabilitation Work Any maintenance, repair, stabilization, rehabilitation, preservation, conservation or reconstruction of any portion of Building A shall be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards), Weeks and Grimmer (1995). Project plans for the rehabilitation/restoration of Building A shall be submitted. Photography and Recordation Prior to the rehabilitation of Building A, a photographic documentation report shall be prepared of the significance of the building and its physical conditions, both historic and current. Identification of Character-Defining Features Prior to completion of project design and prior to the rehabilitation /restoration of Building A, an inventory of significant, character-defining features and materials of the historic resource shall be made by a qualified architectural historian or historic architect. These features and materials shall be retained in-place and repaired as part of the overall rehabilitation/restoration project proposed for Building A. Compatibility of New Construction Where new construction is proposed near or adjacent to Building A, the Standards shall be followed.	Impacts would be greatly reduced, but not eliminated.

Table S-2 (Continued)

SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Potential Environmental Impacts	Proposed Mitigation Measures	Level of Significance After Mitigation
The removal of Building C, which has been identified as a historic resource for the purposes of CEQA.	Recordation Prior to demolition of Building C for the implementation of the proposed Project, a Historic Structures Report shall be prepared. Demolition Coordination The demolition of Building C shall be coordinated with the construction of the new educational facilities on the ca.m.pus. Therefore, Building C shall not be demolished until all project plans are final and approved by the District and the City of Los Angeles Cultural Affairs Department. Interpretive Education Progra.m. An interpretive educational progra.m. or display shall be incorporated into the develop.m.ent of the new ca.m.pus, specifically adjacent to or within the Building A.	Demolition of a historic resource is considered a significant adverse impact that cannot be mitigated to a level of less than significant.
The removal of the Apffel's Coffee Company Building, which is considered a historic resource for the purposes of CEQA.	Recordation Prior to the demolition of the Apffel Coffee Company building for the implementation of the proposed Project, a Historic Structures Report shall be prepared. Relocation As part of the acquisition process currently underway, the District will provide relocation assistance to the Apffel Coffee Company as required by law. The Company has acquired a relocation site in Santa Fe Springs, California. Subject to the consent of the Coffee Company, the District will provide funds to assist in relocating the existing Coffee Company museum, located in the current building's lobby, to the new facility.	Demolition of a historic resource is considered a significant adverse impact. However, because of the nature of the building's significance as it relates to its economic history as a long time Los Angeles business versus architectural merit, and given that the business has previously relocated twice in Los Angeles before settling into its current building, implementation of the mitigation measures would reduce the impact to a level of less than significant.

Table S-2 (Continued)

SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Potential Environmental Impacts	Proposed Mitigation Measures	Level of Significance After Mitigation
The removal of the PTA Building. The building as a whole is not considered a historic resource for the purposes of CEQA; however, the building's auditorium is of special interest because of its distinguishing International Style architectural design.	Recordation Prior to the demolition of the Parent Teacher Building, specifically the Auditorium portion of the building, for the implementation of the proposed Project, a Historic Structures Report shall be prepared.	Impact would be less than significant.
Potential construction impacts to the mature Morten Bay Fig Tree.	Any new landscaping proposed shall respect the historic character of the identified landscape features and the historic building(s), if any, in which it is adjacent to. Any maintenance, repair, stabilization, rehabilitation, preservation, conservation or reconstruction of any portion of fig tree shall be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards), Weeks and Grimmer (1995).	Impact would be less than significant.
NOISE		
Construction noise.	During all Project site preparation, grading, and construction activities, the Project contractor(s) shall equip all construction equip.m.ent, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. An eight-foot temporary sound barrier (e.g., plywood) shall be erected along the site boundary to block the line of sight between construction activity and off-site receptor locations.	Reduced, yet impact would remain significant and unavoidable.

Table S-2 (Continued)

SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Potential Environmental Impacts	Proposed Mitigation Measures	Level of Significance After Mitigation
TRANSPORTATION AND CIRCULATION		
I-10 westbound Ra.m.ps/17th Street would experience a significant traffic impact during the P.M. peak hour.	The westbound approach of I-10 westbound Ra.m.ps/17th Street would be re-striped to provide an additional through lane.	Impact would be less than significant.
Grand Avenue and 22nd Street would experience a significant traffic impact during both the A.M. and the P.M. peak hours.	A traffic signal would be installed.	Impact would be less than significant.
Grand Avenue and 23rd Street would experience a significant traffic impact during the P.M. peak hour.	The offset on 23rd Street would be eliminated by realigning the west leg of 23rd Street northerly to align with the east leg of the intersection. In addition, a left-turn lane would be provided on the eastbound approach, requiring the dedication by the College of a small area of right of way.	Impact would be less than significant.
I-110 NB off-ra.m.p and Ada.m.s Boulevard would experience a significant traffic impact during the P.M. peak hour.	An exclusive right-turn lane would be provided on the "mixed-flow" portion of the northbound off-ra.m.p. Widening, including acquisition, of minor area of right of way may be necessary based upon review of improvement by Caltrans.	Impact would be less than significant.
Grand Avenue and Washington Boulevard would experience a significant traffic impact during the P.M. peak hour.	No physical or operational mitigation measures considered feasible.	Impact would remain significant and unavoidable.
Grand Avenue and Ada.m.s Boulevard would experience a significant traffic impact during the P.M. peak hour.	No physical or operational mitigation measures considered feasible.	Impact would remain significant and unavoidable.

Table S-2 (Continued)

SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Potential Environmental Impacts	Proposed Mitigation Measures	Level of Significance After Mitigation
The incremental addition to the traffic at intersections operating without the Project at Level of Service F [Grand and 21st and Grand and 22nd].	A traffic signal would be installed at Grand and 22nd. Western leg of 21st at Grand would be eliminated as part of the Project.	Impact would be less than significant.
The incremental addition to the traffic on the Harbor Freeway and the Santa Monica Freeway.	Mitigation measures to address significant cumulative conditions are beyond the ability of individual projects to implement.	Impact would remain significant and unavoidable.

II--Project Description

II. PROJECT DESCRIPTION

The Los Angeles Community College District ("District") in collaboration with the Los Angeles Trade-Technical College ("College") propose to implement the *Campus Plan 2002,* 5-year plan (the "Project") of development for the College campus located at 400 W. Washington Boulevard, Los Angeles, California. This Draft Environmental Impact Report (EIR) evaluates the Project's environmental effects pursuant to the California Environmental Quality Act (CEQA) and the District's implementing guidelines. The Draft EIR analyzes the Project's short-term and long-term impacts, as well as its contribution to cumulative regional effects consistent with CEQA Section 15146.

A. LOCATION, BOUNDARIES AND SETTING

Since 1959, the College has been located at the site of the former Los Angeles Polytechnic High School. Currently the campus encompasses approximately 23 acres bounded by Washington Boulevard, Grand Avenue, 23rd Street and Flower Street. Regional access to the site is provided either from the Harbor Freeway or Santa Monica Freeway to Grand Avenue or Flower Street. Figure 1 on page 23 depicts the Project site in a regional and local context. The campus is within the Southeast Los Angeles Community Plan Area and is indicated on that community plan as a public facility surrounded by industrial uses. The campus area is zoned Multi-Family Residential [R4], Commercial [C2] and Industrial [M1].

The location of 21st Street roughly divides the campus into a northern area and a southern area. The northern area is densely developed with about eleven buildings linked by pedestrian courtyards. The defined line between the northern and southern campus is 21st Street between Grand Avenue and Flower Street. The southern area is more open with only four buildings plus two surface parking lots and athletic fields and courts. Outside of the main campus area, on the east side of Grand Avenue between Washington Blvd and 21st Street, is the Child Development Center and a pair of parking lots. The College has initiated acquisition of the property at Grand Avenue between 21st and 22nd Streets, which contains the Apffel's Coffee Company, and plans to acquire additional properties on the east side of Grand Avenue that are not part of the Project. Additional offsite parking is located under the raised Santa Monica Freeway a block north of Washington Boulevard. In total, the existing College campus includes approximately 780,000 gross square feet (GSF) of building floor area, 355,316 SF of open space, and 1,381 parking spaces.

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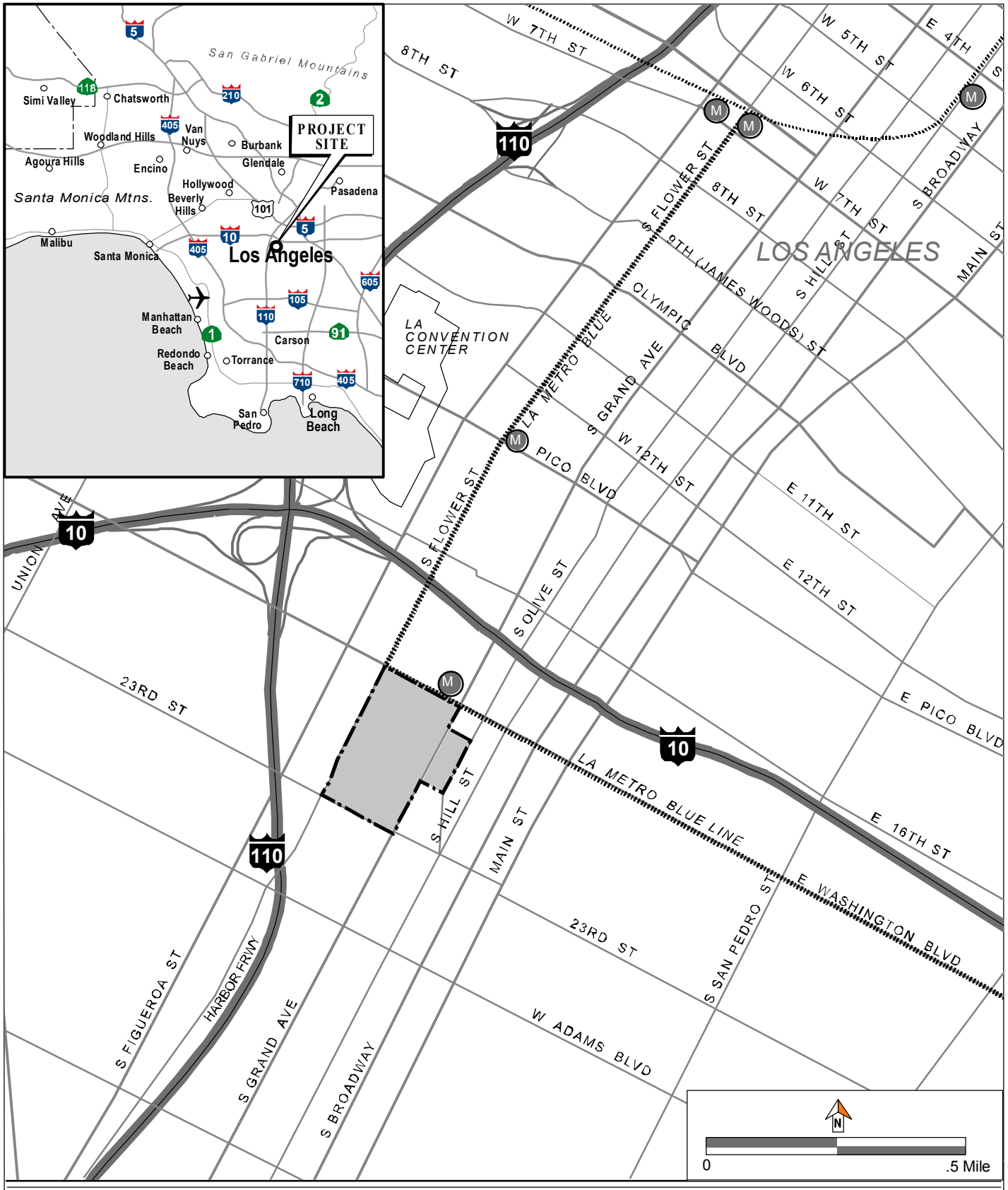

LEGEND

Project Site

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Figure 1
Regional and Project Vicinity Map

Source: PCR Services Corporation, 2003

B. STATEMENT OF OBJECTIVES

The purpose of *Campus Plan 2002* is to build on the College's strong position as a valued educational institution for the people of Los Angeles. To achieve this, *Campus Plan 2002* envisions new directions for the College's academic programs and corresponding improvements to the physical environment on campus. The proposed Project responds to the ever increasing need to educate and equip a growing population of students with the knowledge and technical capabilities that are consistent with the evolving and advancing demands within the technological, liberal arts and business markets. Through the Project, the District and College take advantage of supplemental funding opportunities that help realize their long-term educational goals and objectives while at the same time advancing their mission. Overall, the *Campus Plan 2002* incorporates new facilities, provides for improved circulation, access and organization, refurbishes existing buildings and provides for additional parking space to accommodate a growing student population. It is intended to capitalize on its strategic location within a highly urbanized setting and promote its educational services.

Funds made available through the passage of Proposition A in 2001 are limited and would not likely be sufficient for full build-out of the *Campus Plan 2002*. As such, the 5-year plan constitutes those building projects that could feasibly be funded utilizing Proposition A funds. The purpose of the Project is to implement the improvements identified within the *Campus Plan 2002*, 5-year plan, thereby correcting inadequacies in the current conditions of the campus. The current inadequacies of the campus include the following:

- Lack of instructional space to accommodate a growing student population.
- Insufficient parking to meet projected student growth populations.
- Poorly configured and dedicated open space which inhibits opportunities for large. group activities and the use of areas for future structural development.
- Organization and spatial arrangement of buildings and the programs they support.
- Inability of the existing facilities to transform, expand and contract with changing technologies, changing teaching formats, and mechanical upgrades.
- Fragmented and ill-defined open space.
- Non-descript and inadequately sized entrance points and campus perimeter.
- Insufficient outdoor seating opportunities.

The Project is driven by the need to rectify these physical deficiencies and by an ever-increasing population of students pursuing vocational training. The programmatic objectives of the College are listed below followed by a listing of the Project-specific objectives.

Programmatic Objectives

a. Accommodate student growth projections.

b. Provide core curriculum and program opportunities to future students that are responsive to market demands and labor pressures.

c. Improve vocational training opportunities while balancing the need to provide for greater instruction in the liberal arts and business disciplines.

d. Establish a long-term economic development plan so as to regularly fund any necessary mechanical and technological upgrades.

e. Provide for new learning environment opportunities that parallel those of liberal arts institutions in the form of more theatre style lecture halls equipped with multi-media technology for addressing larger student audiences and for "distance learning."

f. Maximize available outdoor space.

g. Incorporate sustainable building and operation practices through architectural design which minimize the negative long-term effects on the environment, maximize energy efficiency and the use of renewable resources.

h. Promote a college-like feel for the campus.

i. Provide an element of tranquility within the greater urban setting.

j. Establish a definitive link and unification of the campus to the community through its landscaping.

Project-Specific Objectives

a. Increase landscaped areas, open space and recreational areas to 55 percent to include roof gardens and terraces.

b. Increase instructional space by 70,600 SF.

c. Increase available on-campus parking by at least 1,100 spaces.

d. Define and establish a dignified and visible entry to the campus.

e. Improve overall organization, distribution and placement of buildings supporting key academic and vocational programs.

f. Incorporate detention systems and permeable paving to achieve maximum on-site retention of surface water/storm water run-off.

g. Strategically locate trees and landscaping so as to assist in cooling buildings and in reducing the Heat Island Effect.

h. Use reclaimed water for supplying water features and install water efficient irrigation systems.

i. Use recycled materials in new construction whenever feasible (i.e., asphalt and concrete from the deconstruction of the parking lots, commercially available furniture made of recycled plastics).

C. PROJECT CHARACTERISTICS

The following describes the key operational and physical characteristics that are key components to the *Campus Plan 2002* 5-year plan. It is important to note that the key components were devised and influenced by the Sustainable Building Policy adopted by the District for the Proposition A Program entitled *Sustainable Building – Principles, Standards and Process*[2]. The guidelines associated with this policy address ways to integrate environmentally sustainable building practices into projects so as to minimize long-term negative effects on the environment. The guidelines apply to new buildings (occupied) over 7,500 SF and to renovation projects where the building code requires upgrades throughout the structure. As such, these sustainability guidelines would apply to the new buildings proposed for the South Campus—the portion of the campus situated between 21st and 23rd streets—and renovations proposed for the North Campus—the portion of the campus situated between 21st Street and Washington Boulevard.

Through its LEED™ (Leadership in Energy and Environmental Design) Rating System, the U.S. Green Building Council has established sustainable building measurement criteria for major renovations and new construction. Accordingly, the Project must achieve a minimum of 26 LEED™ Points, which can be accomplished through the efficient use of water, energy, and

[2] *Sustainable Building – Principles, Standards and Process (March 6, 2002). Includes proposed Amendment to Section III, Sustainable Standards ¾ New Construction (June 19, 2002).*

building materials as well as through the application of practices that improve indoor environmental quality. Specific energy conservation targets have been established for both major renovation and new construction projects. The targeted energy efficiency is to exceed Title 24 by 20 percent for new construction projects and 10 percent for major renovation projects.

1. Operational Changes

The College foresees three operational and programmatic changes. Traditionally a vocational training school, the College is seeking to expand its scope of programs in order to incorporate a broad-based liberal arts foundation that supplements the core curriculum of vocational training. In addition, the College is seeking to modernize its facilities to embrace the latest in educational technologies and techniques.

The College envisions increased opportunities for learning through the distribution of course offerings at all times and on all days, allowing a greater utilization of classroom space. Current and future programs the College would offer include the On-line Program, which already serves approximately 800 students pursuing an Associate Degree; the Apprenticeship Program, which offers courses to College students at an off-site location and also serves approximately 800 students at the present time; and other similar types of programs that would maximize space utilization of on- and off-campus facilities. By these means, increases in enrollment can be accommodated without proportional increases in classroom capacity. For example, the Project would accommodate the projected 47 percent increase in enrollment with a less than 10 percent increase in building floor area.

Below is a detailed description of three of the programs offered by the College that allow students to participate via a combination of off-site and on-site instruction, or evening coursework, thereby allowing a greater utilization of classroom space.

(a) Apprenticeship Program

Nationally, the Apprenticeship Program is encouraged and promoted by the Federal Bureau of Apprenticeship and Training as authorized by the Fitzgerald Act of 1937. In California, the program is fostered and promoted by the California Apprenticeship Council, and serviced by the State Division of Apprenticeship Standards as authorized by the Shelley-Maloney Act of 1939. The California Apprenticeship Program is a formalized industrial plan for training skilled crafts persons in all branches of a trade or technical occupation. The plan provides opportunity for the apprentice to "earn while learning" as a full-time worker while attending school as a part-time student.

The apprenticeship system is a time-tested method of training skilled workers. It combines the interests and concern of labor, management, government, and schools in training adequate skilled manpower for American industry. The training facilities of industry and the schools are coordinated in providing that portion of training to the apprentice that each is best prepared to give by virtue of their specialized personnel and facilities.

In California, an indentured apprentice is a select individual who has met all the requirements for entrance into a particular apprenticeship program. The apprentice is typically between 16 and 26 years of age, has entered into an Apprentice Agreement with an employer or a joint apprenticeship committee and the State of California, and has otherwise met all the requirements for entrance into the craft of his or her choice.

The Apprentice Agreement is a written document setting forth the basic points that govern the training of the apprentice. The agreement provides for reasonable continuous employment and training on the job and for not less than 144 hours per year of classroom instruction in the public schools. Apart from names and dates, the Apprentice Agreement also provides data on the length of the training period and the probationary period; a schedule of major work processes to be learned and the hours for each; the wages and hours of work; school attendance hours; and other special provisions.

The on-the-job training normally involves 40 hours per week of supervised work experience and instruction with an employer who has been approved by the joint apprenticeship committee for training apprentices. The apprentice is rotated through a series of organized and scheduled work experiences, which have been planned on a sequential learning basis and designed to develop the apprentice's overall skills of the craft.

(b) Cooperative Education – Work Experience Program

The Cooperative Education – Work Experience Program allows students to earn college units for their on-the-job learning experiences. Students that are employed for 20 hours or more per week at a job related to their major are eligible to earn four units of credit. Students who are employed at a job not related to their major may earn three units of credit. Through cooperation with the employer and the student, the Cooperative Education Coordinator will aid the students in writing learning objectives to be completed on the job. Assistance will be given in preparing a learning agreement during the classroom sessions. Students must be enrolled in a total of 7 units (including Cooperative Education) in order to be eligible to earn Cooperative Education units.

(c) TEACH Project Program

TEACH Project is a program, which provides a way for individuals to continue working while attending college full-time. TEACH Project provides an abridged curriculum that allows students to complete their General Educational (GE) requirements for a teaching credential in five semesters or less by attending classes two days a week. Through weekly class sessions, a student is able to carry four courses, 12 semester units and generally complete the requirements for graduation and transfer in two years. Students enrolled full-time take a cluster of 4 courses totaling 12 semester units. The cluster of classes is offered on a rotating basis, making it possible for a student to enroll in TEACH at the beginning of any semester.

TEACH classes are offered in segments of 8 weeks. Students will enroll in all four courses. Two of the classes will be taught during the first part of the academic semester and the other two will be taught the second 8 weeks that follow. Classes are held on Monday/ Wednesday and Tuesday/Thursday from 6:00pm to 9:00pm at an off-campus facility.

2. Physical Changes

To support the vision of *Campus Plan 2002*, a number of immediate physical improvements are proposed for the 5-year plan. A summary of the proposed changes is presented in Table 1 on page 30. Under *Campus Plan 2002,* the campus would be reconfigured around open space features that would reinforce the role of the northern portion of the campus as the academic heart of the College and the southern portion of the campus as the focus of recreation and community activities. In addition, the presence along Grand Avenue would be enhanced with new buildings, public spaces and gateways. Figure 2 on page 31 presents the existing campus site plan while Figure 3 on page 33 presents the proposed campus site plan. An aerial photograph of the existing campus is shown in Figure 4 on page 35 while a computer-generated aerial view of the proposed campus is shown in Figure 5 on page 37.

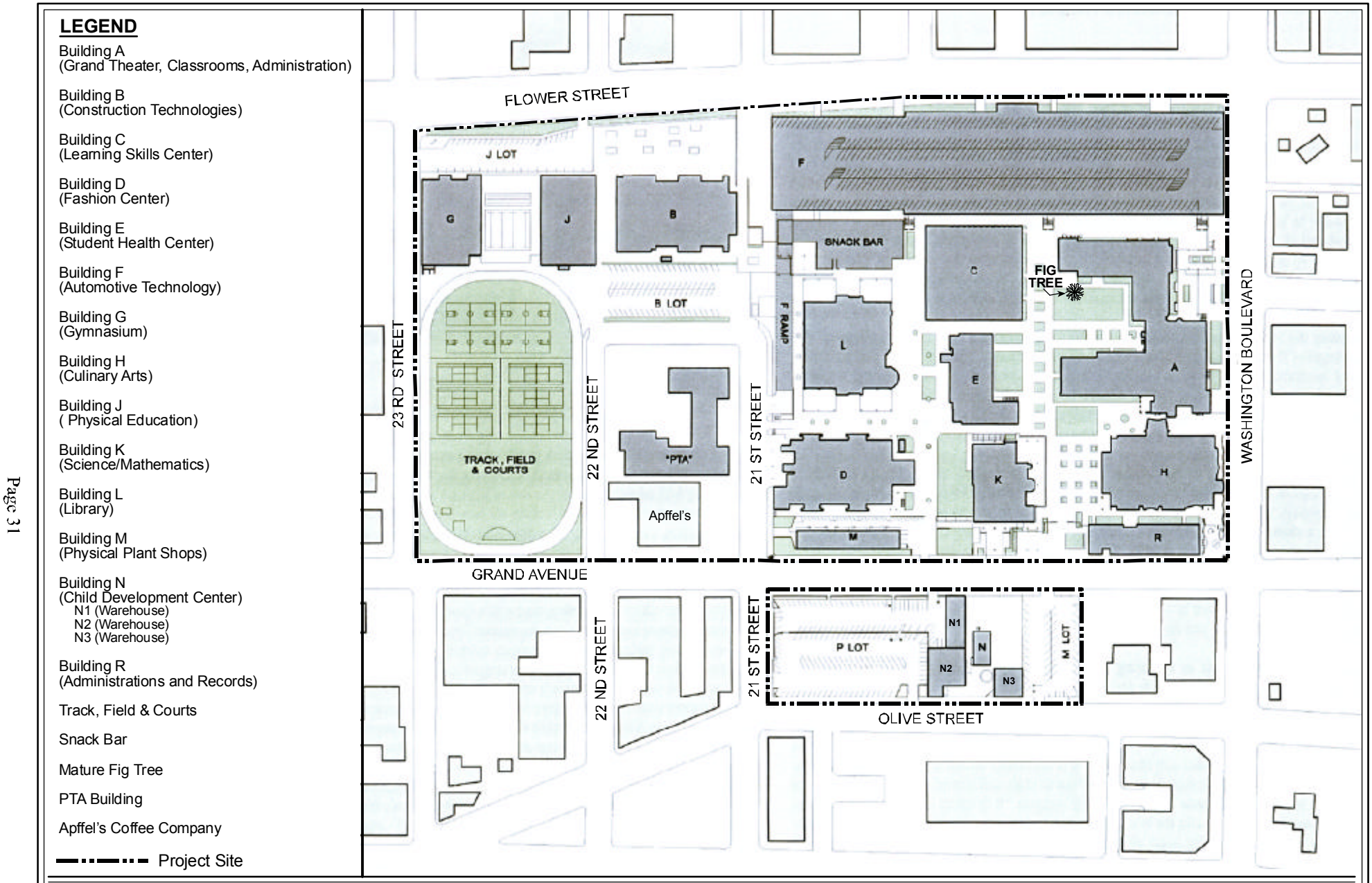
The Project involves three distinct elements: 1) the expansion, renovation, modernization, and demolition of existing buildings (Building Projects); 2) the increase in open space (Landscape and Open Space Plan); and 3) the implementation of non-structural upgrades (Utilities and Infrastructure Projects). Upon completion of the proposed Project, the campus would provide for approximately 850,000 GSF of building space and approximately 682,344 SF of open space. The separate components of the proposed Project are outlined below with greater detail of the individual and specific elements proposed for each.

Table 1

SUMMARY OF PROPOSED NEW BUILDINGS, ADDITIONS AND BUILDING REMOVALS AT THE LOS ANGELES TRADE-TECHNICAL COLLEGE CAMPUS

Building	Net square feet	Proposed height
New Buildings		
North Building	57,765 SF	75 feet
South Building	68,950 SF	75 feet
Subterranean Parking	268,632 SF	Two levels subterranean
Parking Structure (Olive Avenue)	132,300 SF	60 feet
Child Development Center	14,000 SF	30 feet
Total New	541,647 SF	
Additions To Existing Buildings		
Building D	9,261 SF	Existing
Building H	4,617 SF	Existing; 87-foot Tower Addition
Building K	12,493 SF	Existing
Building L	14,280 SF	35 feet
Total Additions	40,651 SF	
Demolition Of Existing Buildings		
Removed – Building C	(35,728) SF	-
Removed – Building E	(42,727) SF	-
Removed – Building M	(7,340) SF	-
Removed – Building N	(1,800) SF	-
Removed – Building R	(10,106) SF	-
Removed – PTA Building	(56,000) SF	-
Removed – Apffel's Coffee Company	(14,293) SF	-
Total Demolition	(167,994) SF	-
Renovation of Existing Buildings		
Building A	0 SF	Existing
Building B	0 SF	Existing
Building F	0 SF	Existing
Building G	0 SF	Existing
Building J	0 SF	Existing
TOTAL NET CHANGE IN BUILDING AREA		
Parking	400,932 SF	
Facilities, Programs And Offices	70,600 SF	

Source: Los Angeles Trade-Technical College Campus Plan 2002; *MDA Johnson Favaro, November 2000*.



Source: MDA Johnson Favaro, 2003

Figure 2
Existing Site Plan

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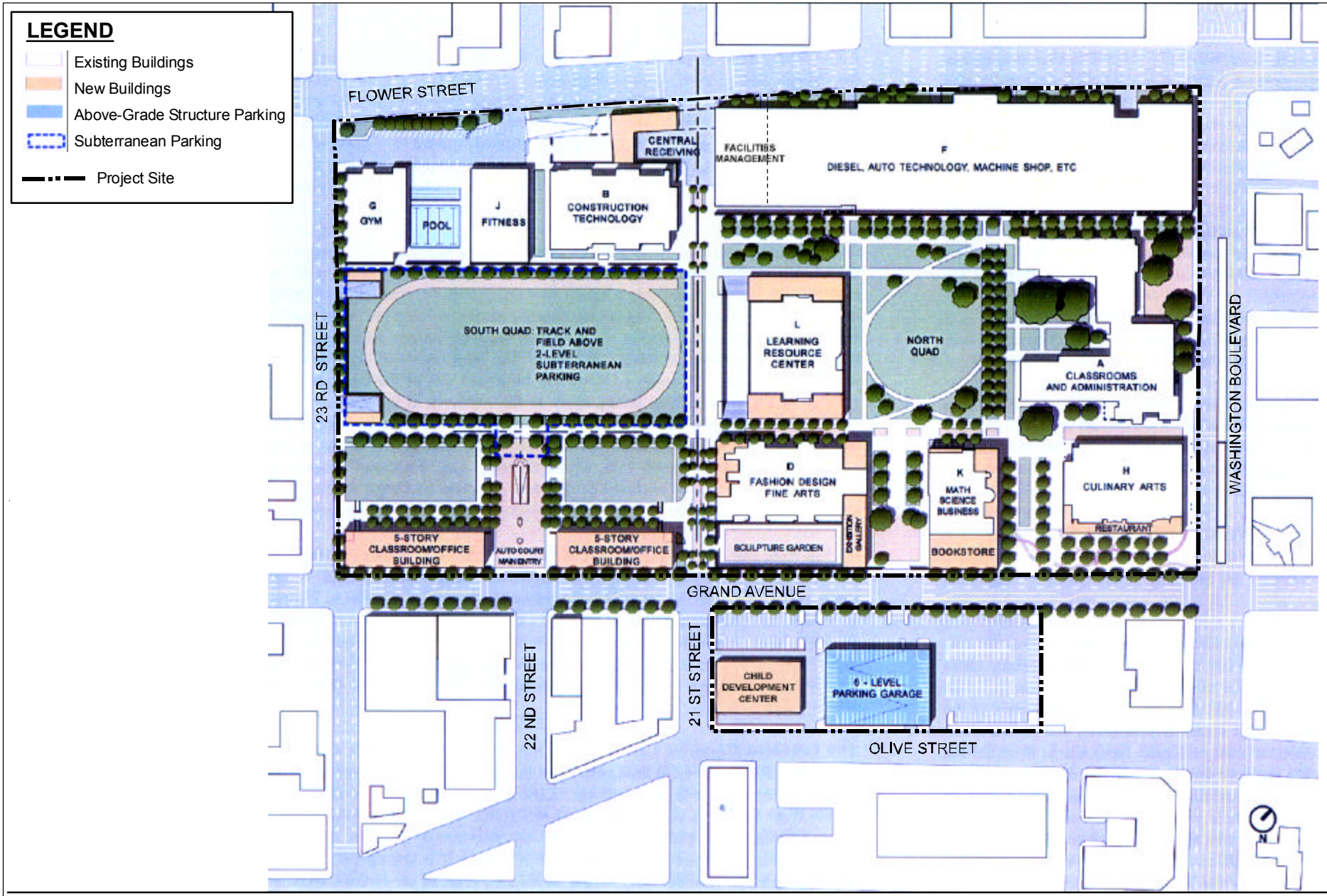

Source: MDA Johnson Favaro, 2003

Figure 3
Proposed Site Plan

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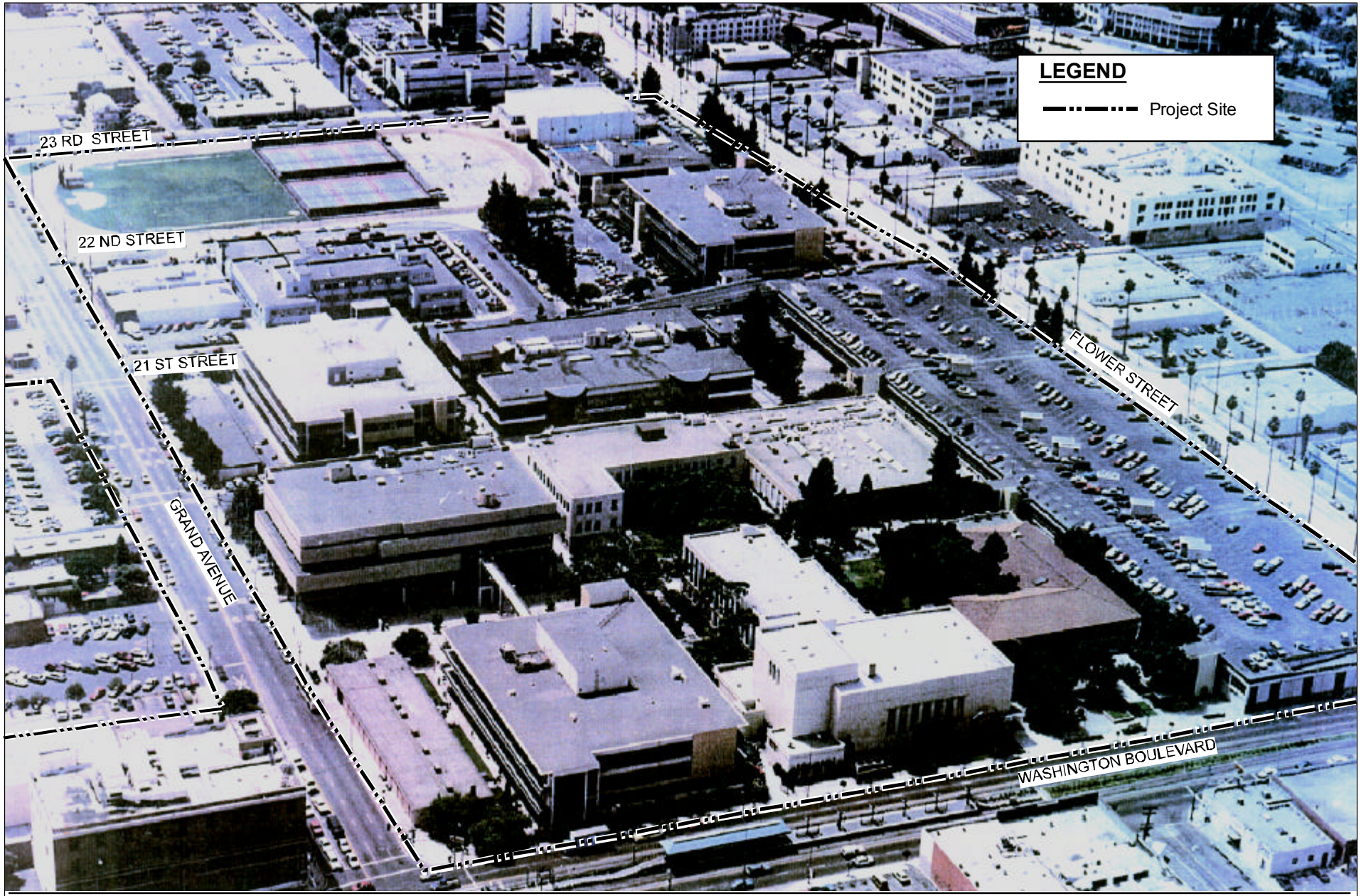

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Source: MDA Johnson Favaro

Figure 4
Aerial View of Existing Campus

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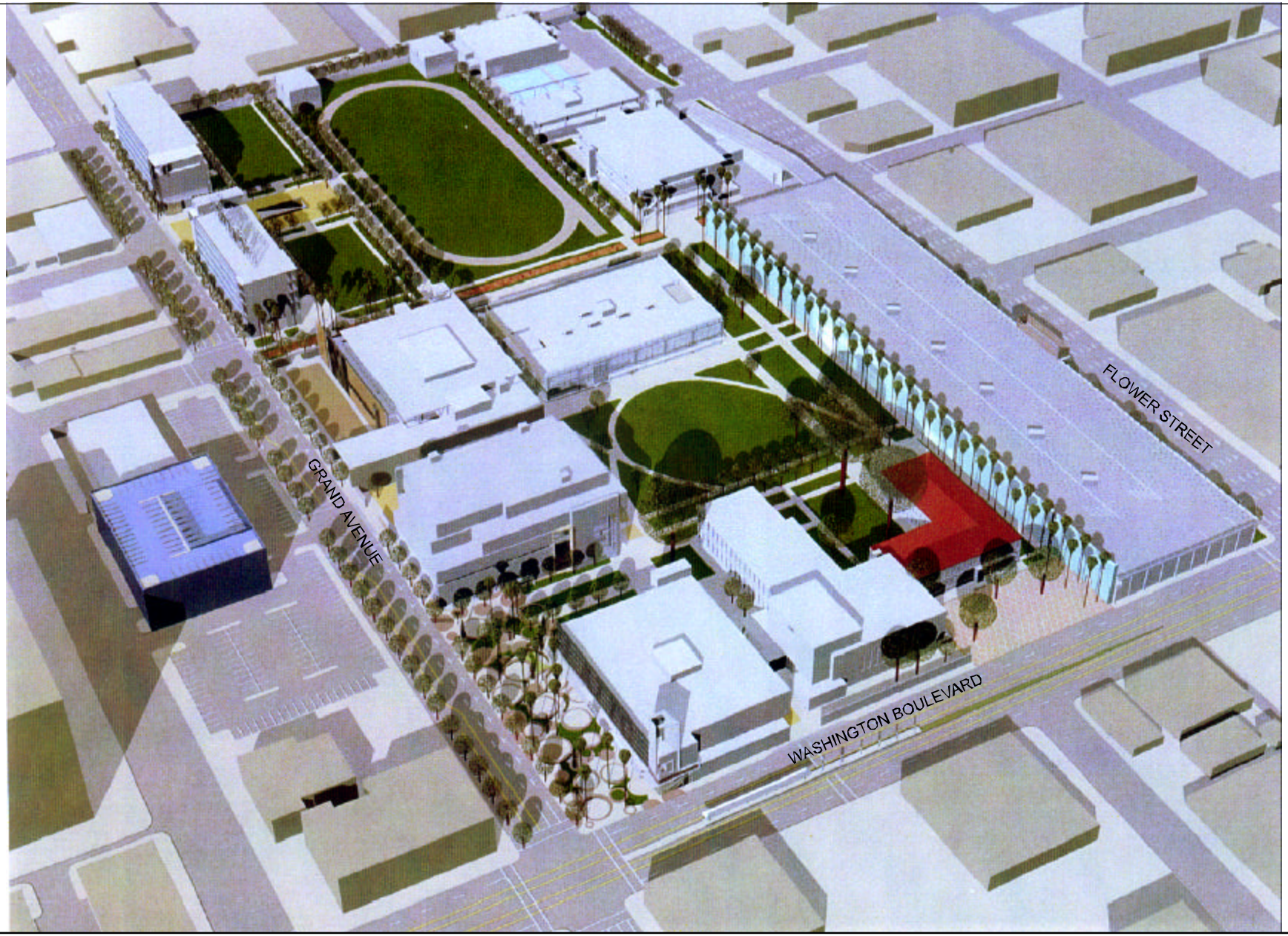

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Figure 5
Aerial View of the Proposed Project

Source: MDA Johnson Favaro, 2003

(a) Building Projects

The Project proposes seven individual building projects. These building projects define the placement, volume and configuration of the campus building space and take into consideration the goal of integrating open space to the maximum extent possible. Each building project in turn, encompasses multiple components. The seven building projects are as follows: 1) South Campus; 2) North Quad; 3) F-Ramp; 4) Building H; 5) Building K; 6) Building D; 7) Olive Avenue Parking Garage and Child Development Center.

(1) South Campus

The South Campus project is located between Grand Avenue and Flower Street, and is bounded on the south by 23rd Street and on the north by 21st Street. As part of the South Campus building project, a new automobile entry court is planned off of Grand Avenue opposite 22nd Street (Figure 6 on page 39) that would lead to a two-level, 780-car subterranean parking garage beneath the South Campus. The parking structure would be approximately 268,632 SF.

The South Campus building project includes the construction of two new five-story buildings: the Technology Building (or South Building) and the Student Services Center (or the North Building). Each of these buildings would rise to a maximum height of 75 feet and accommodate roof top features such as a café and terrace with skyline views of downtown Los Angeles. The location of these two buildings in relation to the entry court and parking structure would provide for immediate information to visitors with respect to services and registration. The Technology Building would allocate approximately 68,950 GSF to such programs as visual communication, architectural technologies/multi-media digital, computer information systems, and electronic technology while the Student Services Center would allocate approximately 57,765 GSF to support administration, business and student service programs. Combined, these new buildings would add 126,715 GSF of building space.

Implementation of this building project would involve the demolition or removal of the PTA building, the Apffel's Coffee Company building, the existing track and athletic field, Parking Lot B, and the 21st, Hope, and 22nd Streets vehicular loop off of Grand Avenue. As part of this building project, a new track and athletic field would be positioned on a north-south alignment in the center of the South Campus. The remaining buildings within the South Campus—Building G (Gymnasium), Building J (Fitness Center) and Building B (Construction Technology)—also would be targeted for renovation and modernization.

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Figure 6
View of Proposed Grand Avenue Entry

Source: MDA Johnson Favaro, 2003

The construction of the new underground parking levels and the removal of Parking Lot B as well as the curbside spaces along the loop formed by 21st, Hope, and 22nd Streets would result in a net gain of 688 parking spaces within the South Campus.

Though not integral to this particular building project, the demolition of Building R, which is located on the north campus, would be removed.

(2) North Quad

The North Quad project involves the renovation and modernization of the existing Building L (Learning Resource Center) and the creation of a centralized open space or North Quad area located on the North Campus. Renovation and modernization of Building L would involve the addition of approximately 14,280 SF of new space by enclosing the ground floor areas of the four corners of the building and adding new first and second floor area at the existing east and west entries of the building. Building height would be limited to 35 feet. Building L would receive new paint and floor finishes. Modifications to its 24,850 SF basement are also proposed that would improve access and light. The LRC would ultimately support such programs and services as the library, media center, information technology center, learning skills center, writing center, orientation and assessment center, disabled student services, and English as a Second Language.

To accommodate the new open space that the North Quad would provide, Buildings C and E would be removed entirely. This North Quad would be at the heart of the entire campus, surrounded by buildings containing most of the disciplines offered by the College.

(3) F-Ramp

There is an existing two-lane automobile ramp that connects grade-level traffic south of Building L to the parking lot located on the roof of Building F (Automotive Technology Building). The F-Ramp building project proposes to relocate this ramp from its existing location on the south of Building L to a new location parallel to Flower Street and connecting to the Building F roof-top parking. The new F-Ramp would be equipped with an automated control gate for entry and exit, and rise to 20-feet. Additionally, a new receiving facility at grade level, including a trash and mulching depot, is proposed below and east of the new ramp with a loading and delivery area. Access would be from Flower Street at 22nd Street.

In relocating the existing ramp, other appurtenant facilities would need to be removed including the 'Snack Bar' and patio area underneath the ramp, an auto storage yard and parking area for the Automotive Technology Program. The new ramp would

occupy the area currently utilized as the construction technology yard. To accommodate the new ramp, the construction technology yard would be relocated to College-owned property at the northeast corner of Washington Boulevard and Flower Street.

(4) Building H

The Building H project involves the modernization, renovation and expansion of Building H (Culinary Arts Building). Specific improvements include the construction of a façade with a sign or multi-media message board on the north and east side and a tower reaching a height of about 87 feet. The main façade would be situated parallel with Grand Avenue and the tower would be situated at the northeast corner of the building (Figure 7 on page 43). Reconfiguration of its loading dock to accommodate 30-foot trucks would also occur. Approximately 4,617 SF of new space would be constructed as part of this building, supporting a restaurant and bakery shop. The open space resulting from the removal of Building R would be developed into a new piazza.

(5) Building K

The Building K project involves both renovation and expansion of Building K (Math Science Business Building) with an emphasis on enhancing its facade. It currently houses the bookstore, Student Union, business administration offices, administration offices, computer information system services, foreign language programs, personnel/payroll operations, and science and mathematics programs. The total floor area for the addition is approximately 12,493 SF to be achieved through the enclosure of the ground floor along Grand Avenue and the north and west side of the building. Currently, the Student Union in housed in the basement and would ultimately be relocated to the ground floor in the newly enclosed space. The proposed uses within this building would include: bookstore, coffee shop, loading dock, mortgage and finance operations, community planning/economic development operations, science and mathematics, nursing programs, student government operations, Student Union and copy center. The approximate 16,751 SF of basement space would be renovated to support warehouse and storage use, as well as science and mathematics labs. A college and bookstore identification sign would be added to the building's west and northwest sides with direct line of site to Grand Avenue. Existing heights would be maintained.

(6) Building D

The Building D project would involve the removal of Building M (Physical Plant) located along Grand Avenue just east of Building D (Fashion and Fine Arts Building) with the resulting new space transformed into a Sculpture Garden. The southwest corner of Building D would be enclosed thereby eliminating existing parking and loading area.

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Figure 7
View of Proposed Project from Washington at Grand

Source: MDA Johnson Favaro, 2003

Similarly, the northwest and northeast corners of the building would likewise be enclosed providing for the expansion of the existing indoor Exhibition Gallery. The expanded Exhibition Gallery would lead directly to the new Sculpture Garden along the east side of the building. Additionally, the third floor classroom space would be renovated to accommodate art studios and the basement would receive some minor renovations. Because of its visibility to passersby along Grand Avenue, this building would also be treated with some form of façade screening specific to its program. Existing building heights would be maintained including the addition of the new facades.

Proposed uses and operations within Building D include: fashion design and merchandising, costume library, cosmetology, gallery, vocational studies, labor enter, international student programs, grant programs, PACE office, Americorp, recruitment, CAL Works, community service and Sheriff's Department. The 13,560 SF existing basement would accommodate the Plant Facilities and Sheriff's Department as well.

(7) Olive Avenue Parking Garage and Child Development Center

This building project is located directly east of the main campus and north of 21st Street, between Grand Avenue and Olive Avenue. It involves the construction of a six-level 400-car parking structure reaching a height of about 60 feet and an adjoining parking lot that would accommodate 150 cars. The new parking structure would be approximately 132,300 SF and the surface parking lot would encompass 54,000 SF. Demolition of Building N, miscellaneous adjacent buildings and the existing P and M Lots would be required. There would be a net gain of 557 parking spaces as a result of this building project.

As Building N currently provides for child development and care services, a new 14,000 SF Child Development Center would be constructed at the northwest corner of Olive Street and 21st Street. To reduce construction-related air quality and noise effects associated with construction of the adjoining parking facilities, the Child Development Center is not expected to be occupied during the summer months when a majority of the site preparation work would occur.

(b) Landscape and Open Space Plan

The Project would involve the implementation of a Landscape and Open Space Plan. Within the Landscape and Open Space Plan, the existing open space on campus is described as fragmented and ill defined, and its circulation (entry points and pathways) non-descript and difficult to navigate for the first time visitor. Furthermore, the important corner entrance area at Washington Boulevard and Grand Avenue is considered inadequate in size for its literal

intersection of campus and community.[3] Since the College was constructed sequentially, the whole of the campus including its open spaces was affected with every physical change. The proposed Project would reconfigure the existing disjointed and paved open spaces to create a central campus quadrangle with well-defined secondary quadrangle and garden spaces, and enhance the athletic facilities (e.g., track and field) at the College. This concept acknowledges the important role of open space within a park-deprived area of Los Angeles and the community reliance on the College for public park-like space. The term "campus" has come to represent an aggregate and interconnection of spaces between college buildings; a collection of outdoor rooms and corridors that enrich the student learning experience, the daily lives of people who work in academic settings, and the visitor.[4] In this tradition of American campus architecture the District and College wish to substantially improve the physical character and functionality of the whole campus at once, actions uniquely afforded through Proposition A.

The Landscape and Open Space Plan identifies landscape improvements linked to the individual building projects. Landscaping improvements associated with each of the building projects would involve the planting of trees along perimeter streets of the campus and along interior campus walkways, providing visual connectivity. Piazzas and courtyards are incorporated into the design plans to provide welcoming gateways. Other landscape design features include 'quads', lawns, fields, and gardens located strategically throughout the campus. Six distinct landscape typologies have been identified and are described below:

(1) South Campus

Integral to the landscape improvements proposed for the South Campus is the planting of street trees along Grand Avenue and the perimeter of the new track and athletic field. Tree-lined pathways alongside the proposed new structures and open areas or new 'fields' would also be integrated. The fields would essentially provide space for informal recreation and gathering with the potential for development in the future. The new auto court would be enhanced with a new water feature or comparable feature directing the flow of traffic.

(2) North Quad

The proposed new North Quad would receive both landscape and hardscape treatments. Trees would be planted in or around the quad to provide shade and to define

[3] Los Angeles Trade-Technical College, *Campus Plan 2002*, Landscape and Open Space Plan, MDA Johnson Favaro (November 2000), page 2.

[4] *Moore Ruble Yudell*, Campus and Community, *Rockport Publishers, Inc., 1997.*

designated pathways. Hardscape features would include the addition of benches and other seating areas.

(3) Exterior Building A

The exterior of Building A (Administration Building) would be reconfigured and the existing courtyards that surround the building would be adequately landscaped to provide for outdoor classroom instruction and informal gathering opportunities while enhancing the interest and open space variety of the campus. In particular, a solid wall with gates enclosing the Washington Theatre Courtyard on the north side of Building A is proposed. This hardscape enclosure would ensure the tranquility and protection of this space relative to the vehicular activity along Washington Boulevard.

(4) Exterior Building H and K

The exterior of Building H (Culinary Arts Building) supports the proposed new piazza along Grand Avenue and new campus entryway to the east. The piazza would serve as the first introduction of the interior garden components of the campus while sustaining a highly visual and urban feel consistent with the nearby city intersection. Hardscape features such as tables, chairs, benches, and paved edges would be incorporated into the piazza while at the same time introducing both deciduous and evergreen trees to the area. A mature ficus tree currently dominates the space between Buildings H and K but it is seriously stressed. Landscaping improvements would include the possible removal of this tree and replacement with a mature Magnolia tree. The courtyard area just outside of Building H to the south would also be enhanced through the planting of tree alleys with some sort of water feature. Landscape improvement would also be made to the space adjacent to the Building K (Math Science Business Building) and would involve planting of trees within the courtyard and the placement of permeable material for increasing groundwater infiltration.

(5) Exterior Building D

Landscape improvements to Building D (Fashion and Fine Arts Building) would include an enclosed garden adjacent to its new exhibition gallery and a new pedestrian entry court with a grove of trees. This courtyard would be supplemented with paving and seating to provide for a more 'room-like' outdoor setting. It would also be enhanced with a campus landmark to distinguish the space from other campus locations.

(6) Exterior Building F

Landscape improvements to Building F would include the planting of trees along Flower Street from Washington Boulevard to 21st Street and between 22nd Street and 23rd Street.

(c) Utilities and Infrastructure Projects

The proposed Project also involves improvements to the existing utility, mechanical, plumbing, electrical, and information technology systems. The construction of additional sanitary sewer lines, storm drain, and water lines within the campus. Each additional utility line would be connected to an existing off-site public line. Specifically, the proposed Project would involve the following:

(1) Sewer

The proposed Project would involve the construction of approximately 200 linear feet (LF) of 8-inch main pipe to connect to existing sanitary sewer lines and associated laterals totaling approximately 900 LF.

(2) Storm Drain

The proposed Project would involve the construction of 3,200 LF of storm drain pipe up to 21-inches and approximately 1,500 LF of associated lateral lines and inlets up to 10-inches for the drainage of the new soccer fields, parking lots, building roofs and landscaping. Five new stormwater treatment facilities designed in compliance with SUSMP requirements would also be constructed to retain and treat surface water runoff from the campus during a 10-year storm event and the 30-year plan.

(3) Water

The proposed Project would involve the construction of approximately 800 LF of lateral water pipelines up to 8-inches in diameter and the construction of new meters, pressure valves and backflow devices for the new buildings.

(4) Heating, Ventilation and Air Conditioning (HVAC)

The proposed Project would involve the installation of a Water Source Heat Pump to provide for the most economical and practical air conditioning to the proposed new buildings. Building specific air conditioning needs would be independently assessed and the appropriate cooling system incorporated into the design of each proposed new

building. Likewise, the ventilation needs for the subterranean parking structure would be assessed and the appropriate form of exhaust or ventilation system in accordance with the Uniform Building Code would be incorporated into the design.

(5) Plumbing

The two new buildings proposed on the South Campus along Grand Avenue would require new sewer lines (6 inches), gas lines (3 inches) and new water lines (4 inches). The new Child Development Center would also require a new water line (3 inches), gas line (2 inches), and a new sewer line (4 inches). A foundation drain system would be incorporated into the design of the proposed new subterranean parking structure.

(6) Electrical

The existing campus is in need of an electrical overhaul. As part of the proposed Project, a complete new service would be implemented involving new optic lines.

(7) Information Technology

The proposed Project involves upgrades to the campus' existing telephone system to provide phone service and voicemail to the whole campus. It also considers the need to provide sufficient space and environmental conditions for an expanding Network Operations Center which accommodates the Server, data network equipment, and routers for the campus.

(d) Access and Parking

Access to the campus, including parking, would be improved as a result of the Project. Campus parking would be focused in three locations: the two parking levels beneath the recreation field; the 6-story garage and surface lot on the east side of Grand Avenue; and the roof parking on Building F. In addition, the small surface lot along Flower Street next to the gymnasium would remain. Access to the subterranean parking levels would be through the auto-court on Grand Avenue opposite 22nd Street. Flanked by the two new 5-story buildings, the auto-court would function as the principal gateway to the new campus, as shown in Figure 6 on page 39. Secondary entries to the subterranean garage would be at mid-block on 23rd Street. The garage on the east side of Grand Avenue would be reached from Olive Street. The new ramp to the parking on the roof of Building F would connect to the small lot along Flower Street. The primary service access would be from Flower Street opposite 22nd Street to the new central receiving area under the new Building F roof access ramp.

During the design process for each building project, the College would check with the Bureau of Engineering Land Development Group to determine the highway dedication or street widening requirements in order to improve and construct along the Project frontage in accordance with standards adopted by the City. In so doing, the College acknowledges the existence of the Transportation Element of the City of Los Angeles General Plan adopted by City Council and Section 12.37 of the Los Angeles Municipal Code which require that the College in its role as the developer adhere to any highway dedication and street widening requirements of the General Plan, unless the District governing board votes to exempt the Project from local planning and zoning requirements.

(e) Visual Character

The visual transformation of the campus would be noteworthy. With the new quad and repositioning of the athletic field, the center of the campus would be more open. At the same time, the new buildings and renovations of existing buildings along Grand Avenue would create a strong street presence with defined gateways into the interior of the campus, such as the auto-court opposite 22nd Street on Grand Avenue and the piazza at Washington Boulevard.

In summary, the new campus would be organized around central open space features, with clearly defined campus gateways, almost double the open space, and a net gain of over 70,600 SF of building space[5] and 1,100 parking spaces. The overall development density of the campus would change only slightly from a current Floor Area Ratio (FAR) of 0.66 to a future FAR of 0.68.[6] The percentage of the campus devoted to building footprint would not increase while at the same time the proportion of the campus devoted to open space would increase from 30 percent (355,316 SF) to 55 percent (682,344 SF). This transformation would be achieved by reorganizing the circulation, parking and service spaces to be more efficiently allocated.

D. CONSTRUCTION

The proposed Project would be constructed over a period of about six years, beginning October 2003 and ending July 2009. Table 2 on page 50 shows an estimated construction schedule for demolition, new construction, renovation and non-structural related activities. Additionally, it is estimated that approximately 112,037 cubic yards (cy) of dirt would be excavated and exported to accommodate the construction of the subterranean parking structure

[5] *Not including area within parking structures.*

[6] *FAR calculations do not include floor area within parking structures, consistent with the definition in the City of Los Angles Municipal Code.*

Table 2

ANTICIPATED CONSTRUCTION SCHEDULE

ACTIVITY	BUILDING	YEAR TO COMMENCE
DEMOLITION		
	PTA Building	2003
	Existing Athletic Field/Parking Lot B	2004
	Apffel's Coffee Company	2004
	Building N (Child Development Center)	2005
	Existing F-Ramp/Snack Bar	2005
	Building C (Learning Skills Center)	To Be Determined
	Building E (Student Health Center)	To Be Determined
	Building M (Physical Plant)	To Be Determined
	Building R (Administration and Records)	To Be Determined
NEW CONSTRUCTION (including Utility and Infrastructure Upgrades)		
	Construction Technology Yard	2003
	New F-Ramp/Central Receiving	2005
	New Child Development Center	2004
	Subterranean Parking and Athletic Field	2004
	North Building (Student Services Center)	2005
	South Building (Technology)	2005
RENOVATION AND EXPANSION (including Utility and Infrastructure Upgrades)		
	Building A (Grand Theater and Administration)	To Be Determined
	Building B (Construction Technologies)	2003
	Building D (Fashion and Fine Arts)	To Be Determined
	Building F (Automotive Technology)	2003
	Building G (Gymnasium)	2005
	Building H (Culinary Arts)	2007
	Building J (Physical Education)	2005
	Building K (Math Science Business)	To Be Determined
	Building L (Learning Resource Center)	2007
LANDSCAPING		
	On-site	On-going
	Off-site	2008

Source: Los Angeles Trade-Technical College Campus Plan 2002; ACG+AVA, April 2003

proposed for the South Campus. Pursuant to the District's policy for Sustainability, materials removed during demolition will be recycled wherever possible.

Demolition (November 2003 – September 2005)

Demolition activities would involve abatement of hazardous materials such as asbestos and lead-based paint; the sorting and recycling of reusable building materials to the extent practicable; and the removal and offsite disposal of waste. The buildings to be removed include the PTA Building, buildings C, E, R, M and N, and the buildings and structures on the Apffel's

Coffee Company parcel, when acquired. The demolition of the existing F-ramp would occur upon completion of the new F-ramp scheduled for September 2005.

New Construction (October 2003 – April 2005)

Construction activities would begin with the Technology Yard commencing in October of 2003, followed by the construction of the new F-Ramp and Child Development Center scheduled for December of 2004.

Excavation and construction of the new underground parking structure is scheduled for November 2004 followed by the construction of the athletic field. Construction of the subterranean parking structure would involve removal of approximately 112,037 cubic yards (cy) of earth from the Project site. To remove this amount of earth from the Project site, approximately 7,469 trucks with a carrying capacity of about 15 cy would be used. This activity would be scheduled during daytime hours and, to the extent possible, would avoid traffic A.M. and P.M. peak periods.

Construction of the two new South Campus buildings would begin in September of 2005. Other improvements including landscaping would commence in February of 2007.

Renovation (April 2005 – July 2007)

Project renovations, including building expansion, would begin with the Building G (Gymnasium Building) scheduled for April 2005, followed by the Building H (Culinary Arts Building) and Building L (Learning Resource Center) both scheduled for October 2007.

Landscaping (February 2008 – May 2008)

Landscaping construction activities includes improvements to the roadways, walkways, grounds and parking lots and would commence almost immediately upon completion of the structural improvements. Offsite landscaping improvements are scheduled for February 2007.

E. DISTRICT REGULATIONS

District regulations require a Draft EIR to discuss the Project relative to the following topics: sustainability, zoning consistency, and student enrollment growth.

1. Sustainability

The Project must achieve a minimum of 26 LEED™ Points, which can be accomplished through the efficient use of water, energy, and building materials as well as through the application of practices that improve indoor environmental quality. Specific energy conservation targets have been established for both major renovation and new construction projects. The proposed Project[7] promotes sustainable development principles and better management practices for both architecture and open space development. Specifically, the proposed Project would implement the following sustainable building principles to the maximum extent practicable:

- The targeted energy efficiency is to exceed Title 24 by 20 percent for new construction project and 10 percent for major renovation projects.
- Planted roofs or "cool roof systems" would be utilized to insulate buildings and reduce cooling needs.
- Tree canopies on the west and south side of buildings would be used to cool them, reducing air conditioning needs.
- Efficient irrigation systems (equipment and controls) would be used to reduce water usage. Water features would incorporate systems for recirculation of water.
- Permeable paving materials would be used in parking areas and pathways when possible. These materials would include decomposed granite, porous asphalt or unit pavers set on permeable base material.
- Recycled materials (e.g., asphalt and concrete) would be used in future construction, such as future paving. Commercially available materials include site furniture composed of recycled plastics.
- Reduction of Heat Island Effect on buildings, mechanical cooling systems and paved areas would be achieved through tree plantings that create shade from the sun during warm periods of the day.

2. Zoning Consistency

The proposed Project is located within the City of Los Angeles. The City's Southeast Los Angeles Community Plan Area identifies the College campus as a "public facility" surrounded by industrial uses. The college use is consistent with this land use designation. The

[7] Los Angeles Trade-Technical College, *Campus Plan 2002*, Landscape and Open Space Plan, page 5.

Project site is zoned Multi-Family Residential [R4], Commercial [C2] and Industrial [M1]; and, therefore the College is a pre-existing, non-conforming use. To achieve consistency with City zoning the Project would require City approval of a zone change or a Conditional Use Permit, and possibly a parking variance.

Los Angeles Municipal Code (LAMC) Section 12.21.A.4(c)(7) specifies the minimum number of parking spaces for a community college type of use. One (1) space is required for each 50 square feet of floor area contained within classrooms and assemble areas or one parking space for each five fixed seats contained with classrooms and assembly areas, whichever is greater. For classroom areas in which heavy equipment is used in training, one parking space is required for each 500 square feet of floor area.

The existing College campus includes classroom space and assembly areas for several departments allocated in several buildings. The proposed Project would result in approximately 288,320 SF of classroom space and approximately 259,600 SF of classroom space in which heavy equipment would be used.[8] Based on the LAMC parking regulations, the College would need 6,286 parking spaces. The College currently provides 1,439 parking spaces to serve its estimated 780,000 GSF of building floor area. The proposed Project would increase the building floor area by approximately 70,600 GSF for a total of 850,600 GSF. Of the 70,600 GSF approximately 56,480 SF would be usable square feet.[9] Using the LAMC parking criteria, 1,130 parking spaces would be needed for the Project's increase in usable building floor area. The proposed Project would provide 1,100 parking spaces more than exists on the campus, for a total of 2,598 parking spaces, excluding off-campus metered parking along streets surrounding the College.

3. Student Growth Projections

The proposed Project would provide the campus facilities necessary to accommodate up to 21,300 students. The existing estimated College enrollment is approximately 15,000 students. In order to present a conservative worse case scenario for CEQA purposes, it has been assumed within this Draft EIR enrollment would reach 21,300 by the opening year—2007. Future enrollment growth (participation rate) is dependent upon a number of key factors such as the availability of State funding; the College's academic programs, course scheduling, and campus facilities; business and industry needs; and demographic characteristics. At the present time,

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[8] Los Angeles Trade-Technical College, *Campus Plan 2002*, Appendix II—Campus-wide Departmental Space Inventory and Distribution Map.

[9] *The "usable" or assignable square feet (ASF) estimate excludes corridors, elevators, storage rooms, mechanical equipment spaces, and other similar spaces.*

these factors strongly suggest the enrollment for the opening year would be slightly less than 17,000.

The College plans to accommodate its enrollment growth in part through course scheduling. Through its course schedule, the College would ensure the campus student population does not exceed 35 percent during any given time frame. The existing percentage of the student population on campus weekdays is as noted below; the remaining 12 percent are on campus Saturdays and Sundays:

- 7:00 A.M. to Noon 35 percent
- 1:00 P.M. to 5:00 P.M. 21 percent
- 6:00 P.M. to 10:00 P.M. 32 percent

F. INTENDED USES OF THE EIR, RESPONSIBLE AGENCIES AND DISCRETIONARY ACTIONS

This EIR assesses the Project (5-year plan) for the purposes of complying with CEQA prior to action by the District Board of Trustees. As part of the implementation of this Project, additional approvals and permits would be required. These include demolition, drainage and grading permits granted by the City of Los Angeles. The Project would also require zoning approvals granted by the City of Los Angeles, including a zone change, conditional use permit, and parking variance. Despite the independent sovereignty of the District, the Project must comply with applicable building and zoning ordinances of the City, unless the governing board of the District votes to expressly exempt the Project. On- and off-site drainage infrastructure and roadway improvements would be subject to review and approval by the appropriate local agency. In addition, the Project would be subject to review and approval by the California Division of State Architect pursuant to the Education Code. This Draft EIR serves as environmental compliance documentation for these and any other related permits or approvals required as part of the implementation of the Project.

III--General Description of Environmental Setting

III. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING

California Environmental Quality Act (CEQA) requires a description of the environmental context for the proposed Project in order to adequately investigate and discuss the significant effects of the Project (CEQA Guidelines Section 15125). The purpose of this section is to provide the reader with a generalized overview of the regional and local setting in which the proposed Project site is located, and to introduce the baseline physical conditions by which the District and the College determine whether an impact is significant. Detailed setting descriptions are provided within Section V., Environmental Impact Analysis, of the EIR which is presented by environmental topic.

A. SETTING

1. Location and Regional Context

The Project site is composed of the existing College campus and the adjacent property at 2115 S. Grand Avenue, presently utilized as a commercial use (Apffel's Coffee Company). The immediately surrounding properties are mostly commercial, industrial and public service in nature, with residential areas within a few blocks. The Project is situated just southeast of the intersection of the Santa Monica Freeway (I-10) and the Harbor Freeway (I-110). To the north of the Project site is downtown Los Angeles, including Staples Center and the LA Convention Center; to the east and south of the Project site is the Southeast Los Angeles neighborhood; the South Central neighborhood is to the west, with Exposition Park and University of Southern California's University Park Campus to the southwest.

Though located within the City of Los Angeles ("the City"), the College is part of the Los Angeles Community College District service area. Despite the independent sovereignty of the District, the Project must comply with applicable building and zoning ordinances of the City, unless the governing board of the District votes to expressly exempt the Project. The City governs land use policy and development standards through the General Plan of the City of Los Angeles and the Planning and Zoning Chapter of the City of Los Angeles Municipal Code.

At the regional level, the Southern California Association of Governments (SCAG), the Metropolitan Transportation Authority (MTA), and the South Coast Air Quality Management District (SCAQMD) have jurisdiction over planning and land use issues. SCAG's Regional Comprehensive Plan and Guide (RCPG) contains a general overview of federal, state, and regional plans applicable to the southern California region and serves as a comprehensive planning guide for future regional growth. The primary goals of the RCPG are to improve the standard of living, enhance the quality of life, and promote social equity. The Metropolitan

Transportation Authority administers the state-mandated Congestion Management Plan (CMP), designed to address the community and regional impact of urban congestion. The primary goal of the CMP is to enhance economic vitality and quality of life by reducing traffic congestion. SCAQMD's Air Quality Management Plan presents strategies for achieving the air quality planning goals set forth in the Federal and California Clean Air Acts.

2. Air Quality

The Project site is located within the 6,600 square mile South Coast Air Basin (Basin). SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment, which currently includes ozone, CO, and PM_{10}. SCAQMD's Air Quality Management Plan (AQMP) lists pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional and local population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG)in cooperation with local jurisdictions within Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties. The Regional Comprehensive Plan and Guide prepared by SCAG includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation control portions of the AQMP and are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP.

3. Cultural Resources

The College encompasses the site of the former Los Angeles Polytechnic High School ("Poly High"), begun in 1897 as a commercial branch of the only high school in Los Angeles at the time, Los Angeles High School. By the 1950s, the growing commercialization of the area led to the decision to close the high school and the campus became the College. Over the past forty years the College has expanded southward to 23rd Street and various buildings from the Poly High were replaced by newer, larger facilities. Remaining Campus buildings that are over 45 years of age include the buildings at 1948 and 2208 South Grand. Both appear ineligible for federal, state, or local designation due to a lack of sufficient historical and/or architectural importance necessary to merit recognition as a historical resource as defined by CEQA. In addition, the Project site encompasses a commercial property associated with Apffel's Coffee Company, a highly recognized local family business operating at this site for over fifty years. Currently, no portion of the Project site is listed on either the National Register of Historic Places or the California Register of Historical Resources, nor is it a designated City of Los Angeles Historic-Cultural Monument. The City has been committed to on-going survey and inventory work of its historic resources; however, the subject property has not been previously identified or surveyed as part of this past work effort.

4. Noise

The noise environment in the Project area is dominated by traffic noise from nearby roadways and the Blue Line Light Rail Transit line. The heaviest traveled roadways in the vicinity of the Project site include Washington Boulevard, Grand Avenue, and Flower Street, which border the Project site to the north, east, and west, respectively. Secondary noise in the area persists from general commercial/industrial-related activities (e.g., delivery and solid waste collection trucks). Ambient noise levels in the Project area are typical of noise levels experienced within urbanized areas.

5. Transportation and Circulation

The Project site is centrally located in the Los Angeles region, near the intersection of the Santa Monica Freeway (I-10) and the Harbor Freeway (I-110). The Project site is bounded by Washington Boulevard on the north, Flower Street on the west, 23rd Street on the south, and Grand Avenue and Olive Street on the east. Other major arterials that serve the Project area include Figueroa Street, one block west of Flower Street, and Adams Boulevard, one block south of 23rd Street. Washington Boulevard features the MTA Blue Line train along the median with a stop just west of the intersection with Grand Avenue. In addition, the Project area is served by bus lines operated by the MTA, the Los Angeles Department of Transportation, Torrance Transit, Foothill Transit, and Gardena Municipal Bus Lines.

B. RELATED PROJECTS

CEQA requires that Environmental Impact Reports analyze "cumulative impacts", defined in CEQA Guidelines Section 15355 as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." In addition, CEQA Guidelines Section 15130 indicates that the analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed Project, but instead is to "be guided by the standards of practicality and reasonableness."

Cumulative impacts are anticipated impacts of the Project along with reasonably foreseeable growth. According to CEQA Guidelines Section 15130(b)(1), reasonably foreseeable growth may be based on: [10]

- A list of past, present, and probable future projects producing related or cumulative impacts; and/or

[10] *Clarification based on Communities for a Better Environment v. California Resources Agency (2002)*

- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

Cumulative study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area, and related projects contained within, for each individual environmental impact issue may vary. For example, a cumulative visual impact generally could only affect the area within the view of the Project site, while a cumulative air quality impact could affect the entire South Coast Air Basin. The specific boundaries, and the related projects within those boundaries, for the cumulative study area of each environmental issue, are identified in the applicable environmental issue section in Section V., Environmental Impact Analysis, of this Draft EIR.

IV--Effects Not Found to be Significant

IV. EFFECTS NOT FOUND TO BE SIGNIFICANT

Public Resources Code section 21002.1 and CEQA Guidelines Section 15128 require a statement briefly indicating the reasons why the lead agency determined that various possible significant effects actually were not significant and were not discussed in detail in the EIR. This section discusses those anticipated effects of the Project that were determined, through the Initial Study process, to not require further analysis in the EIR. The following is a summary of the determinations made in the Initial Study.

A. Aesthetics

As identified in the Initial Study, the surrounding area is generally flat, primarily urban in nature and does not contain views classified as scenic vistas or designated scenic highways. The Project site does not contain any unique or valuable scenic features. The Project would not impede any currently unobstructed vistas. The Project would substantially alter the visual character of the site. However, the Project is designed to improve the visual quality of the site. Project related changes in lighting and glare would not be substantial as compared to the existing lighting and glare associated with the site and surrounding conditions. Therefore, the impacts of the Project on aesthetics would not be significant.

B. Agricultural Resources

The Project site is already developed with an urban use and is located in an urban setting. There are no agricultural uses or related operations on or near the site. Due to its urban setting, the site area has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency and no land in the surrounding area is zoned for agricultural use nor enrolled under the Williamson Act. Therefore, the Project would have no impact to agricultural resources.

C. Air Quality

Potentially significant impacts to air quality were identified in the Initial Study and are analyzed in this EIR. However, the Initial Study also determined that some possible air quality impacts would not be significant. Specifically, the Project is not expected to conflict with or obstruct the implementation of the South Coast Air Quality Management District's Air Quality Management Plan. Additionally, no objectionable odors are expected as a result of Project construction or operation. Objectionable odors are typically associated with waste handling,

treatment and disposal facilities and with industrial operations that utilize strong-smelling elements or processes. The Project does not include these types of uses or activities.

D. Biological Resources

Because of the urban history of the Project site and the high levels of urban activity in the immediate area, the site is not a habitat location for candidate, sensitive, or special status species. No waterbodies, wetlands, riparian habitat or other sensitive natural communities exist on the site. No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans are applicable to the site. The site does contain ornamental, shade and recreational landscaping. The Project would reconfigure these features with a net gain in landscaped area. As such, the impact on biological resources was determined not to be significant.

E. Cultural Resources

Potentially significant impacts on cultural resources were identified in the Initial Study and are analyzed in this EIR. However, the Initial Study also determined that some possible impacts on cultural resources would not be significant. Specifically, impacts on archeological resources, paleontological resources, and human remains were found not to be significant. No prehistoric archeological sites, unique paleontological resources, or human remains are known to be present on the Project site. The Project site is located within an urbanized area and has been fully developed and subject to disturbance for decades, thus surficial resources that could have been present would likely have been disturbed or removed previously. Though no archeological resources, paleontological resources, or human remains are expected to be uncovered, construction monitoring would evaluate and address any such resources that might be uncovered. Therefore, the Initial Study found that the Project would not have a significant impact on subsurface cultural resources.

F. Geology and Soils

The Project site is located in the seismically active Southern California region and the potential exists for moderate to strong ground shaking to occur at the Project site during large local seismic events. However, the site is not located within a designated Alquist-Priolo Special Study Zone area, an Earthquake Fault-Rupture Hazard Zone as designated by either the State of the County, or a Fault Rupture Study Area as designated by the City. Additionally, the Project site is not within an area identified as susceptible to liquefaction. Based on the location, geology and topography of the site and based on adherence to applicable safety requirements and construction specifications, the Project would not expose people or structures to substantial adverse effects associated with ground shaking, fault rupture, liquefaction, landslide, mudslide, settlement or expansive soils. Construction processes would include erosion control measures.

Landscaped areas would be maintained with vegetative cover, site drainage would be integrated into the surrounding urban stormwater management system and the Project would be connected to the City's existing wastewater disposal and treatment system. Therefore, geology and soil impacts were determined to be less than significant.

G. Hazards and Hazardous Materials

The Project would not involve large quantities of hazardous materials, and those that are used would be limited to those typically used in construction, academic support and standard maintenance activities. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

The Project site is included on the California Underground Storage Tank database and on the Department of Toxic Substance Control Haznet database. However, based on the findings of the Phase I Environmental Site Assessment and subsequent specific test-level investigations, the Project would not create a significant hazard to the public relative to the conditions for which the site appears on these lists. Several existing concerns identified in the Phase I Environmental Site Assessment conducted for the Project will be satisfactorily addressed via compliance with applicable standards and regulations. In addition, the Asbestos Construction Standard would be adhered to in the proposed demolition, renovation, and modernization of buildings constructed prior to 1981.

Levels of methane gas detected on the site were well below the US EPA standards for additional assessment or remediation. The site is not located within an airport land use plan or within two miles of a public airport, public use airport or private airstrip. No wildlands are present on the site or in the surrounding area. No roadway modifications with the potential to affect emergency response would occur. Any temporary construction operations within adjacent roadways would be coordinated with the City of Los Angeles so as not to impede emergency response.

Based on the information summarized above, the Initial Study determined that hazards and hazardous materials impacts were not significant.

H. Hydrology and Water Quality

The Project would not increase the impervious cover of the site and, as part of the Project, new drainage facilities would be constructed in accordance with the City's Standard Urban Storm Water Mitigation Plan requirements to better accommodate drainage flows and

treat water quality. Similarly, through compliance with the appropriate with Code provisions, the Project would not be expected to cause substantial erosion during construction activities. Therefore, the Project is not expected to result in substantial erosion, siltation, flooding, degraded water quality or additional sources of pollution.

The Project would not require the use of groundwater nor would the Project interfere with the existing groundwater level or groundwater recharge. Therefore, impacts on groundwater were determined to be less than significant.

The Project is not located within a 100-year flood plain. The Project site and surrounding area are flat and have been previously graded, thus the potential for a mudflow to occur on-site is low. The Project is distant from the ocean or other large bodies of water, reducing the potential for inundation by seiche or tsunami. The Project site is located within the area identified as susceptible to inundation during the incidence of a catastrophic failure of the Sepulveda or Hansen Dams. The Los Angeles Citywide General Plan Framework EIR describes this hazard as a relatively low probability of occurrence; the site is separated by a considerable distance containing extensive amount of intervening structures; and that both dams are normally dry flood control structures. Therefore, the Initial Study found that the risks of these catastrophic hydrologic events would be less than significant.

I. Land Use and Planning

The Project is in an urban setting and the immediately surrounding properties are mostly commercial, industrial and public service in nature. A majority of the Project site is currently used as a college campus and would continue to be used as a college campus in the future. No community would be divided by the Project. No habitats or natural communities subject to conservation plans are found on site.

The Initial Study determined that the Project corresponds with the land use designation of the Southeast Los Angeles Community Plan and with the permitted uses of the existing zoning designation. In addition, the Project is consistent with the height, density and setback limitations set forth by the Los Angeles Municipal Code (LAMC). The site is also designated as within the "O" supplemental use district, indicating the site is within an oil drilling district as defined in Section 13.00 of the Code. Since no drilling operation currently exists on the site and no drilling operation is part of the Project, this supplemental use designation has no effect on the Project. The Initial Study also found that the Project furthers the Southeast Los Angeles Community Plan's urban design policies and would be consistent with the policies of the Southern California Association of Governments' Regional Plan & Guide and the South Coast Air Quality Management District's Air Quality Management Plan.

The relationship of the Project to the Metropolitan Transportation Authority's Congestion Management Plan (CMP) is addressed in Section V.D. of this EIR.

J. Mineral Resources

The Project site is in an urban, developed condition and no mineral resources are currently accessed through the site. The Project site is not designated by the City of Los Angeles or the California Geological Survey as containing significant mineral deposits or designated as a locally-important mineral resource site. The site is within the boundary of a mapped oil field, however the Project does not alter the potential availability of oil resources. Therefore, the Initial Study found that the Project would have no impact on the availability of any known mineral resource.

K. Noise

Potentially significant noise impacts were identified in the Initial Study and are analyzed in this EIR. However, the Initial Study also determined that some possible noise impacts would not be significant. The Project would be constructed using typical construction techniques that are not expected to generate excessive groundborne noise or vibration. Operation of the Project would not include activities that would generate excessive groundborne noise or vibration. The Project site is not located within an airport land use plan area or within two miles of a public airport, public use airport or private airstrip. Therefore, the Initial Study found that the Project would not expose people to excessive groundborne noise or airport related noise levels.

L. Population and Housing

The Project is not residential in nature, would not displace any housing or population, and is not expected to induce substantial new residents to the region. Thus impacts on population and housing were not found to be significant.

M. Public Services

The Project site is adequately protected by existing facilities of the Los Angeles Fire Department and proposed structures would comply with appropriate fire and safety building codes and building interiors would be appropriately sprinklered. The Project would also be adequately protected by the existing facilities of the Community College Bureau of the Los Angeles Special Districts and by the City of Los Angeles Police Department. The Project is not expected to introduce any new population to the region that would require instruction or service from the public school system (other than those being served by the Project itself) or the public library system. Therefore, the Initial Study determined that no new or physically altered public

services or facilities would be necessary to meet additional demands generated by the proposed Project.

N. Recreation

The Project proposes enhancements to the recreational facilities provided by the College to meet the recreational demand of the student body. The Project is not expected to introduce a substantial new resident population that would change the regional demand for recreational facilities. Therefore, the Project was found to have no significant impact on recreation.

O. Transportation and Circulation

Potentially significant impacts to transportation and circulation were identified in the Initial Study and are analyzed in this EIR. However, the Initial Study also determined that some possible transportation and circulation impacts would not be significant. The Project has been designed to permit adequate emergency access to the site and not to impede access to any adjacent or surrounding properties. No hazardous design features, such as sharp curves or dangerous intersections, are proposed. The Project is not directly related to air traffic nor expected to be indirectly related to any changes in air traffic. The College will continue to foster opportunities for its student body to utilize alternative transportation. Bicycle racks are provided on campus and the proximity of the MTA rail stop and stops for MTA bus lines provide numerous opportunities for students to utilize alternative transportation. Therefore, the Initial Study process determined that transportation and circulation impacts related to emergency access, transportation hazards, air traffic, and alternative transportation would not be significant.

P. Utilities and Service Systems

The Initial Study found that the estimated wastewater flows from the proposed Project would not have a significant impact to the City's wastewater conveyance or treatment systems and that existing water and wastewater facilities are adequate to serve the demand generated by the Project. The Project would operate in accordance with the City's Solid Waste Management Policy Plan and Framework Element of the General Plan, in addition to applicable Federal and State regulations associated with solid waste. The College is also engaged in various recycling programs. Therefore, the Initial Study determined that impacts on utilities and service systems would not be significant.

V--Environmental Impact Analysis

V. ENVIRONMENTAL IMPACT ANALYSIS

The Initial Study prepared for the Project (refer to Appendix A) determined that an EIR would be required for the Project due to the potential for significant impacts relative to four environmental issues. These environmental issues and their corresponding subchapter numbers are listed below:

- Section V.A., Air Quality, beginning on page 67
- Section V.B, Cultural Resources, beginning on page 89
- Section V.C, Noise, beginning on page 133
- Section V.D, Transportation And Circulation, beginning on page 147

Each impact analysis for the above-listed environmental issues is structured in the following manner: 1. Environmental Setting; 2. Environmental Impacts; 3. Cumulative Impacts; 4. Mitigation Measures; and 5. Level of Significance After Mitigation. The impact evaluations address foreseeable effects on the existing environment that could occur with implementation of the Project. The analysis is formulated on the basis of available information, using reasonable projections of the consequences. The significance of the potential impacts is assessed based upon significance threshold criteria established for each environmental topic. Considerations of the significance of an impact are based upon acceptable changes to the existing environment and a determination of what would constitute a substantial detrimental effect. If significant impacts are identified, various measures to reduce potential environmental impacts will be incorporated through the design of the Project. As applicable, these requirements are discussed within the environmental setting for each environmental issue analyzed in this EIR. In addition to such requirements, as appropriate, this EIR will recommend mitigation measures to reduce or eliminate environmental impacts identified through the environmental analysis process.

Cumulative impacts also could occur to the extent that the Project in conjunction with other approved, proposed, and reasonably foreseeable future projects could result in cumulative effects to the environment. As appropriate, specific mitigation measures are included in this EIR to eliminate or reduce cumulatively significant impacts. If identified project-specific or cumulative impacts cannot be mitigated, they are noted as significant, unavoidable, adverse impacts. Impacts that can be mitigated are either mitigated to a less than significant level, or are lessened but not mitigated to a less than significant level and remain unavoidable adverse environmental impacts of the Project.

V. ENVIRONMENTAL IMPACT ANALYSIS
A. AIR QUALITY

1. ENVIRONMENTAL SETTING

a. Regulatory Setting

In response to longstanding concerns regarding air pollution, Federal, State and local authorities have adopted various rules and regulations requiring evaluation of the impact of a project on air quality and appropriate mitigation for air pollutant emissions. The following discussion focuses on current air quality planning efforts and the responsibilities of the agencies involved in these efforts. A discussion of ambient air quality standards is also provided.

(1) Authority for Current Air Quality Planning

A number of plans and policies have been adopted by various agencies that address air quality concerns. Those plans and policies that are relevant to the Project are discussed below.

(a) Federal Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes Federal air quality standards, known as National Ambient Air Quality Standards (NAAQS), and specifies future dates for achieving compliance. The CAA also mandates that states submit and implement a State Implementation Plan (SIP) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. The City of Los Angeles is included in the South Coast Air Basin (Basin), which has been designated as a non-attainment area for certain pollutants that are regulated under the CAA. By a separate State statute, the South Coast Air Quality Management District (SCAQMD) has been established as the local air pollution control agency for the Basin. The NAAQS were amended in July 1997 to include an additional standard for ozone and to adopt a NAAQS for fine particulates ($PM_{2.5}$). No official determination has been made regarding the attainment status of the new ozone and $PM_{2.5}$ standards.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to

meet interim milestones. The sections of the CAA applicable to the development of the Project include Title I (Non-attainment Provisions) and Title II (Mobile Source Provisions).

Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants: (1) Ozone (O_3); (2) Nitrogen Dioxide (NO_2); (3) Sulfur Dioxide (SO_2); (4) Particulate Matter (PM_{10}); (5) Carbon Monoxide (CO); and (6) Lead (Pb). Table 3 on page 69 shows the NAAQS currently in effect for criteria pollutants. The NAAQS were amended in July 1997 to include an additional standard for ozone and to adopt a NAAQS for $PM_{2.5}$. The CAA sets certain deadlines for meeting the NAAQS within the Basin including: (1) Ozone by the year 2010; (2) PM_{10} by the year 2006; and (3) CO by the year 2000.[11]

The Basin fails to meet the National standards for O_3, PM_{10}, and CO and therefore is considered a Federal non-attainment area for these pollutants. Non-attainment designations are categorized into four levels of severity based on projected attainment date and level of concentration above the standard including: moderate, serious, severe, and extreme. In addition, the Basin is classified as being in maintenance for NO_2 since it is currently in attainment and measures are being taken to ensure that it does not go back into non-attainment. The Basin's status with regard to $PM_{2.5}$ concentrations has not yet been classified, but selected monitoring stations have already begun analyzing air samples for this pollutant. Deadlines for meeting this standard will be set for 10 years after the region is designated as being in non-attainment by the United States Environmental Protection Agency (USEPA). Table 3 on page 69 lists the criteria pollutants and Table 4 on page 71 lists the Basin's relative attainment status.

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner-burning gasoline and other cleaner-burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and nitrogen oxides (NO_X).

(b) California Clean Air Act

The California CAA, signed into law in 1988, requires all areas of the State to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. The CAAQS incorporate additional standards for most of the criteria pollutants and has set standards for other pollutants recognized by the State. California standards tend to be more restrictive than Federal standards and are based on even greater health and welfare concerns. California has also set standards for $PM_{2.5}$, sulfates, hydrogen sulfide, vinyl chloride and

[11] *The CO attainment deadline of December 31, 2002 has not been met and the Basin is still classified as "Serious" non-attainment for CO.*

Table 3

AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standard [a]	Federal Primary Standard [a]	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone (O_3)	1 hour	0.09 ppm	0.12 ppm	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Motor vehicles.
	8 hour	--	0.08 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, CO interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hour	9.0 ppm	9 ppm		
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	--	0.053 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.25 ppm	--		
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	--	0.03 ppm	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	--		
	24 hour	0.04 ppm	0.14 ppm		
Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 $\mu g/m^3$	50 $\mu g/m^3$	May irritate eyes and respiratory tract. Absorbs sunlight, reducing amount of solar energy reaching the earth. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 Hour	50 $\mu g/m^3$	150 $\mu g/m^3$		
Particulate Matter ($PM_{2.5}$) [b]	Annual Geometric Mean	12 $\mu g/m^3$	15 $\mu g/m^3$	Increases respiratory disease, lung damage, cancer, premature death; reduced visibility; surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning. Also formed from reaction of other pollutants (acid rain, NO_X, SO_X, organics).
	24 Hour	--	65 $\mu g/m^3$		

Table 3 (Continued)

AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standard [a]	Federal Primary Standard [a]	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Lead (Pb)	Monthly	1.5 ug/m^3	--	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurologic dysfunction (in severe cases).	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Quarterly	--	1.5 ug/m^3		
Sulfates (SO_4)	24 hour	25 ug/m^3	--	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardio-pulmonary disease; vegetation damage; degradation of visibility; property damage.	Industrial processes.

[a] *ppm=parts per million and µg/m^3 = micrograms per cubic meter.*

[b] *A Federal air quality standard for $PM_{2.5}$ was adopted in 1997. Presently, no methodologies for determining impacts relating to $PM_{2.5}$ have been developed. In addition, no strategies or mitigation programs for this pollutant have been developed or adopted by federal, state, or regional agencies.*

Source: California Air Resources Board, Ambient Air Quality Standards, 2003 and the USEPA, 2003.

visibility-reducing particles. The Basin does meet the standards for sulfates, hydrogen sulfide and vinyl chloride, but does not meet the California standard for visibility and is not expected to fully meet the visibility standard until 2010. Table 3 also shows the CAAQS currently in effect for criteria pollutants.

Local air quality management districts, such as the SCAQMD, regulate air pollution from commercial and industrial facilities. All air pollution control districts have been formally designated as in attainment or non-attainment for each State air quality standard. Table 4 on page 71 lists the criteria pollutants and the Basin's attainment status relative to the CAAQS and NAAQS.

Serious non-attainment areas are required to prepare Air Quality Management Plans (AQMP) that include specified emission reduction strategies in an effort to meet clean air goals. These plans as discussed in the subsequent section are required to include, among other emissions-reducing activities, Best Available Retrofit Control Technology for existing sources; control programs for area sources and indirect sources; a SCAQMD permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;

Table 4

SOUTH COAST AIR BASIN ATTAINMENT STATUS

Pollutant	National Status	California Status
Ozone (O_3)	Extreme	Extreme
Carbon Monoxide (CO)	Serious	Serious
Sulfur Dioxide (SO_2)	Attainment [a]	Attainment [a]
Nitrogen Dioxide (NO_2) [b]	Maintenance [b]	Maintenance [b]
PM_{10}	Serious	Serious
$PM_{2.5}$	Pending [c]	Pending [c]
Lead (Pb)	Attainment [a]	Attainment [a]

[a] *An air basin is designated as being in attainment for a pollutant if the standard for that pollutant was not violated at any site in that air basin during a three year period.*

[b] *NO_2 is classified as being in maintenance since it is currently in attainment and measures are being taken to ensure that it does not go back into non-attainment.*

[c] *Attainment status with the PM_{25} standard will not be determined until 2004.*

Source: California Air Resources Board, 2003.

transportation control measures; sufficient control strategies to achieve a five percent or more annual reduction in emissions (or 15 percent or more in a three-year period) for Reactive Organic Compounds (ROC), NO_X, CO and PM_{10}; and demonstration of compliance with the California Air Resources Board's (CARB) established reporting periods for compliance with air quality goals.

(c) South Coast Air Quality Management District

The SCAQMD has jurisdiction over an area of approximately 10,743 square miles, consisting of the four-county Basin which includes: Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties, and the Riverside County portions of the Salton Sea Air Basin and Mojave Desert Air Basin. While air quality in this area has improved, with 2001 (the latest year for which comprehensive data are available) registering some of the lowest levels of air pollutant concentrations in decades, the Basin requires continued diligence to meet air quality standards.

The SCAQMD has adopted a series of AQMP to meet the CAAQS and NAAQS. The 1997 AQMP, the currently adopted plan, was amended in 1999 and resubmitted to the USEPA, which approved the amended plan in April 2000. The 1999 Amendment provides additional short-term stationary source control measures that implement portions of the 1997 Ozone SIP long-term stationary source control measures. In addition, the Amendment revised the adoption and implementation schedule for the remaining 1997 Ozone SIP short-term stationary source control measures that the SCAQMD is responsible to implement.

The 1997 PM_{10} SIP was approved by CARB and submitted to the USEPA in February 1997. In order to expedite EPA's action on the 1997 PM_{10} SIP, SCAQMD updated the Plan in 2002 with respect to the adoption and implementation schedule of various PM_{10} related measures. The PM_{10} SIP approval is expected by early 2003.[12]

The SCAQMD is in the process of preparing a comprehensive AQMP update – the Proposed 2003 Air Quality Management Plan for the Basin. The 2003 AQMP seeks to demonstrate attainment with federal air quality standards and to make progress toward state standards. The 2003 AQMP will incorporate a revised emissions inventory, the latest modeling techniques, and updated control measures remaining from the 1997/1999 SIP as well as new control measures.[13]

The SIP component will revise the region's demonstration of attainment for both the federal one-hour ozone standard by 2010 and the federal PM_{10} standard by 2006, as well as show maintenance of the federal CO standard. Upon local, State, and Federal approval, the 2003 Plan will replace the existing 1997/1999 Ozone SIP and 1997 PM_{10} SIP for the South Coast, plus the 2002 Coachella Valley PM_{10} Plan. The 2003 Plan will use more recent data on air quality, emissions and modeling to assess attainment. It will also include an updated control strategy for both stationary and mobile sources, reflecting new measures for local, State, and Federal implementation.

The SCAQMD also adopts rules to implement portions of the AQMP. Several of these rules may apply to construction or operation of the Project. Rule 403 requires the implementation of best available fugitive dust control measures during active operations capable of generating fugitive dust emissions from onsite earth-moving activities, construction/ demolition activities, and construction equipment travel on paved and unpaved roads. Specific control requirements are included in Appendix B.

In addition to the AQMP and its rules and regulations, SCAQMD has published a handbook (*CEQA Air Quality Handbook*, November 1993) that is intended to provide local governments and California Environmental Quality Act (CEQA) practitioners with guidance for analyzing and mitigating project-specific air quality impacts. This handbook provides standards, methodologies and procedures for conducting air quality analyses in EIRs.

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[12] *South Coast Air Quality Management District, Preview of the Proposed 2003 Air Quality Management Plan for the South Coast Air Basin, January 2003.*

[13] *South Coast Air Quality Management District, AQMD Website, http://www.aqmd.gov/aqmp/03aqmp.htm.*

b. Existing Conditions

(1) Regional Air Quality

The distinctive climate of the Basin, in which the Project site is located, is determined primarily by its terrain and geographical location. Regional meteorology is largely dominated by a persistent high pressure area which commonly resides over the eastern Pacific Ocean. Seasonal variations in the strength and position of this pressure cell cause changes in the weather patterns of the area. Warm summers, mild winters, infrequent rainfall, moderate daytime on-shore breezes, and moderate humidity characterize local climatic conditions. This normally mild climatic condition is occasionally interrupted by periods of hot weather, winter storms, and hot easterly Santa Ana winds.

The Basin is an area of high air pollution potential, particularly from June through September. This condition is generally attributed to light winds and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season and time of day. O_3 concentrations, for example, tend to be lower along the coast, higher in the near inland valleys and lower in the far inland areas of the Basin and adjacent desert.

Over the past 30 years, substantial progress has been made in reducing air pollution levels in southern California. The area previously was in non-attainment for all NAAQS, except SO_2. The area is now defined as in attainment for NO_2, Pb, and SO_2, with CO approaching attainment. PM_{10} and ozone levels, while reduced substantially from their peak levels, are still far from attainment.

The SCAQMD published a Basin-wide air toxic study (*MATES II, Multiple Air Toxics Exposure Study*, March 2000). The MATES II study represents one of the most comprehensive air toxics studies every conducted in an urban environment. The study was aimed at determining the cancer risk from toxic air pollution throughout the Basin by conducting a comprehensive monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to fully characterize Basin risk. The study concluded that the average carcinogenic risk in the Basin is approximately 1,400 in one million. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. About 70 percent of all risk is attributed to diesel particulate emissions; about 20 percent to other toxics associated with mobile sources, (including benzene, butadiene, and formaldehyde); and about 10 percent of all carcinogenic risk is attributed to stationary sources (which include industries and other certain businesses such as dry cleaners and chrome plating operations).

(2) Local Area Conditions

(a) Existing Pollutant Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Basin and has divided the Basin into air monitoring areas. The Project site is located in the Central Los Angeles County Monitoring Area. The monitoring station for this area is the North Main Street Monitoring Station, which is located at 1630 North Main Street in the City of Los Angeles, a few miles north of the Project site. Criteria pollutants monitored at this station include PM_{10}, $PM_{2.5}$, O_3, CO, SO_2, and NO_2. The most recent data available from these monitoring stations encompassed the years 1998 to 2002. The data, shown in Table 5, shows the following pollutant trends:

Ozone (O_3) – The maximum one-hour ozone concentration recorded during the reporting period was 0.15 ppm (1998). During this reporting period, the California standard of 0.09 ppm was exceeded between six and seventeen times annually. The National standard of 0.12 ppm was exceeded between zero and five times annually during the five-year reporting period, with the maximum number of exceedances occurring in 1998. The maximum eight-hour ozone concentration recorded during the reporting period was 0.11 ppm in 1998. During this reporting period, the National standard of 0.08 ppm was exceeded between zero and nine times with the maximum number of exceedances occurring in 1998.

Carbon Monoxide (CO) – The highest recorded eight-hour CO concentration was 6.2 ppm, recorded in 1998. Neither the California standards of 9.0 ppm or the national standard of 9.0 ppm were exceeded during the reporting period.

Nitrogen Dioxide (NO_2) – The highest recorded one-hour concentration of NO_2 during the reporting period was 0.21 ppm (1999) and the highest recorded annual arithmetic mean during the reporting period was 0.040 (2000). Neither the California nor National NO_2 standard was exceeded during the reporting period.

Sulfur Dioxide (SO_2) – The highest recorded 24-hour concentration was 0.010 ppm in 1999. No violations of the California or National SO_2 standards were recorded during this reporting period.

Table 5

POLLUTANT STANDARDS AND AMBIENT AIR QUALITY DATA
FROM THE LOS ANGELES -NORTH MAIN MONITORING STATION

Pollutant/Standard	1998	1999	2000	2001	2002 [a]
Ozone (O_3)					
O_3 (1-hour)					
Maximum Concentration (ppm)	0.15	0.13	0.14	0.12	0.12
Days > CAAQS (0.09 ppm)	17	13	8	8	8
Days > NAAQS (0.12 ppm)	5	1	1	0	0
O_3 (8-hour)					
Maximum Concentration (ppm)	0.11	0.11	0.10	0.10	0.08
Days > NAAQS (0.08 ppm)	9	2	4	1	0
Particulate Matter (PM_{10})					
PM_{10} (24-hour)					
Maximum Concentration	80	88	80	97	57
Calculated Days > CAAQS (50 $\mu g/m^3$)	61	114	90	119	48
Calculated Days > NAAQS (150 $\mu g/m^3$)	0	0	0	0	0
PM_{10} (Annual Average)					
Annual Arithmetic Mean ($\mu g/m^3$)	37	44	40	44	36
Annual Geometric Mean ($\mu g/m^3$)	34	42	37	40	37
Particulate Matter ($PM_{2.5}$)					
$PM_{2.5}$ (24-hour)					
Maximum Concentration ($\mu g/m^3$)	n/a	69	88	73	62
Calculated Days > NAAQS (65 $\mu g/m^3$)	n/a	2	11	4	0
$PM_{2.5}$ (Annual)					
Annual Arithmetic Mean ($\mu g/m^3$)	n/a	23	22	23	20
Carbon Monoxide (CO)					
CO (8-hour)					
Maximum Concentration (ppm)	6.2	6.4	6.0	4.5	3.8
Days > CAAQS (9.0 ppm)	0	0	0	0	0
Days > NAAQS (9 ppm)	0	0	0	0	0
Nitrogen Dioxide (NO_2)					
NO_2 (1-hour)					
Maximum Concentration (ppm)	0.17	0.21	0.15	0.14	0.14
Annual Arithmetic Mean (ppm)	0.039	0.039	0.040	0.038	n/a
Days > CAAQS (0.25 ppm)	0	0	0	0	0
Days > NAAQS (0.053 ppm AAM)	0	0	0	0	0

Table 5 (Continued)

POLLUTANT STANDARDS AND AMBIENT AIR QUALITY DATA FROM THE LOS ANGELES -NORTH MAIN MONITORING STATION

Pollutant/Standard	1998	1999	2000	2001	2002 [a]
Sulfur Dioxide (SO_2)					
SO_2 (24-hour)					
Maximum Concentration (ppm)	0.006	0.010	0.007	0.008	0.008
Days > CAAQS (0.04 ppm)	0	0	0	0	0
Days > NAAQS (0.14 ppm)	0	0	0	0	0
SO_2 (Annual)					
Annual Arithmetic Mean (0.03 ppm)	0.001	0.003	0.001	0.003	0.003

[a] *Incomplete data.*

ppm = parts per million; mg/m^3 = micrograms per cubic meter; AAM = Annual Arithmetic Mean; n/a = not available

Note: Ambient data for airborne lead is not included in this table since the Basin is currently in compliance with state and national standards for lead.

Source: South Coast Air Quality Management District, Air Quality Data 1998-2002.

Particulate Matter (PM_{10}) – The highest recorded concentration during the reporting period was 97 micrograms per cubic meter (µg/m^3) of air particulates (2001). During this reporting period, the California PM_{10} standard was calculated to be exceeded between 48 and 119 times annually, with the highest number of exceedances in 2001. No exceedances of the National standard occurred between 1998 and 2002. The highest annual arithmetic mean recorded was 44 µg/m^3 in 1999 and 2001. The highest annual geometric mean recorded was 42 µg/m^3 in 1999.

Fine Particulates ($PM_{2.5}$) – $PM_{2.5}$ concentrations of 69, 88, and 73 µg/m^3 were recorded for the years 1999, 2000 and 2001, respectively. During these three years the National standard was exceeded between 2 and 11 times annually. The highest annual arithmetic mean recorded was 23 in 1999.

Lead (Pb) – The Basin is currently in compliance with California and National standards for Pb and, therefore, no ambient data for airborne Pb is available for the applicable monitoring station.

(b) Existing Health Risk in the Surrounding Area

According to the SCAQMD's MATES-II study, the Project area is within a cancer risk zone of approximately 1,500 in one million which is largely due to diesel particulate generated from the convergence of freeways surrounding the downtown Los Angeles area. In comparison, the average cancer risk in the Basin is 1,400 per million.

(3) Sensitive Receptors

Some population groups, such as children, the elderly, and acutely ill and chronically ill persons, especially those with cardio-respiratory diseases, are considered more sensitive to air pollution than others. Sensitive receptors (e.g., childcare facilities, schools, or convalescent care facilities) located within the area that may be affected by the proposed Project include the Campus Child Development Center that is located east of the Project site on Grand Avenue; and the Los Angeles Orthopedic Hospital, located south of the Project site across 23rd Street. With the exception of the above-mentioned child development center and orthopedic hospital, land uses surrounding the Project site consist primarily of light industrial, commercial, and parking lot uses. While pedestrians accessing these uses could include some members of sensitive population groups, these individuals are not specifically identified in the analysis in accordance with SCAQMD methodology, since their presence in the vicinity of the Project site would be limited and/or intermittent. Please refer to Figure 2 in Section II., Project Description, for a vicinity map of the Project site and surrounding land uses.

2. ENVIRONMENTAL IMPACTS

a. Thresholds of Significance

Neither the District nor the City of Los Angeles have adopted specific significance thresholds for air quality impacts. However, because of the SCAQMD's regulatory role in the Basin, the significance thresholds and analysis methodologies in the SCAQMD *CEQA Air Quality Handbook* will be used in evaluating projects proposed within the City.

(1) Regional Impacts

The SCAQMD has promulgated daily emission thresholds for construction and operational activities. These thresholds are set at a level that either promote or maintain regional attainment of the relevant ambient air quality standards. A project is deemed to have a significant impact on regional air quality if emissions of criteria pollutants (specified in pounds

of pollutant emitted per day) related to either project construction or operation exceed the significance thresholds summarized in Table 6 on page 79.

(2) Local Impacts

The SCAQMD indicates that a significance threshold of 20.0 ppm and 9.0 ppm should be used for assessing one-hour and eight-hour CO concentrations, respectively, attributable to operation sources. An analysis at selected intersections is performed to determine the potential for the presence or the creation of CO hot spots attributable to project operations.

Based on the types of fuels to be consumed, specifically gasoline and diesel, during Project construction and operations, emissions of sulfates, hydrogen sulfide, lead, and vinyl chloride are expected to be negligible. Although State and/or Federal air quality standards exist, these pollutants are not analyzed herein due to the negligible quantities to be generated.

(3) Air Toxics

The SCAQMD *CEQA Air Quality Handbook*, Chapter 10, Air Toxics, provides significance thresholds for potential adverse health risks associated with the operation of a proposed Project. The SCAQMD guidelines for operation permit processing considers the following types of Projects significant:

- Any project involving the emission or threatened emission of a carcinogenic or toxic air contaminant identified in District Rule 1401 that exceeds the maximum individual cancer risk of ten in one million, or

- Any project where the Chronic or Acute Hazard Indices exceed 1.0 at any receptor location. An acute hazard index is defined as the ratio of the estimated maximum 1-hour concentration of a toxic air contaminant for a potential maximally exposed individual to its acute reference exposure level (REL). The chronic hazard index is the ratio of the estimated long-term level of exposure to a toxic air contaminant for a potential maximally exposed individual to its chronic REL. The chronic hazard index calculations include multi-pathway consideration.

The SCAQMD recommended approach for assessing air toxics is to evaluate conditions on a localized rather than regional basis. This approach is recommended by the SCAQMD as it has been concluded that if a project would not result in a localized air toxics impacts, then regional air toxics impacts would be similarly less than significant. Since Project development would not introduce any new air toxics emissions sources, potential impacts would be less than significant. As such, impacts related to localized air toxics are not analyzed in this report.

Table 6

SCAQMD REGIONAL SIGNIFICANCE THRESHOLDS

Air Contaminant	Construction (Pounds per Day)	Post-Construction Operations (Pounds per Day)
Carbon Monoxide	550	550
Nitrogen Oxides	100	55
Reactive Organic Compounds	75	55
Particulate Matter	150	150
Sulfur Oxides	150	150

Source: South Coast Air Quality Management District, CEQA Air Quality Handbook, November 1993.

b. Methodologies/Analysis of Project Impacts

An analysis of potential air quality impacts related to the development of the proposed Project was conducted for both the construction and post-construction operation of the campus. For each of these phases, an analysis was performed for regional emissions. For post-construction operations, the analysis also addresses local area concentrations of a specific pollutant, CO. CO is the primary pollutant of concern when analyzing local traffic-related air quality impacts, and it is the only pollutant from mobile sources for which standardized modeling methodologies for estimating localized concentrations have been developed and approved by the SCAQMD.

(1) Construction

Construction of the Project has the potential to create air quality impacts through earth moving operations and the use of heavy-duty construction equipment. Fugitive dust emissions result from land clearing, demolition, ground excavation, cut and fill operations, and equipment traffic over temporary roads at construction sites. Mobile source emissions, primarily NO_X result from the use of construction equipment such as bulldozers, trucks, and scrapers. These emissions are most significant when using heavy-duty, diesel-fueled equipment. Mobile source emissions also result from vehicle trips by construction workers to and from the Project site. During the finishing phase paving operations and the application of architectural coatings (i.e., paints) and other building materials release ROC. Emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Construction emissions are calculated based on the type and magnitude of development that would be accommodated under the Project, the mix of construction equipment required to build the project, and emission factors from the SCAQMD's *CEQA Air Quality Handbook* and USEPA's *Compilation of Air Pollutant Emission Factors* (AP-42). In addition, PM_{10} emissions assume implementation of SCAQMD Rule 403 fugitive dust control measures, as detailed in the Air Quality Appendix. Project-related factors used to evaluate construction air quality impacts include the following:

- Combustion Emissions from Construction Equipment: Type, number of pieces and usage for each type of construction equipment; estimated fuel usage and type of fuel (e.g., diesel, gasoline, and compressed natural gas) for each type of equipment; and emission factors for each type of equipment.

- Fugitive Dust—Grading, Excavation, and Hauling: Amount of soil to be disturbed on-site or moved off-site; emission factors for disturbed soil; duration of grading, excavation and hauling activities; type and number of pieces of equipment to be used; and projected haul routes.

- Fugitive Dust—Heavy-Duty Equipment Travel on Unpaved Roads: Length and type of road; type, number of pieces, weight and usage of equipment; and type of soil.

- Other Mobile Source Emissions: Number and average length of construction worker trips to project site, per day; and duration of construction activities.

Daily construction-related regional emissions for the proposed Project during each phase of construction are presented in Table 7 on page 81. As shown, worst-case daily emissions are expected to exceed the SCAQMD significance threshold for NO_X. As such, construction-period emissions would result in a significant short-term regional air quality impact without incorporation of mitigation measures. Daily emissions for CO, ROC, SO_X, and PM_{10} would be considered adverse, but less than significant, since levels of these emissions would fall below SCAQMD significance thresholds.

(2) Operations

Project operational impacts were evaluated for Project buildout by 2007. In order to properly analyze operational emissions, it is important to assign appropriate emissions and emission factors to the individual pollutant sources. Mobile source emission forecasts are sensitive to the forecast year, as future mobile source emission factors are substantially reduced as cleaner on-road vehicles are introduced into the county-wide vehicle fleet.

Table 7

ESTIMATE OF CONSTRUCTION-PERIOD DAILY EMISSIONS

Characterization	Estimated Emissions (lbs/day) [a]				
	CO	ROC	NO_X	SO_X	PM_{10} [b]
Worst-case Day (25% of time)	118	18	109	5	10
Average Day (45% of time)	93	13	79	2	7
Daily Significance Threshold	550	75	100	150	150
Significant Impact?	No	No	Yes	No	No

[a] *The equipment mix for each phase is provided in Appendix B of this Draft EIR.*
[b] *Fugitive dust emissions are based on USEPA AP-42 assumptions and compliance with SCAQMD Rule 403.*

Source: PCR Services Corporation, April 2003

(a) Regional Operation Impacts

Air pollutant emissions associated with Project occupancy and operation would be generated by both the consumption of electricity and natural gas, and by the operation of on-road vehicles. Emissions associated with energy production (i.e., electricity and natural gas) are classified by the SCAQMD as regional stationary source emissions. Electricity is considered an area source since it is produced at various locations within, as well as outside of, the Basin. Since it is not possible to isolate geographically where electricity production occurs, these emissions are considered to be regional in nature. Emissions of criteria pollutants associated with the production of energy were calculated using emission factors from the SCAQMD *CEQA Air Quality Handbook* (Appendix to Chapter 9).

Emissions modeled for the regional on-road air quality analysis were compiled using the URBEMIS 2001 emission inventory model. This computer model projects emission rates for motor vehicles based on a desired year of analysis, a projected vehicle fleet mix, projected vehicle speeds, and whether these emissions are expected to occur during the summer or winter months. Assumptions used in preparing the model analysis were consistent with those recommended in SCAQMD *CEQA Air Quality Handbook* (Appendix to Chapter 9). The regional on-road emissions were based on average daily trips as presented in Section V.D., Transportation and Circulation, of this Draft EIR.[14] Project emissions were calculated for the Project buildout, as shown in Table 8 on page 82. As shown in Table 8, Project-related daily emissions are expected to exceed the SCAQMD significance threshold for NO_X and CO. As such, operational emissions would result in a significant regional air quality impact without

[14] *This analysis assumed an average daily trip rate of 1.14 trips per student. This was obtained by assuming P.M. peak hour traffic represents 10% of average daily traffic.*

Table 8

PROJECT-RELATED OPERATIONAL EMISSIONS
(Pounds Per Day)

Emission Source	CO	NO_X	PM_{10}	ROC	SO_X
On-Road Mobile Sources [a, b]	814	83	49	167	< 1
Stationary Sources [c]	< 1	4	< 1	< 1	< 1
Total (Proposed Project)	**815**	**87**	**49**	**167**	**1**
SCAQMD Significance Threshold	550	55	150	55	150
Over (Under)	**265**	**32**	**(101)**	**112**	**(149)**
Significant?	**Yes**	**Yes**	**No**	**Yes**	**No**

[a] *URBEMIS 2001 output files are provided in Appendix B of this Draft EIR.*
[b] *Includes all Project trips.*
[c] *Based on electricity and natural gas consumption taken from the SCAQMD's CEQA Air Quality Handbook.*

Source: PCR Services Corporation, April 2003.

incorporation of mitigation measures. Daily emissions for ROC, SO_X and PM_{10} would be considered adverse, but less than significant, since levels of these emissions would fall below SCAQMD significance thresholds.

(b) Localized Operational Impacts

During the operational phase of the Project, air pollutant emissions related to Project traffic would have a potential to create new, or worsen existing, localized air quality impacts. An analysis of selected intersections was performed to determine the potential for the creation of CO hotspots attributable to the proposed Project in 2007. Local area CO concentrations were projected using the CALINE-4 traffic pollutant dispersion model. The analysis of CO impacts followed the protocol recommended by the California Department of Transportation and published in the document entitled *Transportation Project-Level Carbon Monoxide Protocol*, December 1997. This methodology is also consistent with procedures identified through the SCAQMD CO modeling protocol, with all four corners of each intersection analyzed to determine whether project traffic would result in a CO concentration that exceeds Federal or State CO standards.

Intersections with the highest potential for CO hot spot formation were selected for analysis based on their Level of Service (LOS), high Project-related traffic volumes, and the proximity of the intersection to sensitive receptors. Intersections functioning near or above capacity, which are characterized by a LOS of E or F, have the potential to yield a CO hot spot

condition. Based on these criteria, the intersection of Grand Avenue at Washington Boulevard was selected for analysis.

The CALINE-4 model determines CO concentrations attributable to vehicular traffic with implementation of the Project. Traffic volumes for the A.M. and P.M. peak hours were input into the model to evaluate potential Project impacts. These volumes are presented in the traffic study prepared by Kaku Associates for the Project. The CALINE-4 model generates CO concentrations averaged over an one-hour time period under worst-case atmospheric conditions, which include low wind speeds and low atmospheric circulation. Eight-hour concentrations are calculated by converting one-hour concentrations to eight-hour equivalents, using the conversion protocol recommended by the *Transportation Project-Level Carbon Monoxide Protocol*.

Future CO concentrations were determined for the weekday peak time periods by adding the predicted increase in CO concentrations attributable to implementation of the proposed Project to a projected ambient concentration (i.e., a future baseline condition). Based upon guidance from the SCAQMD, an ambient CO concentration was projected for 2007 based on 1-hour and 8-hour tables provided in the SCAQMD *Air Quality Analysis Guidance Handbook*.[15] The Los Angeles-North Main Monitoring Station was used in the analysis as it is the most representative of existing conditions within the area that may be affected by the proposed Project.

The CALINE-4 model generates CO concentrations averaged over a one-hour time period under worst-case atmospheric conditions for the area, including low wind speeds and low atmospheric circulation. Eight-hour concentrations were calculated by converting one-hour concentrations to eight-hour equivalents, using the conversion protocol set forth in SCAQMD *CEQA Air Quality Handbook*, Chapter 9.

The results of the local area CO dispersion analysis are presented in Table 9 on page 84. As shown, Project-related traffic is not anticipated to result in any exceedances of the State one-hour CO standard of 20 ppm at the study intersection during the A.M. or P.M. peak period. Similarly, eight-hour concentrations would remain below the State standard of 9 ppm.

Since significant impacts would not occur at the intersection with the highest potential for CO hotspot formation, no significant impacts are anticipated to occur at any other locations in the Project vicinity as a result of the proposed Project. Consequently, sensitive receptors in the area would not be significantly affected by CO emissions generated by Project-related traffic.

[15] http://www.aqmd.gov/ceqa/hdbk. *(CO Concentrations for Hotspot Analysis – Los Angeles-North Main Monitoring Station.)*

Table 9

PROJECT BUILDOUT LOCAL AREA CARBON MONOXIDE DISPERSION ANALYSIS

Intersection	Peak Period [a]	1-Hour Ambient Concentration (ppm)	Maximum 1-Hour Project Contribution [b] (ppm)	Maximum 1-Hour Concentration [b] (ppm)	8-Hour Ambient Concentration (ppm)	Maximum 8-Hour Project Contribution (ppm)	Maximum 8-Hour Concentration [b] (ppm)
Grand Avenue and Washington Blvd	A.M.	5.5	2.0	7.5	5.0	1.2	6.2
	P.M.	5.5	3.1	8.6	5.0	1.5	6.5

ppm = parts per million.

[a] *Peak hour traffic levels based on SectionV.D., Transportation & Circulation, of this Draft EIR.*

[b] *The most stringent Air Quality Standard for 1-hour average concentration is 20 ppm, and 9 ppm for an 8-hour average concentration.*

Source: PCR Services Corporation April 2003.

Localized air quality impacts related to mobile source emissions would therefore be less than significant for the Project.

3. CUMULATIVE IMPACTS

With respect to construction-period air quality emissions and the Basin-wide cumulative air quality condition, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal CAA mandates. As demonstrated earlier, the Project would comply with SCAQMD Rule 403 requirements, and would implement all feasible mitigation measures. Although the Basin-wide cumulative condition is adverse (i.e., non-attainment status for CO, O_3, and PM_{10}), the Project would comply with adopted AQMP emissions control measures; and these same requirements would be imposed on related projects. As such, construction-period emissions are not considered cumulatively considerable.

As demonstrated in the Initial Study (Appendix A of this Draft EIR), the Project would be consistent with the currently adopted AQMP. In addition, the CO Hot Spot analysis discussed on page 60, which concluded that localized impacts would be less than significant, was based on a cumulative traffic analysis that considered cumulative growth through 2007. As such, air emissions related to long-term Project operations are not considered cumulatively considerable.

4. MITIGATION MEASURES

The measures identified below implement SCAQMD measures associated with on-site grading activities, construction equipment travel on paved roads, as well as the SCAQMD's intent to control fugitive dust emissions associated with demolition activities and construction equipment travel on-site. Measure 2 identified below exceeds SCAQMD Rule 403 requirements in order to increase PM_{10} control efficiency.

a. Land Clearing/Earth-Moving

1. Exposed pits (i.e., gravel, soil, dirt) with 5 percent or greater silt content shall be watered twice daily, enclosed, covered or treated with non-toxic soil stabilizers according to manufacturers' specifications.

2. All other active sites shall be watered as often as necessary to remain visibly moist.

3. All grading activities shall cease during second stage smog alerts and periods of high winds (i.e., greater than 25 mph) if soil is being transported to off-site locations and cannot be controlled by watering.

4. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer).

b. Paved Roads

1. All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite, or shall be paved.

2. Streets shall be swept hourly if visible soil material has been carried onto adjacent public paved roads.

3. Construction equipment shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

c. Unpaved Roads

1. Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

2. Traffic speeds on all unpaved roads shall not exceed 15 mph.

d. Construction Equipment

1. All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

2. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would be kept with their engines off, when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the mitigation measures described above, Project construction would continue to generate NO_X emissions that exceed SCAQMD regional significance thresholds for construction activities, resulting in an impact to regional air quality that is significant and unavoidable. An estimate of construction-period emissions after implementation of prescribed mitigation measures is shown in Table 10 on page 87.

During the operational phase, the Project emissions would continue to exceed SCAQMD significance thresholds for CO and NO_X. Therefore, the Project would have a significant and unavoidable impact on regional air quality.

Table 10

ESTIMATE OF CONSTRUCTION-PERIOD DAILY EMISSIONS WITH MITIGATION

Characterization	Estimated Emissions (lbs/day) [a]				
	CO	ROC	NO_X	SO_X	PM_{10} [b]
Worst-case Day (25% of time)	117	17	106	5	8
Average Day (45% of time)	93	13	78	2	5
Daily Significance Threshold	550	75	100	150	150
Significant Impact?	No	No	Yes	No	No

[a] *The equipment mix for each phase is provided in Appendix B of this Draft EIR.*
[b] *Fugitive dust emissions are based on USEPA AP-42 assumptions and compliance with SCAQMD Rule 403.*

Source: PCR Services Corporation, April 2003.

V. ENVIRONMENTAL IMPACT ANALYSIS
B. HISTORIC RESOURCES

The purpose of this section is to identify and evaluate historic resources that could be impacted by the implementation of the proposed Project, to analyze the nature of those impacts in association with the identified historic resources, and to propose mitigation measures for those adverse impacts identified, if necessary.

1. ENVIRONMENTAL SETTING

A prehistoric archaeological resources records search of the Project area, conducted by the South Central Coastal Information Center at California State University, Fullerton, indicates that no recorded prehistoric archaeological resources exist on the site and the likelihood of discovering such resources is remote. Additionally, a paleontological resources records search of the Project area was conducted by the Natural History Museum of Los Angeles County. A review of the records search data indicates that no recorded paleontological resources exist within the Project area and that the likelihood of encountering such resources is remote. As no significant impacts to paleontological or archaeological resources are expected, no further analysis is warranted.[16]

a. Regulatory Framework

Numerous laws and regulations require Federal, State, and local agencies to consider the effects of a proposed Project on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies (e.g., State Historic Preservation Office and the Advisory Council on Historic Preservation). Relevant to this Project, the National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); and the California Register of Historical Resources, Public Resources Code (PRC) 5024, are the primary Federal and State laws governing and affecting preservation of historic resources of national, State, regional, and local significance. Additional regulations pertinent to the Project include the U.S. Secretary of the Interior's Standards for Rehabilitation of Historic

[16] *Potential paleontological and archaeological impacts associated with the Project were determined to be less than significant in the Initial Study prepared for the Campus 2002 project, Los Angeles Trade-Technical College, March 19, 2003.*

Buildings, the Americans With Disabilities Act (ADA), the State Historical Building Code, and the City of Los Angeles Cultural Heritage Ordinance.

(1) Federal Level

(a) National Register of Historic Places

First authorized by the Historic Sites Act of 1935, the National Register of Historic Places (National Register) was established by the NHPA of 1966, as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."[17] The National Register recognizes properties that are significant at the national, State and local levels.

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must meet one of more of the following four established criteria:[18]

- Are associated with events that have made a significant contribution to the broad patterns of our history;
- Are associated with the lives of persons significant in our past;
- Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- Have yielded, or may be likely to yield, information important in prehistory or history.

Unless the property possesses exceptional significance, it must be at least fifty years old to be eligible for National Register listing.

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[17] *Code of Federal Regulations (CFR), 36 Section 60.2.*

[18] *U.S. Department of the Interior, National Park Service, National Register Bulletin: How to Apply the National Register Criteria for Evaluation (Washington, DC: National Park Service, 1995).*

In addition to meeting the criteria of significance, a property must have integrity. Integrity is understood as "the ability of a property to convey its significance."[19] The National Register recognizes seven qualities that, in various combinations, define integrity. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.[20] The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association.

(b) Secretary of the Interior's Standards

The Secretary of the Interior has promulgated Standards for Rehabilitation of Historic Buildings (Standards).[21] These Standards may be used by the United States Department of the Interior, National Park Service and other Federal, State, and local agencies in reviewing and approving work to be performed on historic buildings. The Standards were written to "assist the long-term preservation of a property's significance through the preservation of historic materials and features. The Standards pertain to historic properties of all materials, construction types, sizes, and occupancy and encompass the exterior and interior of the buildings. They also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction."[22]

(c) Americans with Disabilities Act

The ADA was signed into law in July 1990.[23] This civil rights statute applies to employment, as well as access to public structures and services or "public accommodations" owned or operated by private entities. In general, alterations to buildings subject to ADA must provide for disabled access. However, there are special rules and minimum access requirements where an alteration "would threaten or destroy the historic significance" of a historic building. Historic buildings include those eligible for listing in the National Register of Historic Places or designated under State or local law.[24] To use the minimum requirements, consultation is required

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[19] *National Register Bulletin 15, p. 44.*

[20] *National Register Bulletin 15, p. 44.*

[21] *The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, U.S. Department of the Interior, National Park Service, Preservation Assistance Division, 1990. Also see 36 CFR § 67.7.*

[22] *Secretary of Interior's Standards, page 5.*

[23] *42 U.S.C. §§ 12101, et seq.*

[24] *See 28 CFR § 36.405.*

with the State Office of Historic Preservation (OHP) and, in the case of projects subject to Section 106, with the Advisory Council on Historic Preservation (ACHP).[25]

(2) State Level

The State implements the NHPA through its statewide comprehensive resource surveys and preservation programs. The California OHP, as an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The OHP also maintains the California Historic Resources Inventory. The State Historic Preservation Officer is an appointed official who implements historic preservation programs within the State's jurisdictions.

(a) California Environmental Quality Act

Under CEQA, a "project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment."[26] This statutory standard involves a two-part inquiry. The first involves a determination of whether the project involves a historical resource. If so, then the second part involves determining whether the project may involve a "substantial adverse change in the significance" of the historical resource. To address these issues, guidelines that implement the 1992 statutory amendments relating to historical resources were adopted in final form on October 26, 1998 with the addition of CEQA Guideline Section 15064.5. The new CEQA Guidelines provide that for the purposes of CEQA compliance, the term "historical resources" shall include the following:[27]

- "A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.

- A resource included in a local register of historical resources, as defined in section 5020.1(k) of the PRC or identified as significant in a historical resource survey meeting the requirements in section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

[25] *See § 4.1.7 of Appendix A of the 36 CFR Part 800 Regulations.*

[26] *California Public Resources Code Section 21084.1 - Added in 1992 by AB 2881.*

[27] *State CEQA Guidelines, 14 CCR Section 15064.5(a).*

- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.

- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the PRC), or identified in a historical resources survey (meeting the criteria in section 5024.1(g) of the PRC) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC sections 5020.1(j) or 5024.1."

(b) California Register of Historical Resources

Created by Assembly Bill 2881 which was signed into law on September 27, 1992, the California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."[28] The criteria for eligibility for the California Register are based upon National Register criteria.[29] Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register of Historic Places.[30]

A resource must meet one or more of the following criteria for listing on the California Register of Historical Resources:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

- Is associated with the lives of persons important in our past;

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[28] *California Public Resources Code Section 5024.1(a).*

[29] *California Public Resources Code § 5024.1(b).*

[30] *California Public Resources Code § 5024.1(d).*

- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

- Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register of Historic Places and those formally Determined Eligible for the National Register of Historic Places.

- California Registered Historical Landmarks from No. 770 onward.

- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources which may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5.[31]

- Individual historical resources.

- Historical resources contributing to historic districts.

- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

[31] *See Section III.B.2 of this report for an explanation of significance rating categories.*

(3) Local level

(a) City of Los Angeles Historic-Cultural Monuments

The City of Los Angeles enacted a Cultural Heritage Ordinance in April 1962, which defines Los Angeles Historic-Cultural Monuments (LAHCMs) for the City. According to the ordinance, LAHCMs are sites, buildings, or structures of particular historic or cultural significance to the City of Los Angeles in which the broad cultural, economic, political, or social history of the nation, state, or City is reflected or exemplified, including sites and buildings associated with important personages or which embody certain distinguishing architectural characteristics and are associated with a notable architect. These LAHCMs are regulated by the City's Cultural Heritage Commission, which reviews permits to alter, relocate, or demolish these landmarks.

(b) City of Los Angeles Historic-Cultural Monument Criteria

The Los Angeles Cultural Heritage Ordinance (Section 22.130: City of Los Angeles Administrative Code) establishes criteria for designating local historic resources as LAHCM. The City's criteria are sufficiently broad enough to include a wide variety of historic resources. However, a proposed resource should possess sufficient architectural, historical, and/or cultural significance to warrant designation. Though there is no age requirement designation as a LAHCM, sufficient time to develop a historical perspective and to evaluate its significance in context should be considered. A LAHCM must satisfy one or more of the City's criteria, which are defined as the following:

- It reflects or exemplifies the broad cultural, political, economic, or social history of the nation, state, or community.
- It is identified with historic personages or with important events in the main currents of national, state, or local history.
- It embodies certain distinguishing characteristics of an architectural type, specimen, inherently valuable for a study of a period style or method of construction.
- It is notable work of a master builder, designer, or architect whose individual genius influenced his age.

b. Historic Context

(1) Los Angeles

Prior to the arrival of the Spanish in California, the Los Angeles area was inhabited by the Gabrielino Indians. The earliest explorers to the region arrived in 1769, with the Gaspar de Portola Expedition. In 1781, Mexican settlers under the direction of Spanish Governor Felipe de Neve founded El Pueblo de La Reina de Los Angeles. Land to the west of the pueblo comprised four large ranchos. The largest of these was Rancho San Vicente y Santa Monica, encompassing most of the Santa Monica Mountains, Brentwood, West Los Angeles, and the City of Santa Monica. Rancho Boca de Santa Monica comprised the Pacific Palisades and Santa Monica Canyon. The present-day Palms area was situated within Rancho Rincon de los Bueyes while Rancho San Jose de Buenos Ayres encompassed present-day Westwood, land near Bel Air, Beverly Hills, and land to the north of Pico Boulevard. During the 1800s, many of these rancho lands were sold to several individuals and families.

In 1850, California was admitted as the 31st state in the Union. Many Americans flocked to California in hopes of finding gold. During the 1860s and 1870s, land to the west and north of the present-day Harbor Freeway was settled as Los Angeles began to expand. In the 1870s and 1880s, immigrants established Chinatown, to the north of Los Angeles. By the 1880s, southern California began attracting Midwesterners and Easterners with its new railroad lines. Streetcars also made possible development of residential neighborhoods further west during the late 1880s and early 1890s.

(2) The Beginnings of Public Education in Los Angeles

Public schooling in Los Angeles is generally acknowledged to have begun with a primary school opened in 1817, by order of the last Spanish governor, Pablo Vicente de Sola, while the California territory was still under Spanish rule and Los Angeles a pueblo of around five hundred residents.[32]

The second school in Los Angeles opened in 1827, about a year after California became a territory of Mexico, and was taught at the residence of its teacher, Don Ygnacio Coronel, on Los Angeles Street. Classes were also held at a church in the plaza. Like its Spanish-era predecessor, the school held intermittent sessions until its closure in 1831. Historical accounts variously attribute periodic suspension of classes to the lack of regular attendance by students and unqualified teachers. Local rebellions, often requiring the participation of the teacher and

[32] *Historic Context Statement of "Preliminary Historic Resources Survey" of the Los Angeles Unified School District, Leslie Heumann and SAIC, 2002. p. 2.*

any young men in enrollment, also interrupted schools, sometimes for extended periods. It is estimated that no more than ten cumulative years of school sessions were held in Los Angeles between the end of Spanish rule in 1821 and California's admission to the Union in 1850, with the longest active sustained period between 1838 and 1844.[33]

Incorporation of the City of Los Angeles in 1850 marked the beginning of more concerted efforts to institute a program of formal education in the City, aided by the passage of state legislation in 1849 explicitly addressing education. Los Angeles, with a resident population of just 1,700 as of 1850, waged a continual struggle throughout this period to elevate its status to that of a recognized center of government. As part of its city-building efforts, the Los Angeles town council appointed two committee members in 1850 to establish a public school. The City's first English-speaking school opened in 1851 in the home of Reverend Henry Weeks and his wife. In 1853, the city adopted an ordinance providing for the establishment and maintenance of city public schools and empowered a Board of Education. The first superintendent of schools, Stephen C. Foster, then-mayor of Los Angeles, was appointed in 1854.

Construction of the first dedicated public schoolhouse, two stories in height and constructed of brick, was undertaken in 1855 at the corner of Second and Spring Streets, then a southern suburb of the city proper. A second school opened shortly thereafter on North Main Street. Because Los Angeles was still a largely rural settlement in the 1850s, truancy was a problem among school-age children. The 1860s saw the distant civil war take its toll on state resources and attention with Los Angeles gaining only 1,000 new residents during the decade. A one-room brick schoolhouse called the San Pedro Street School was constructed in 1861 and occupied the present school of the same name. The property is recorded as the oldest in the ownership of the School District.[34]

(3) Formation of the Los Angeles City School District

The State legislature made education compulsory in 1872 and passed a bond issue for school construction. Each city was required to create a board of education consisting of five members with the power to appoint a superintendent. In this manner, a City school district, separate of the County, was formed. Two new schools, the first in Los Angeles in a decade, were built in 1872 and 1873. The 1873 school represented the first high school in Los Angeles and in southern California. The high school was located in a classroom of the three- or four-

[33] *Historic Context Statement of "Preliminary Historic Resources Survey" of the Los Angeles Unified School District, Leslie Heumann and SAIC, 2002. p. 3.*

[34] *Historic Context Statement of "Preliminary Historic Resources Survey" of the Los Angeles Unified School District, Leslie Heumann and SAIC, 2002. p. 4.*

room building known as the Central Elementary School that sat atop "Pound Cake Hill" at Temple and Broadway (then Fort) Streets (now the site of the County Courthouse).[35]

Growth in the first part of the twentieth century continued at an extraordinary rate. By 1910, the City of Los Angeles' population was 319,000 with the school district encompassing over 85 square miles and with enrollment of 46,500. By 1916, district enrollment stood at 78,658 and the district served an area of 400 square miles. The district included both the City of Los Angeles and adjacent unincorporated land, and frequently portions of other incorporated cities. The district's first junior high school was organized in 1911, and four more followed later the same year. In 1916 it was reported that the majority of new schools were of brick construction, together with three frame buildings, five of plaster and wood, one of concrete and plaster, and two of plaster on tile.

The boom in school attendance and new school construction during the 1920s reflected a correspondingly dramatic growth in Los Angeles County. By the end of the decade Los Angeles was the fifth largest city in America, with a population of 1,238,048.

(4) 1933 Long Beach Earthquake and the Field Act

In 1914, the citizens of Los Angeles voted to replace wood frame construction school buildings with masonry structures, in keeping with the new emphasis in building on fire resistance. Masonry's vulnerability to earthquakes was not a consideration, as the risk was not recognized. New schools built during the 1920s were generally of masonry construction. The 1925 Santa Barbara earthquake resulted in the 1927 City of Los Angeles Building Ordinance, which added more safety requirements for school construction. After 1927, new schools included reinforced concrete beams within floors and roofs. Schools built with these features proved more resilient to the March 1933 Long Beach earthquake than those constructed prior to 1927. Nonetheless, the school district suffered great losses as the result of the 1933 earthquake with 40 masonry buildings so severely damaged that they required condemnation and demolition. The district planned and implemented a phased school building reconstruction program immediately following the earthquake. Using bond funds and additional matching funds from the Federal Public Works Administration, a total of $12.1 million was ultimately raised for the 1933-35 reconstruction program.

The state passed the Field Bill, or Act, in 1933 in response to public outcry over the vulnerability of school buildings to earthquake-related damage. The Act resulted in the

[35] *LAUSD: History of Schools (Chronology) 1855-1972, 3rd Edition. Originally published in 1963 and updated in 1973. Published by the Educational Housing Branch, School Planning Division, Los Angeles Unified School District.*

development and enforcement of regulations to ensure earthquake resistant structures. The City of Los Angeles Board of Education further decreed that elementary school buildings were not to exceed one story in height and high school buildings were to be limited to two stories. Rehabilitation of schools typically included installation of reinforced gunite, and installation of reinforced concrete walls. New buildings similarly incorporated recent construction advances and prominently featured the use of structural steel and reinforced concrete.

(5) World War II and Postwar Growth of the School District

The World War II era and its aftermath had a profound effect on the growth and organization of the school district. The geographical area served by the school district fluctuated over time, expanding and contracting as districts were annexed and others split off to form self-contained districts. Rapid postwar residential development greatly increased enrollment within the Los Angeles City School District and perpetuated the need for funds for additional classroom space and other resources. Building construction, which had slowed to a standstill during the war years, exploded in the 1950s as new tracts and suburbs were constructed for veterans who moved to Los Angeles and started families. Areas such as the San Fernando Valley witnessed unprecedented growth during this period.

Today, the Los Angeles Unified School District serves the second largest student population in the nation, encompassing more than 720,000 students located in a 704-square mile area including the City of Los Angeles, areas of unincorporated Los Angeles County, and parts of 20 other municipalities.

(6) Los Angeles Polytechnic High School

Los Angeles High School, originally opened in 1873 as a classroom in the Central Elementary School building on Pound Cake Hill at Temple and Fort Streets (now Broadway). As student enrollment grew, the need for expansion grew and the high school relocated to a number of sites with larger facilities all within the downtown area. In 1917, Los Angeles High settled into its current location at 4600 West Olympic Boulevard.[36]

The current location of the Los Angeles Trade-Technical College was the former site of Los Angeles Polytechnic High School ("Poly High"). Poly High had its beginning in 1897 as the commercial branch of Los Angeles High School. From 1897 until 1905, the branch was called Commercial High School and was located in the same building as Los Angeles High School on

[36] *LAUSD: History of Schools (Chronology) 1855-1972, 3rd Edition. Originally published in 1963 and updated in 1973. Published by the Educational Housing Branch, School Planning Division, Los Angeles Unified School District. p. 75.*

Fort Moore hill.[37] In 1905, the name was changed to Polytechnic High School and was relocated to 400 West Washington Boulevard.[38] Poly High, initially situated on a L-shaped lot, was originally comprised of approximately four buildings: a three-story building that contained lecture rooms, offices, dining rooms, and a kitchen; a two-story building with a first floor gymnasium and second floor auditorium hall and gallery; a large, one-story industrial arts building containing a carpenter/mechanical shop with a blacksmiths shop and foundry; and a large one-story building called the Science Hall that was divided into lecture rooms.[39] Architect Franklin P. Burnham designed the buildings fronting Washington Boulevard in a highly ornate and imposing Classical Revival style.[40] Triangular pediments, Ionic columns, and decorative friezes characterized the Greek temple-like buildings. By 1910, the campus had expanded to include additional parcels creating a "Z" configuration between South Flower Street and Barnard Park. In 1910, an Arts Building was built on the west corner of the property facing South Flower Street.[41]

By the 1920s, Poly High had grown to occupy most of a city block bounded by South Flower Street on the west, Barnard Park on the east, West Washington Boulevard on the north, and West 21st Street on the south. A new three-story Gymnasium was constructed in 1922 near the southwest corner of the campus. In 1924, a larger new auditorium (Building A, the Grand Theater) replaced the original 1905 auditorium/gymnasium, with additional classrooms (Building A, Classroom Wing) attached to the south of the new building in 1925. In 1926, as the campus expanded to include additional parcels, a science building (Building E) was constructed near the southeast corner of the property in addition to a restaurant and classrooms built along South Flower Street during the same year. In 1935, a new Administration Building (now part of Building A) designed by the architect Albert C. Martin replaced the original 1905 Main Building at the same location. That same year, Los Angeles Polytechnic High School changed its name for the last time to John H. Francis Polytechnic High School, after the school's first principal. A. C. Martin also designed the Industrial Arts Building (Building C), which was constructed in 1936 in the center of the campus that replaced the old Science Hall and industrial arts activities. Together the auditorium/classroom addition/administration building, Science Building, and the Industrial Arts building created the "core" of the Poly High campus still extant today.

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[37] *Dorsay, Susan M. "History of Schools and Education in Los Angeles: Our Schools from Pueblo to Metropolis" Notes for a lecture given at the Los Angeles Public Library. No date. p. 9.*

[38] *LAUSD: History of Schools (Chronology) 1855-1972, 3rd Edition. Originally published in 1963 and updated in 1973. Published by the Educational Housing Branch, School Planning Division, Los Angeles Unified School District. p. 73.*

[39] *1907 Sanborn maps.*

[40] *"Western Architect" April 1906, Vol. 9. p. 9. Polytechnic High School, Los Angeles, Franklin P. Burnham, architect. From Avery online index.*

[41] *1922 Sanborn maps.*

Perhaps the most notable Poly High alumnus from the Washington Street location was Mayor Tom Bradley, class of 1937. Other alumni include feminist author Helen Gurley Brown, actors Anthony Quinn and Mary McCarty, and ex-Pittsburgh Steeler Brady Keys. In 1931, the school's four-man 880 relay team and a pole-vaulter, Bill Sefton, set world records. The school's so-called "Cinderella" teams won many leagues and city track, football, basketball and gymnastic championships during its decades on Washington Boulevard.

In the postwar years, however, the growing commercialization of the area brought about the decision to close John H. Francis Polytechnic High School in 1955. Not wanting to see the historic school forgotten, the Board of Education relocated the school's name, colors, and traditions to a newly completed school in the San Fernando Valley that opened in 1957. Poly High remains the second oldest high school in Los Angeles.

(7) Los Angeles Trade-Technical College

The Frank Wiggins Trade School, the first of its kind in the Los Angeles Unified School District, was established in 1925 on Grand Avenue and relocated in 1927 to 1646 South Olive Street. It provided a course of adult education in specific vocations and placement of students in the occupations for which they had been trained. Among its other curricula, the school offered the first professional culinary training program in the nation, an offshoot of the home economics program. The trade school evolved into the LATTC operated today as part of the nine-campus 882-square-mile Los Angeles Community College District.

In 1957, the LATTC opened in the renovated buildings of the old Poly High campus at 400 West Washington Boulevard. Over the past forty years the campus has grown, expanding southward to 23rd Street and east to South Grand Avenue. Since LATTC obtained the campus, the buildings comprising the "core" of Poly High (Buildings, A, C, E) have been retained and reused while the perimeter buildings (1910 Arts Building, 1922 Gymnasium, 1926 Restaurant/Classroom) and a small boiler room building have been demolished for new construction.[42]

In the 1960s five new buildings were constructed, Building B (Construction Technologies, 1961); Building H (Culinary Arts, 1961); Building D (Fashion Center, 1964); Building F (Automotive Technology, 1966); Building J (Physical Education, 1966); and Building G (Gymnasium, 1968). Five buildings were built in the 1970s, Building M (Physical Plant Shops, 1971); Building R (Admission and Records, 1971); Building K (Science/ Mathematics, 1975); Building N (Child Development Center, 1975); and Building L (Library, 1979). The Snack Bar was built in 1982. Most recently, the PTA Building located between 21st

[42] *1954 Sanborn maps.*

and 22nd Streets that was erected in 1950 was acquired and added to the campus. The current campus now covers approximately 27 acres.

(8) The Wholesale Coffee Industry in Los Angeles

In the first decades of the twentieth century there were a number of coffee importers, roasters, and wholesalers operating in the City of Los Angeles. According to the Los Angeles City Directory, in 1916 there were 16 wholesale coffee importers/roasters in the city, including Hills Brothers and the California Importing Tea and Coffee Company, which was under the ownership of Louis Apffel. In 1922, the Edward A. Apffel Company appears for the first time in the Los Angeles City Directory. By 1924, there were 21 coffee wholesalers listed in Los Angeles. The 1941 city directory lists 27 coffee wholesalers including Farmer Brothers, Hills Brothers Coffee, MJB Company, Maxwell House Division of General Foods Corp., and the Edward Apffel Coffee Company, among others. Twenty-one years later, there were 51 coffee wholesalers listed in the Los Angeles phone directory including, in addition to the companies listed in 1941, Folger's Coffee Company and Schilling, a Division of McCormick & Co. By 1956 the number of coffee wholesalers was down to 40, and the 1970 phone directory lists only 29 wholesalers with the major name brand companies dominating the local industry.

(9) Edward A. Apffel Coffee Company

The 1913 Los Angeles city directory shows that Edward Apffel worked as a clerk at the California Importing Tea and Coffee Company located at 631 West 7th Street in Los Angeles. The company was under the ownership of Louis Apffel, most likely a relative of Edward Apffel. By 1914, Edward Apffel was in Oakland, California and had started his own importing, roasting, and retail coffee business. Starting as a one-man operation, Edward Apffel delivered roasted coffee to customers using only a bicycle. Later, as business expanded, Apffel delivered coffee by buggy and, eventually, by motorcar. In 1922, Edward Apffel relocated his coffee business to Los Angeles. His firm appears in the city directory for the first time as the Edward A. Apffel Company. The company's first address was 119 West 1st Street in downtown Los Angeles. Around 1928 the company moved to 317 East 2nd Street in Los Angeles and remained in that location until 1941. From 1941 until today, the Edward Apffel Coffee Company has been headquartered at 2115 South Grand Avenue.

The Apffel family emigrated from the Alsace-Lorraine region of Germany to Los Angeles in the early twentieth century. Today, the third generation of the Edward Apffel branch of the family owns and operates the company with the Grand Avenue location serving as a roasting factory, distribution warehouse, sales office, and headquarters.

c. Existing Conditions

The campus is roughly divided by the line of 21st Street into a northern and a southern area. The northern portion is densely developed with approximately eleven buildings linked by pedestrian courtyards. The southern portion is comprised of four buildings, two surface parking lots, and athletic fields and courts. The property at Grand Avenue between 21st and 22nd Streets which contains the Apffel's Coffee Company, will be acquired by the College in a separate action from the Project. Outside of the main campus area, on the east side of Grand Avenue between Washington Boulevard and 21st Street, is the Child Development Center and a pair of parking lots. Additional offsite parking is located under the raised Santa Monica Freeway a block north of Washington Boulevard. In total, the College includes approximately 780,000 square feet of building area, 8.16 acres of open space and 1,381 parking spaces.

(1) Survey Study Area Defined

The historic resources study area was identified based on the anticipated direct and indirect effects of the proposed Project on potential historic resources. The study area was defined as the Project site, which is comprised of two areas separated by South Grand Avenue. The larger area is bounded by Washington Boulevard on the north, Flower Street on the west, 23rd Street on the south, and Grand Avenue on the east, an area comprising most of the current College campus. Within the larger study area are the PTA Building and the Apffel's Coffee Company Building. Also considered as part of the Project site is a smaller parcel located east of the main campus within the boundaries of Grand Avenue on the west, 21st Street on the south, Olive Street on the east, and the property line ending at the north boundary of M parking lot. This parcel occupies approximately two-thirds of the entire block. The 28.3-acre Project site consists of the campus and adjacent commercial buildings and parking lots along Grand Avenue as depicted in Figure 8 on page 105. All existing buildings on the larger site are currently occupied except for the PTA Building, which is vacant. Of the buildings indicated as Building N, within the smaller parcel on the east side of Grand Avenue, the three one-story brick warehouse buildings are unoccupied with only the 'temporary' building housing the Child Development Center currently occupied.

(2) Historic Resources within Study Area

The California Historical Resources Information system indicated that there are no properties listed in the California Historic Resources Inventory database maintained by OHP within the Project site. In addition, a review of literature data indicated that no previously recorded prehistoric or historic archaeological have been identified within the study area or within a one-half mile radius of the Project area. The California Point of Historical Interest

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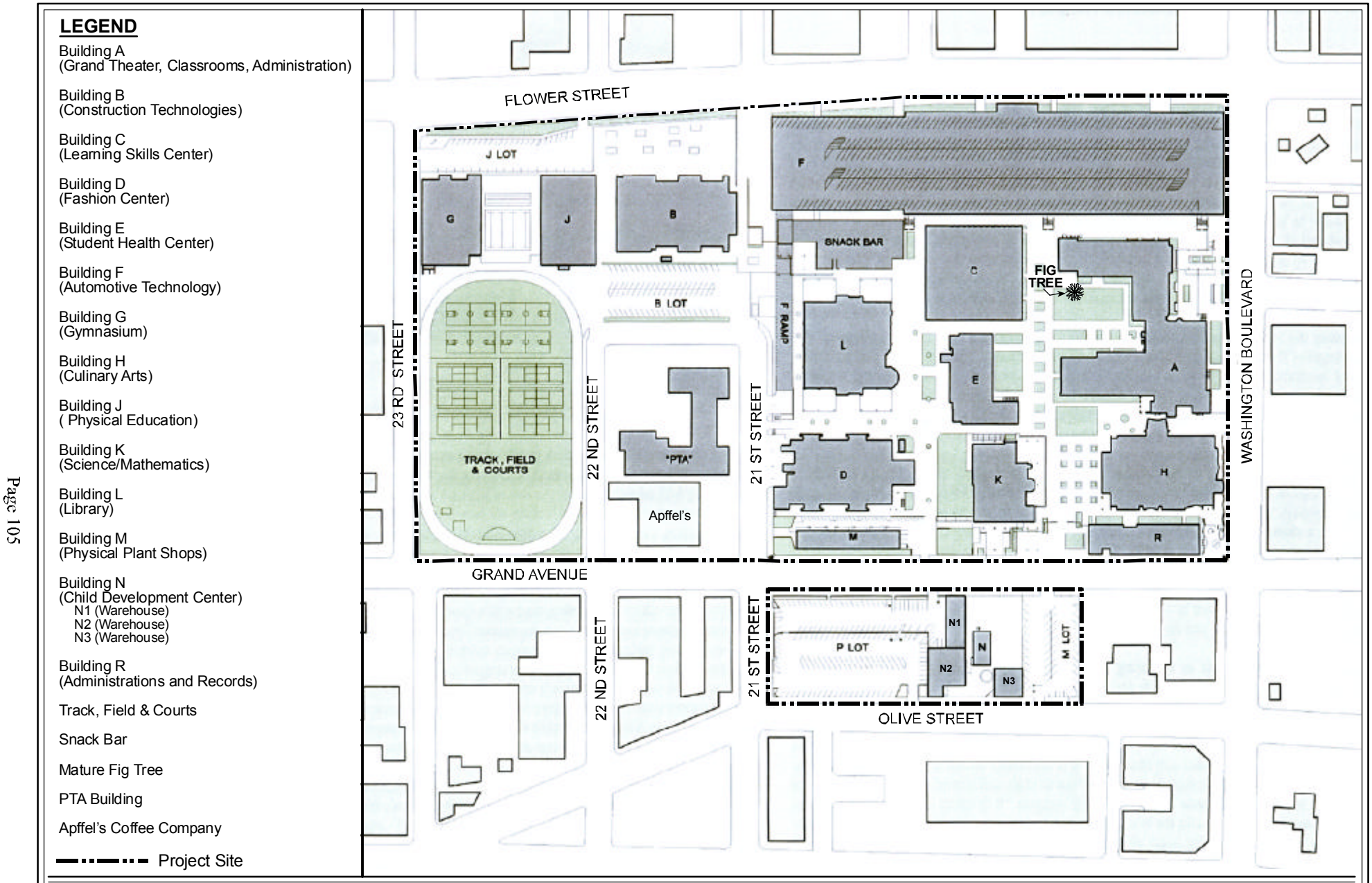

Source: MDA Johnson Favaro, 2003

Figure 8
Survey Study Area Defined

(1992) of the OHP lists one property within a one-half mile radius of the Project area, Patriotic Hall at 1816 S. Figueroa Street. The California Historical Landmarks (1990) of the OHP lists no properties within a one-half mile radius of the Project area. Additionally, the National Register of Historic Places lists four properties (three residences and a historic district) within a one-half mile radius of the Project area. The listings of the City of Los Angeles' Historic-Cultural Monuments indicates that there are 27 landmarks within a one-half mile radius of the Project area, but none within the Project site.

The current survey process was conducted per OHP instructions, which gives a 45-year threshold for surveying properties for significance. During the current survey, six pre-1958 properties and one feature were identified within the study area. Summarized findings of the properties are noted in Table 11 on page 107.

Those properties that appeared to be of post-1958 construction (under 45 years of age) were not documented in the current survey unless they exhibited "exceptional" importance. However, none of the post-1958 properties exhibited the exceptional significance necessary for National Register eligibility under Criteria Consideration G: Properties That Have Achieved Significance Within the Past Fifty Years.

(3) Los Angeles Trade-Technical College

The current college campus has experienced considerable growth and change since occupying the Polytechnic High School site in 1957. Many of the older buildings that remained prior to Poly High's relocation have since been demolished. Three buildings and one landscape feature now comprise the remaining historic grouping of the old high school campus: Building A (auditorium, classroom wing, administration building), Building C (Learning Skills Center), and Building E (Student Health Center). The mature Morten Bay fig tree, located in the center courtyard of Building A, is a large landscape feature and is considered a contributor to this grouping of educational buildings.

The buildings embody the evolution of the distinctive characteristics of a significant building type that played a critical role in the history of the community: the public school. However, because of the nature of the development of the school, at which buildings were erected and demolished at several points in time, the current College campus does not constitute a unified entity reflective of the early Los Angeles Polytechnic High School campus. Rather, the extant grouping of the three buildings and landscape feature from the 1920s and 1930s better represent individually the surviving elements associated with the high school that once occupied the current College campus.

Table 11

PROPERTIES SURVEYED WITHIN THE STUDY AREA

Address	Description	Year Built	Rating
1. 400 W. Washington	Building A (Grand Thtr, Classrms, Admin)	1924; 1925; 1935	5S1
2. 400 W. Washington	Building B (Construction Technologies)	1961	6Z1
3. 400 W. Washington	Building C (Learning Skills Center)	1936	5S1
4. 400 W. Washington	Building D (Fashion Center)	1964	6Z1
5. 400 W. Washington	Building E (Student Health Center)	1925	6Z1
6. 400 W. Washington	Building F (Automotive Technology)	1966	6Z1
7. 400 W. Washington	Building G (Gymnasium)	1968	6Z1
8. 400 W. Washington	Building H (Culinary Arts)	1961	6Z1
9. 400 W. Washington	Building J (Physical Education)	1966	6Z1
10. 400 W. Washington	Building K (Science/Mathematics)	1975	6Z1
11. 400 W. Washington	Building L (Library)	1979	6Z1
12. 400 W. Washington	Building M (Physical Plant Shops)	1971	6Z1
13. 1948 S. Grand	Building N (Child Development Center) N1 (Warehouse) N2 (Warehouse) N3 (Warehouse)	1975 c. 1930 c. 1958 c. 1940	6Z1
14. 400 W. Washington	Building R (Admissions and Records)	1971	6Z1
15. 400 W. Washington	Track, Field & Courts	n.d.	6Z1
16. 400 W. Washington	Snack Bar	1982	6Z1
17. 400 W. Washington	Mature Fig Tree	c. 1930s	5S1
17. 400 W. Washington	PTA Building	1950	5S3
18. 2115 S. Grand	Apffel's Coffee Company	1941	5S1

5S1 Property found ineligible for the National Register, but listed on or eligible for designation under an existing local ordinance

5S3 Property found ineligible for the National Register or for designation under an existing local ordinance but is eligible for special consideration in local planning

6Z1 Property found ineligible for federal, state, and local designation

Source: PCR Services Corporation, 2003.

(a) Building A – Administration

Building A, depicted in Figure 9 on page 109, consists of three contiguous buildings connected via a hallway constructed at different times for different purposes: an auditorium (1924), a classroom wing (1925), and an administration building (1935). The building is arranged in a "U" plan around a rear, south-facing central courtyard. A large, square, three story auditorium was constructed in 1924 along Washington Boulevard as a replacement for the 1905 gymnasium/auditorium on the same site. Now called the Grand Theater, the auditorium's main entrance is on the west side of the building. When built, the old 1905 Main Administration Building was still extant and attached to the new auditorium to the west. The auditorium is a reinforced concrete building capped with a flat roof and sprayed with a non-original gunite finish. Its design is an unusual mix of Moorish and Classical Revival styles. The main entrance along the primary west elevation is shaded by a wide flat steel awning, supported by chains, with strips of opaque glass for filtered light (Figure 9). An ornamental iron crest of acanthus leaves crowns the awning. A cant bay box office of wood construction is flanked by a pair of non-original double steel doors on either side beneath the awning. Above the awning on the second floor is a band of five perforated concrete screens. On the third floor, centered above the screens, is a recessed combination squared and rounded window with molded surrounds. Along the Washington Boulevard (north) facade is a row of six, squared pilasters (Figure 9). Steel-framed, deeply recessed multipane casement windows fill the spaces between the pilasters. A decorative, wrought iron sconce and perforated concrete screen (since filled-in) are east of this window grouping as shown in Figure 10 on page 111. A utilitarian concrete staircase that wraps around the theater's northwest corner has replaced the original cantilevered concrete staircase along Washington Boulevard. A grid pattern of stylized floral squares in relief wraps around the building on the third floor on the east (rear) end of the building (Figure 10). Centered below the grid on the upper stories of the east elevation is a trio of recessed, round arch windows with perforated concrete screens, rounded pilasters, and Corinthian capitals that evoke the Moorish Revival style. The ground floor southeast corner of the auditorium has a projecting arcade featuring rounded arched openings and a plain entablature that merges with the classroom wing added in 1925 (Figure 10).

The interior of the auditorium consists of a lobby, balcony, stage, and main seating area. Crown molding, squared pilasters with Corinthian capitals, turned posts, and original suspended light fixtures characterize the lobby area. The walls and ceilings of the theater and proscenium are festooned with intricately patterned floral and classical motifs in molded relief. Ornate medallions and perforated wood ceiling screens characterize the proscenium. Suspended from the intricately decorated theater ceiling are original chandeliers. Interior modifications include the attachment of acoustical tile on wall surfaces, new seating, non-original lighting grids, and non-original HVAC vents.

Building A - Grand Theater, West Elevation

Building A - Grand Theater, North Elevation

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Figure 9
Building A

Source: PCR Services Corporation, 2003

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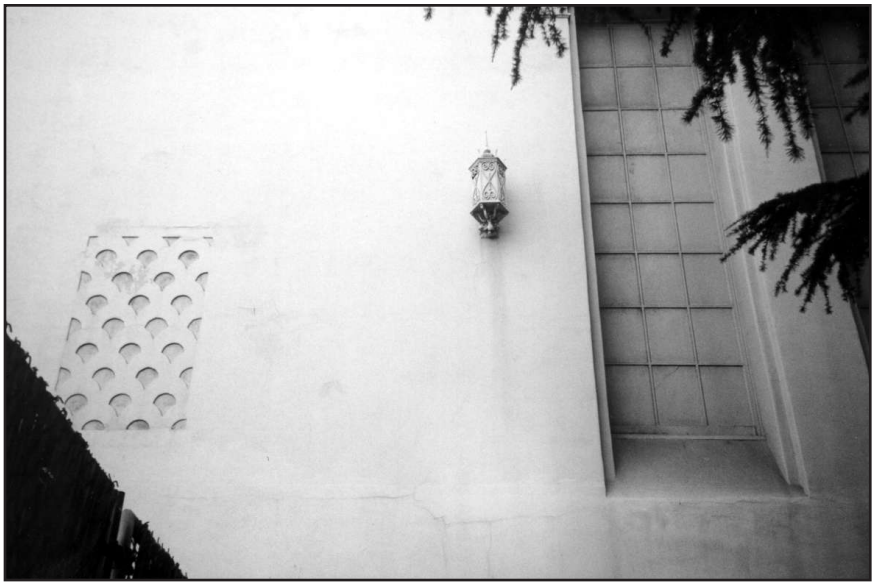
Building A - Grand Theater, East and South Elevations



Building A - Grand Theater, North Elevation Detail

PCR

Figure 10
Building A

Source: PCR Services Corporation, 2003

The exterior of the auditorium has been modified by the removal of the original exterior staircase near the northeast corner of the building, infill of several perforated concrete screens, replacement of the main entrance doors, and a coating of gunite. Yet the auditorium still retains key character-defining architectural elements of both the Moorish Revival and Classical Revival styles. These features include the stylized floral grid pattern surrounding the top floor, the band of squared pilasters interspersed with recessed steel-framed multipane casement windows along Washington Boulevard, perforated concrete screens, wrought iron sconce, flat steel entrance awning, wood sheathed cant bay box office, a recessed molded window, a projecting arcade on the east elevation with rounded arch openings, and a trio of Moorish-influenced arched windows with perforated concrete screens and pilasters with Corinthian capitals.

Constructed in 1925 and attached to the auditorium's south elevation, is a three-story classroom wing as shown in Figure 11 on page 113. It is rectangular in plan, flat-roofed, and of a Classically influenced style similar to the Washington Boulevard-facing façade of the auditorium. Following the Long Beach earthquake, the building was reinforced with steel in 1935. A row of squared pilasters separated by recessed, multipane, double-hung windows characterizes the east elevation on the second and third floors. The ground floor, divided from the upper stories by a belt course, has recessed apertures following the pattern of the windows above. The west elevation facing the courtyard is mostly unadorned with multipane, double hung windows of various sizes (Figure 11). Exterior surfaces were sprayed with a non-original rough-textured gunite. Other than the gunite spray, the building appears mostly original.

The third wing of Building A, presented in Figure 12 on page 115, the Administration Building, was designed in 1935 following the Long Beach earthquake and replaced the original 1905 Main Administration Building on the same site. Set back further from Washington Boulevard than the original building and the adjacent, attached 1925 auditorium, the reinforced concrete building is "L"-shaped in plan. It is capped with a low-pitched, hipped red tile roof with a shallow overhang, plain entablature, and a row of decorative wrought iron brackets above the north-facing primary entrance. The concrete surface has been sprayed with rough-textured gunite. The asymmetrical primary north façade of the two-story building is a mixture of Spanish Colonial Revival and Classical Revival elements. Concrete steps lead to a projecting, covered entrance porch that features three cambered arch openings separated by squared columns capped with stylized acanthus leaf capitals. Original paneled wood and glazed doors lead to the entrance lobby. The lobby features original squared pilasters with acanthus leaf capitals, crown molding, and molded terra cotta tiled walls. Centered above rectangular-shaped windows of the projecting buttresses flanking the entrance are circular medallions in relief. One depicts the "Fine Arts" the other "Manual Arts." A flat-roofed, non-original covered walkway is attached to the main entrance below the arches. Faux quoins distinguish the entrance porch corners and primary corners of the east, west, and north elevations. The west elevation features sill courses on both floors beneath trios of four-over-four recessed windows. On the east and south elevations facing the courtyard, the exteriors are mostly unadorned with six-over-six, double-hung sash windows

Building A - Classroom Wing, East Elevation

Building A - Classroom Wing, West Elevation

PCR

Figure 11
Building A

Source: PCR Services Corporation, 2003

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Building A - Administration, North Elevation

Building A - Administration, East and South Elevations
Morten Bay Fig Tree

PCR

Figure 12
Building A

Source: PCR Services Corporation, 2003

singly or in groups, and a second floor sill course (Figure 12). As detailed above, the Administration Building is in mostly original but neglected condition, particularly the deteriorating exterior surfaces.

The architect of the 1935 Administration Building wing of Building A was Albert C. Martin, Sr. (1879-1960). Martin founded his architecture and engineering firm in 1908 and is notable for designing or collaborating on a number of significant buildings in Los Angeles in the years prior to World War II. These buildings included theaters, churches, hospitals, office buildings, civic buildings, and schools. A. C. Martin, Sr., along with William L. Woolett, designed the Million Dollar Theater in Los Angeles in 1918. From the 1920s, noteworthy A. C. Martin, Sr. buildings in Los Angeles include St. Vincent's Catholic Church (1923-1925), the Boulevard Theater (1925), and Los Angeles City Hall (1923: associated architects John Parkinson, John C. Austin, A. C. Martin). Los Angeles schools designed by Martin in 1924 include the Raymond Avenue School and the Utah Street School. His firm also built school buildings outside of Los Angeles such as Lomita High School (1924) and the St. James School auditorium in Redondo Beach (1927). The firm was also responsible for designing the May Company Wilshire building (1939-40). Today, the third generation descendants of A. C. Martin, Sr. manage the architecture and engineering firm of AC Martin Partners, still headquartered in Los Angeles.

Building A appears ineligible for National Register listing because of lack of sufficient historical and architectural integrity and associations necessary for such a designation. The building does, however, appear eligible for designation under the City of Los Angeles' Cultural Heritage Ordinance (Section 22.130: City of Los Angeles Administrative Code). The City of Los Angeles' Historic-Cultural Monument Criteria are sufficiently broad enough to include a wide variety of historic resources. However, a proposed resource should possess sufficient architectural, historical, and/or cultural significance to warrant designation. According to the local criteria, Building A appears to "reflect or exemplify the broad social history of the community." Building A, with its combination of administration building, auditorium, and classrooms, was the main building of Los Angeles Polytechnic High School, the second high school in the Los Angeles Unified School District and the first high school to be located outside of the original Los Angeles High School campus on Fort Moore Hill (since demolished). The school moved to the current Project site location and was given the name Los Angeles Polytechnic High School in 1905. In addition, Building A also meets local designation criteria specifying that the building should embody "certain distinguishing characteristics of an architectural type," in this case, Moorish-Revival, Classical-Revival, and Spanish Colonial Revival style characteristics. In accordance with section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is considered a historical resource for the purposes of CEQA.

(b) Building C – Learning Skills Center

Built in 1936 as the Industrial Arts building, this one-story, steel-framed, reinforced concrete building is square in plan with a central north-south corridor (Figure 13 on page 119). It is an example of an industrial type building designed in a restrained P.W.A. Moderne style typical of the period and property type. Today the building is called Building C and is referred to as the Learning Skills Center. Located near the center of the campus, the A. C. Martin-designed building is a flat-roofed, mostly utilitarian structure. The exterior finish is non-original rough textured gunite. The rectangular main entrance centers the north façade and is recessed with a molded, Moderne-style surround. The metal-framed glazed double doors and transom of the main entrance are not original. A stringcourse serves as an extended lintel for the original tall, recessed, multipane steel-framed windows that punctuate all sides of the building. Most of the windows contain six-light, awning-type center sections for air circulation. Other than the non-original main entrance doors, transom, and sprayed gunite exterior finish, Building C appears mostly original and in good condition.

Building C appears ineligible for National Register listing because of insufficient historical associations and architectural integrity necessary for designation at that level. However, locally the building is a good example of a PWA industrial type structure designed for the purposes of an educational classroom, specifically for the teaching of the industrial arts. Its integrity and importance is sufficient enough to satisfy the City of Los Angeles' Historic-Cultural Monument criteria. Therefore, Building C appears eligible for designation as a City of LAHCM because of its historical associations with the early Los Angeles Polytechnic High School campus and its PWA Moderne architectural styling as interpreted in an educational facility. Further, in accordance with section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is considered a historical resource for the purposes of CEQA.

(c) Building E – Student Health Center

Constructed in 1925, Building E was originally the Science Building prior to significant modifications to its exterior for its new purpose as the Student Health Center (Figure 13). The three-story building is designed as an unadorned utilitarian educational structure. The reinforced concrete building is "L"-shaped in plan, flat-roofed, with a non-original rough gunite finish. Most windows are tall, recessed, multipane, double-hung sash. The south (rear) elevation serves as a loading dock with a flat, cantilevered canopy shading the raised loading platform and entrance stairs. Non-original exterior metal staircases are attached to the west and north elevations within the "L." Other alterations and modifications over the years have erased any notable character-defining features that once might have existed on the building.

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Building C - Learning Skills Center, North Elevation

Building E - Student Health Center, North Elevation

PCR

Figure 13
Buildings C and E

Source: PCR Services Corporation, 2003

Though associated with the early Los Angeles Polytechnic campus, Building E lacks sufficient physical integrity to reflect adequately its original historic character. Therefore, it appears ineligible for listing on the National Register and California Register. Additionally, the building appears ineligible for designation as a City of Los Angeles Cultural-Monument because of insufficient integrity. Further, the building is not considered a historic resource the purposes of CEQA under Section 15064.5(a)(2)-(3) of the CEQA Guidelines.

(d) Mature Fig Tree Feature

The large, mature Morten Bay fig tree, shown in Figure 12 on page 115, provides abundant shade to the area located along the west side of the center courtyard within the rear (south) "U" of Building A. Because of its size, type, age, and provenance this tree has been identified as an important landscape feature to the historic grouping of buildings.

The Morten Bay fig tree appears ineligible for National Register because of lack of sufficient historical associations necessary for designation at that level. It does, however, appear eligible for City of LAHCM designation because of its association with the early Los Angeles Polytechnic High School campus, its age, and type. Additionally, for the purposes of CEQA compliance, the fig tree is considered a historic resource.

(e) Apffel's Coffee Company Building

The Edward Apffel Coffee Company is located at 2115 South Grand Avenue in downtown Los Angeles occupying the block between West 22nd and West 23rd Streets, as shown in Figure 14 on page 121. The building, constructed in 1941, is primarily vernacular Modern in style. The property consists of a one story square wood-frame building with a pair of low vaulted ceilings supported by trusses divided east/west down the middle. The main, east-facing building is faced with red brick on the lower half and a false-front façade above. Windows of square glass block provide interior light. On the southeast corner above the glass block and masonry is a box-like section of horizontally scored plaster that forms a signboard for the Apffels Coffee logo that is written in a stylized script of rear-lit plastic. A non-original metal mansard roof wraps around the façade's northeast corner. A recessed entrance, fronted by a non-original metal security door, is located on the building's southeast corner. A perpendicular one-story rectangular wing extends south toward West 22nd street from the rear of the main building. Within the "L" on the southeast corner of the property is a loading area and parking lot. A flat metal awning shades the raised loading dock along the south elevation. The parcel facing West 21st street on the north side of the property is also a parking lot. Clipped hedges partially disguise the chain link and barbed wire fence along Grand Avenue. The building houses a small museum devoted to communicating the history of the business from its founding in Oakland in 1914 to the present

Apffel's Coffee Company, East and South Elevations

PTA Building, South and West Elevations

Building N - Child Development Center, Warehouse Building, West Elevation

PCR

Figure 14
Additional Buildings

Source: PCR Services Corporation, 2003

day. The building appears mostly original except for the prominent mansard roof section, metal security door, and fencing.

Apffel's Coffee Company Building appears ineligible for National Register listing because of insufficient historical associations and integrity necessary for designation at that level. However, the property appears eligible for designation under the City of Los Angeles' Cultural Heritage Ordinance (Section 22.130: City of Los Angeles Administrative Code). Although the property was not identified as having sufficient architectural merit to reach a minimum level of significance, the building does represent an element of the economic history of Los Angeles. The City of Los Angeles' Historic-Cultural Monument Criteria are sufficiently broad enough to include a wide variety of historic resources. According to the local criteria, Apffel's Coffee Company Building appears to "reflect or exemplify the broad economic history of the community" given its association with a family-owned business that has been operating continuously in downtown Los Angeles since 1922. In light of its eligibility as a City of LAHCM, the property is considered a historical resource for the purposes of CEQA under Section 15064.5(a)(2)-(3) of the CEQA Guidelines.

(f) PTA Building

Built in 1950, the PTA Building is "L"-shaped in plan, constructed of reinforced concrete, and capped with a flat roof (Figure 14 on page 121). According to building permits, the architect was Walter R. Hagedohm (1901-1976) who was known primarily as a designer of churches. Designed in the International Style, the building was originally called The Congress of Parents & Teachers Health Center Building. The building is positioned on a square lot between West 22nd and West 21st Streets with the primary elevation and entrance facing south towards West 22nd Street. The two- and three-story building houses primarily offices except for the lecture hall and auditorium, which is located on the southeast corner of the parcel. The auditorium features a mostly glazed entrance lobby on the auditorium's southwest corner and is covered with a flat roof with deep eaves. Narrow, squared concrete posts are separated by stacked metal-framed, awning-type windows that reach the ceiling on south and west elevations. The west elevation facing the parking lot is angled slightly inward towards the lobby. Red brick entrance steps lead to three pairs of metal and glazed main entrance doors on the south. An aluminum flagpole pierces the overhang east of the entrance. The auditorium space is enclosed by a box-like concrete shell with an exterior surface scored to create a decorative grid pattern. Metal letters spelling the word "Auditorium" in a modern typeface are attached to the upper southeast corner. Low red brick walls border this and most of the building's other elevations in creating planters of low shrubs and trees. The three-story center section of the south elevation is unadorned and utilitarian in design with multiple bays divide by concrete posts. Horizontal bands of metal-framed casement windows punctuate each bay. Metal awnings shade the third floor windows of the south elevation. A two-story section at the west end of the building projects southward towards the parking lot. It, too, is unadorned with bands of metal casement

windows on both floors. A projecting concrete surround frames the two window bands. The north-facing elevation along West 21st Street mirrors the south elevation in style and fenestration, except for the ground floor window bands which have been filled-in. Low red brick planters parallel the street. Except for the noted changes, the PTA Building appears mostly original and well maintained.

The PTA Building appears ineligible for federal, state, and local designation because of the lack of sufficient historical and architectural integrity. It should, however, be given special consideration in the local planning process. The auditorium section located on the southeast corner of the building exemplifies numerous character-defining features of the International Style of architecture. These include the flat roof with deep overhangs, square concrete posts with vertical awning-type window bands, the box-like concrete auditorium shell with scored grid pattern, attached aluminum flagpole that pierces the south-facing overhang, and the metal "Auditorium" letters in period typeface. The auditorium also appears to retain high levels of physical integrity. The remainder of the building, however, does not approach the auditorium in terms of the quality of architectural style or physical integrity. Its more restrained and utilitarian interpretation of the International Style is not especially noteworthy or significant. In addition, its integrity has been greatly compromised by the filling-in of ground floor window bands and other windows on the north elevation facing West 21st Street. In accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, this property is not considered a historical resource for the purposes of CEQA.

(g) Building N – Child Development Center

The parcel upon which the portable buildings of the Child Development Center were placed in 1975 consists of several older buildings (Figure 14 on page 121). Sanborn maps indicate that a one-story brick warehouse was constructed circa 1930 with the address 1948 South Grand Avenue. The west-facing (primary elevation) building is rectangular in plan with a medium-smooth stucco façade. The vernacular building exhibits modest Moderne stylistic features, including the vertical scoring of the slightly projecting corners of the primary (west) elevation and the horizontal scoring above the main openings of the west facade. The windows along the primary elevation have been replaced or are covered with plywood. The main front entrance also along the west elevation does not appear original. Another building directly east of 1948 South Grand Avenue faces east onto South Olive Street. In reviewing Sanborn maps, this building was probably constructed circa 1958. It is one-story, vernacular warehouse/industrial type building constructed of brick. Currently, the building appears vacant with plywood covering all street-facing openings. Towards the northeast corner of the parcel is located a small, one-story building of brick construction that is square in plan. The 1954 Sanborn map notes the building as "The Pacific Telephone & Telegraph Company." It is a vernacular warehouse/ industrial type building with no obvious character-defining features and was most likely constructed circa 1940.

The buildings that comprise Building N appear ineligible for National Register, California Register, and City of Los Angeles Cultural-Monument designation because of insufficient integrity and lack of important historical and/or architectural significance. For the purposes of CEQA this property is not considered a historic resource under Section 15064.5(a)(2)-(3) of the CEQA Guidelines.

2. ENVIRONMENTAL IMPACTS

a. Methodology

In order to identify and evaluate historic resources, a multi-step methodology was utilized. Record searches to identify previously documented historic resources were conducted. This search included a review of the National Register of Historic Places and its annual updates, determinations of eligibility for National Register listings, and California Historical Resources Inventory database maintained by the State OHP, and the City of LAHCM list. Site inspections were made to assess existing conditions, define the historic resources study area, document potentially significant properties, and identify character-defining features of those properties evaluated as significant. A reconnaissance survey of the study area, including photography and background research, was then made. Additional background and site-specific research was conducted in order to evaluate historic resources within their historic context. National Register of Historic Places, California Register of Historical Resources, and the local city criteria were employed to assess the significance of properties.

b. Thresholds of Significance

The current CEQA Guidelines state that a project involves a "substantial adverse change" when one or more of the following occurs:

- Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[43]

- The significance of a historical resource is materially impaired when a project:[44]

[43] *State CEQA Guidelines, 14 CCR Section 15064.5(b)(1).*

[44] *State CEQA Guidelines, 14 CCR Section 15064.5(b)(2).*

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- Demolishes 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 in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The Secretary of the Interior's Standards for Rehabilitation (Standards) are codified at 36 Code of Federal Regulations (CFR) Section 67.7. The Standards are designed to ensure that rehabilitation does not impair the significance of a historic property. In most circumstances, the Standards are relevant in assessing whether there is a substantial adverse change under CEQA. Section 15064.5b(3) of the CEQA Guidelines states in part that "…a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historic resource." Refer to Appendix C for a more detailed discussion of the Standards.

c. Project Design Features

The proposed Project includes components that have the potential to impact the six resources in the Project area that meet survey requirements. (1) Exterior alterations to Building A to improve the building's presence on the north side of the quad and along Washington Boulevard, and interior renovations to Building A; (2) removal of Building C; (3) removal of Building E; (4) unspecified impacts to the mature fig tree in the rear courtyard of Building A; (5) removal of Apffel's Coffee Company Building, and (6) removal of the PTA Building.

(1) Building A

Under the proposed Project the non-original main entrance canopy of the Administration Building section would be removed. This would greatly enhance the approach to the building by making visible many of the original architectural details of the primary (north) elevation. The proposed Project also calls for the rehabilitation of the exterior and interior of the Building A, though specific work tasks have yet to be determined. Such work tasks may include the removal and repair of exterior wall surfaces, the repair of windows, and the reconfiguration and landscaping of the rear (south) courtyard. Interior modifications may include reuse of interior spaces, and the repair and modernization of various interior elements. As proposed, such interior and exterior modifications may result in a significant adverse impact to important character-defining features of Building A. Mitigation measures would be required to implement this component of the proposed Project.

(2) Building C

The proposed Project calls for removal of Building C. This building has been identified as a historic resource for the purposes of CEQA. Demolition of a historic resource is considered a significant adverse impact that cannot be mitigated to a level of less than significant. Mitigation measures are still recommended to implement this component of the proposed Project, though a Statement of Overriding Considerations would also be necessary.

(3) Building E

Under the proposed Project Building E would be demolished. For the purposes of CEQA Building E is not considered a historical resource; therefore, its demolition would not pose a significant impact on the environment. Mitigation measures would not be required to implement this component of the proposed Project.

(4) Morten Bay Fig Tree

Though illustrated on the proposed Project plans in the current location, there is no indication of any plans for the Morten Bay fig tree. It is assumed that the mature tree would be retained in-place and maintained under the proposed Project; however, without specifics potential impacts may occur to this historic resource. Therefore, mitigation measures would be required to implement this component of the proposed Project.

(5) Apffel's Coffee Company Building

The proposed Project calls for the removal of the Apffel's Coffee Company Building. For the purposes of CEQA, the Apffel Coffee Company building is considered a historical resource. Though demolition of a historic resource is considered a significant adverse impact, because of the nature of the building's significance as it relates to its economic history as a long time Los Angeles business versus architectural merit, and given that the business has previously relocated twice in Los Angeles before settling into its current building, implementation of the mitigation measures noted below would reduce the Project's potential impact on this resource to a level of less than significant.

(6) PTA Building

The proposed Project calls for the removal of the PTA Building. The building as a whole is not considered a historic resource for the purposes of CEQA. However, the building's auditorium is of special interest because of its distinguishing International Style architectural design. Though mitigation measures regarding this property are not required, they are strongly recommended.

(7) Building N

Under the proposed Project Building N and its associated portable buildings would be demolished. For the purposes of CEQA, Building N is not considered a historic resource. Therefore, removal of Building N would not pose a significant impact on the environment. Mitigation measures would not be required to implement this component of the proposed Project.

3. CUMULATIVE IMPACTS

Cumulative impacts on historic resources evaluate whether impacts of the proposed Project and related projects, when taken as a whole, substantially diminish the number of extant resources within the same or similar context or property type. To the extent that other projects in the City of Los Angeles affect historic resources, adverse cumulative impacts may be expected. However, none of the related projects listed in Table 17 on page 141 of this EIR are known to have such effects.

4. MITIGATION MEASURES

The following mitigation measures address the proposed rehabilitation of Building A, the demolition of Building C, the PTA, and the Apffel Building, and the retention and maintenance of the Morten Bay fig tree located within the central courtyard.

a. Building A

1. Rehabilitation Work. Any maintenance, repair, stabilization, rehabilitation, preservation, conservation or reconstruction of any portion of Building A shall be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards), Weeks and Grimmer (1995). Project plans for the rehabilitation/restoration of Building A shall be submitted.

2. Photography and Recordation. Prior to the rehabilitation of Building A, a photographic documentation report shall be prepared. This report will document the significance of the building and its physical conditions, both historic and current through photographs, text, and completion of appropriate State of California Historic Inventory forms (DPR 523). Photographic documentation noting all elevations and additional details of the building's architectural features should be taken utilizing 35-mm black and white film. The photographer should be familiar with the recordation of historic resources. Photographs should be prepared in a format consistent with Historic American Buildings Survey (HABS) standards for field photography. Copies of the report shall be submitted to the California OHP, the City of Los Angeles Cultural Affairs Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

3. Identification of Character-Defining Features. Prior to completion of project design and prior to the rehabilitation /restoration of Building A, an inventory of significant, character-defining features and materials of the historic resource shall be made by a qualified architectural historian or historic architect. These features and materials shall be retained in-place and repaired as part of the overall rehabilitation/restoration project proposed for Building A.

4. Compatibility of New Construction. Where new construction is proposed near or adjacent to Building A, the Standards shall be followed. Consistent with the Standards, the proposed new construction shall be differentiated from Building A, but compatible in size, scale, massing, and proportions. Following the Standards, materials, design, color, and texture proposed for the new construction may complement that of Building A.

b. Building C

1. Recordation. Prior to demolition of Building C for the implementation of the proposed Project, a Historic Structures Report shall be prepared. This document shall record the history of building and its contextual relationship to Los Angeles Polytechnic High School and LATTC. Its physical condition, both historic and current, should be noted in the document through the use of site plans, original as-built drawings, historic maps, 35-mm photographs, and written data and text. Photographs should be 35-mm black and white format, and taken by a professional photographer familiar with the recordation of historic buildings. Photographs should be archivally prepared in a format consistent with HABS standards for photography. Archival copies of the report shall be submitted to the California OHP, the City of Los Angeles Cultural Affairs Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

2. Demolition Coordination. The demolition of Building C shall be coordinated with the construction of the new educational facilities on the campus. Therefore, Building C shall not be demolished until all Project plans are final and approved by the District and the City of Los Angeles Cultural Affairs Department.

3. Interpretive Education Program. To assist the students, faculty, parents, and others interested parties in understanding the history of LATTC (Los Angeles Polytechnic High School) an interpretive educational program or display shall be incorporated into the development of the new campus, specifically adjacent to or within the Building A. This interpretative program shall be created with the assistance of a qualified historic preservation professional[45] in coordination with the Applicant. Content and design of the interpretive program should be specific to the educational history and architecture of Los Angeles Polytechnic High School and its eventually evolution into the LATTC. The program may include, but not be limited to: commemorative signage, plaques, historic photographs, salvaged material, models, exhibit display, tour or special event, and/or published material in the form of a brochure, pamphlet, video, electronic media, etc.

c. Morten Bay Fig Tree

1. Preservation and maintenance. Significant existing designed historic landscape features, such as the Morten Bay Fig Tree located with the main courtyard behind (south) Building A, shall be retained and preserved. Any new landscaping proposed

[45] *A qualified historic preservation professional is one who meets the Secretary of the Interior's Professional Qualifications Standards for History and Architectural History, as per 36 CFR 61.*

shall respect the historic character of the identified landscape features and the historic building(s), if any, in which it is adjacent to. Any maintenance, repair, stabilization, rehabilitation, preservation, conservation or reconstruction of any portion of fig tree shall be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards), Weeks and Grimmer (1995).

d. PTA Building

1. Recordation. Prior to the demolition of the Parent Teacher Building, specifically the Auditorium portion of the building, for the implementation of the proposed Project, a Historic Structures Report shall be prepared. This document shall record the social and architectural history of building. Its physical condition, both historic and current, should be noted in the document through the use of site plans, historic maps, 35-mm photographs, and written data and text. Photographs should be 35-mm black and white format, and taken by a professional photographer familiar with the recordation of historic buildings. Photographs should be archivally prepared in a format consistent with HABS standards for photography. Archival copies of the report shall be submitted to the California OHP, the City of Los Angeles Cultural Affairs Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

e. Apffel Coffee Company

1. Recordation. Prior to the demolition of the Apffel Coffee Company building for the implementation of the proposed Project, a Historic Structures Report shall be prepared. This document shall record the history of the Apffel Coffee Company business and its contextual relationship to the area. The building's physical condition, both historic and current, should be noted in the document through the use of site plans, original as-built drawings, historic maps, 35-mm photographs, and written data and text. Photographs should be 35-mm black and white format, and taken by a professional photographer familiar with the recordation of historic buildings. Photographs should be archivally prepared in a format consistent with HABS standards for photography. Archival copies of the report shall be submitted to the California OHP, the City of Los Angeles Cultural Affairs Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

2. Relocation. As part of the acquisition process currently underway, the District will provide relocation assistance to the Apffel Coffee Company as required by law. The Company has acquired a relocation site in Santa Fe Springs, California. Subject to the consent of the Coffee Company, the District will provide funds to assist in

relocating the existing Coffee Company museum, located in the current building's lobby, to the new facility.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Under CEQA, the mitigation measures proposed and compliance with the Standards during rehabilitation of Building A would greatly reduce, but not eliminate the significant impacts of the Project to the identified historic resources. As previously indicated, Building A would be retained and rehabilitated per the Standards. However, Building C, considered a City of LAHCM, would be demolished under the proposed Project. Such an action is considered a significant impact that cannot be mitigated to a less than significant level.[46] The mitigation measures outlined are important to assure that information regarding the educational, economic, and architectural history of the City is retained.

[46] *California Public Resources Code, Sections 5020.1(q) and 21084.1.*

V. ENVIRONMENTAL IMPACT ANALYSIS
C. NOISE

1. ENVIRONMENTAL SETTING

a. Noise Characteristics and Sound Measurement

Sound is energy transmitted through the air. Noise is generally defined as unwanted or excessive sound. Increasingly recognized as having the potential to cause physiological or psychological damage, noise can interfere with communication, work, rest, recreation and sleep.

Sound can vary in intensity within the human range of hearing. Therefore, the logarithmic decibel (dB) scale has been established to quantify sound intensity. To better approximate the range of sensitivity of the human ear to various frequencies, the A-weighted decibel scale (dBA) was developed. This scale de-emphasizes low frequencies to which human hearing is less sensitive and focuses on mid- to high-range frequencies. Due to the physical characteristics of noise transmission and reception, an increase of 10 dBA is normally required to achieve a doubling of the "loudness," as perceived by the human ear. In addition, a 3-dBA increase is recognizable to most people. A change in noise levels will usually not be detectable unless the new noise source is at least as loud as the ambient conditions.

Sound levels decrease (or attenuate) as the distance from the noise source increases. For a single "point" source, such as a piece of mechanical equipment, the sound level normally attenuates by about 6 dBA for each doubling of distance. In comparison, sound generated by "linear" sources, such as vehicles traveling along a busy street, attenuates by about 3 dBA for each doubling of the distance. This attenuation rate is based upon "hard" reflective surfaces (e.g., pavement and concrete) and increases to 4.5 dBA for each doubling of the distance for "soft" surfaces (e.g., vegetative cover).

Various noise indices have been developed to express the way in which noise levels are experienced by sensitive receptors. The most commonly used index is the equivalent sound level (L_{eq}), which is the average sound exposure over a specified period of time. Examples of other noise metrics based on given periods of time include L_{max} (the maximum noise level), L_{min} (the minimum noise level), and L_{xx} (the noise level exceeded xx percent of the time). In addition, noise metrics can be categorized as single event metrics and cumulative metrics. Single event metrics describe the noise from individual events, such as an individual aircraft flyover. Cumulative metrics describe the noise in terms of total noise exposure throughout an extended period of time, such as a full day.

Two metrics that have been devised to characterize community noise are the Day-Night Sound Level (L_{dn}) and the Community Noise Equivalent Level (CNEL). The L_{dn}, a cumulative metric, was developed by the U.S. Environmental Protection Agency as a descriptor of 24-hour sound levels. Under this index, noise generated between the hours of 10:00 P.M. and 7:00 A.M. are increased by 10 dBA (penalty) due to the heightened noise sensitivity during this time. The CNEL is similar to the L_{dn} in that it represents a 24-hour noise metric with a 10-dBA nighttime penalty. However, CNEL noise levels include an additional 5-dBA penalty for noise generated in the evening between 7:00 P.M. and 10:00 P.M. L_{dn} and CNEL values rarely differ by more than one dBA.

b. Federal Standards and Regulations

There are no Federal noise standards that directly regulate environmental noise related to the construction or operation of the proposed Project. With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise.

c. State of California Standards and Regulations

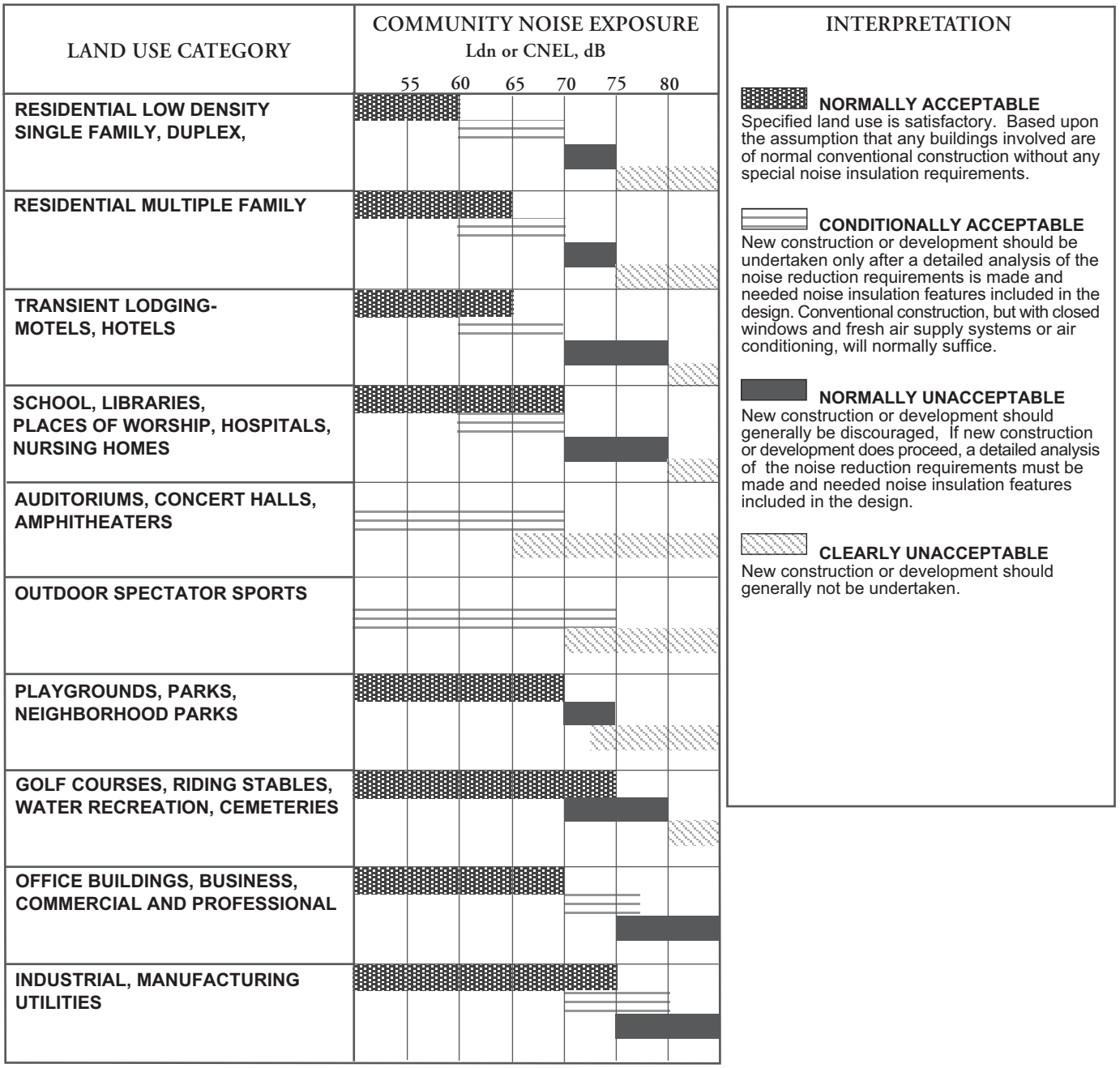
The California Department of Health Services (SDHS) has studied the correlation of noise levels and their effects on various land uses. As a result, the SDHS has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. The State Noise/Land Use Compatibility Matrix (Matrix) is presented in Figure 15 on page 135. In addition, California requires each local government entity to perform noise studies and implement a Noise Element as part of their General Plan. California Administrative Code, Title 4, has guidelines for evaluating the compatibility of various land uses as a function of community noise exposure.

d. Local Standards and Regulations

(1) City of Los Angeles

The Los Angeles Municipal Code (LAMC) establishes regulations regarding allowable increases in noise levels as a result of Project implementation, both in terms of established noise criteria and construction activities.

The LAMC (Section 111) establishes ambient sound levels for specific land use zones. In accordance with LAMC Section 112.02, a noise level increase of 5 dBA over the ambient conditions at an adjacent property line is considered a noise violation. The LAMC allows for higher noise levels for noise occurring over relatively short periods of time (i.e., 15 minutes or



Source: Guidelines for the Preparation and Content of the Noise Element of the General Plan, California Department of Health, in coordination with the office of Planning and Research.

PCR

Figure 15
Land Use Compatibility for Community Noise

less). This standard applies to all noise sources except vehicles traveling on public streets and construction noise.

Section 112 of the LAMC limits noise levels generated by construction equipment when construction activities are located within 500 feet of a residential zone. Such activities shall not exceed 75 dBA, as measured at a distance of 50 feet from the source.[47] The LAMC also prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. The City of Los Angeles Department of Building and Safety and the LAPD have the responsibility for enforcing noise regulations.

In addition to the previously described LAMC provisions, the City has also established noise guidelines that are used for planning purposes. These guidelines are based in part on the community noise compatibility guidelines established by the State Department of Health Services and are intended for use in assessing the compatibility of various land use types with a range of noise levels.

e. Existing Conditions

(1) Receptor Locations

Some land uses are considered more sensitive to intrusive noise than others, due to the types of activities typically involved at the receptor location. Specifically, residences, schools, libraries, religious institutions, hospitals and nursing homes are generally more sensitive to noise than are commercial and industrial land uses. The area neighboring the Project site is primarily zoned for light industrial uses, interspersed with commercial and public facility zones.

(2) Existing Noise Environment

The noise environment in the Project area is dominated by traffic noise from nearby roadways and the Blue Line Light Rail Transit (LRT) line. The heaviest traveled roadways in the vicinity of the Project site include Washington Boulevard, Grand Avenue, and Flower Street, which border the Project site to the north, east, and west, respectively. Secondary noise in the area persists from general commercial/industrial-related activities (e.g., delivery and garbage

[47] *Compliance with this standard shall not apply if compliance cannot occur with the inclusion of all measures deemed to be "technically feasible." In accordance with the City of Los Angeles Noise Ordinances, "technically feasible" means that the established noise limitations cannot be complied with at a project site, despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.*

trucks). Ambient noise levels in the Project area are typical of noise levels experienced within urbanized areas.

(a) Ambient Noise Levels

To determine the existing ambient sound level, a field survey was conducted on January 23, 2003. (See Appendix D, Noise Analysis Worksheets.) During the field survey, measurement locations were selected based on their proximity to the Project site and proximity to noise sensitive uses. The six measurement locations are shown in Figure 16 on page 139. As shown in Table 12 on page 140, the early afternoon L_{eq} ranged from 63.4 to 78.8 dBA.

(b) Traffic Noise

CNEL values were predicted for selected roadway segments using the Sound2000 roadway noise prediction model. Average daily traffic (ADT) volumes were assumed to be 10 times the volume observed during the P.M. peak-hour period. The results of this analysis are provided in Table 13 on page 140.

2. ENVIRONMENTAL IMPACTS

a. Thresholds of Significance

The analysis of impacts related to noise considers the impacts of the Project on the surrounding environment during both construction and on-going operations. The LA CEQA Thresholds Guide (Thresholds Guide) is a guidance document adopted in August 2001 by the City of Los Angeles to provide assistance in evaluating environmental impacts for projects subject to CEQA. The Thresholds Guide addresses the analysis of construction noise and operational noise, as well as noise from railroads and airports.

(1) Construction

Based on the Thresholds Guide, construction noise impacts would be significant if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or

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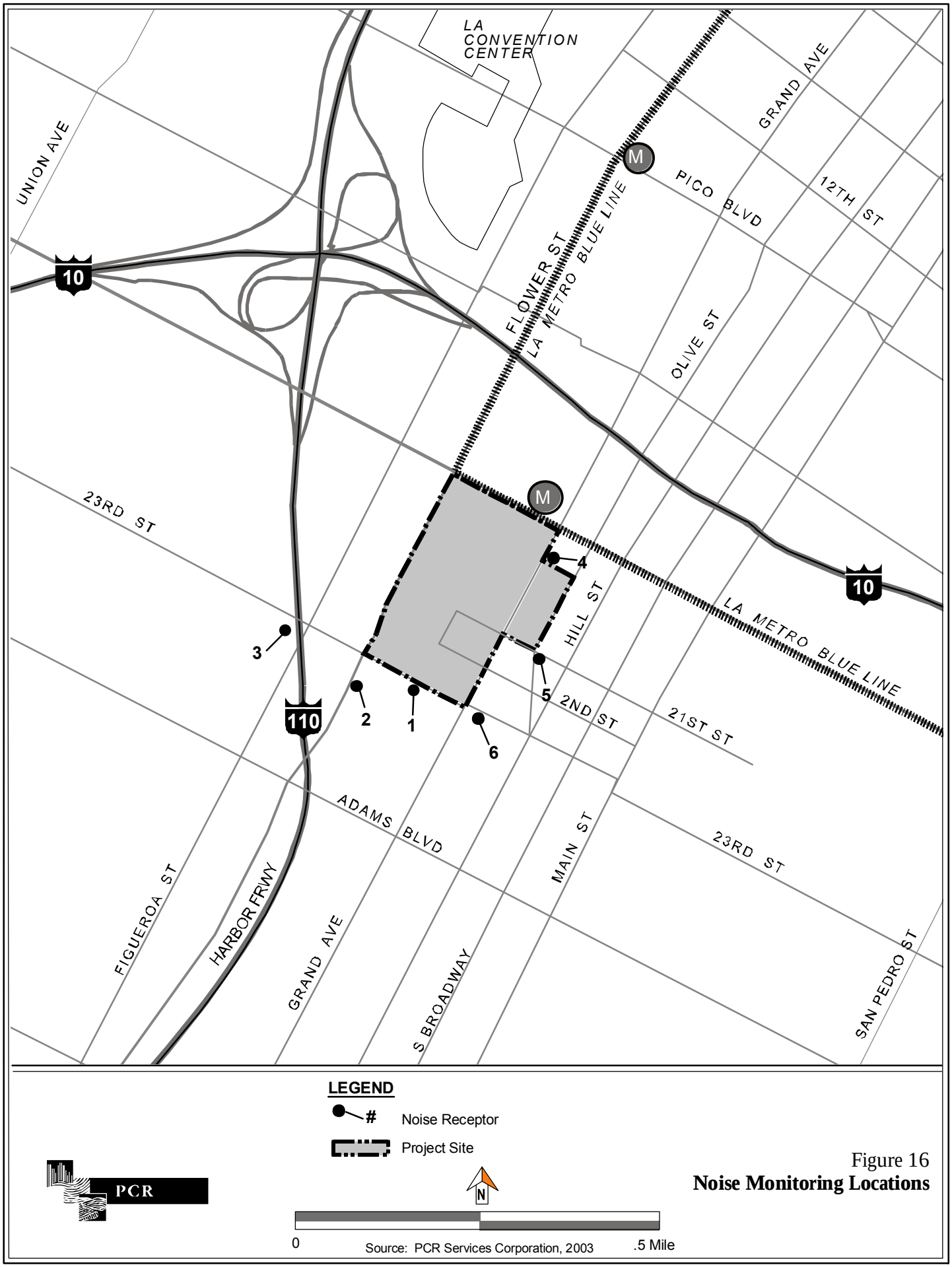

Figure 16
Noise Monitoring Locations

Table 12

AMBIENT NOISE MEASUREMENT DATA

Position [a]	Start Time	Duration[b]	Sound Level dBA (L_{eq})	Predominant Noise Source
NR-1	11:10	15 minutes	67.8	Traffic on 23rd Street
NR-2	11:32	15 minutes	68.7	Traffic on 110 freeway and 23rd Street
NR-3	11:55	15 minutes	78.8	Traffic on 110 freeway and Figueroa Street
NR-4	11:40	15 minutes	67.6	Traffic on Grand Avenue
NR-5	11:15	15 minutes	68.0	Traffic on Olive Street and 21st Street
NR-6	12:30	15 minutes	63.4	Traffic on 23rd Street and adjacent Police Impound Yard

[a] *Receptor locations are shown on Figure 16 on page 139.*
[b] *15-minute measurements were conducted January 23, 2003.*

Source: PCR Services Corporation, March 2003.

Table 13

PREDICTED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

		Predicted CNEL (dBA) at Reference Distance from Roadway Right-of-Way		
Roadway Segment	**Land Use**	**Adjacent**	**50 ft**	**100 ft**
Figueroa Street, north of Washington Blvd	Commercial	74.2	71.1	67.8
Grand Avenue, south of Washington Blvd	Institutional	71.1	66.7	64.3
Flower Street, south of 23rd Street	Commercial/ Institutional	71.8	67.7	65.3
21st Street, east of Grand Avenue	Institutional	64.3	59.6	57.1
Grand Avenue, north of 22nd Street	Institutional	71.2	66.9	64.5

Source: PCR Services Corporation, March 2003.

- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6 P.M. on Saturday, or at anytime on Sunday.

(2) Operation

Based on the Thresholds Guide, operational noise impacts would be significant if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase…." [48]

b. Analysis of Project Impacts

(1) Construction

Noise disturbances in those areas located adjacent to the Project site can be expected during construction. These disturbances would occur during site preparation activities and the subsequent construction of on-site structures. As with most construction projects, construction would require the use of a number of pieces of heavy equipment, such as bulldozers, backhoes, loaders, and concrete mixers. In addition, both heavy and light trucks would be required to deliver construction materials to and export construction debris from the site. Noise levels generated by typical construction equipment are depicted in Table 14 on page 142.

Composite construction noise is best characterized in a study conducted by Bolt, Beranek, and Newman for the USEPA (USEPA December 31, 1971). In this study, construction noise during the heavier initial periods of construction of commercial development is presented as 86 dBA L_{eq} when measured at a reference distance of 50 feet from the construction activity. This value takes into account both the number of pieces and spacing of the heavy equipment used in the construction effort. In later phases during building construction, noise levels are typically reduced from this value and the physical structures that are constructed further break up line-of-sight noise transmission. In order to present a conservative analysis, the 86 dBA noise level was used to evaluate construction-period noise impacts.

During Project construction activities, heavy equipment operation would generate steady-state and episodic noise levels well above the ambient levels currently experienced in areas surrounding the Project site. Since noise attenuates (decreases) at a rate of approximately six

[48] *LA CEQA Thresholds Guide, August 2001.*

Table 14

NOISE LEVELS GENERATED BY TYPICAL CONSTRUCTION EQUIPMENT

Type of Equipment	Typical Sound Level (dBA at 50 feet)
Dump truck	81
Portable air compressor	81
Concrete mixer (truck)	85
Jackhammer	82
Scraper	88
Dozer	80
Paver	80
Generator	78
Rock drill	80
Pump	76
Pneumatic tools	85
Backhoe	85

Source: USEPA, Bolt, Beranek, and Newman, Noise Control for Buildings and Manufacturing Plants, 1987; and Cowan, James P., Handbook of Environmental Acoustics, 1994.

dBA per doubling of distance. At a distance of 100 feet, for example, the noise levels would be about six dBA less or 80 dBA.

The nearest adjacent property is located approximately 200 feet from the center of construction activity. At this distance, the average (L_{eq}) construction-period noise level would be approximately 74 dBA L_{eq}; however, L_{max} noise levels would likely exceed 80 dBA as construction equipment approaches the Project site perimeter. With the exception of noise monitoring position NR-3, the construction-period hourly L_{eq} noise level would likely exceed the ambient sound level by more than 5-dBA at all receptor locations that surround the Project site. As such, construction-period noise impacts would be significant without incorporation of mitigation measures.

(2) Operations

(a) Impacts from Off-Site Activities

Roadway noise related to the anticipated increase in local traffic volumes would be the predominant long-term noise source attributable to Project development that would have a potential to impact off-site locations. The roadway segments that were selected for analysis were based upon two factors: (1) the volume of Project-generated traffic; and (2) the presence of sensitive receptors. In general, the analysis evaluates those roadways that are proximal to the Project site and also involve the presence of sensitive noise receptors such as a residence. This traffic noise analysis considered the roadway configuration, grade, percentage of 2-axle and 3-axle trucks, posted vehicle speed, and right-of-way distance (property line) to calculate future

traffic noise levels. According to the traffic study prepared by Kaku Associates and included in Appendix E, the Project is expected to generate 463 trips during the A.M. peak traffic hour and 842 trips during the P.M. peak hour. Table 15 on page 144 provides the predicted CNEL for the analyzed roadway segments for the following scenarios: existing conditions, future without development of the Project; future with development of the Project; the increase attributed to Project-generated traffic, and the cumulative increase above existing noise levels.

To provide for a conservative analysis, Project-generated daily traffic was calculated based on evening peak-hour traffic volumes. The number of trips arriving to and departing from the site during the evening peak hour was summed and the total daily traffic volume divided by this sum to create a multiplier. This multiplier was then used to augment the Project-generated traffic volumes at the intersections analyzed and these augmented values were added to the existing daily traffic to determine future traffic levels.

Table 15 presents the existing plus Project traffic daily noise levels. As noted, noise levels along streets in the Project vicinity could increase by as much as 0.6 dBA CNEL due to Project development. This increase is neither audible nor significant based upon the referenced threshold standards. As such, traffic noise impacts would be less than significant.

(b) Impacts from On-Site Activities

(i) Athletic Activity Area

Project development would entail repositioning the existing track, field, and court areas, as detailed in the Project Description section of this Draft EIR. The repositioning would involve locating activity areas that are currently on the Project site perimeter, to the Project site interior, which would have the effect of reducing athletic activity-related noise levels at off-site receptor locations relative to the existing condition. As such, impacts would be less than significant. No mitigation measures are required.

(ii) Rooftop Equipment

Individual air handling units and exhaust fans would be located on the roofs of the Academic and Administration Buildings in order to provide for the ventilation and air-conditioning of these buildings. Parapet screens would shield rooftop units from neighboring properties. The following project design feature will be incorporated into the final design to ensure compliance with City of Los Angeles Noise Ordinance requirements:

- Silencers will be specified at all air exhausts and inlets, as required, in order to ensure that the requirements of the City of Los Angeles Noise Ordinance are satisfied. The

Table 15

EXISTING-PLUS-PROJECT TRAFFIC AND RESULTANT NOISE LEVELS ALONG MAJOR THOROUGHFARES IN THE PROJECT AREA

Location		Predicted Future CNEL (dBA) at Roadway Right-of-Way			
Roadway Segment	Existing CNEL	Project Buildout (Year 2007) Without Project	Project Buildout (Year 2007) With Project	Project Increment[a]	Cumulative Increment[b]
Figueroa Street, north of Washington Blvd	74.2	74.8	74.8	--	0.6
Grand Avenue, south of Washington Blvd	71.1	72.5	73.1	0.6	2.0
Flower Street, south of 23rd Street	71.8	71.8	71.8	--	--
21st Street, east of Grand Avenue	64.3	64.3	64.2	--	--
Grand Avenue, north of 22nd Street	71.2	72.7	72.4	--	1.2

[a] *Increase relative to traffic noise levels associated with ambient growth without the Project, resulting from ambient growth plus Project development.*

[b] *Cumulative increase relative to existing traffic noise levels, resulting from ambient growth plus Project development.*

Source: PCR Services Corporation, December 2002.

nighttime noise limits will be applicable to any equipment items required to operate between the hours of 10 P.M. and 7 A.M.

As such, impacts would be less than significant. No mitigation measures are required.

3. CUMULATIVE IMPACTS

a. Cumulative Construction Noise Levels

There are 22 related projects that would have a potential to produce construction noise impacts within the general area. The timing of construction activities for the related projects is uncertain. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Noise from the construction and on-site operations of each project is expected to be localized. Compliance with the limitation of allowable construction hours contained in the local noise ordinance would reduce potentially significant cumulative construction noise impacts to less than significant levels.

b. Cumulative Noise Levels from Facility Operations

As previously indicated in Table 15 on page 144, the cumulative increase in future CNEL traffic noise levels at Project buildout with future ambient growth relative to the existing baseline, would be 2 dB or less in areas that can potentially be affected by the proposed Project. This increase would not be perceptible and would be less than significant.

4. MITIGATION MEASURES

The following mitigation measures are proposed to reduce potential noise impact associated with implementation of the proposed Project:

a. Construction

1. During all Project site preparation, grading, and construction activities, the Project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards.

2. An eight-foot temporary sound barrier (e.g., plywood) shall be erected along the site boundary to block the line of sight between construction activity and off-site receptor locations.

b. Long-term Operations

Based on the absence of potentially significant impacts, no mitigation measures are required or recommended.

c. Cumulative Impacts

Based on the absence of potentially significant cumulative noise impacts, no mitigation measures are required or recommended.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. Construction

The 8-foot temporary sound barrier (e.g. plywood) can achieve a typical barrier insertion loss of 5 – 10 dB. Assuming a minimum noise reduction of 5 dBA, the construction-period L_{max}

and L_{eq} noise level would be reduced to approximately 75 and 69 dBA, respectively, for the receptor locations where the line-of-sight between construction activity and receptor locations would be interrupted by the proposed sound barrier.

With incorporation of feasible mitigation measures, construction-period noise levels during the heaviest periods of activity would likely exceed the City of Los Angeles significance threshold of 5-dBA over ambient at the residential receptor location near the intersection of Grand Avenue and 23rd Street. Therefore, construction-period noise impacts would be significant and unavoidable.

V. ENVIRONMENTAL IMPACT ANALYSIS
D. TRANSPORTATION AND CIRCULATION

This section is based upon the technical report *Traffic Study and Parking Study for Los Angeles Trade Technical College*, prepared by KAKU Associates and dated March 31, 2003, that is included as Appendix D of this EIR. That report documents the assumptions, methodologies and findings of the study conducted by KAKU Associates for the Project. KAKU Associates developed the scope of its study in conjunction with the City of Los Angeles Department of Transportation (LADOT).

1. ENVIRONMENTAL SETTING

a. Street System

The Project site is integrated into the Los Angeles street system and the nearby Santa Monica Freeway (I-10) and Harbor Freeway (I-110) provide regional access to the Project. The Santa Monica Freeway runs in an east-west direction to the north of the Project site. The nearest entrance and exit ramps to the Santa Monica Freeway are at Grand Avenue and at Los Angeles Street. The Harbor Freeway runs north-south to the west of the Project site with entrance and exit ramps at Adams Boulevard. Washington Boulevard, along the to north side of the Project site, and Adams Boulevard, to the south, are major east-west arterials featuring two travel lanes in each direction. Washington Boulevard also features the MTA Blue Line train along the median. To the west of the Project site is Figueroa Street, a major north-south arterial featuring two travel lanes in each direction, and Flower Street, a major one-way arterial with four travel lanes in the southbound direction. To the east of the Project site is Grand Avenue, a major north-south arterial with one northbound and two southbound travel lanes, and Olive Street, a secondary arterial with four northbound travel lanes to the north of Washington Boulevard and two travel lanes in each direction to the south of Washington Boulevard. On the south side of the Project site is 23rd Street, a collector street with one travel lane in each direction.

b. Existing Conditions

Existing traffic volumes and intersection Levels of Service (LOS) provide a basis for determining the baseline traffic conditions. Traffic counts were collected at the study intersections for the weekday morning and afternoon peak hours. Fifteen (15) intersections were identified by LADOT to be analyzed for the Project traffic study: Grand Avenue and 17th Street; Grand Avenue and 18th Street; Figueroa Street and Washington Boulevard; Flower Street and

Washington Boulevard; Grand Avenue and Washington Boulevard; Olive Street and Washington Boulevard; Grand Avenue and 21st Street; Grand Avenue and 22nd Street; Figueroa Street and 23rd Street; Flower Street and 23rd Street; Grand Avenue and 23rd Street; Olive Street/Hill Street and 23rd Street; Flower Street and Adams Boulevard; I-110 NB off-ramp and Adams Boulevard; Grand Avenue and Adams Boulevard. The location of the study intersections is shown in Figure 17 on page 149.

Level of Service is a qualitative measure that describes the traffic flow at an intersection on a graded scale from A (excellent) to F (failure). LOS D is typically recognized as the minimum acceptable level in urban areas. For signalized intersections, LOS is determined through a volume to capacity ratio (V/C) calculation following the "Critical Movement Analysis-Planning" method (Transportation Research Board, 1980). For stop sign controlled intersections, LOS is determined through the Two-Way Stop" method (Highway Capacity Manual, 2000). In addition, the calculated LOS was adjusted to reflect the benefits of the City of Los Angeles's Automated Traffic Surveillance and Control System (ATSAC).

Table 16 on page 150, presents the calculated LOS for the 15 study intersections under existing conditions. Fourteen (14) of the intersections currently operate at acceptable levels. One intersection, Grand Avenue and 21st Street, operates at LOS F during the afternoon peak hour.

c. Future Baselines Traffic Volumes and Levels of Service

The existing traffic volumes were forecast to 2007, the expected year of completion for the Project, in order to allow proper evaluation of the Project impact. This forecast establishes the baseline condition to which the Project generated traffic would be added.

Future traffic conditions are forecast by applying a regional growth factor and by identifying other area projects that are expected to be completed by the year 2007. Due to general regional growth, background traffic volumes in the vicinity are estimated to increase at a rate of one (1) percent per year. With the assumed completion of 2007, the 2002 measured traffic was adjusted upward by 5 percent to reflect the background growth. Using data obtained from LADOT, 22 related projects were identified, as listed in Table 17 on page 151. Trip generation was estimated for each of these projects based on *Trip Generation, 6th Edition* (ITE, 1997). The distribution of these trips was also estimated based on the land use type and density of these projects. These trips were added to the adjusted background traffic to arrive at future traffic volumes at each of the study intersections. These traffic volumes are analyzed to determine the projected V/C ratio and LOS in the absence of the Project. The resulting future base condition is shown in Table 18 on page 152.

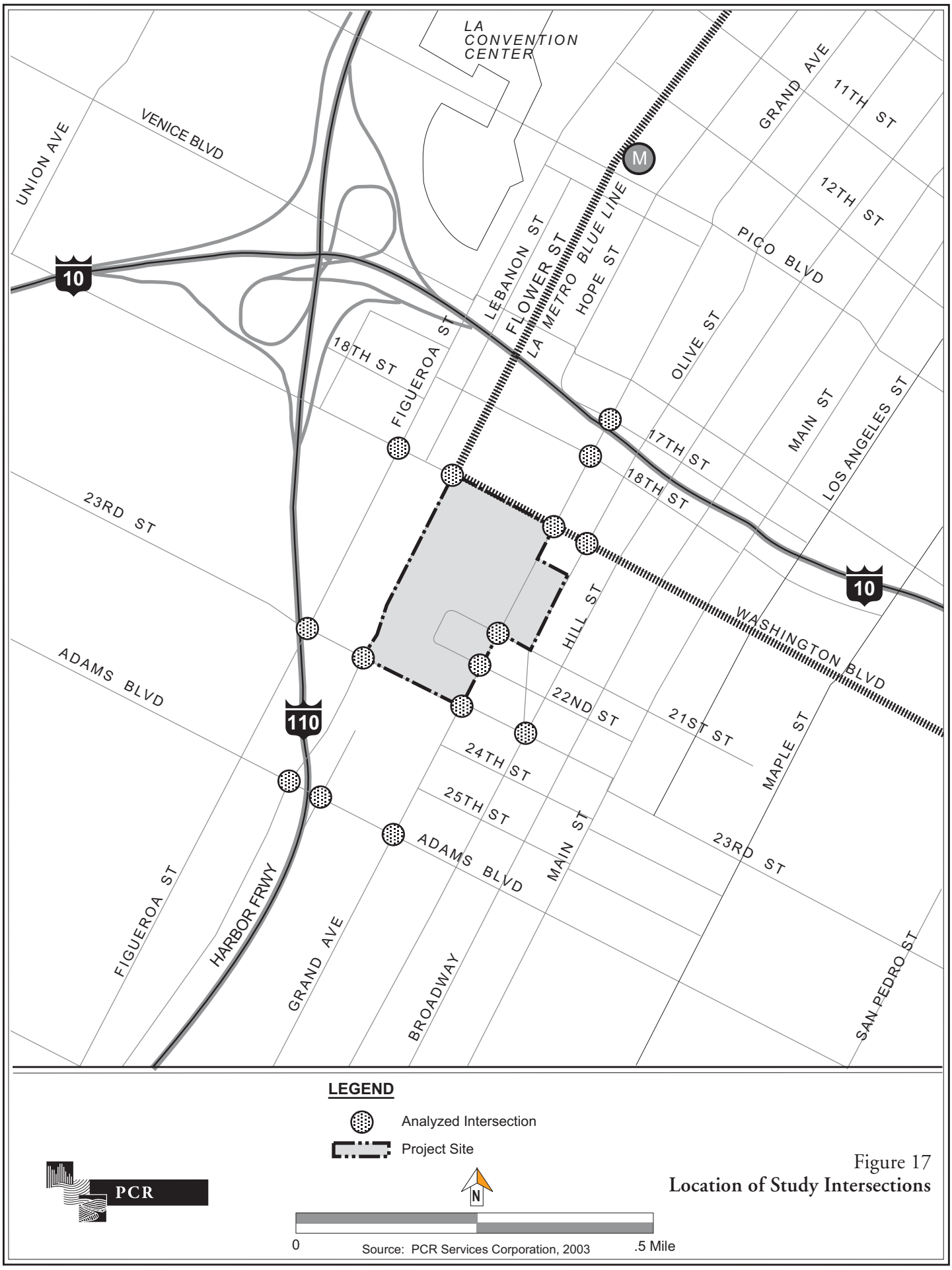

Figure 17
Location of Study Intersections

Table 16

YEAR 2002 EXISTING INTERSECTION LEVELS OF SERVICE

Intersection	A.M. Peak		P.M. Peak	
	V/C Ratio	LOS	V/C Ratio	LOS
Grand Avenue and 17th Street	0.207	A	0.512	A
Grand Avenue and 18th Street	0.379	A	0.343	C
Figueroa Street and Washington Boulevard	0.707	C	0.755	B
Flower Street and Washington Boulevard	0.296	A	0.606	C
Grand Avenue and Washington Boulevard	0.570	A	0.791	A
Olive Street and Washington Boulevard	0.479	A	0.540	F
Grand Avenue and 21st Street(1)	21	B	51	D
Grand Avenue and 22nd Street(1)	14	A	28	A
Figueroa Street and 23rd Street	0.505	A	0.546	A
Flower Street and 23rd Street	0.203	A	0.517	A
Grand Avenue and 23rd Street	0.443	A	0.565	A
Olive Street/Hill Street and 23rd Street	0.536	A	0.550	A
Flower Street and Adams Boulevard	0.381	A	0.597	A
I-110 NB off-ramp and Adams Boulevard	0.625	B	0.734	C
Grand Avenue and Adams Boulevard	0.391	A	0.531	A

(1) Intersection controlled by stop sign on minor approaches, therefore average vehicle delay in seconds is reported rather than V/C ratio.

Source: Kaku Associates, Final Draft Traffic and Parking Study for Los Angeles Trade-Technical College (March 31, 2003).

2. ENVIRONMENTAL IMPACTS

a. Methodology

Using empirical data, Project-related trips were calculated. These trips were distributed according to the existing pattern of student distribution and the existing street system. These trips would then be added to the future baseline traffic condition to arrive at a LOS for the study intersections with the Project. The analysis focuses on the Project effects at the opening year, 2007, when all of the building projects that comprise the Project would be completed and operational. Because future development is unspecified and uncertain within the *Campus Plan*

Table 17

RELATED PROJECTS

Project	Location	Land Use	Size
Yee Yaun Laundry	2575 Normandie Avenue	Laundromat	N/A
California Center Bank	2222 Olympic Boulevard	Bank	12,000 sq.ft.
Car Wash & Retail Center	955 S Alvarado Street	Car wash/retail	7,100 sq.ft.
Hollytron Retail Store	2580 Olympic Boulevard	Retail	23,500 sq.ft.
Disney Hall	1st Street & Hope Street	Concert Hall/Theater/Theater	2,268 seats/266 seats/366 seats
Staples Entertainment District	Figueroa Street & 11th Street	Hotel/Cinema Theater/Restaurant/ Retail/Office/Apartment	1,800 rooms/3,600 seats/1,000 seats/345, 000 sq.ft./ 498,000 sq.ft./ 165, 000 sq.ft./ 800 dwelling units
Metropolis	8th St & Francisco Street	Hotel/Office/Retail	600 rooms/1,600,000 sq.ft./233,000 sq.ft.
LA Center Studios Expansion	5th Street & Bixel Street	Sound Stage	249,300 sq.ft.
Bar and Restaurant	400 Main Street	Restaurant/Bar	5,300 sq.ft.
Residential/Commercial Mixed Use	1207 W 3rd Street	Residential/Commercial	50,000 sq.ft.
Dance Hall	740 S Broadway	Dance Hall	12,500 sq.ft.
Condominium	108 W 2nd Street	Condominium	146 dwelling units
Fast Food w/Drive Thru	4405 S Avalon Boulevard	Fast Food	2,500 sq.ft.
Office & Specialty Retail	1630 Olympic Boulevard	Office/Retail	12,600 sq.ft.
LA Mart	1933 Broadway	Retail	250,000 sq.ft.
Commercial & Residential Development	616 Saint Paul Street	Retail/Apartment	10,000 sq.ft./146 dwelling units
Manufacturing Facility	2015 S Long Beach Avenue	Manufacturing	4.96 acres
Orthopedic Magnet High School	Grand Avenue/Adams Boulevard	High School	1,054 students
Quality Restaurant & Nightclub	605 W Olympic Boulevard	Restaurant	7,100 sq.ft.
Medical Center/Clinic	1530 S Olive Street	Medical Center	31,700 sq.ft.
High School	Maple Street & Washington Boulevard	High School	3,077 students
Middle School	35th Street & Grand Avenue	Middle School	2,129 students

Source: Kaku Associates, Final Draft Traffic and Parking Study for Los Angeles Trade-Technical College (March 31, 2003).

Table 18

YEAR 2007 BASELINE INTERSECTION LEVELS OF SERVICE

Intersection	AM Peak		PM Peak	
	V/C Ratio	LOS	V/C Ratio	LOAS
Grand Avenue and 17th Street	0.293	A	0.808	D
Grand Avenue and 18th Street	0.534	A	0.441	A
Figueroa Street and Washington Boulevard	0.810	D	0.851	D
Flower Street and Washington Boulevard	0.345	A	0.650	B
Grand Avenue and Washington Boulevard	0.816	D	0.950	E
Olive Street and Washington Boulevard	0.551	A	0.595	A
Grand Avenue and 21st Street(1)	62 / 0.434	F	(2) / 0.533	F
Grand Avenue and 22nd Street(1)	24 / 0.474	C	(2) / 0.445	F
Figueroa Street and 23rd Street	0.633	B	0.653	B
Flower Street and 23rd Street	0.270	A	0.550	A
Grand Avenue and 23rd Street	0.642	B	0.755	C
Olive Street/Hill Street and 23rd Street	0.620	B	0.588	A
Flower Street and Adams Boulevard	0.459	A	0.649	B
I-110 NB off-ramp and Adams Boulevard	0.734	C	0.792	C
Grand Avenue and Adams Boulevard	0.593	A	0.722	C

(1) Intersection is controlled by stop signs. For the purpose of evaluating the operating condition of the intersection, the first number shows average vehicular delay in seconds using Highway Capacity Manual stop-controlled methodology; for the purpose of applying the City of Los Angeles significance criteria, the V/C ratio using the CMA methodology is provided as the second number.

(2) Overflow condition indicating oversaturated conditions for long periods. Average vehicle delay cannot be calculated.

Source: Kaku Associates, Final Draft Traffic and Parking Study for Los Angeles Trade-Technical College (March 31, 2003).

2002 30-year plan, no purpose would be served by speculating as to the environmental consequences under a 2025 scenario, therefore, no such out-year analysis was conducted.[49]

b. Thresholds of Significance

LADOT standards specify that a project would have a significant impact on an intersection if it affected the V/C ratio of that intersection in the following way:

LOS	Change in V/C
A-B	n/a
C	equal to or greater than 0.040
D	equal to or greater than 0.020
E, F	equal to or greater than 0.010

c. Project Trips

Recent traffic counts were collected at the main entrance and exit of the campus. Based on the assumed proportion of trips that access the campus at the data collection point, these counts were adjusted to determine the existing ratio of trips to student. Traffic counts collected at the Project site estimated that the site currently generates 0.081 trips per student during the morning peak hour and 0.114 trips per student during the afternoon peak hour. The Project is expected to increase enrollment from 15,000 to 21,300 students. By applying the current trip rate to the expected increase in students and in number of classes, it was determined that the Project would generate 1,679 vehicles per hour during the morning peak hour and 2,557 vehicles per hour during the afternoon peak hour. This represents a net increase of 463 vehicles during the morning peak hour and 842 vehicles during the afternoon peak hour.

The ITE *Trip Generation, 6th Edition* was referenced for the trip generation rates of typical community college campuses. The trip rates derived from actual counts at the Project site were much lower than those specified by ITE. The discrepancy is due to the location of the Project in an urban setting served by multiple transit lines. The frequency and proximity of transit services provides an alternative mode of transportation that reduces the potential trip rate of the Project to well below that of a typical community college campus.

[49] *Lake County Energy Council v. County of Lake ([1st District] 1977) 70 Cal.App.3d 851, 854-855 [139 Cal. Rptr. 176].;Los Angeles Unified School District v. City of Los Angeles ([2nd District] 1997) 58 Cal.App.4th 1019,1027-1028 [68 Cal. Rptr. 2d 367].*

d. Impacts on Intersections Levels of Service

These trips were added to the future baseline traffic volumes to arrive at future plus Project traffic volumes at each of the study intersections. These traffic volumes are analyzed to determine the projected V/C ratio and LOS with the Project, as shown in Table 19 on page 155.

Applying the significance thresholds to the resulting LOS and V/C ratios reveals that the Project would have a significant impact at six intersections:

- Grand Avenue and I-10 Westbound Ramps/17th Street
- Grand Avenue and Washington Boulevard
- Grand Avenue and 22nd Street
- Grand Avenue and 23rd Street
- I-110 Northbound off-ramp at Adams Boulevard
- Grand Avenue and Adams Boulevard

e. Congestion Management Program Analysis

The Los Angeles County Metropolitan Transportation Authority (MTA) administers the Congestion Management Plan (CMP), a state-mandated program designed to address the impact urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project (STIP). The CMP guidelines specify that all freeway segments where a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of all designated CMP roadway intersections where a project could add 50 or more trips during either peak hour.

The Project is located proximate to two freeways—the Santa Monica Freeway and the Harbor Freeway—and one CMP designated intersection—the intersection of Alameda Street and Washington Boulevard. The Traffic Study found that the Project is not expected to generate 150 or more trips in any direction on the freeways during peak hours. Using the CVMP criteria, the Project would have a negligible impact on the freeway system. Additionally, the Project is not expected to generate 50 or more trips at the intersection of Alameda Street and Washington Boulevard. Therefore, no further analysis with respect to the CMP is required.

Table 19

YEAR 2007 TRAFFIC CONDITIONS WITH THE PROJECT

Intersection	AM Peak		PM Peak	
	V/C Ratio	LOS	V/C Ratio	LOS
Grand Avenue and 17th Street	0.321	D	0.850	D
Grand Avenue and 18th Street	0.542	A	0.486	A
Figueroa Street and Washington Boulevard	0.814	D	0.869	D
Flower Street and Washington Boulevard	0.349	B	0.657	B
Grand Avenue and Washington Boulevard	0.829	F	1.027	F
Olive Street and Washington Boulevard	0.560	B	0.613	B
Grand Avenue and 21st Street(1)	16 / 0.442	C	22 / 0.421	C
Grand Avenue and 22nd Street(1)	(2) / 0.501	F	(2) / 0.705	F
Figueroa Street and 23rd Street	0.646	B	0.685	B
Flower Street and 23rd Street	0.288	A	0.586	A
Grand Avenue and 23rd Street	0.694	B	0.823	D
Olive Street/Hill Street and 23rd Street	0.633	B	0.625	B
Flower Street and Adams Boulevard	0.467	A	0.666	B
I-110 NB off-ramp and Adams Boulevard	0.748	C	0.814	D
Grand Avenue and Adams Boulevard	0.627	B	0.781	C

(1) Intersection is controlled by stop signs. For the purpose of evaluating the operating condition of the intersection, the first number shows average vehicular delay in seconds using Highway Capacity Manual stop-controlled methodology; for the purpose of applying the City of Los Angeles significance criteria, the V/C ratio using the CMA methodology is provided as the second number.

(2) Overflow condition indicating oversaturated conditions for long periods. Average vehicle delay cannot be calculated.

Source: Kaku Associates, Final Draft Traffic and Parking Study for Los Angeles Trade-Technical College (March 31, 2003).

f. Construction Related Impacts

Construction of the subterranean parking structure within the South Campus area would involve removal of approximately 112,037 cubic yards (cy) of earth from the Project site. To remove this amount of earth from the Project site, approximately 7,469 trucks with a carrying capacity of about 15 cy would be used. This activity would be scheduled in 2005 during daytime hours and, to the extent possible, during non-traffic peak periods. Accordingly, less than significant impacts are expected to occur.

g. Parking

Currently there are 1,690 parking spaces within and around the campus. About 840 of these spaces are within surface parking lots on the camps, while approximately 550 are in off-campus lots and the remaining 300 are metered street parking. Based on the spaces available and the current enrollment of 15,000, the current ratio of parking availability to demand is about 0.113 spaces per student.

The Project includes construction of 700 new parking spaces in the proposed subterranean garage and 400 new parking spaces in the garage and lot on the east side of Grand Street. In addition, the physical changes to the Campus would remove 192 existing spaces. After completion of the Project, the total number of parking spaces available to the College would be 2,598. Based on this number of spaces anticipated to be available and a future enrollment of 21,300 students, the future ratio of parking availability to demand would be about 0.122 spaces per student, a slight increase in availability.

Due to heavy transit presence adjacent to the Project, the demand for parking would be reduced compared to typical suburban community college campuses. The empirical count of trip rates generated by the College were only 67 percent of the ITE trips rates for Community College campuses. Therefore, it is assumed that the Project would only generates 67 percent of the parking demand of a typical Community College Campus. Parking ratios were calculated for other community colleges in the region. Based on the expected level of parking demand for the Project and the empirical evaluation of parking demand for other Community Colleges, the Project parking supply would be adequate.

Notwithstanding, Los Angeles Municipal Code (LAMC) Section 12.21.A.4(c)(7) specifies the minimum number of parking spaces for a community college type of use. One (1) space is required for each 50 square feet of floor area contained within classrooms and assemble areas or one parking space for each five fixed seats contained with classrooms and assembly areas, whichever is greater. For classroom areas in which heavy equipment is used in training, one parking space is required for each 500 square feet of floor area.

The existing College campus includes classroom space and assembly areas for several departments allocated in several buildings. The proposed Project would result in approximately 288,320 SF of classroom space and approximately 259,600 SF of classroom space in which heavy equipment would be used.[50] Based on the LAMC parking regulations, the College would need 6,286 parking spaces. The College currently provides 1,439 parking spaces to serve its

[50] *Los Angeles Trade-Technical College, Campus Plan 2002, Appendix II—Campus-wide Departmental Space Inventory and Distribution Map.*

estimated 780,000 GSF of building floor area. The proposed Project would increase the building floor area by approximately 70,600 GSF for a total of 850,600 GSF. Of the 70,600 GSF approximately 56,480 SF would be usable square feet.[51] Using the LAMC parking criteria, 1,130 parking spaces would be needed for the Project's increase in usable building floor area. The proposed Project would provide 1,100 parking spaces more than exists on the campus, for a total of 2,598 parking spaces, excluding off-campus metered parking along streets surrounding the College.

Although the proposed Project would result in less parking than required by the LAMC parking standards for a college use, the impact of this deviation from the LAMC would not be significant because: 1) as summarized earlier on p. 139, the traffic study determined, using historical demand rates, that the parking provided by the Project would be adequate; 2) the City allows variances from its normal code rates where warranted by evidence of shared uses or other circumstances; and 3) a parking variance would not be required if the District's governing board elects to exempt the project from local planning and zoning requirements.

3. CUMULATIVE IMPACTS

CEQA requires that cumulative impacts be analyzed. The potential for cumulative impacts occurs when independent occurrence of the impacts of the Project and the impacts of other area projects yield an impact that is greater than the impacts of the Project alone. The project could potentially contribute a cumulative impact to intersections that are operating poorly (LOS F) even where the previously identified Project contribution to that condition does not exceed LADOT or LA County CMP threshold criteria. Two of the 15 study intersections are expected to operate at LOS F under the future with Project condition. In addition, the 2002 Congestion Management Program notes that the Harbor Freeway and the Santa Monica Freeway operate at LOS F in the vicinity of the Project during morning and afternoon peak hours. The incremental addition to the traffic at these locations as a result of the Project represents contributions to significant cumulative impacts.

[51] *The "usable" or assignable square feet (ASF) estimate excludes corridors, elevators, storage rooms, mechanical equipment spaces, and other similar spaces.*

4. MITIGATION MEASURES

a. Intersections

As described above, the Project would generate significant traffic impacts at six of the 15 study intersections. The following mitigation measures are proposed for four of these intersections:

1. Grand Avenue and I-10 westbound Ramps/17th Street – The westbound approach would be re-striped to provide an additional through lane.

2. Grand Avenue and 22nd Street – A traffic signal would be installed.

3. Grand Avenue and 23rd Street – The offset on 23rd Street would be eliminated by realigning the west leg of 23rd Street northerly to align with the east leg of the intersection. In addition, a left-turn lane would be provided on the eastbound approach, requiring the dedication by the College of a small area of right of way.

4. I-110 NB off-ramp and Adams Boulevard – An exclusive right-turn lane would be provided on the "mixed-flow" portion of the northbound off-ramp. Widening, including acquisition, of minor area of right of way may be necessary based upon review of improvement by Caltrans.

With the implementation of these mitigation measures, the significant Project impacts to four of the impacted intersections would be reduced to less than significant levels. Table 20 on page 159, shows that the mitigation measures would reduce the V/C ratios to levels less than significant, based on City of Los Angeles criteria. By improving the LOS of these intersections, the proposed mitigation measures would also reduce the cumulative impact to a less than significant level at these intersections.

b. Freeways

The cumulative condition of the Harbor Freeway and the Santa Monica Freeway are addressed through regional planning such as the Long Range Transportation Plan (LRTP) prepared by the MTA, the Regional Transportation Improvement Plan (RTIP) prepared by SCAG, and the Statewide Transportation Improvement Program (STIP) prepared by the California Department of Transportation. Additional measures to address significant cumulative conditions are beyond the ability of individual projects to implement.

Table 20

YEAR 2007 TRAFFIC CONDITIONS WITH THE PROJECT AND MITIGATION FOR INTERSECTIONS AT WHICH MITIGATION IS PROPOSED

Intersection	AM Peak		PM Peak	
	V/C Ratio	LOS	V/C Ratio	LOS
Grand Avenue and 17th Street	0.231	A	0.725	C
Grand Avenue and 22nd Street(1)	0.501(2)	A	0.705(2)	C
Grand Avenue and 23rd Street	0.585	A	0.671	B
I-110 NB off-ramp and Adams Boulevard	0.618	B	0.720	C

(1) Intersection is controlled by stop signs. For the purpose of evaluating the operating condition of the intersection, the first number shows average vehicular delay in seconds using Highway Capacity Manual stop-controlled methodology; for the purpose of applying the City of Los Angeles significance criteria, the V/C ratio using the CMA methodology is provided as the second number.

(2) Intersection would improve operation and LOS due to signalization

Source: Source: Kaku Associates, Final Draft Traffic and Parking Study for Los Angeles Trade-Technical College (March 31, 2003).

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

After implementation of the above described mitigation measures, significant impacts would still be experienced at two intersections—Grand Avenue at Washington Boulevard and Grand Avenue at Adams Boulevard. No physical or operational mitigation measures were considered feasible to mitigate the anticipated impact of the Project. In addition, significant cumulative conditions not addressed by the above described mitigation would be considered significant unavoidable impacts.

VI--Alternatives

VI. ALTERNATIVES

A. INTRODUCTION

Pursuant to Section 15126.6(a) of the CEQA Guidelines, an EIR:

> "shall describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

CEQA also requires that the "No Project" Alternative be evaluated and compared to the proposed action. The selection and discussion of alternatives is intended to foster informed public participation and decision-making. As stated in Section 15126.6(a), an EIR need not consider every conceivable alternative to the Project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. If an alternative is clearly environmentally superior to the proposed Project, it is to be designated as such. If the alternative with the least environmental impact is the "No Project" Alternative, then one of the other alternatives is to be identified as the environmentally superior alternative among the other alternatives.

Consistent with the requirements of Section 15126.6(a) of the CEQA Guidelines, a range of alternatives to the proposed Project were considered and evaluated in this Draft EIR. These alternatives, which were developed in the course of project planning and environmental review, consist of:

- Alternative 1 - No Action/No Project
- Alternative 2 - Full Retention of Building C
- Alternative 3 - Reduced Future Enrollment

The purpose of describing and analyzing Alternative 1-No Action/No Project is to allow the decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the Project. Alternative 2-Full Retention of Building C was selected for detailed evaluation because it would achieve some of the basic objectives of the proposed Project while reducing impacts on cultural resources. Alternative 3-Reduced Future Enrollment was selected for detailed evaluation because it would achieve most of the basic objectives of the

proposed Project while reducing impacts on air quality, noise, and transportation and circulation. The discussion of the alternatives to the proposed Project presented in this section includes the following information:

- A description of the alternatives considered.
- An evaluation of the environmental impacts expected for the alternatives in comparison to the proposed Project, which focuses on the ability of each alternative to avoid or substantially lessen any significant environmental impacts associated with the proposed Project.
- A description of the impacts of the alternatives that are not impacts of the proposed Project.
- A statement of whether the alternatives are feasible, meet the objectives of the proposed Project (as defined in Section II., Project Description, of this Draft EIR), and remains under further consideration.
- A summary evaluation of the alternative or alternatives that are environmentally superior to the proposed Project.

1. Alternative Eliminated From Further Evaluation – Alternative Site Location

CEQA directs that the alternatives analysis include consideration of an alternative site for the proposed Project. Factors to take into account when addressing the feasibility of alternatives are the site suitability and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. As stated in the CEQA Guidelines Section 15126.6(f)(2)(a),

> "the key question and first step in the analysis is whether any of the significant effects of the proposed project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR."

In those cases in which it is determined that no feasible alternative locations exist, the lead agency must disclose the reasons for this conclusion and include these reasons in the EIR. The purpose and need for the Project is in direct response to identified deficiencies in the existing College campus facilities, including the need to restore or rehabilitate deteriorated and damaged structures, facilities, and mechanical equipment to meet current standards of public health and safety. The Project is made possible by Proposition A, passed by the voters on April 10, 2001. Proposition A states that the bond proceeds are to be "…spent only on college and

classroom improvements and for no other purposes." The District will receive $1.245 billion in general obligation bonds, a portion of which has been allocated to each of the nine colleges of the District. Because the primary purpose of the Project is to rectify existing physical deficiencies (refer to page 20) on the College campus, selection of an alternative site location is neither reasonable nor viable.

B. ALTERNATIVES ANALYSIS

1. Alternative 1 – No Action/No Project

a. Description of the Alternative

In accordance with CEQA Guidelines Section 15126.6(d)(4), "the 'no project' analysis shall discuss the existing conditions, … as well as what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services."

Alternative 1-No Action/No Project would assume that the proposed Project resulting in the modernization and/or renovation of identified existing buildings on the campus, and replacement of other existing campus facilities with new buildings and landscaping on the College campus and the adjoining property at 2115 S. Grand Avenue would not occur. The Project site would continue to be occupied by a majority of the existing College buildings, landscaping, and infrastructure (i.e., streets and utilities) described in Section II of this Draft EIR. In addition, this Alternative would assume that student enrollment would remain at its current level, about 15,000 students, and that colleges and universities within the region would partially or wholly accommodate the future enrollment demand increment (6,300 students) not met by the College.

However, there would be some alterations to the campus even under Alternative 1-No Action/No Project. On April 10, 2001 the voters authorized the District to issue $1.245 billion of general obligation bonds. Proposition A, which passed with a 67% majority (only 55% being required), states that the bond proceeds are to be "…spent only on college and classroom improvements and for no other purposes." The funding allocation to the College from the bond proceeds is $138 million. For this reason Alternative 1-No Action/No Project would assume the funding allocation to the College from the bond proceeds would be used for construction, repair, improvement, and upgrade of College buildings, classrooms, and other facilities on the existing campus and that such activities would involve no expansion of use beyond that existing. Examples of activities that would occur under this Alternative include but are not limited to: (1) minor interior or exterior alterations involving such things as painting, resurfacing, repaving,

upgrade, repairing or replacing of plumbing, HVAC[52] systems, Fire/Life Safety and electrical conveyances; (2) installation of new equipment and furnishings; and (3) restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety.

b. Environmental Evaluation Relative To The Proposed Project

(1) Air Quality

The regional air quality is described as in attainment for nitrogen dioxide (NO_2), lead, and sulfur dioxide (SO_x), with carbon monoxide (CO) approaching attainment; ozone (O_3) and particulate matter (PM_{10}) levels are far from attainment (refer to page 73 of this EIR). The findings relative to local air quality conditions found the National standard for O_3 was exceeded nine times during the reporting period; the National standard for fine particulates (PM_2) was exceeded between 2 and 11 times annually during the reporting period; and the California standard for PM_{10} was exceeded between 48 and 119 times annually during the reporting period (refer to pages 74 through 76 of this EIR). In this context, Alternative 1-No Action/No Project would assume negligible change to the physical environment on the College campus and only certain types of improvements such as those described in Section VI.B.1.a would take place. Enrollment would be maintained at about 15,000 students.

Alternative 1-No Action/No Project would not involve extensive demolition or construction nor an increase in enrollment. As such, this Alternative is not expected to generate substantial construction-related emissions or additional mobile-source emissions. This Alternative would avoid the proposed Project's significant impacts related to localized PM_{10} associated with construction and less than significant mobile source emissions. This alternative would avoid the less than significant impacts of the proposed Project related to long-term air quality.

Alternative 1-No Action/No Project would not generate the daily emissions associated with the proposed Project, which would be expected to exceed the SCAQMD significance threshold for CO and NO_x resulting in a significant regional air quality impact without incorporation of mitigation measures; and adverse but less than significant impacts relative to ROC, SO_x and PM_{10} (refer to Table 9 on page 84). This Alternative would not cause localized air quality impacts related to mobile source emissions. In contrast, the proposed Project would result in such localized mobile source emissions, however the findings of the local area CO dispersion analysis conclude the impacts would be less than significant (refer to page 83 of this EIR).

[52] *Heating, ventilation, and air conditioning.*

(2) Cultural Resources

The survey conducted for this EIR identified six pre-1958 properties and one feature on the Project site. Although none of these were found eligible for the National Register, three properties (Buildings A, C, and Apffel's Coffee Company) and the feature (Mature Fig Tree) were found to be listed on or eligible for designation under an existing local ordinance, and one property (PTA Building) was found eligible for special consideration in local planning.

Under Alternative 1-No Action/No Project all of these properties would remain in their existing condition with these exceptions: it is reasonable to expect Buildings A and C, and the PTA building would undergo minor alterations involving such things as (1) interior and exterior painting and resurfacing; (2) repairing or replacing of plumbing, HVAC systems, Fire/Life Safety, electrical conveyances and other utilities; (3) installation of new equipment and furnishings; and (4) restoration or rehabilitation to meet current standards of public health and safety. The Mature Fig Tree and Apffel's Coffee Company would not be affected by this Alternative.

Alternative 1-No Action/No Project would not involve the removal or substantial alteration of a property found to be listed on or eligible for designation under an existing local ordinance, or found eligible for special consideration in local planning. Conversely, under the proposed Project, Building A would be modernized, Building C and the PTA building would be removed and replaced with landscaping, and the Apffel's Coffee Company buildings would be removed and replaced with new buildings, landscaping, and infrastructure. The Mature Fig Tree would not be affected by the proposed Project.

(3) Noise

The noise environment in the Project area is dominated by traffic noise from nearby roadways and the Blue Line Light Rail Transit line. Secondary noise in the area persists from general commercial and industrial uses surrounding the College campus. The findings of the noise analysis describe the ambient noise levels, which range from 63.4 to 70.8 dBA (A-weighted decibel scale), to be typical of noise levels experienced within urbanized areas (refer to page 137 of this EIR).

Alternative 1-No Action/No Project would not change to ambient noise environment. Construction-related noise associated with this Alternative is expected to be temporary and negligible because no heavy equipment (bulldozers, backhoes, loaders, and concrete mixers) would be used. In contrast, the proposed Project would generate the steady-state and episodic noise typically associated with the operation of heavy equipment.

With this Alternative, operations on the campus are not expected to increase noise levels. By comparison, based on the findings presented in Table 15 on page 144 of this EIR, the proposed Project would cause noise levels along adjacent streets to increase by as much as 0.6 dBA CNEL, which is neither audible nor significant based upon referenced thresholds.

(4) Transportation and Circulation

The level of service (LOS) at 15 intersections in the vicinity of the College campus was estimated for weekday morning and afternoon peak hours. Level of service is a qualitative measure used to describe the condition of traffic flow on the street system, ranging from LOS A (excellent conditions) to LOS F (congested conditions). LOS D is typically recognized as the minimum acceptable level of service in urban areas. Of the 15 intersections analyzed, 14 currently operate at acceptable levels. One intersection, Grand Avenue and 21st Street, operates at LOS F during the afternoon peak hour.

Alternative 1-No Action/No Project would not generate significant short-term, construction-related traffic or result in long-term adverse impacts on local intersections. Conversely, the proposed Project would have a significant impact on six intersections (refer to page 154 of this EIR). After implementation of mitigation measures, the Project-related impacts at two of the six intersections (Grand Avenue/Washington Boulevard and Grand Avenue/Adams Boulevard) would be significant, adverse, and unavoidable. In addition, the incremental addition to traffic on the Harbor Freeway (110) and Santa Monica Freeway (I-10) as a result of the Project would represent contributions to significant cumulative impacts.

c. Impact Evaluation Summary

Alternative 1-No Action/No Project would avoid the proposed Project's significant unavoidable adverse impacts on: air quality and noise due to construction; cultural resources associated with the removal of Building C; and cumulative transportation and circulation conditions associated with the proposed Project when considered in combination with the related projects and future conditions at the intersections of Grand Avenue/Washington Boulevard and Grand Avenue/Adams Boulevard and on the Harbor Freeway and Santa Monica Freeway.

Other possible areas of impact, identified in the Initial Study as less than significant for the Project, would also be less than significant under this alternative.

d. Feasibility

Although Alternative 1-No Action/No Project would avoid or substantially lessen the potential impacts of the proposed Project described in Section IV of this EIR, it would not meet

the District and College objectives for the Project. Specifically, this Alternative would not provide a campus environment with sufficient and adequate instructional and support space to:

- accommodate student enrollment growth projections;
- provide core curriculum and program opportunities to future students that would be responsive to market demands and labor pressures;
- improve vocational training opportunities while balancing the need to provide for greater instruction in the liberal arts and business disciplines; and
- establish a definitive link and unification of the campus to the community through landscaping.

In addition, Alternative 1-No Action/No Project would not achieve the Project-specific objective to increase landscape areas, open space and recreational areas to 55 percent.

2. Alternative 2 – Full Retention of Building C

a. Description of the Alternative

In accordance with CEQA Guidelines Section 15126.6(b), the discussion of alternatives must focus on alternatives to the proposed Project or its location which are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives or would be more costly. Alternative 2-Full Retention of Building C would avoid or substantially lessen the proposed Project's effects on cultural resources found to be listed on or eligible for designation under an existing local ordinance.

Building C (Learning Skills Center) was built in 1936 as the Industrial Arts building. This one-story, steel-framed, reinforced concrete building is square in plan with a central north-south corridor. It is an example of an industrial type building designed in a restrained P.W.A. Moderne style typical of the period and property type. Building C contains approximately 35,728 gross square feet (GSF) divided among a number of College departments and support uses, with about one third of the building used for printing technologies education. Alternative 2 would retain Building C in its current location and renovate the offices, classrooms, common areas, HVAC systems, Fire/Life Safety and other building elements to meet Uniform Building Code, Uniform Fire Code, and the Americans with Disabilities Act requirements. This Alternative would retain Building C for instruction, office, and other campus use. Student enrollment would be expected to reach 21,300 under this Alternative, the same as for the

proposed Project. Under the proposed Project, Building C would be removed and replaced with landscaping.

Implementation of this Alternative would result in a campus with approximately 885,728 GFS of building space and 664,480 GSF of open space, landscaped area. For comparison, the proposed Project would result in a campus with approximately 850,000 GSF and 682,344 GSF of open space.

b. Environmental Evaluation Relative to the Proposed Project

(1) Air Quality

With the retention of Building C, Alternative 2 would involve less demolition and construction than that of the proposed Project. As a result, the average construction-related emissions generated by this Alternative would be somewhat lower than the average construction-related emissions generated by the Project. In both cases (Alternative 2 and the Project), daily emissions for CO, ROC, NO_x, SO_x, and PM_{10} would be considered adverse but less than significant because levels of emissions would fall below the SCAQMD significance thresholds (refer to Table 8 on page 82). The worst-case day construction-related emissions would be comparable to the Project. In both cases (Alternative 2 and the Project) construction-period emissions would be expected to exceed the SCAQMD significance threshold for NO_x.

With a similar increase in student enrollment, regional and localized operational impacts would be comparable to the proposed Project. Daily emissions associated with Alternative 2 would be expected to exceed the SCAQMD significance threshold for CO and NO_x; thus resulting in a significant regional air quality impact without incorporation of mitigation measures. The daily emissions of ROC, SO_x and PM_{10} associated with Alternative 2 would be considered adverse but less than significant because levels of these emissions would fall below the SCAQMD significance thresholds (refer to Table 9 on page 84). Comparable to the proposed Project, Alternative 2 is expected to result in localized air quality impacts related to mobile source emissions, however, the findings of the local area CO dispersion analysis conclude the impacts would be less than significant (refer to page 83).

(2) Cultural Resources

Alternative 2 would fully retain Building C, which has been identified as a historic resource for purposes of CEQA, however it is reasonable to assume it would undergo maintenance, repair, stabilization, and rehabilitation. Therefore, Alternative 2 would likely result in significant impacts on Building C. Were such interior and exterior modifications conducted in a manner consistent with the Standards, the impacts would be lessened but not eliminated. In

contrast, the proposed Project calls for removal of Building C. Demolition of a historic resource is considered a significant adverse impact that cannot be mitigated to a level less than significant.

(3) Noise

As no demolition activity would be carried out for Building C, Alternative 2 would feature a reduced level of construction activity compared to the Project. Nonetheless, noise impacts comparable to those identified for the proposed Project would be generated from other construction activities associated with Alternative 2, which include all other demolition, renovation, modernization, and new construction activities identified for the North Campus, South Campus, and the Olive Avenue Parking Garage parcel under the proposed Project.

Because this Alternative proposes to accommodate a projected student enrollment comparable to the proposed Project (21,300 students), operations on the campus would be expected to increase noise levels above existing conditions, equivalent to those levels estimated for the proposed Project. Based on the findings presented in this EIR (refer to Table 15 on page 144), both Alternative 2 and the proposed Project would cause noise levels along adjacent streets to increase by as much as 0.6 dBA CNEL, which is neither audible nor significant based upon referenced thresholds.

(4) Transportation and Circulation

As Alternative 2 would result in only slightly less construction, the same increase in enrollment, and the same modifications to parking facilities as for the proposed Project, the transportation and circulation impacts of this Alternative would be comparable to the transportation and circulation impacts of the proposed Project.

Operations of both Alternative 2 and the proposed Project would cause a significant impact on six intersections (refer to page 154 of this EIR). After implementation of mitigation measures, the impacts at two of the six intersections (Grand Avenue/Washington Boulevard and Grand Avenue/Adams Boulevard) would be significant, adverse, and unavoidable under both Alternative 2 and the proposed Project. In addition, the incremental addition to traffic on the Harbor Freeway (110) and Santa Monica Freeway (I-10) as a result of the Project would represent contributions to significant cumulative impacts.

c. Impact Evaluation Summary

Alternative 2 would: lessen the Project's significant unavoidable adverse construction-related air quality and noise impacts; lessen significant impacts on cultural resources; and result in project-specific and cumulative transportation and circulation impacts comparable to the

proposed Project. Other possible areas of impact, identified in the Initial Study as less than significant for the Project, would also be less than significant under this alternative.

d. Feasibility

Although implementation of Alternative 2 would be technically feasible, it would not meet the District/College objectives for the Project. Specifically, Alternative 2 would not advance the desire of the District and the College to:

- incorporate sustainable building and operation practices through architectural design which minimize the negative long-term effects on the environment, maximize energy efficiency and the use of renewable resources;
- establish a definitive link and unification of the campus to the community through landscaping;
- increase landscape areas, open space and recreational areas to 55 percent to include roof gardens and terraces; and
- improve overall organization, distribution and placement of buildings supporting key academic and vocational programs.

By retaining Building C, Alternative 2 would preclude the expansion of open space and landscape areas on the College campus. The Landscape Vision[53] for the College recognizes campus space as the "heart of college life" and open space, in particular, as the element most often vividly remembered and associated with the image of a college campus. The *Campus Plan 2002* seizes the opportunity to "both better connect with its surrounding community and context as well as draw distinction by contrast in the creation of a gracious and tranquil heart" around which college life would center. Removal of Building C and creation of the proposed North Quad would shape a part of that tranquil space and provide the means to reinforce campus and community connectivity by creating a physical and visual opening to the South Campus.

3. Alternative 3 – Reduced Future Enrollment

a. Description of the Alternative

In accordance with CEQA Guidelines Section 15126.6(b), the discussion of alternatives must focus on alternatives to the proposed Project or its location which are capable of avoiding

[53] *Los Angeles Trade-Technical College Campus Plan 2002, Landscape and Open Space Plan (Appendix IV).*

or substantially lessen any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives, or would be more costly. Alternative 3-Reduced Enrollment Alternative would substantially lessen the Project's effects on air quality, transportation and circulation, and noise.

Alternative 3 assumes future enrollment would reach 18,000 students. This would be an increase of 3,000 students over the current enrollment, representing an estimated 20 percent growth over the existing enrollment. Conversely, the Project would accommodate 21,300 students, an estimated increase of 42 percent over the existing enrollment. No changes to the facilities programmed for construction under the *Campus Plan 2002* are proposed under this alternative. Alternative 3 would facilitate College course scheduling by reducing the future demand for available instructional space and support facilities. Alternative 3-Reduced Future Enrollment assumes colleges and universities within the region would partially or wholly accommodate the future enrollment demand increment (3,300 students) not met by the College.

b. Environmental Evaluation Relative to the Proposed Project

(1) Air Quality

Alternative 3 would feature the same physical improvements to the Campus as in the proposed Project. As such, the extent of the construction-related emissions generated by this Alternative would be identical to the Project. The average daily construction-related emissions (CO, ROC, NO_x, SO_x, and PM_{10}) associated with Alternative 3 would be considered adverse but less than significant because levels of emissions would fall below the SCAQMD significance thresholds (refer to Table 8 on page 82). The worst-case day construction-related emissions are expected to exceed the SCAQMD significance threshold for NO_x.

With only a 20 percent increase in student enrollment, the regional and localized operational emissions associated with Alternative 3 would be substantially less than the emissions estimated for the proposed Project. Alternative 3 would generate daily emissions which would be expected to exceed the SCAQMD significance threshold for ROC resulting in a significant regional air quality impact without incorporation of mitigation measures; and adverse but less than significant impacts relative to CO, NO_x, SO_x, and PM_{10}.[54] Both Alternative 3 and the proposed Project would result in localized mobile source emissions, however the findings of the local area CO dispersion analysis conclude the impacts would be less than significant for the proposed Project (refer to page 83 of this EIR,) and for Alternative 3. Because the student enrollment for Alternative 3 (18,000) would be substantially less than for the proposed Project

[54] *Operational emissions estimates for Alternative 3 are (in pounds per day): CO, 387.8; ROC, 79.6; NO_x, 40.9; SO_x, 0.3; and PM_{10}, 23.6. Refer to Table 9 on page 84 for the SCAQMD significance thresholds.*

(21,300), the localized mobile source emissions associated with Alternative 3 are expected to cause less than significant impacts.

(2) Cultural Resources

Alternative 3 would feature the same physical improvements to the College campus as in the proposed Project. Therefore, under Alternative 3, Building A would be modernized, Building C and the PTA building would be removed and replaced with landscaping, and the Apffel's Coffee Company buildings would be removed and replaced with new buildings, landscaping, and infrastructure. The Mature Fig Tree would not be affected by this Alternative. The impacts on cultural resources associated with these actions would be identical to those described in this EIR for the proposed Project (refer to Section V.B., Historic Resources).

(3) Noise

Alternative 3 would feature the same physical improvements to the College campus as in the proposed Project. As such, the extent of the construction-related noise generated by Alternative 3 would be identical to the Project. Both Alternative 3 and the proposed Project would generate the steady state and episodic noise typically associated with the operation of heavy equipment (bulldozers, backhoes, loaders, and concrete mixers).

Because Alternative 3 proposes to accommodate a projected student enrollment less than to the proposed Project (21,300 students), operations on the campus are expected to increase noise levels above existing conditions, but the associated noise levels would be less than that estimated for the proposed Project. Based on the findings presented in this EIR (refer to Table 15 on page 144), the proposed Project would cause noise levels along adjacent streets to increase by as much as 0.6 dBA CNEL, which is neither audible nor significant based upon referenced thresholds. Therefore, it is reasonable to expect the increase in noise levels associated with operation of College under Alternative 3 would be neither audible nor significant.

(4) Transportation and Circulation

Alternative 3 would feature the same physical improvements to the Campus as in the proposed Project. As such, the extent of the construction-related traffic would be identical to the proposed Project. Under Alternative 3, the College would accommodate an enrollment growth nearly 50% below that assumed for the proposed Project. Accordingly, this Alternative would generate proportionally fewer new trips and associated impacts on the streets and intersections evaluated in this EIR (refer to Section V.D., Transportation and Circulation).

Operations associated with Alternative 3 would increase traffic above existing conditions, but the associated impacts would be less than those estimated for the proposed Project. Alternative 3 would significantly impact three (3) intersections: Grand Avenue and I-10 westbound ramps/17th Street; Grand Avenue and Washington Boulevard; and Grand Avenue and 21st Street. Of these intersections, only the impacts on the intersection of Grand Avenue and Washington Boulevard would be significant after the application of mitigation measures.

By comparison, operations associated with the proposed Project would cause a significant impact on six (6) intersections (refer to page 154 of this EIR). After implementation of mitigation measures, the impacts at two of the six intersections (Grand Avenue/Washington Boulevard and Grand Avenue/Adams Boulevard) would be significant, adverse, and unavoidable with the proposed Project. In addition, the incremental addition to traffic on the Harbor Freeway (110) and Santa Monica Freeway (I-10) as a result of the Project would represent contributions to significant cumulative impacts.

c. Impact Evaluation Summary

Alternative 3-Reduced Future Enrollment would lessen the Project's significant construction-related air quality and noise impacts, and result in significant unavoidable impacts on cultural resources. Alternative 3 also would cause significant traffic impacts on fewer (three) intersections than would be caused by the proposed Project, however both Alternative 3 and the Project would result in significant, adverse, and unavoidable impacts on the intersection of Grand Avenue and Washington Boulevard.

d. Feasibility

Although implementation of Alternative 3 would be technically feasible, it would not meet the District and College objectives for the Project. Specifically, Alternative 3 would not satisfy the need for the District and College to accommodate the estimated student enrollment growth increment of 6,300 students for a total enrollment of 21,300 students.

The District, the California Community Colleges, and the broader community of higher education providers foresaw the surge in student enrollment colleges and universities statewide began to experience in 2000-2001. Referred to as Tidal Wave II, higher education systems and institutions have been planning the means to accommodate California's record numbers of high school graduates, and greater numbers of re-entry students or those Californians seeking training or retraining to cope with job loss and industry dislocation. The estimated enrollment for community colleges statewide increased an average of 5.7 percent and 6.9 percent in the Fall semesters of 2001 and 2002, respectively. During those and the preceding years, the number of

students enrolled in occupational programs also increased. Since 1995-96, enrollments in occupational programs increased by 26.7 percent. [55]

The Los Angeles Trade-Technical College is distinguished by its urban context and location at the center of metropolitan Los Angeles. The College campus lies near the vibrant, emerging downtown of the new Disney Concert Hall, the Our Lady of Angels Cathedral, Pershing Square and the Broadway Theater District, as well as near the Los Angeles Convention Center, Exposition Park, University of Southern California, LA Mart and the Fashion District. Recognized for its dedication to vocational training in the areas of manufacturing and service industries, design and the arts, the construction trades, and fields of computer and electronic technology, the College is committed to meeting the community-driven demand for higher education and business demands for educated and well-trained individuals with the skills necessary to adapt to technology and changing industry needs.

By accommodating an enrollment growth of 3,000 students over the existing enrollment, Alternative 3 would allow the District and College to partially attain its objective and partially fulfill its commitment to provide a college education to any person motivated to seek such an education.

C. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126(d) of the CEQA Guidelines indicates that an analysis of alternative to the proposed Project shall identify one alternative as the environmentally superior alternative. Furthermore, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify the environmental superior alternative from among the other alternatives. Generally, the No Action/No Project and Reduced Future Enrollment Alternatives would have generally lower impacts than the proposed Project for most environmental issue areas. Therefore, these alternatives are considered environmentally superior to the proposed Project.

Alternative 1 (No Action/No Project) is considered the overall environmentally superior alternative because it would reduce adverse impacts in most issues areas. However, Alternative 1 does not meet all of the objectives of the Project and would delay the District and College implementation of Proposition A funded construction, repair, improvement, and upgrade of College buildings, classrooms, and other facilities on the existing campus. In addition,

[55] *"Community Colleges Experience Record Enrolments while Funding Concerns Mount" (September 10, 2002),* http://www.cccco.edu/news/press/press_2002/press_september/press_091002.htm [April *14, 2003]; "Largest Statewide Enrollment Increase Ever for California Community Colleges" (November 21, 2001),* http://www.cccco.edu/news/press/ press_2001/press_november/press_112101.htm [April *14, 2003]*

Alternative 1 would preclude the realization of several beneficial impacts of the proposed Project, including enhancements to existing infrastructure (streets and utilities), expansion of open space, improvements and expansion of onsite parking facilities, and increased community access to recreational opportunities on campus.

Alternative 3 (Reduced Future Enrollment) meets all of the project-specific objectives of the proposed Project but would only partially meet the programmatic objective relative to future enrollment. By accommodating an enrollment growth of only 3,000 students over the existing enrollment (15,000 students), Alternative 3 would allow the District and College to only partially attain its programmatic objective (enrollment of up to 21,300 students). Because all renovation, modernization, and new construction proposed within the *Campus Plan 2002 5-year plan* would be realized, the environmental impacts of this Alternative would be substantially equivalent to the proposed Project with respect to construction-related effects (air quality and noise) and the impacts on cultural resources. The operational impacts of this Alternative, however, would generally be less than those associated with the proposed Project. Specifically, Alternative 3 would cause significant traffic impacts on fewer (three) intersections than would be caused by the proposed Project. In addition, only one intersection—Grand Avenue and Washington Boulevard—would be significantly impacted after implementation of mitigation measures.

VII--Long-term Implications of the Proposed Project

VII. LONG-TERM IMPLICATIONS OF THE PROPOSED PROJECT

A. SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED

Section 15126.2 (b) of the CEQA Guidelines states that an EIR:

> "Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

The proposed Project would remove four buildings (C, E, PTA, and Apffel's Coffee Company), three of which have been identified as a building of local interest and historical value. Other structures with local historical value (Building A) would be renovated in accordance with the Secretary of the Interior Standards for Rehabilitation. With application of identified mitigation measures, the Project would cause a significant impact on Building C, which cannot be avoided. Redesigning the *Campus Plan 2002* to retain Building C would conflict with the College vision of creating a learning environment with outdoor spaces that enhance the student's higher education experience, while contributing toward the supply of public open spaces within central Los Angeles.

The construction of the Project would generate emissions of NO_x that would exceed SCAQMD thresholds. Mitigation measures would reduce and control construction related emissions. However, Project construction would continue to generate NO_x emissions in excess of SCAQMD thresholds. In addition, construction would generate noise levels in excess of the City of Los Angeles significance threshold. These impacts are unavoidable aspects of the construction process.

Additionally, the proposed Project is located at a highly urbanized area that continues to experience traffic congestion on local roadways and freeways (I-110 and I-10). Implementation of the proposed *Campus Plan 2002* 5-year plan would result in significant unavoidable impacts on two intersections near the College even with the application of mitigation measures. The two intersections affected by the Project are 1) Grand Avenue/ Washington Boulevard and 2) Grand Avenue/Adams Boulevard.

In addition, the incremental addition to traffic on the Harbor Freeway (110) and Santa Monica Freeway (I-10) as a result of the Project would represent contributions to significant

unmitigated cumulative impacts. Furthermore, emissions from Project-related trips are expected to exceed the SCAQMD significance thresholds for NO_x, CO and ROC. These impacts result from the Project's location in the highly urbanized Los Angeles metropolitan region and measures to mitigate these impacts are considered beyond the feasibility of any individual project.

B. GROWTH-INDUCING IMPACTS

The CEQA statute and guidelines require that an EIR discuss the growth-inducing impacts of a proposed project (CEQA §21100(b)(5); CEQA Guidelines §15126.2). Specifically, an EIR must:

> "Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." (CEQA Guidelines §15126.2)

The CEQA Guidelines further state that the EIR should consider those types of projects that would remove obstacles to population growth such as the construction of needed utility service systems, infrastructure and public services. The Project does not propose to create any new off-site infrastructure (transportation or utilities) that would generate additional capacity or excess capacity, thereby removing obstacles to population growth. Rather, the Project would remove, renovate, and modernize existing buildings and structures, and construct new facilities that would support the College's academic and student services programs on campus.

Construction and operation of the Project would generate construction-related jobs and increase the number of faculty and staff on campus by approximately 47 percent, commensurate with the anticipated increase in student enrollment (from approximately 15,000 students to 21,000 students). These jobs and the spending associated with them may indirectly stimulate economic vitality within the area surrounding the College campus. Elements of the Project that may stimulate change by attracting students and visitors to the campus are the renovation to the existing exhibition gallery located within Building D, creation of a piazza and sculpture garden along campus frontage on Grand Avenue, and expansion of Building H located at the southwest corner of Washington Boulevard and Grand Avenue. Expansion of Building H would add a restaurant and bake shop to the east side of the building, fronting the proposed piazza and Grand Avenue. The restaurant and bake shop would serve the campus and wider community as well as provide training for the students of the Culinary Arts and Professional Baking programs.

The projected increase in the campus population in conjunction with the planned construction associated with the proposed Project would contribute toward the economic revitalization within the immediate area. A college campus generally draws large numbers of people who stay on the campus for extended periods of time (several hours) during weekdays.

Commercial establishments such as fast-food restaurants, cafes, office supply stores, and other businesses that cater to student needs tend to flourish near college campuses. Were the Project to indirectly encourage private investment within the surrounding area, any such investment in the form of new development initiatives would be evaluated through the planning and development permit process administered by the City of Los Angeles, which would ensure project consistency and conformance with City-adopted plans and codes.

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE CAUSED BY THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

Uses of nonrenewable resources during the construction and operation of the proposed Project would be irreversible since a commitment of such resources makes removal or nonuse thereafter unlikely. Pursuant to CEQA Guidelines Section 15126.2(c), "irretrievable commitments of resources should be evaluated to assure that such current consumption is justified".

Construction of the proposed Project would result in an irretrievable commitment of nonrenewable and slowly renewable resources such as raw materials in steel, metals such as copper and lead, timber and other forest products, aggregate materials (sand and gravel) used in concrete and asphalt, and petroleum-based construction materials. To the extent feasible and practicable, the proposed Project would incorporate the use of as much on-site recyclable material in accordance with the District's LEED™ program, which encourages reuse of existing materials (e.g., undamaged piping) and incorporation of expended concrete into building foundations. Construction activities associated with the proposed Project would utilize and consume fossil fuels to power the heavy equipment. These resources would be expended outright and, therefore, would be irretrievable were the Project implemented.

The proposed Project would remove four buildings (C, E, PTA, and Apffel's Coffee Company, when acquired), three of which have been identified as a building of local interest and historical value. The proposed removal and replacement of these buildings with other uses (campus facilities and landscape) would irreversibly change the College campus and the adjoining property (Apffel's Coffee Company).

The commitments of resources and the irretrievable environmental changes associated with the proposed Project would advance the District's objectives for implementation of the Proposition A bond measure passed by Los Angeles County voters to fund remodel, renovation, and new facilities construction projects on the District's nine college campuses, including the Los Angeles Trade-Technical College campus. Therefore, there is no particular justification for avoiding or delaying those commitments of resources and the irretrievable environmental changes associated with the proposed Project.

VIII--Summary of Standard Requirements and Mitigation Measures

VIII. SUMMARY OF STANDARD REQUIREMENTS AND MITIGATION MEASURES

A. STANDARD REQUIREMENTS

The regulations of the Los Angeles Community College District ("District") specify that development of District facilities follow certain standard requirements, as outlined below.

1. Building Permits

The Project would be subject to review and approval by the Division of the State Architect pursuant to the Education Code. The Project would not be subject to local (City of Los Angeles) building permit or building code requirements.

2. Drainage and Grading Permits

The Project would be subject to City of Los Angeles review and approval for drainage and grading plans, pursuant to California Government Code section 53097.

3. Demolition Permits

The Project would be subject to City of Los Angeles review and approval for demolition plans, excepting partial demolitions, meaning those that are incidental to repair, rehabilitation or expansion of an existing building, which are subject to review by Division of the State Architect under 24 California Code of Regulations Sec. 4-312.

4. Infrastructure Improvements

The Project would be subject to local review and approval for on- and off-site improvements related to drainage, grading and roadways.

5. Zoning Approvals

The Project would be subject to conditional use permits, variances or other City of Los Angeles zoning approvals required by the Planning and Zoning Chapter of the Los Angeles Municipal Code, unless the District governing board votes to exempt the Project from local planning and zoning requirements.

B. SUMMARY OF MITIGATION MEASURES

Mitigation measures that would reduce or eliminate environmental impacts were identified as part of the environmental analysis contained in this EIR. These mitigation measures are summarized below.

1. Air Quality

(a) Land Clearing/Earth-Moving

1. Exposed pits (i.e., gravel, soil, dirt) with 5 percent or greater silt content shall be watered twice daily, enclosed, covered or treated with non-toxic soil stabilizers according to manufacturers' specifications.

2. All other active sites shall be watered as often as necessary to remain visibly moist.

3. All grading activities shall cease during second stage smog alerts and periods of high winds (i.e., greater than 25 mph) if soil is being transported to off-site locations and cannot be controlled by watering.

4. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer).

(b) Paved Roads

1. All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite, or shall be paved.

2. Streets shall be swept hourly if visible soil material has been carried onto adjacent public paved roads.

3. Construction equipment shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

(c) Unpaved Roads

1. Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

2. Traffic speeds on all unpaved roads shall not exceed 15 mph.

(d) Construction Equipment

1. All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

2. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would be kept with their engines off, when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

2. Cultural Resources

(a) Building A

1. Rehabilitation Work. Any maintenance, repair, stabilization, rehabilitation, preservation, conservation or reconstruction of any portion of Building A shall be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards), Weeks and Grimmer (1995). Project plans for the rehabilitation/restoration of Building A shall be submitted

2. Photography and Recordation. Prior to the rehabilitation of Building A, a photographic documentation report shall be prepared. This report will document the significance of the building and its physical conditions, both historic and current through photographs, text, and completion of appropriate State of California Historic Inventory forms (DPR 523). Photographic documentation noting all elevations and additional details of the building's architectural features should be taken utilizing 35-mm black and white film. The photographer should be familiar with the recordation of historic resources. Photographs should be prepared in a format consistent with Historic American Buildings Survey (HABS) standards for field photography. Copies of the report shall be submitted to the California Office of Historic Preservation, the City of Los Angeles Cultural Affairs Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

3. Identification of Character-Defining Features. Prior to completion of project design and prior to the rehabilitation /restoration of Building A, an inventory of significant, character-defining features and materials of the historic resource shall be made by a qualified architectural historian or historic architect. These features and materials

shall be retained in-place and repaired as part of the overall rehabilitation/restoration project proposed for Building A.

4. Compatibility of New Construction. Where new construction is proposed near or adjacent to Building A, the Standards shall be followed. Consistent with the Standards, the proposed new construction shall be differentiated from Building A, but compatible in size, scale, massing, and proportions. Following the Standards, materials, design, color, and texture proposed for the new construction may complement that of Building A.

(b) Building C

1. Recordation. Prior to demolition of Building C for the implementation of the proposed project, a Historic Structures Report shall be prepared. This document shall record the history of building and its contextual relationship to Los Angeles Polytechnic High School and Los Angeles Technical Trade College. Its physical condition, both historic and current, should be noted in the document through the use of site plans, original as-built drawings, historic maps, 35-mm photographs, and written data and text. Photographs should be 35-mm black and white format, and taken by a professional photographer familiar with the recordation of historic buildings. Photographs should be archivally prepared in a format consistent with Historic American Buildings Survey (HABS) standards for photography. Archival copies of the report shall be submitted to the California Office of Historic Preservation, the City of Los Angeles Cultural Affairs Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

2. Demolition Coordination. The demolition of Building C shall be coordinated with the construction of the new educational facilities on the campus. Therefore, Building C shall not be demolished until all project plans are final and approved by the District and the City of Los Angeles Cultural Affairs Department.

3. Interpretive Education Program. To assist the students, faculty, parents, and others interested parties in understanding the history of LATTC (Los Angeles Polytechnic High School) an interpretive educational program or display shall be incorporated into the development of the new campus, specifically adjacent to or within the Building A. This interpretative program shall be created with the assistance of a qualified historic preservation professional[56] in coordination with the Applicant. Content and design of the interpretive program should be specific to the educational history and architectural of Los Angeles Polytechnic High School and its eventually

[56] *A qualified historic preservation professional is one who meets the Secretary of the Interior's Professional Qualifications Standards for History and Architectural History, as per 36 CFR 61.*

evolution into the Los Angeles Trade Technical College. The program may include, but not be limited to: commemorative signage, plaques, historic photographs, salvaged material, models, exhibit display, tour or special event, and/or published material in the form of a brochure, pamphlet, video, electronic media, etc.

(c) Morten Bay Fig Tree

1. Preservation and maintenance. Significant existing designed historic landscape features, such as the Morten Bay Fig Tree located with the main courtyard behind (south) Building A, shall be retained and preserved. Any new landscaping proposed shall respect the historic character of the identified landscape features and the historic building(s), if any, in which it is adjacent to. Any maintenance, repair, stabilization, rehabilitation, preservation, conservation or reconstruction of any portion of fig tree shall be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards), Weeks and Grimmer (1995).

(d) PTA Building

1. Recordation. Prior to the demolition of the Parent Teacher Building, specifically the Auditorium portion of the building, for the implementation of the proposed project, a Historic Structures Report shall be prepared. This document shall record the social and architectural history of building. Its physical condition, both historic and current, should be noted in the document through the use of site plans, historic maps, 35-mm photographs, and written data and text. Photographs should be 35-mm black and white format, and taken by a professional photographer familiar with the recordation of historic buildings. Photographs should be archivally prepared in a format consistent with Historic American Buildings Survey (HABS) standards for photography. Archival copies of the report shall be submitted to the California Office of Historic Preservation, the City of Los Angeles Cultural Affairs Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

(e) Apffel's Coffee Company

1. Recordation. Prior to the demolition of the Apffel Coffee Company building for the implementation of the proposed project, a Historic Structures Report shall be prepared. This document shall record the history of the Apffel Coffee Company business and its contextual relationship to the area. The building's physical condition, both historic and current, should be noted in the document through the use of site plans, original as-built drawings, historic maps, 35-mm photographs, and

written data and text. Photographs should be 35-mm black and white format, and taken by a professional photographer familiar with the recordation of historic buildings. Photographs should be archivally prepared in a format consistent with Historic American Buildings Survey (HABS) standards for photography. Archival copies of the report shall be submitted to the California Office of Historic Preservation, the City of Los Angeles Cultural Affairs Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

2. Relocation. As part of the acquisition process currently underway, the District will provide relocation assistance to the Apffel Coffee Company as required by law. The Company has acquired a relocation site in Santa Fe Springs, California. Subject to the consent of the Coffee Company, the District will provide funds to assist in relocating the existing Coffee Company museum, located in the current building's lobby, to the new facility.

3. Noise

a. Construction

1. During all Project site preparation, grading, and construction activities, the Project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards.

2. An eight-foot temporary sound barrier (e.g., plywood) shall be erected along the site boundary to block the line of sight between construction activity and off-site receptor locations.

4. Transportation and Circulation

a. Grand Avenue and I-10 westbound Ramps/17th Street

1. The westbound approach would be re-striped to provide an additional through lane.

b. Grand Avenue and 22nd Street

1. A traffic signal would be installed.

c. Grand Avenue and 23rd Street

1. The offset on 23rd Street would be eliminated by realigning the west leg of 23rd Street northerly to align with the east leg of the intersection. In addition, a left-turn lane

would be provided on the eastbound approach, requiring the dedication by the College of a small area of right of way.

d. I-110 NB off-ramp and Adams Boulevard

1. An exclusive right-turn lane would be provided on the "mixed-flow" portion of the northbound off-ramp. Widening, including acquisition, of minor area of right of way may be necessary based upon review of improvement by Caltrans.

IX--Persons Contacted, References, and Preparers

IX. PERSONS CONTACTED, REFERENCES, AND PREPARERS

LEAD AGENCY

Los Angeles Community College District
770 Wilshire Boulevard
Los Angeles, CA 90017

Los Angeles Trade-Technical College
400 West Washington Blvd., Bldg. A, Room A-108
Los Angeles, CA 90015

- Dr. Daniel A. Castro, President
- Mary Ann Breckell, Vice President, Administration

District Legal Counsel

- Joshua G. Gottheim, Esq., Brown, Winfield and Canzoneri

ENVIRONMENTAL IMPACT REPORT PREPARATION

PCR Services Corporation
233 Wilshire Boulevard, Suite 130
Santa Monica, California 90401

- Gregory J. Broughton, President
- Patricia Flores Shoemaker, AICP, Project Manager
- Janet Ostashay, Director of Cultural Resources Management
- Mark Hagmann, P.E., Principal Engineer
- Keith Cooper, Planner/Scientist
- Sally Salavea, Senior Planner
- Christine Lenches-Hinkel, Senior Planner
- Peter Moruzzi, Cultural Resources Specialist

- Ned Baldwin, Associate Planner
- Terrence Keelan, Publications Supervisor
- Sherrie Cruz, Senior Graphics Associate

PROJECT MANAGEMENT

ACG & AVA
400 West Washington Blvd., Bldg. D
Los Angeles, CA 90015

- Ronald Johnson, R.A., Project Director
- Maria T. Carvajal, Construction Manager

ARCHITECT/MASTER PLANNER

MDA Johnson Favaro
5898 Blackwelder St
Culver City, CA 90232

ENGINEER

Kleinfelder, Inc.
1370 Valley Vista Drive #150
Diamond Bar, CA 91765

TRAFFIC AND PARKING

KAKU Associates, Inc.
1453 Third Street, Suite 400
Santa Monica, CA 90401

Appendices

PCR Santa Monica
233 Wilshire Boulevard
Suite 130
Santa Monica, California 90401
TEL 310.451.4488
FAX 310.451.5279
EMAIL info@pcrnet.com

PCR Irvine
One Venture
Suite 150
Irvine, California 92618
TEL 949.753.7001
FAX 949.753.7002
EMAIL info@pcrnet.com