

3.0 COMMENTS AND RESPONSES TO COMMENTS

PURPOSE

This section of the Final EA/EIR presents copies of comments on the Draft EA/EIR received during the public review period between April 8, 2004, and May 24, 2004. Each comment letter is numbered, and each comment within the letter is numbered. Each comment letter is followed by responses, which are numbered in corresponding fashion for that comment letter.

The County of Los Angeles's Responses to Comments on the Draft EA/EIR represent a good faith, reasoned effort to address the environmental issues identified by the comments. Under *California Environmental Quality Act (CEQA) Guidelines*, the County is not required to respond to all comments on the Draft EA/EIR, but only to respond to those comments that raise environmental issues (see *CEQA Guidelines* Section 15088(a)). Case law under CEQA recognizes that the County need only provide responses to comments that are commensurate in detail with the comment itself. In the case of specific comments, the County has responded with specific analysis and detail; in the case of a general comment, the reader is referred to a related response to a specific comment, if possible. The absence of a specific response to every comment does not violate CEQA if the response would be cumulative to other responses.

LIST OF AGENCIES AND INDIVIDUALS THAT COMMENTED ON THE DRAFT EA/EIR

The following agencies and organizations provided written comments are listed below:

State Agencies

1. State of California Governor's Office of Planning and Research, May 25, 2004
2. State of California Department of Conservation, May 12, 2004

Regional and Local Agencies

3. Southern California Association of Governments, May 12, 2004
4. County of Los Angeles Department of Public Works, May 17, 2004
5. County of Los Angeles Sheriff's Department Headquarters, May 24, 2004
6. County of Los Angeles Fire Department, May 28, 2004
7. City of Los Angeles Department of Transportation, May 19, 2004

Regional and Local Organizations

8. Los Angeles Conservancy, May 21, 2004



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Jan Boel
Acting Director

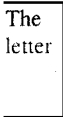
May 25, 2004

Cheryl Fuerth
Los Angeles County
500 West Temple St. Room 754
Los Angeles, CA 90012

Subject: Hall of Justice Repair and Reuse Project
SCH#: 2003021019

Dear Cheryl Fuerth:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on May 24, 2004, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.



1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

SCH# 2003021019
Project Title Hall of Justice Repair and Reuse Project
Lead Agency Los Angeles County

Type EIR Draft EIR
Description The project would include repairing the Hall of Justice by seismically retrofitting the earthquake-damaged building into a useable office building while preserving and restoring selected historic features. This project would include the repair of the interior of the Hall of Justice building to provide 325,000 sq. ft. of useable office space, the development of a new multi-level garage with 1,000 parking spaces on the site, landscaping and hardscaping improvements, architectural and security lighting and necessary upgrades to utility systems.

Lead Agency Contact

Name Cheryl Fuerth
Agency Los Angeles County
Phone 213-974-1127 **Fax**
email
Address 500 West Temple St. Room 754
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets Temple Street and Broadway
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways 101, 110, I-10
Airports
Railways
Waterways Los Angeles River
Schools Castelar, Utah, 9th Street Elementary, Belmont HS
Land Use The project site is presently occupied by the existing Hall of Justice Building which was built in 1925 and is the oldest public structure within the Los Angeles Civic Center area. According to the Los Angeles Central City Community Plan, the project site is designated as "Civic Center." The project site is zoned as commercial (C4-R2).

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Office of Emergency Services; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 04/08/2004 **Start of Review** 04/08/2004 **End of Review** 05/24/2004

Note: Blanks in data fields result from insufficient information provided by lead agency.

1. State of California Governor's Office of Planning and Research, Terry Roberts, May 25, 2006

Response 1

The Office of Planning and Research (OPR) is indicating that the County of Los Angeles has complied with State Clearinghouse review requirements, and that no comments were submitted by State Agencies to the OPR. This comment does not pertain to the adequacy or completeness of the Draft EIR; therefore, no further response is required.



DEPARTMENT OF CONSERVATION
STATE OF CALIFORNIA

May 12, 2004

DIVISION OF OIL,
GAS, & GEOTHERMAL
RESOURCES

■ ■ ■

5816 CORPORATE AVE.
SUITE 200
CYPRESS
CALIFORNIA
90630-4731

PHONE
714/816-6847

FAX
714/816-6853

INTERNET
consv.ca.gov

■ ■ ■

ARNOLD
SCHWARZENEGGER
GOVERNOR

Ms. Cheryl Fuerth
County of Los Angeles Chief Administrative Office
500 West Temple, Room 754
Los Angeles, California 90012

Subject: Notice of Completion of the Draft Environmental Impact Report
for the Hall of Justice Repair and Reuse Project, SCH# 2003021019

Dear Ms. Fuerth:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California.

The proposed project is located beyond the administrative boundaries of any oil or gas field. There are no oil, gas, or injection wells within the boundaries of the project. However, if excavation or grading operations uncovers a previously unrecorded well, the Division district office in Cypress must be notified, as the discovery of any unrecorded well may require remedial operations.

1

Thank you for the opportunity to comment on the Draft Environmental Impact Report. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

Sincerely,

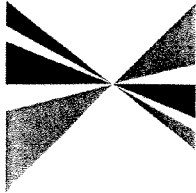
Paul Frost
Associate Oil & Gas Engineer

2. State of California Department of Conservation, Paul Frost, May 12, 2004

Response 1

The County of Los Angeles, in the unlikely event that an oil, gas, or injection well is unearthed during excavation or grading operations, will notify the appropriate individual within the Department of Conservation. The County of Los Angeles will place this condition on the construction contractor. This comment does not pertain to the adequacy or completeness of the Draft EIR; therefore, no further response is required.

SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

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Imperial County: Hank Kuiper, Imperial County • Jo Shields, Brawley

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Orange County: Chris Norby, Orange County • Ronald Bates, Los Alamitos • Lou Bone, Justin • Art Brown, Buena Park • Richard Chavez, Anaheim • Debbie Cook, Huntington Beach • Calhryn DeYoung, Laguna Niguel • Richard Dixon, Lake Forest • Alta Duke, La Palma • Bev Perry, Brea • Tod Ridgeway, Newport Beach

Riverside County: Marion Ashley, Riverside County • Thomas Suckler, Lake Elsinore • Bonnie Hickinger, Moreno Valley • Ron Lowridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Paul Biene, San Bernardino County • Bill Alexander, Rancho Cucamonga • Edward Burginon, Town of Apple Valley • Lawrence Dale, Barstow • Lee Ann Garcia, Grand Terrace • Susan Longville, San Bernardino • Gary Ovit, Ontario • Deborah Robertson, Rialto

Ventura County: Judy Mikels, Ventura County • Glen Berra, Simi Valley • Carl Morehouse, San Buenaventura • Ioni Young, Port Hueneme

Orange County Transportation Authority: Charles Smith, Orange County

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

May 12, 2004

Ms. Cheryl Fuerth
County of Los Angeles
Chief Administrative Office
500 W. Temple Street Street, Room 754
Los Angeles, CA 90012

RE: SCAG Clearinghouse No. I 20040217 County of Los Angeles Hall of Justice Renovation and Reuse Project

Dear Ms. Fuerth:

Thank you for submitting the County of Los Angeles Hall of Justice Renovation and Reuse Project for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the County of Los Angeles Hall of Justice Renovation and Reuse Project, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's April 1-15, 2004 Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

1

3. Southern California Association of Governments, Jeffrey Smith, May 12, 2004

Response 1

The Southern California Association of Governments (SCAG) is indicating they have reviewed the document and that the project is not regionally significant per SCAG Intergovernmental Review Criteria and the California Environmental Quality Act (CEQA). This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
www.ladpw.org

JAMES A. NOYES, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

May 17, 2004

IN REPLY PLEASE
REFER TO FILE: WM-4

TO: Cheryl Fuerth
Chief Administrative Office
FROM: Rod Kubomoto
for Assistant Deputy Director

**RESPONSE TO NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT
ENVIRONMENTAL IMPACT REPORT
HALL OF JUSTICE REPAIR AND REUSE PROJECT
CITY OF LOS ANGELES**

Thank you for the opportunity to provide comments on the subject document which we received on April 12, 2004. The proposed project consists of repairing the Hall of Justice by seismically retrofitting the earthquake damaged building into a usable office building while preserving and restoring selected historic features. The proposed project also includes repairing the interior of the building to provide 325,000 square feet of usable office space, the development of a new multilevel garage with 1,000 parking spaces on the site, landscape and hardscape improvements, architectural and security lighting, and necessary upgrades to utility systems. The project site is located at 211 West Temple Street in the City of Los Angeles. We have reviewed the submittal and offer the following comments.

Environmental Programs

As projected in the Los Angeles County Countywide Siting Element, which was approved in late 1997 by a majority of the cities in the County of Los Angeles with a majority of the population and by the County Board of Supervisors in January 1998, a shortfall in permitted daily landfill capacity may be experienced in the County within the next few years. The construction, retrofit and renovation activities associated with the proposed project and the postdevelopment operation over the life of the proposed project will increase the generation of solid waste and may negatively impact the solid waste management infrastructure in the County.

In addition, Assembly Bill 939, as amended, requires the County to reduce by 50 percent the amount of solid waste disposed at landfills. Failure to comply could subject the County to fines up to \$10,000 per day. Waste generated as a result of the project that is not diverted from landfills will be counted against the County unincorporated areas for the purpose of measuring compliance with the waste reduction mandate. Pages 4.8-17ff and 4.8-20ff of the Environmental Impact Report (EIR) discuss recycling in a general manner but do not list specific mitigation measures to reduce solid waste generated from the project and divert solid waste away from landfill disposal.

In order to mitigate the project's impact and facilitate the County's compliance with the State waste reduction mandate, the proposed project should incorporate these requirements:

- Comply with the County's construction and demolition debris recycling specifications: divert a minimum of 50 percent of construction and demolition debris from disposal, and submit reports to our Environmental Programs Division, detailing the volume of debris generated and the percentages of this debris that are recycled and disposed in landfills. For information on these specifications, please contact Allen Welbourn at (626) 458-3554.
- Provide adequate areas for the collection and removal of recyclable materials.
- Implement a recycling program for tenants as discussed on pages 4.8-17ff and 4.8-20ff of the Environmental Impact Report. This should include participation in the County's Departmental Recycling Program (for information, please contact Allen Welbourn at (626) 458-3554.

Cafeterias or food service establishments may be required to provide a grease treatment device and will be subject to review and approval by our Environmental Programs Division.

If you have any questions, please contact Wilson Fong at (626) 458-3581.

Geotechnical and Materials Engineering

The proposed project will not have significant environmental effects from a geology and soils standpoint, provided the appropriate ordinances and codes are followed.

If you have any questions, please contact Amir Alam at (626) 458-4972.

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Land Development

Hydrology and Standard Urban Storm Water Mitigation Plan (SUSMP) Review

This environmental document has been reviewed only for drainage and SUSMP impacts to County of Los Angeles areas and facilities. The proposed project is located within the City of Los Angeles and does not affect the County drainage system. We have no comments at this time.

6

We have no comments regarding sewer at this time.

7

The applicant shall obtain the Statement of Water Service/Water Availability Letter from the water purveyor indicating that the water system has sufficient water supplies to serve the subject proposal. This includes meeting minimum domestic flow requirements as well as fire flow/fire hydrants requirements. The document has indicated that an infrastructure analysis will be prepared to address project specific utility needs. This issue will be addressed in the environmental document for this project.

8

Prior to issuance of building permits, project must comply with all applicable Best Management Practices, Storm Water Pollution Prevention Plan, and SUSMP requirements.

9

If you have any questions, please contact Timothy Chen at (626) 458-4921.

Transportation Planning

We reviewed the subject document and determined that the proposed project will not have any significant impacts on County of Los Angeles Highways.

10

If you have any questions, please contact Hubert Seto at (626) 458-4349.

Traffic and Lighting

We agree with the study that the traffic generated by the project alone will not have significant impact to the roadways in the vicinity of the project area or to the Congestion Management Program monitored intersections, arterials, or freeways. We agree with the study that the cumulative traffic generated by the project and other related projects will significantly impact the following intersections. The project's level of impact is indicated for each intersection:

11

Ms. Cheryl Fuerth
May 17, 2004
Page 4

North Broadway at Temple Street (Project Impact: 6 Percent)

North Broadway at US-101 Freeway Northbound On-Ramp (Project Impact: 7 Percent)

The project is responsible for the implementation of the Transportation System Management Program outlined in the Improvement Measures Section on Page 60 and 61 in the Traffic Study, Appendix 4.2. The implementation of the Transportation System Management will help mitigate cumulative traffic impacts to less than significant.

11

If you have any questions, please contact Jennifer Frary of our Traffic Studies Section at (626) 300-4792.

Waterworks and Sewer Maintenance

We have reviewed the Draft Environmental Assessment/Environmental Impact Report of the above project and have no comments to offer.

12

If you have any questions, please contact Norman Cortez at (626) 300-3388.

Watershed Management

The proposed project should include investigation of watershed management opportunities to maximize capture of local rainfall on the project site, eliminate incremental increase in flows to the storm drain system, and provide filtering of flows to capture contaminants originating from the project site.

13

Los Angeles River/Harbor Watershed

We recommend the use of native or drought tolerant landscaping in the design of the project.

14

If you have any questions, please contact Travis Perry at (626) 458-4319.

Ms. Cheryl Fuerth
May 17, 2004
Page 5

If you have any questions regarding the above comments or the environmental review process, please contact Massie Munroe at (626) 458-4359.

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4. County of Los Angeles Department of Public Works, Rod Kubomoto, May 17, 2004

Response 1

Please note that this is a standard requirement that must be complied with by the County of Los Angeles and, as such, is not a mitigation measure. As indicated within the Draft EA/EIR, construction debris and waste generated would be separated and recycled, to the extent feasible, consistent with current County plans and policies. Consequently, the County of Los Angeles is required to divert construction and demolition debris.

Response 2

Please note that this is a standard requirement that must be complied with by the County and, as such, is not a mitigation measure. As indicated within the Draft EA/EIR, all development projects in unincorporated areas are required to cooperate with Countywide programs and to implement site-specific source reduction, recycling, and reuse programs. The renovated Hall of Justice property would cooperate with these existing programs through actions such as use of designated recycling separation areas that are conveniently located and prominently marked. With participation in these programs, the increased solid waste generated by the proposed project would be reduced by up to 50 percent. Further, the County is obligated to meet the recycling and source reduction requirements of Assembly Bill 939 and, therefore, must have recycling programs in place and must expand these programs as needed. Compliance with these requirements would reduce the volume of waste entering landfills.

Response 3

Please refer to **Response to Comment No. 2**, above.

Response 4

If the cafeteria or food services established in the Hall of Justice Repair and Reuse Project are required to install grease traps, the County of Los Angeles will comply and install these amenities. The County of Los Angeles will have the grease traps reviewed and approved by the County of Los Angeles Environmental Programs Division.

Response 5

The comment indicates that neither geology nor soil impacts would occur with the compliance of standard ordinances and codes. As indicated in the Draft EA/EIR, the project would be developed in

accordance with the Uniform Building Code and applicable Los Angeles Building Code. Adherence to these standard requirements would result in less-than-significant geology and soil impacts.

Response 6

This comment indicates that the County of Los Angeles Land Development Group has no comment regarding the drainage system. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required. Please refer to **Response to Comment No. 8** for information about the Standard Urban Stormwater Mitigation Plan (SUSMP).

Response 7

This comment indicates that the County of Los Angeles Land Development Group has no comment regarding sewer. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 8

Please refer to Appendix 4.8 of the Draft EIR where the Los Angeles Department of Water and Power (DWP) prepared a Water Supply Assessment (WSA) in accordance with Senate Bill 610 and CEQA. The WSA concluded that the DWP-projected water supplies available during normal, single-dry, and multiple-dry years, as included in the 20-year projection contained in the Urban Water Management Plan, can accommodate the projected water demand of the project. As indicated with the Draft EA/EIR, the DWP provides water service to the Hall of Justice site. Currently, a 6-inch water line enters the Hall of Justice from North Broadway. The project requires a 4-inch line and will utilize a pump to ensure adequate flow and pressure in accordance with the County Building Code (CBC) and DWP requirements. In addition, the fire flow requirements of the County of Los Angeles Fire Department shall be met by the County Chief Administrative Office prior to final site plan approval.

Response 9

The quality of runoff from the project site would be subject to Section 402(p) of the Clean Water Act under the National Pollutant Discharge Elimination System (NPDES) program. Development projects have responsibilities under the NPDES Municipal Permits No. CAS004001 to ensure pollutant loads from the projects do not exceed total maximum daily loads for downstream receiving waters. Development

projects are required to submit, and then implement, an SUSMP¹ containing design features and Best Management Practices (BMPs) appropriate and applicable to the project. The purpose of the SUSMP is to reduce post-construction pollutants in storm water discharges. Prior to issuance of any grading or building permits, the County of Los Angeles Chief Administrative Office (CAO) will prepare and submit the SUSMP for approval to the appropriate County Land Development Group. Potential water quality impacts of the proposed project would be less than significant through the preparation and implementation of the SUSMP, as specified in the NPDES Permit.

Response 10

This comment indicates that County of Los Angeles Transportation Planning has reviewed the Draft EA/EIR and concurs with the findings of the document that the project will not have a significant impact on the County of Los Angeles Highways. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 11

This comment indicates that County of Los Angeles Traffic and Lighting has reviewed the Draft EA/EIR and concurs with the findings of the document that the project will not have a significant impact on roadways in the vicinity of the project area or to the Congestion Management Program-monitored intersections. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 12

This comment indicates that County of Los Angeles Waterworks and Sewer Maintenance has reviewed the Draft EA/EIR and has no comments. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 13

Please refer to **Response to Comment No. 9**. These opportunities will be incorporated into the SUSMP to be prepared as part of the project.

¹ The Los Angeles Regional Water Quality Control Board approved the SUSMP that requires new construction and development projects to implement BMPs on March 8, 2000. In May 2000, the County of Los Angeles finalized its "Manual for the Standard Urban Storm Water Mitigation Plan," which details the requirements of the SUSMP. Projects that are subject to the SUSMP requirements are required to incorporate measures into their development plans prior to issuance of grading and building permits.

Response 14

The recommendation of using drought-tolerant landscaping is provided here for consideration by the County of Los Angeles Board of Supervisors.



Leory D. Baca, Sheriff

County of Los Angeles
Sheriff's Department Headquarters

4700 Ramona Boulevard
Monterey Park, California 91754-2169



May 24, 2004

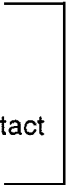
Ms. Cheryl Fuerth
Financial and Operations
Management Branch
Chief Administrative Office
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Ms. Fuerth:

**REVIEW OF ENVIRONMENTAL IMPACT REPORT
HALL OF JUSTICE REPAIR AND REUSE PROJECT**

Our Department has reviewed the above referenced report and has no comments.

Should you have any questions, or need additional information, please contact me at (626) 300-3003.



1

Sincerely,

LEORY D. BACA, SHERIFF

Gary T. K. Tse, Director
Facilities Planning Bureau

A Tradition of Service Since 1850

Ms. Cheryl Fuerth

-2-

May 24, 2004

GTKT:AF:af/ij

Cc: Victor Rampulla
Frank Williams
Adrienne Ferree
Chrono
File
(RevofEnvImpReprHOJ)

5. County of Los Angeles Sheriff's Department Headquarters, Gary T. K. Tse, May 24, 2004

Response 1

The County of Los Angeles Sheriff's Department is indicating they have reviewed the document and have no comments. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 890-4330

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

May 28, 2004

Ms. Cheryl Fuerth
County of Los Angeles
Chief Administrative Office
500 West Temple Street, Room 754
Los Angeles, CA 90012

Dear Ms. Fuerth:

DRAFT ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL IMPACT
REPORT FOR THE HALL OF JUSTICE REPAIR AND REUSE PROJECT,
SCH #2003021019 - "DOWNTOWN LOS ANGELES" (EIR #1991/2004)

The Draft Environmental Assessment/Environmental Impact Report for the Hall of Justice Repair and Reuse Project has been reviewed by the Planning Division, Land Development Unit, and the Forestry Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION - SERVICE RESPONSIBILITY:

The subject property is totally within the City of Los Angeles and does not appear to have any impact on the emergency responsibilities of this Department. It is not a part of the emergency response area of the Consolidated Fire Protection District.

1

LAND DEVELOPMENT:

The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles.

Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department.

2

We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities located within non-contract cities.

The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

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

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

The County of Los Angeles Fire Department will be working closely with the Los Angeles Fire Department to set conditions concerning this project. This project is located in the City of Los Angeles. The County of Los Angeles Fire Department has jurisdiction concerning all County facilities located within non-contract cities and will be setting conditions for this project.

2

The following comments are the general requirements for construction within the County of Los Angeles Fire Department's jurisdiction. Additional conditions may be imposed at a later date. The specific requirements will be determined during the subdivision and building plan check phases.

GENERAL REQUIREMENTS:

The proposed development may necessitate multiple ingress/egress access for the circulation of traffic, and emergency response issues. The Department may condition future development to provide additional means of access. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and hydrants. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.

3

Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width, unobstructed, clear-to-sky. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

Fire Department requirements for access, fire flows and hydrants are addressed during the building permit stage. Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems, it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.

COMMERCIAL:

Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in length and at the end of all cul-de-sacs. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to, and within 30 feet of an exterior wall on one side of the proposed structure.

4

1. Any access way less than 34 feet in width shall be labeled "Fire Lane" on the final recording map, and final building plans.
2. The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING – FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.

LIMITED ACCESS DEVICES (GATES, ETC.):

All access devices and gates shall meet the following requirements:

5

1. Any single-gated opening used for ingress and egress shall be a minimum of 26 feet in width, clear-to-sky.
2. Any divided gate opening (when each gate is used for a single-direction of travel – i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
3. Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way, and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
4. All limited access devices shall be of a type approved by the Fire Department.
5. Gate plans shall be submitted to the Fire Department prior to installation. These plans shall show all locations, widths and details of the proposed gates.

5

TRAFFIC CALMING MEASURES:

All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review prior to implementation. Should any questions arise regarding design and construction, and/or water and access, please contact Inspector Marvin Dorsey at (323) 890-4243.

6

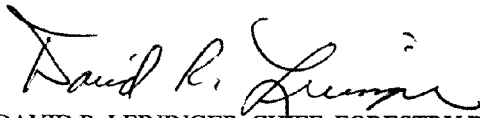
FORESTRY DIVISION:

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. There will be no impact to the areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division.

7

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

Very truly yours,



DAVID R. LEINGER, CHIEF, FORESTRY DIVISION
PREVENTION BUREAU

DRL:sc



CITY OF LOS ANGELES
DEPARTMENT OF TRANSPORTATION

221 N. Figueroa Street, Suite 600
Los Angeles, CA 90012

FAX COVER SHEET

DATE	5-20-04	FROM	MIKE BAGHERI
TO	CHERYL FEURTH	PHONE	213-580-5202
Co./Dept.	L.A. COUNTY CAD	Co./Dept.	
FAX NO.	213-626-7827	FAX NO.	(213) 580-

You should receive 5 pages including this fax cover sheet

Subject COMMENTS FOR DEIR FOR HALL OF JUSTICE REUSE PROJECT

6. County of Los Angeles Fire Department, David Leininger, May 28, 2004

Response 1

Comment is noted that the project is not anticipated to impact the emergency responsibilities of the County of Los Angeles Fire Department. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 2

Comment is noted pertaining to the responsibilities of the County of Los Angeles Fire Department and the intent to work closely with the City of Los Angeles Fire Department to set conditions concerning this project. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 3

Comment is noted that the County of Los Angeles Fire Department may require additional fire and safety requirements during plan check. In addition, comment is noted that the County of Los Angeles Fire Department would be involved and address access, fire flows, and hydrant during the building fire plan check. These comments do not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 4

The Hall of Justice Repair and Reuse Project will meet these requirements to the extent that they are applicable. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 5

The Hall of Justice Repair and Reuse Project will meet these requirements to the extent that they are applicable. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 6

The Hall of Justice Repair and Reuse Project will meet these requirements to the extent that they are applicable. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 7

Comment is noted that the project would not impact areas germane to the statutory responsibilities of the County of Los Angeles Fire Department.

CITY OF LOS ANGELES
CALIFORNIA

WAYNE K. TANDA
GENERAL MANAGER



JAMES K. HAHN
MAYOR

DEPARTMENT OF
TRANSPORTATION
221 N. FIGUEROA ST. SUITE 500
LOS ANGELES, CA 90012
(213) 580-1177
FAX (213) 580-1188

211 W. Temple Street
DOT Case No. CEN 04-1011

May 19, 2004

Cheryl Fuerth
County of Los Angeles
Chief of Administrative Office
500 West Temple Street, Room 754
Los Angeles, CA 90012

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE PROPOSED HALL OF JUSTICE REPAIR AND REUSE PROJECT LOCATED AT 211 WEST TEMPLE STREET IN THE COMMUNITY OF DOWNTOWN LOS ANGELES

The Los Angeles Department of Transportation (LADOT) has reviewed the DEIR, dated April 2004, prepared by Impact Sciences, and the supporting traffic study, prepared by traffic consultant Crain & Associates, for the proposed County of Los Angeles Hall of Justice Repair and Reuse project located on the block bounded by North Broadway, Aliso Street, Spring Street, and Spring Street. The traffic study analyzed seven intersections and determined that none the study intersections would be significantly impacted. Except as noted, the study adequately evaluated the project's traffic impacts on the surrounding community.

1

DISCUSSION AND FINDINGS

Project Description

In 1994, the Northridge earthquake severely damaged the Hall of Justice building. At the time of the earthquake damage, the occupancy in the Hall of Justice was approximately 537,585 gross square feet with 1,343 employees and 527 inmates on fifteen floors. As a result of the damages, the County of Los Angeles has received funding to rehabilitate the Hall of Justice by seismically retrofitting the damaged building and refurbishing the building interior for office use, while preserving and restoring the selected historic features. The project also proposes a new parking structure with 1,000 parking spaces with driveway access from North Broadway and Spring Street. The proposed project consist of three alternatives. Alternative 2 is the proposed project.

Alternative 1

Alternative 1 consist of no action/no project to the present site.

Alternative 2

Alternative 2, which is the proposed alternative, consist of repairing the Hall of Justice by seismically retrofitting the damaged building into a usable office building while preserving and restoring selected historic features. This includes the repair of the interior building to provide 325,000 square-foot (SF) of usable office space, the development of a new multilevel garage with 1,000 parking spaces on the site, landscape and hardscape improvements, architectural and security lighting, and necessary upgrades to utility systems. In addition, Alternative 2 would include the restoration of the core shell elements of this building, the cleaning, refurbishing, and repair of the historic exterior wall materials, and certain historically significant interior areas. The proposed occupancy under this alternative is approximately 456,900 gross square feet of building space with 325,000 usable square feet of office space on thirteen stories with two interior floors removed and there would be approximately 1,630 to 1,660 full time day personnel.

Alternative 3

Alternative 3 consist of repairing the Hall of Justice, per the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. All characteristics defining historic features and elements of the building would remain entirely intact under this alternative. This alternative would include the repair of the interior of the Hall of Justice building to provide for 199,132 SF of usable "Class A" office space, the development of a new multi-level garage with 1,000 parking spaces, landscape and hardscape improvements, architectural and security lighting, and necessary upgrades to utility systems. Also, Alternative 3 would include the cleaning, refurbishing and repair of

the historic exterior wall materials. The proposed occupancy under this alternative would be 537,585 gross square feet with 199,132 usable square feet with the same amount of full time employees under the 1994 conditions.

1

Trip Generation

The project will result in a net increase of 1,052 new daily trips, with 152 AM peak hour trips, and 146 PM peak hour trips.

2

PROJECT REQUIREMENTS

A. Construction Impacts

LADOT recommends that a construction work site traffic control plan be submitted to LADOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. LADOT also recommends that all construction related traffic be restricted to off-peak hours.

3

B. Highway dedication and street widening requirements

Aliso Street is classified as a Local Street which requires 18-foot half width roadway on a 30-foot half width right-of-way.

North Broadway is classified as a Secondary Highway which requires a 35-foot half width roadway on a 45-foot half width right-of-way.

Spring Street is classified as a Class II Major Highway which requires a 40-foot half width roadway on a 52-foot half width right-of-way.

Temple Street is classified as a Class II Major Highway which requires a 40-foot half-width roadway on a 52-foot right-of-way.

It appears that highway dedication and widening may be required for streets fronting the proposed project. The developer must check with the Bureau of Engineering's (BOE) Land Development Group to determine the highway dedication, street widening and sidewalk requirements for the project.

4

C. Parking Requirements

The project proposes to construct a new parking structure on the northern end of the project site to accommodate approximately 1,000 parking spaces with access to the

5

new parking structure for staff via card key access on North Broadway and on Spring Street. The developer should check with the Los Angeles Building and Safety Department on the parking requirements.

5

D. Driveway access and circulation

The review of this study does not constitute approval of the driveway access circulation scheme for the project. Those require separate review and approval and should be coordinated as soon as possible with LADOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3) to avoid delays in the building permit approval process. All driveways should be Case 2 driveways and 30 feet wide, unless otherwise noted. In addition, all driveways shall be right turn ingress and egress only, with a minimum of 40' reservoir space from the property line for any driveways with gates proposed.

6

If you have any questions, please contact Ed Chow of my staff at (213) 240-3074.

Sincerely,



MIKE BAGHERI, Transportation Engineer
Los Angeles Department of Transportation

- cc: Sylvia Robledo, Council District No. 9
- Martha Stephenson, Central District, LADOT
- Taimour Tanavoli, Citywide Planning Coordination Section, LADOT
- Hadar Plafkin, City Planning
- Edmund Yew, Land Development Group, BOE
- Crain & Associates

Letters\Hall_of_Justice_DEIR.WPD

7. City of Los Angeles Department of Transportation, Mike Bagheri, May 19, 2004

Response 1

The City of Los Angeles is restating the project description contained within the Draft EA/EIR as it pertains to the proposed alternative and alternatives. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 2

The City of Los Angeles is restating the trip generation rates of the project as identified in the Draft EA/EIR. This comment does not pertain to the adequacy or completeness of the EIR; therefore, no further response is required.

Response 3

Please note that the EA/EIR contains construction mitigation measures, which will be incorporated into a Mitigation Monitoring and Reporting Program (MMRP) to reduce impacts. The County of Los Angeles will be responsible for the monitoring of these mitigation measures. In some cases, the City of Los Angeles will be provided with material for review and approval. The mitigation measures, as contained within the EA/EIR, are as follows:

- T-1 Trucks and construction materials and equipment should be staged on site, whenever feasible. If additional space is necessary, lane closure plans shall be submitted to the County and City of Los Angeles for approval.
- T-2 Temporary "Truck Crossing" warning signs shall be placed in each direction in advance of each site driveway used by construction vehicles.
- T-3 A flag person or persons shall be positioned at the project site to assist truck operators in entering and exiting the project area and to help minimize conflicts with other motorists.
- T-4 To the greatest extent possible, heavy-duty construction trucks shall be scheduled to arrive and depart before and after peak commuting periods of 7:00 AM to 10:00 AM and 4:00 PM to 7:00 PM.
- T-5 A construction worker ridesharing plan shall be implemented to reduce construction-related trips.

- T-6** An off-site parking area for construction workers' personal vehicles shall be established during peak construction activity days/time periods when all worker vehicles cannot be accommodated on site.
- T-7** Once a site has been identified for hauling excess dirt, a haul route shall be developed which keeps trucks on major boulevards. The haul route shall be reviewed and approved by the County and City.

Response 4

The need for highway dedication for street and sidewalk widening is uncertain at this point. Once more, as specific design of the areas surrounding the project site is more refined, this information will be available. At this point, the County of Los Angeles will check with the City of Los Angeles Bureau of Engineering's Land Development Group as to the requirements for the project.

Response 5

The parking requirement for this type of project, per the City of Los Angeles Parking Ordinance (LAMC Section 12.21A4), is 1 space per 500 square feet. Consequently, assuming gross square footage, the project would need 912 parking spaces and, assuming the useable square footage, would need 650 parking spaces. The project is providing 1,000 spaces and is above that required. It should be noted that regardless of the parking spaces provided by this project, any increase in the downtown area would be a benefit to the City of Los Angeles. The existing Hall of Justice site has limited parking currently, and the project will substantially increase this number by developing the parking garage.

Response 6

Access to the new parking structure and project site would be provided for staff via card-key access on North Broadway and public access on North Spring Street. No vehicular access would be provided from Temple Street or Aliso Street. In order to maintain traffic flow on the project's boundary roadways, all driveways would be restricted to right turns in and out of the site, which is consistent with the request by the City of Los Angeles. As proposed, the project site driveways would be 30 feet wide and contain a minimum of 40 feet of reservoir space, if they are to be gated.



May 21, 2004

Ms. Cheryl Fuerth
County of Los Angeles Chief Administrative Office
500 W. Temple St., Rm. 754
Los Angeles, CA 90012

Dear Ms. Fuerth:

I am writing on behalf of the Los Angeles Conservancy to provide comments on the Draft Environmental Impact Report (DEIR) for the Hall of Justice Repair and Reuse Project. The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 8,500 household members throughout Los Angeles County.

The Conservancy commends the County for its vision and tenacity in pursuing the rehabilitation of the Hall of Justice building. The Hall of Justice is one of the most beautiful and historic buildings in downtown Los Angeles and its current state leaves a gaping hole in the Los Angeles Civic Center, now on the verge of revitalization. The project offers an attractive opportunity for the County to bring the Sheriff's headquarters back to the heart of Los Angeles and to consolidate its own office space in the heart of the Civic Center. The exterior cleaning of the building will also restore the Hall of Justice's status as a true visual landmark of downtown.

Despite the Conservancy's support for the important goals of the project, the Conservancy cannot yet offer its complete support because the project proposes to remove numerous character-defining historic features. While the Conservancy acknowledges that it may be difficult to reconcile strict adherence to the Secretary of Interior's Standards for Rehabilitation with the County's specific programmatic requirements for office space, we do believe that additional retention of historic fabric is quite possible within these constraints. Furthermore, because the California Environmental Quality Act (CEQA) process is progressing ahead of the Section 106 review, many of these same preservation concerns may result in an "adverse effect" finding that could delay the project as it moves forward.

The Conservancy has identified three major areas of concern: 1) The removal of all of the building's jail cells; 2) The removal of other interior finishes, corridors, and character-defining interior spaces; and 3) The complete removal of all hollow clay tile.

On the jail cells, these cellblocks are very intact, original spaces of the Hall of Justice, and are integral to understanding the rich history of the structure. The jails housed a vast array of famous, not-so-famous, and infamous inmates over several decades, providing a window an important part of Los Angeles history and the story of our local criminal justice system.

1

The Conservancy does not believe that all or even most cellblocks can be retained, but does request that the Final EIR study the retention of a representative grouping, corridor, or vertical block of cells, which should be feasible without compromising the overall office use in the project. As an example, the San Pedro Municipal Building, which includes government office uses, has retained a representative cellblock that remains open to the public for viewing.

1

We would also ask that the County reexamine its proposed program to study whether it is feasible to retain a number of the character-defining features of the interior, particularly original corridors and some of the intact courtroom suites on the 7th and 8th floors. By reconsidering the mix and locations of potential users of the building, it may well be possible to leave some of these original configurations in place.

2

On the hollow clay tile, the Conservancy is not arguing that all hollow clay tile must be retained in the building. But the DEIR appropriately notes that the scope of hollow clay tile removal may exceed what is strictly necessary for structural purposes: "Although removal of some hollow clay tile is necessary for seismic strengthening, the proposed work removes hollow clay tile in almost all locations independent of structural issues. Therefore the proposed work replaces rather than repairs 'deteriorated historic features.'" In other Southern California projects, hollow clay tile has been encapsulated and reinforced, rather than removed, in a manner that does not compromise public safety. The Final EIR should examine the feasibility of retaining some of these character-defining elements, particularly on the interior.

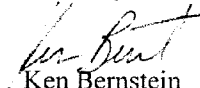
3

Finally, the Draft EIR contains only a skimpy alternatives analysis, which does not address the feasibility of Alternative 3 (the Secretary of Interior's Standards alternative) in any real detail. The range of alternatives studied (aside from the preferred project alternative) is also quite limited, encompassing only a "No Project" Alternative and the Secretary of Interior's Standards alternative. The Final EIR should also consider a fourth alternative, which retains significant additional historic fabric, but may fall somewhat short of full compliance with the Standards.

4

With these adjustments, the Conservancy looks forward to being able to offer full support for the Hall of Justice project when it proceeds to the Board of Supervisors and to working with you to expedite the project's future reviews. Thank you for your consideration.

Sincerely,



Ken Bernstein
Director of Preservation Issues

8. Los Angeles Conservancy, Ken Bernstein, May 21, 2004

Response 1

Please note, per the Draft Memorandum of Agreement between the State Historic Preservation Office (SHPO), the Federal Emergency Management Agency (FEMA), and County of Los Angeles, the County will relocate a representative grouping of jail cells in the basement or ground floor of the Hall of Justice. This requirement has been incorporated into the MMRP for the project, prepared in compliance with CEQA. The County of Los Angeles has met the concerns of the Los Angeles Conservancy.

Response 2

Please note, per the Draft Memorandum of Agreement between the SHPO, the FEMA, and County of Los Angeles, which indicates that the County will rehabilitate the 8th floor library (Room 819) in accordance with the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Properties. In addition, the County will retain the historic features of the 8th floor Courtroom 816 in accordance with Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Properties. These requirements have been incorporated into the MMRP for the project, prepared in compliance with the CEQA. The County of Los Angeles has met the concerns of the Los Angeles Conservancy.

Response 3

The project does include the retaining of hollow clay tile infill material in the interior spaces where historic restoration work is proposed to be conducted. The Los Angeles Conservancy was provided the opportunity to tour the Hall of Justice with FEMA staff to examine the locations of where hollow clay tile was to be preserved. The Los Angeles Conservancy indicated that because they better understand that hollow clay tile would be preserved, this comment provided on the Draft EA/EIR was no longer an issue.

Response 4

The EA/EIR does not provide a skimpy alternative analysis for Alternative 3. In instances where impacts are similar, the text of the EA/EIR simply states that impacts are similar. In those cases where there is a difference between the alternatives, the text of the EA/EIR is expanded to indicate the differences. Alternative 3 was selected because it met the extreme case of saving all the historic features of the project, whereas Alternative 2 involved the removal of some of the historic features. The purpose of the alternative analysis is to choose alternatives that would lessen or avoid the significant impacts and meet most of the project objectives.

The comment indicates that the EA/EIR should also examine a fourth alternative that retains the significant fabric of the building. Since the preparation of the EA/EIR, a Memorandum of Agreement has been prepared between SHPO, FEMA, and the County, which includes the retention of more of the historic fabric of the building than what was initially considered under Alternative 2. Additional mitigation has been added to Alternative 2 to allow for the retention of this historic fabric. So, in essence, Alternative 2 has been modified to meet the request of the Conservancy. Nonetheless, impacts under CEQA would remain significant and unavoidable. The only means by which to reduce impacts to less than significant would be through the implementation of Alternative 3.