

# I. Summary

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## 1. Introduction

In accordance with Sections 15088, 15089, and 15132 of the State Guidelines for the Implementation of the California Environmental Quality Act (CEQA Guidelines), the City of Los Angeles, as Lead Agency, has prepared this Final Environmental Impact Report (Final EIR) for the proposed Convention and Event Center Project (Proposed Project).

As described in Sections 15089 and 15132 of the CEQA Guidelines, a lead agency must prepare a Final EIR before approving a project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies regarding the Draft EIR. Pursuant to CEQA Guidelines Section 15132, this Final EIR includes a revised summary, corrections and additions to the Draft EIR, a list of persons, organizations, and agencies commenting on the Draft EIR, responses to comments received regarding the Draft EIR, and a Mitigation Monitoring and Reporting Program.

This Final EIR comprises the second part of the EIR for the Proposed Project and is intended to be a companion to the Draft EIR. The Draft EIR for the Proposed Project, circulated for public review and comment for a 47-day period from April 5, 2012, through May 21, 2012, comprises the first part of the EIR and is incorporated by reference and bound separately. (Refer to Volumes 1 through 17 of the Draft EIR). This Final EIR is organized into four main sections and seven appendices, as follows:

**Section I. Executive Summary**—This section provides an overview of the Proposed Project and its potential impacts. Also included in this section are areas of controversy and issues to be resolved, an overview of the public review process that was completed for the Proposed Project, and a summary of the alternatives to the Proposed Project.

**Section II. Corrections and Additions to the Draft EIR**—This section provides a list of revisions that have been made to the Draft EIR, based on comments received from the public and agencies, and other items requiring updating and/or corrections.

**Section III. Responses to Comments**—This section provides responses to each of the written comments made regarding the Draft EIR as well as Topical Responses to issues commonly raised. Also included in this section is a matrix summarizing the environmental topics raised in each of the comment letters. Copies of the original comment letters are provided in Appendix A of this Final EIR.

**Section IV. Mitigation Monitoring and Reporting Program (MMRP)**—This section provides the full MMRP for the Project. The MMRP lists all of the proposed mitigation measures by environmental topic, and identifies for each of the measures the applicable enforcement agency, monitoring agency, monitoring phase, monitoring frequency, and action indicating compliance.

In addition, the following technical appendices are included as part of this Final EIR:

**Appendix A.** Draft EIR Comment Letters

**Appendix B.** Updates to Air Quality Worksheets M.1.3 and M.1.4

**Appendix C.** Response to Social and Economic Impact Comments (MR&E)

**Appendix D.** Response to Human Impact Partners Health Impact Assessment (MR&E)

**Appendix E.** Review of Human Impact Partners Health Impact Assessment (Comanor and Riddle)

**Appendix F.** Los Angeles Convention Center Response to Draft EIR Comment

**Appendix G.** Updated Proposed Convention and Event Center Sign Regulations

## 2. Overview of the Proposed Project

The Applicants, L.A. Convention Hall, LLC (Convention Center Applicant) and L.A. Event Center, LLC (Event Center Applicant), propose the Convention and Event Center Project (Proposed Project), which seeks to modernize the existing Los Angeles Convention Center (Convention Center) and create a multi-purpose event center (Event Center) within the Downtown area of the City of Los Angeles. The proposed improvements to the Convention Center, construction of the Event Center, and related improvements are hereafter collectively referred to as the Proposed Project. This EIR is a Project EIR prepared pursuant to Section 15161 of the State CEQA Guidelines.

Implementation of the Proposed Project would occur pursuant to the proposed Convention and Event Center Specific Plan (Proposed Specific Plan), which permits the existing uses and would guide additional development of the approximately 68 acres of land owned by the City of Los Angeles, generally bounded by the following: the Caltrans right-of-way adjacent to the Harbor Freeway (State Route 110 or SR-110) to the west;<sup>1</sup> Chick Hearn Court to the north; Figueroa Street to the east; and Venice Boulevard to the south (collectively, the Project Site). The Proposed Specific Plan provides the regulatory framework for the Proposed Project and establishes the maximum development that may occur on the Project Site.

The Project Site includes all of the existing Los Angeles Convention Center (including the South Hall, the West Hall, the Concourse Building, the Venice Garage, the Bond Street Parking Lot and the Cherry Street Garage) and STAPLES Center, as well as the air space and certain rights-of-way on Pico Boulevard, L.A. Live Way and Bond Street, and certain air space over 12th Street.

Upon completion of the Proposed Project, the Project Site would function as a unified center for convention, sports and entertainment uses. A brief overview of the three primary components that comprise the Proposed Project is provided below:

## A. Convention Center

The Proposed Project includes the construction and operation of a new convention and exhibition structure (New Hall) over Pico Boulevard to replace the exhibition space, meeting rooms, offices, food service and ancillary space in the Convention Center's existing West Hall, which will be removed to allow development of the Event Center. The New Hall is proposed to be located immediately to the south of the site of the existing West Hall. The New Hall would be of a similar size to the existing West Hall and would span Pico Boulevard to connect to the existing South Hall. This proposed reconfiguration of floor

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<sup>1</sup> *The Project Site's actual western boundary may be the current property line between the land owned by the City of Los Angeles and the Caltrans right-of-way in this area. The Applicant is proposing a Specific Plan boundary that accounts for a potential land exchange between the City and Caltrans where a remnant parcel owned by the City of Los Angeles adjacent to the Caltrans right-of-way would be transferred to Caltrans in exchange for the transfer to the City of three small remnant parcels of land owned by Caltrans. Upon the completion of such exchange, the Caltrans parcels, which are referred to "Add Areas," would be added within the Specific Plan area and the City parcel, referred to as the "Exchange Parcel" would be excluded from the Specific Plan area. The Add Areas and the Exchange Parcel are depicted in Figure II-6 of Section II, Project Description, of this Draft EIR. The purpose of the land exchange would be to provide a more uniform property line at the Caltrans right-of-way and to create a site for a more efficient design of the L.A. Live Way Garage.*

area is intended to increase the amount of contiguous floor area available at the Convention Center.

## **B. Event Center**

The Event Center, a multi-purpose entertainment and sports venue, would be constructed on the site of the demolished West Hall. The Event Center would primarily function as the home venue for one or possibly two National Football League (NFL) teams, as well as a venue to host a variety of other events, such as conventions, trade shows and exhibitions; concerts; international soccer matches; motor sports; ESPN X games; rodeos/boxing/World Wrestling Entertainment events; other football events; as well as private and miscellaneous events. To support these uses, the Event Center would have a deployable roof, which would allow it to function as an open-air facility during most events. The Event Center would be configured with 72,000 permanent seats and would be expandable to 76,250 seats for periodic special events such as a Super Bowl. The Event Center would also be designed for use as part of Convention Center events or standalone exhibition events. During such events, the playing field area could be used for exhibit space, and the various clubs and suites at the Event Center could be used as meeting rooms and pre-function and hospitality spaces, supplementing what is available at the Convention Center. The Event Center would also include offices, food and merchandise sales, restaurants, bars and clubs including a stadium club, and similar uses, as described in the Proposed Specific Plan.

## **C. Parking Garages**

Two parking garages would be constructed immediately west of L.A. Live Way to replace the existing Bond Street Parking Lot, the existing Cherry Street Garage, and the parking area currently located beneath the existing West Hall, and to provide additional parking to support the new on-site development. One of the two new parking garages, the L.A. Live Way Garage, would replace the existing Cherry Street Garage. The second new parking garage, the Bond Street Garage, would replace the existing Bond Street Parking Lot.

## **D. Development Program**

Within this EIR, the square footages associated with the Proposed Project components are described in three ways, as appropriate: gross building area (Gross Area); floor area (Floor Area) as defined by Section 12.03 of the Los Angeles Municipal Code (LAMC); and rentable area (Rentable Area), which is the term used by the Los Angeles Convention Center and other convention centers in booking events with

exhibitors.<sup>2</sup> The table below summarizes existing conditions and the Proposed Project in terms of Gross Area, Floor Area, and Rentable Area.

**Summary of Existing and Proposed Square Footages**

	Existing Conditions	Proposed Project	Increase	
			Number	Percent
Gross Area (square feet)	3,033,879	5,008,879	1,975,000	65.1%
Floor Area (square feet)	2,349,779	4,137,578	1,787,799	60.2%
Rentable Area (square feet)	886,093	1,127,243	241,150	27.2%

Proposed Project development would occur in accordance with the Proposed Specific Plan, which would establish development standards including, but not limited to: the amount of development permitted, permitted uses, building height, massing, streetscape, pedestrian and vehicular access, open space, parking, lighting, and public art. Although the Proposed Specific Plan encompasses the entire Project Site, its primary focus would be the regulation of the proposed new buildings and features, as well as transportation and parking. Signage regulations would also be addressed in the Proposed Specific Plan. However, the Proposed Project approvals may include the creation of a Sign District (SD) in lieu of signage regulation in the Proposed Specific Plan.

### 3. Senate Bill 292

On September 9, 2011, the California Legislature approved Senate Bill 292 (SB 292) pertaining specifically to the Proposed Project. This law added Section 21168.6.5 to the Public Resources Code. A copy of this statute is contained in Appendix C-1 of the Draft EIR. Note that in this EIR, the statute is generally referred to as SB 292, whereas

<sup>2</sup> LAMC, Article 2, Section 12.03 states: “The area in square feet confined within the exterior walls of a Building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and Basement storage areas.” “Floor area” for purposes of the Proposed Project is defined by the LAMC, except that under the proposed Specific Plan outdoor areas, including, without limitation, pedestrian bridges, above grade balconies and terraces and eating areas on all floors, shall not count as floor area.

references to specific provisions of the statute are cited to the relevant subsections of Public Resources Code Section 21168.6.5.<sup>3</sup>

For SB 292 to apply to the Proposed Project, the statute requires the Applicant to notify the City prior to the release of the Draft EIR that the Applicant is electing to proceed pursuant to Public Resources Code Section 21168.6.5. The Applicant has made that election. A copy of the Applicant's SB 292 election notice to the City is set forth in Appendix C-2 of the Draft EIR.

Pursuant to SB 292, the Proposed Project's Draft EIR and Final EIR shall include the following notice:

THIS EIR IS SUBJECT TO SECTION 21168.6.5 OF THE PUBLIC RESOURCES CODE, WHICH PROVIDES, AMONG OTHER THINGS, THAT THE LEAD AGENCY NEED NOT CONSIDER CERTAIN COMMENTS FILED AFTER THE CLOSE OF THE PUBLIC COMMENT PERIOD FOR THE DRAFT EIR. ANY JUDICIAL ACTION CHALLENGING THE CERTIFICATION OF THE EIR OR THE APPROVAL OF THE PROJECT DESCRIBED IN THE EIR IS SUBJECT TO THE PROCEDURES SET FORTH IN SECTION 21168.6.5 OF THE PUBLIC RESOURCES CODE AND MUST BE FILED WITH THE SECOND DISTRICT COURT OF APPEAL. A COPY OF SECTION 21168.6.5 OF THE PUBLIC RESOURCES CODE IS INCLUDED IN THE APPENDIX TO THIS EIR.

The Appendix referred to in the notice above is Appendix C of the Draft EIR.

Under the terms of SB 292, any litigation of this EIR or any actions taken by the City that it determines are required to allow construction of the Proposed Project must be filed with the Court of Appeal, rather than the Superior Court. Further, the bill provides for an expedited timeframe of 175 days from the date of the filing of the Notice of Determination for the Court of Appeal to issue its decision. Note that under the general rules of CEQA, the Notice of Determination is filed within 5 days after a project is approved. See Public Resources Code Section 21168.6.5(f)(5) and (a)(2) for the provisions regarding the timing to the Notice of Determination for the Proposed Project.

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<sup>3</sup> *The information regarding SB 292 presented throughout the EIR is general and intended to be explanatory. In the event of any inconsistency between the text of the EIR and Public Resources Code Section 21168.6.5, the provisions of that Code Section shall prevail.*

In accordance with SB 292, the City made available to the public in a readily accessible electronic format the Draft EIR and all other documents submitted to or relied on by the City in preparing the Draft EIR. The City also made available to the public any document prepared by the City or submitted by the Applicant after the release of the Draft EIR that is part of the record of proceedings within 5 business days after the City prepared or received the document. These documents may be accessed from the Planning Department's website at <http://cityplanning.lacity.org/> and then clicking on "Environmental" and then clicking on "Draft EIR." The Draft EIR was circulated for a 47-day public review and comment period beginning on April 5, 2012, and ending on May 21, 2012. As set forth by SB 292, the City did not consider written comments submitted after the close of the public comment period, which did not address any of the matters set forth in Public Resources Code Section 21168.6.5(f)(4). See Appendix C of the Draft EIR.

SB 292 also provides for greater public participation in the CEQA process. In accordance with SB 292, an informational workshop to inform the public of the key analyses and conclusions of the Draft EIR was held on April 9, 2012. In addition, a public hearing on the Draft EIR was held on May 21, 2012. Also in accordance with SB 292, the City and the Applicant also participated in nonbinding mediation with all Commenters who submitted timely comments on the Draft EIR and who requested mediation. As part of SB 292, the Event Center Applicant must take steps to reduce traffic congestion and global climate change impacts that may result from private automobile trips to the Event Center. The Proposed Project must achieve and maintain carbon neutrality by reducing to zero the net emissions of greenhouse gases from private automobile trips to the Event Center in the manner provided in Public Resources Section 21168.6.5(i)(1). Further, operation of the Proposed Project must comply with Public Resources Section 21168.6.5(i)(2), which requires the Event Center Applicant to undertake measures to achieve an automobile trip ratio that is no more than 90 percent of the trip ratio of any other stadium serving a team in the National Football League. For this purpose, the trip ratio is the total annual number of private automobiles arriving at the Event Center for spectator events divided by the total annual number of spectators at the events. Section 21168.6.5 also includes provisions for the implementation and reporting of these requirements.

## 4. Public Review Process

In accordance with CEQA, the environmental review process for the Proposed Project commenced with solicitation of comments from identified responsible and trustee agencies, as well as interested parties on the scope of the Draft EIR, through a Notice of Preparation (NOP) process. The NOP for the Draft EIR was circulated for a 30-day review period beginning on March 17, 2011, and ending on April 18, 2011. In addition, a public scoping meeting was held on March 30, 2011. The public scoping meeting provided the public with the opportunity to receive information regarding the Proposed Project and to

provide input regarding issues to be addressed in the Draft EIR. A copy of the NOP and responses to the NOP are provided in Appendix A of the Draft EIR.

Consistent with the requirements of Sections 15087 and 15105 of the CEQA Guidelines, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was circulated for a 47-day public review and comment period beginning on April 5, 2012, and ending on May 21, 2012. In accordance with SB 292, the City held an informational workshop for the Proposed Project on April 9, 2012 to inform the public of the key analyses and conclusions of the Draft EIR. Furthermore, as also required by SB 292, the City held a public hearing to take testimony on the Draft EIR on May 16, 2012. Following the Draft EIR public comment period, this Final EIR has been prepared that includes responses to the comments raised regarding the Draft EIR.

## **5. Areas of Controversy**

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant unavoidable impact has been identified. These areas may include the following issues: transportation (operational and cumulative impacts) to intersections, freeway segments, as well as freeway on- and off-ramps, Congestion Management Program freeway monitoring locations, and construction; visual quality/aesthetics, and historic resources (construction, operational, and cumulative impacts) resulting from the demolition of the West Hall if a regulatory commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, were to determine the West Hall eligible for the California Register, the National Register, or as a local Historic Cultural Monument; views (operational and cumulative impacts); artificial light (construction, operational, and cumulative impacts); noise (construction, operational and cumulative impacts); air quality (construction, operational, and cumulative emissions); and solid waste (operational and cumulative impacts).

Based on the Draft EIR comment letters received regarding the Draft EIR and testimony provided at the May 16, 2012, public hearing for the Proposed Project, both of which are included in Appendix A of this Final EIR, issues known to be of concern include those related to traffic, including the ability of public transit to reduce traffic impacts, and concerns related to community benefits and neighborhood impacts, including displacement of current residents and gentrification. In addition, comments were provided regarding implementation of SB 292. As shown in the Matrix of Comments Received in Response to the Draft EIR provided in Section III. Response to Comments of this Final EIR, comments were also provided regarding all of the remaining environmental topics addressed in the Draft EIR. Copies of the comment letters submitted regarding the Draft EIR are included in Appendix A of this Final EIR.

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## 6. Summary of Environmental Impacts and Mitigation Measures

### A. Land Use

#### a. Project Impacts

##### *(1) Land Use Compatibility*

The Project Site, which encompasses the existing Convention Center and STAPLES Center, is located in a highly developed urban area of Downtown that is characterized by a mix of convention, sports and entertainment, hotel, office, residential, and parking uses within a predominantly medium to high-rise setting. Substantial development within and adjacent to the Project Site, including STAPLES Center and L.A. LIVE, has occurred in recent years and transformed the Project area into a sports and entertainment center, complemented by newer residential development in the adjacent South Park area to the east. The nearest single-family residences are mixed with multi-family uses within the Pico-Union and Westlake communities west of the SR-110 Freeway. An analysis conducted of how the Proposed Project may impact the Pico-Union area concluded that Project development would not adversely affect this community (see Appendix H of the Draft EIR).

The Proposed Project represents infill development on land owned by the City that is designated for Public Facilities, such as the uses proposed. The Proposed Project would develop a mix of convention, sports and entertainment, and office uses that would be similar in nature to existing sports, entertainment, and event uses within and adjacent to the Project Site. The Proposed Project would also build upon the recent trend to enhance the area as an event and entertainment destination, thus further revitalizing the Convention Center area and Downtown as a whole, for both visitors and the general population.

The Proposed Project would increase the height, density and mass of on-site structures as compared to existing conditions on the Project Site. However, such increases in building height, density and mass would not be atypical in the area given the relatively recent (and planned future) development of dense entertainment and high-rise uses at the adjacent L.A. LIVE, and numerous mid-rise hotel and residential buildings to the east. Additionally, given the presence of mid- to high-rise buildings in the immediate vicinity, including the JW Marriott Los Angeles, the Ritz-Carlton Los Angeles, and the Ritz-Carlton Residences at L.A. LIVE (which are collectively housed in one building referred to herein as the Marriott/Ritz tower), and other large-scale buildings such as STAPLES Center and various Convention Center exhibition halls, the Proposed Project

would not be considered out-of-scale or incompatible in relation to any of the surrounding land uses.

Any new restaurant and retail uses (e.g., a team store) to be included within the Event Center would primarily serve event attendees and would not be expected to compete substantially with traditional restaurant and retail uses in the area, nor would such uses be incompatible with existing surrounding uses.

The Proposed Project would introduce new and enhanced outdoor plazas networked by pedestrian pathways and improved streetscapes, thus enhancing the public realm and creating an active, pedestrian-friendly environment. Various Project elements would be introduced to promote connectivity between the Project Site and L.A. LIVE, as well as with nearby transit stations, thus providing a more cohesive and walkable community within the southern portion of Downtown and enhancing existing land use relationships.

In summary, the proposed uses would be similar to and compatible with the existing uses that occur on the Project Site and in the surrounding area, and the existing relationships between on- and off-site land uses would generally be maintained. The Proposed Project would not substantially and adversely change the existing land use relationships between the Project Site and existing off-site uses or disrupt, divide, or isolate existing neighborhoods or communities. As such, the Proposed Project's impacts related to land use compatibility would be less than significant.

## *(2) Consistency with Land Use Plans, Policies, and Regulations*

Development of the Project Site is guided by several adopted land use plans and policies. Applicable regional land use plans include: the Southern California Association of Governments (SCAG) Compass Blueprint Growth Vision (2004) and Regional Transportation Plan (2008); the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (2007); and the Metropolitan Transportation Authority of Los Angeles County (Metro) Congestion Management Plan (2009).

The City of Los Angeles land use plans, policies, and codes applicable to the Proposed Project include: the General Plan Framework Element (Framework Element) including the 2010 Bicycle Plan; the Central City Community Plan (Community Plan); the Downtown Design Guidelines and Street Standards (Downtown Design Guide); the Downtown Strategic Plan; the Figueroa Corridor Economic Development Strategy; the Walkability Checklist Guidance for Entitlement Review (Walkability Checklist); the Figueroa Streetscape Project (proposed); the Citywide Design Guidelines; and the Los Angeles Municipal Code (LAMC), including Chapter 1, Planning and Zoning Code (Zoning Code).

As discussed in greater detail in Section IV.A, Land Use, of the Draft EIR, the Proposed Project would advance the key policy initiatives set forth in land use plans addressing regional, Citywide, Community Plan area, and Downtown conditions. With respect to regional plans, the Proposed Project would be consistent with and support the policies of SCAG's Compass Blueprint Growth Vision and SCAG's Regional Transportation Plan goals, including the employment and population goals. Development of the Proposed Project would generate substantial employment at the Project Site, including full- and part-time employees associated with events, office space, retail uses, restaurants, maintenance, and other full-time jobs at the Event Center and Convention Center. The Proposed Project would create an estimated 12,000 temporary full-time jobs during construction and approximately 4,123 permanent daily jobs (1,866 FTE jobs) during operations. A local job hiring program would be created to promote access to these jobs for local residents in the surrounding Pico-Union, Westlake, South Park, and Downtown areas. The Proposed Project would thus be consistent with SCAG projections and would support objectives and policies regarding the retention and expansion of the City's employment base, and in particular employment generation in areas of the City that historically have not received a proportional share of such opportunities.

With respect to the City's Framework Element, proposed development would provide uses that specifically complement existing sports, entertainment, and convention uses at the Convention Center, STAPLES Center, and L.A. LIVE. The Proposed Project would also encourage sustainable growth in a higher-intensity commercial/mixed-use district in proximity to existing transportation corridors and transit stations. Additionally, the Proposed Project would reinforce the Downtown center as the primary economic and social focal point of the region through the introduction of uses that promote community activity during both daytime and evening hours. Moreover, the Proposed Project would concentrate mixed-use development in a regional center near existing transit stations and mixed-use corridors and generate a net fiscal surplus for the City, which would also be consistent with the Framework Element's Economic Development policies. Similarly, the Proposed Project would support many of the goals, objectives and policies of the Framework Element's Transportation Chapter. The Proposed Project would be designed as a transit-oriented development (TOD) with clear linkages to facilitate pedestrian circulation to/from nearby transit stops and an active outdoor environment that would provide for pedestrian safety and promote walkability. Furthermore, the Event Center Applicant would promote a variety of travel choices, including use of transit, in order to meet the "Best in the NFL" requirements of SB 292. Project parking would be based on a decentralized parking concept intended to facilitate traffic flows throughout the Project area and encourage the use of transit, and the proposed Transportation Management Plan would include measures to minimize vehicular intrusion into nearby residential areas.

The Proposed Project would also be consistent with the 2010 Bicycle Plan in that it would: connect the Project Site and off-site areas with the existing Class III bike routes that connect to and complement the Downtown area; provide 250 new bicycle parking spaces in the on-site parking garages; and support the proposed Bike Station (to be implemented by the City with allocated funding from sources not related to the Proposed Project and to be located in the vicinity of the Project Site). In addition, street closures for major events at the Event Center would enhance both bicycle and pedestrian circulation. The Proposed Project would not preclude implementation of most of the concepts in the Figueroa Corridor Streetscape Project, and would be consistent with the Downtown Strategic Plan strategies and objectives, in particular those related to increasing tourist activity, addressing the needs of all visitors who visit Downtown, and promoting sports venues in the Downtown area.

The Proposed Project would also be consistent with relevant goals, objectives, and policies in the Central City Community Plan, as it would introduce new visitor-serving uses and pedestrian-oriented amenities, support tourism, generate nighttime activity and create a safe, clean, attractive, and lively environment in the Convention Center/Arena area. The proposed uses would be consistent with the Project Site's current Public Facilities land use designation, which would remain unchanged. However, a General Plan Amendment would be sought to: (a) change the Commercial land use designation currently in place on a portion of the STAPLES Center site to Public Facilities to provide for a single consistent designation across the Project Site; and (b) revise the land use legend within the City's General Plan Land Use Map for the Central City Community Plan area such that the zones listed as corresponding to the Public Facilities designation would include the CEC (Convention and Event Center Specific Plan) Zone. The Proposed Project would also advance and/or complement various Community Plan programs related to the Figueroa Corridor, including: implementation of the Economic Development Strategy recommendations for the Figueroa Corridor; streetscape improvements planned for Figueroa Street; the provision of linkages to the Figueroa Corridor and other areas of the Central City; the creation of a mixed-use entertainment district surrounding the Convention Center and STAPLES Center; and support for the LASED area. The Project would provide an economic basis to further implementation of the LASED Specific Plan adjacent to the Project Site. The Proposed Project would further support objectives to improve the Figueroa Street Corridor both economically and physically and reinforce its regional importance by introducing new event and entertainment-related uses.

The Proposed Project would also meet many of the standards and guidelines in the Downtown Design Guide regarding walkability, the design of buildings and streetscapes, transit-oriented developments (TODs), and the Sustainable Design guidelines. The proposed New Hall would be designed to achieve LEED® Gold Certification, while the Event Center would be designed to achieve a minimum of LEED® Certification. In addition,

in accordance with SB 292, the Proposed Project must achieve and maintain carbon neutrality by reducing to zero the net emissions of greenhouse gases from private automobile trips to the Event Center.

The Proposed Project would also be consistent with the applicable objectives of the Walkability Checklist, in that it would: improve the quality of the public realm; encourage and facilitate pedestrian travel; create an active outdoor environment that provides for pedestrian safety; provide wide sidewalks; provide pedestrian-scaled building entrances; orient buildings with direct access to entrances from sidewalks and streets; incorporate passageways or paseos into the site design to facilitate pedestrian circulation; and include appropriate landscaping. Prominent open space elements would include the redesigned Gilbert Lindsay Plaza, Event Center Plaza, and the New Hall entry plaza within the Pico Passage.

With respect to design, the Proposed Project would be consistent with the six objectives of the Citywide Design Guidelines as well as the Downtown Design Guide, as it would incorporate varied rooflines, variations in façade treatment and building materials, pedestrian-scaled entrances, and building step-backs and/or overhangs to reduce building massing and avoid blank street walls. Further, the Event Center would comply with relevant Design Guide tower requirements.

Signage is an important visual component of the Proposed Project, adding to the event- and entertainment-oriented aspect of the Project Site and complementing the existing sign districts in the adjacent LASED area, including L.A. LIVE. The signage program would be implemented via the Proposed Specific Plan or a Sign District (SD), referred to herein as the Signage Regulations. Project signage would be consistent with the provisions of the Downtown Design Guide, with the exception that animated signs would not be prohibited, as this type of signage is considered critical to the event- and entertainment-oriented nature of the proposed uses.

As it relates to LAMC zoning requirements, a Zone Change for the entire Project Site from PF and C2 to CEC would be sought, and the new zoning requirements would be established by the proposed Convention and Event Center Specific Plan. Operation of the Convention Center, the new Event Center, and the existing STAPLES Center would be consistent with the proposed CEC Zone, and the existing Conditional Use Permits (CUPs) for the Convention Center and STAPLES Center would be no longer needed. The Proposed Specific Plan and its associated subareas would be the organizing tool for development standards for the CEC Zone, including provisions related to building height, setbacks and parking. Furthermore, upon approval of the proposed General Plan Amendment (including amendment of the General Plan Land Use Map for the Central City Community Plan area), the new CEC Zone would be consistent with the Project Site's PF

land use designation. Note that irrespective of the proposed CEC Zone, the Proposed Project would be consistent with the existing zoning on the Project Site with issuance of a CUP for the proposed Event Center.

In summary, the Proposed Project would be consistent with the vast majority of relevant goals, objectives, policies, and guidelines of the applicable regional and local plans. On an overall basis, the Proposed Project would support the general intent of the plans and would not preclude their attainment. As such, the Proposed Project would result in less than significant land use impacts with regard to regulatory consistency.

### *(3) Urban Decay—Disinvestment in Competitive Facilities*

Based on the characteristics of the spectator event and public assembly locations within the region, recent and ongoing investments in these facilities, and the lack of associated potential for the Proposed Project to result in displacement at these facilities, operation of the Proposed Project would not result in the closure of or disinvestment in competing facilities which may, in turn, result in conditions leading to their abandonment or decay. For Spectator Events, the only foreseeable areas of direct competition between the Proposed Project and existing facilities in the region would be limited to international soccer events, and to a lesser degree, concerts and high school football games. However, as a whole, the potential loss of these types of events would not be sufficient to lead to significant capital disinvestment in competing facilities.

With regard to the displacement potential associated with public assemblies, there would likely be some overlap in the regional market between the Los Angeles Convention Center and other free-standing public assembly facilities over 100,000 square feet. However, it was concluded that the capacities of the Proposed Project would not fundamentally alter the market dynamics for public assembly events in Los Angeles County. Thus, potential impacts associated with urban decay would be less than significant.

## **b. Cumulative Impacts**

There are three related projects located adjacent to the Project Site (Related Project Nos. 27, 60, and 91 located across Figueroa Street) and several more within a few blocks' radius, which are in close enough proximity to contribute to cumulative land use impacts by potentially altering existing land use relationships in the immediate Project area. Many of these related projects consist of infill development, and in general, would reinforce existing and emerging land use patterns in the area rather than introduce new land uses to the Project area. Therefore, the existing land use relationships within the area would not be expected to change, and existing neighborhoods or communities would not be disrupted, divided or isolated. Furthermore, those related projects that involve mid- to high-rise

structures are located in or near the Financial Core and South Park, where similar development already exists. The balance of the related projects would not cause cumulative land use impacts due to either distance and/or existing intervening development.

As with the Proposed Project, future development projects would be reviewed by the City for consistency with relevant land use plans and regulations and would incorporate mitigation measures necessary to reduce potential land use impacts. Therefore, such future projects are not expected to fundamentally alter the existing land use relationships in the community. Rather, the concentration of the known development in the area would be expected to promote a more cohesive, compatible and active urban environment. Thus, as the Proposed Project would generally be consistent with applicable land use plans, policies, and regulations, the Proposed Project would not incrementally contribute to significant cumulative land use inconsistencies. In addition, given that the Proposed Project would be compatible with surrounding land uses, the Proposed Project would not contribute to significant cumulative land use compatibility impacts. Cumulative impacts would thus be less than significant.

### c. Project Design Features and Mitigation Measures

#### *(1) Project Design Features*

No project design features are proposed with regard to land use.

#### *(2) Mitigation Measures*

Mitigation measures are not required, since significant impacts associated with land use consistency and compatibility would not occur.

### d. Level of Significance After Mitigation

Proposed Project impacts associated with land use consistency and compatibility would be less than significant.

## **B.1 Transportation**

### a. Project Impacts

#### *(1) Construction*

Overall, the Proposed Project would result in impacts from construction on the transportation system which would be temporary and short-term, and would cause some temporary and intermittent reductions in street and intersection capacity on roadways

adjacent to the Project Site. As increases in delays and travel times would be noticeable to drivers, traffic impacts would be potentially short-term and temporary significant impacts.

The Proposed Project will prepare Construction Traffic and Parking Management Plans for all phase of construction activity at the Project site which will include specific provisions for truck routes and staging, roadway lane closures, maintenance of transit service, and maintenance of access/egress for all modes to buildings on the Project Site and at L.A. LIVE. While development and implementation of a detailed and comprehensive Construction Traffic Control Plan would reduce such impacts, it is conservatively concluded that temporary impacts due to truck traffic, construction worker traffic, and some roadway lane closures would at times be significant and unavoidable.

## *(2) Operation*

### *(a) Introduction*

The comprehensive transportation analysis addressed 177 street intersections, 16 freeway mainline locations, 23 freeway off-ramps, 26 freeway on-ramps, all transit lines serving the site, parking within approximately a twenty minute walk of the Proposed Project, pedestrian circulation at approximately 140 locations, all applicable Congestion Management Plan (CMP) locations, a neighborhood evaluation, and construction transportation impacts. The assumptions and methodology for the study were approved by the City of Los Angeles Department of Transportation.

The analysis focused on the three event scenarios that represent the highest likely combination of event attendance and background traffic on the road system. These are: (1) Sunday Daytime Event: NFL Game—1:00–4:30 P.M.; (2) Saturday Daytime Event: NFL Game or Other Event—1:00–4:30 P.M.; and (3) Weekday Evening Event: NFL Game—5:30–9:00 P.M. Other events scenarios would either draw lower attendances or occur at times when background traffic levels are lower than those identified above. The analysis of these event scenarios focused on the immediate pre-event hour and post-event hour, representing the hours of maximum traffic flows to and from events. The transportation analysis therefore addressed the following time periods:

- Sunday Day Pre-Event Hour (12:00–1:00 P.M.)
- Sunday Day Post-Event Hour (4:30–5:30 P.M.)
- Saturday Day Pre-Event Hour (12:00–1:00 P.M.)
- Saturday Day Post-Event Hour (4:30–5:30 P.M.)
- Weekday Evening Pre-Event Hour (4:30–5:30 P.M.)

- Weekday Evening Post-Event Hour (9:00–10:00 P.M.)

Many of the events at the Event Center would occur during weekends, when existing traffic volumes are much lower than the during the weekday peak commute periods. A small number of events would occur during the Weekday Evening when inbound trips would coincide with the weekday P.M. peak hour. Such events would occur only infrequently. Outbound traffic from weekday evening events would occur in the late evening when background traffic volumes are substantially lower than at other times.

*(b) The Project Site*

The Project Site is located at the hub of the regional rail and bus transit system in the metropolitan Los Angeles area. There are two rail transit stations within short walking distance (Flower & Pico Station and Seventh Street Metro Center Station), which provide direct access to the Metro Blue, Red and Purple rail lines (and connect to the regional Metrolink rail system at Union Station). By 2015, the Exposition Line (to Santa Monica) will also serve the Project Site. There are also approximately 35 bus lines, including five Metro Rapid bus lines, within 0.75 mile (15-minute walking distance) of the Project Site.

The Project Site is also located in downtown Los Angeles at the heart of the regional transportation system for the metropolitan Los Angeles area, with excellent transportation access from locations throughout Southern California. Seven freeways serve downtown Los Angeles and the greater Project Area, with four freeways directly serving the Project Site. There are forty-nine freeway ramps connecting freeway access routes to downtown streets to access/egress parking in the downtown area and the Project Site, with twenty of these freeway ramps located in close proximity to the Project Site. The area of the Project Site is served by eight arterial roadways with many more arterials comprising the Downtown street grid and serving the downtown area. Many of the streets within the Downtown are one-way streets, which substantially enhance the ability of the street system to effectively facilitate travel in the Downtown area.

*(c) Proposed Project Transportation Characteristics*

Given the proximity of the Event Center to significant rail and bus transit, it is estimated that 20 percent of patrons would use transit on a weekday and 15 percent on a weekend. It is also estimated that because of the downtown location approximately 7 percent of spectators would walk-in for a Weekday event and 3.5 percent would walk-in on a Weekend event. These will be people staying in downtown hotels, working or living Downtown.

For a Weekend Day event (Saturday or Sunday), it is estimated that approximately 2,520 patrons would walk or bike to the stadium, about 10,800 would take transit, and the

remaining 58,680 would arrive by car in approximately 19,560 cars. Of the total 19,560 inbound auto vehicle trips, 9,780 would occur in the pre-event hour (12:00–1:00 P.M.). About 14,670 of the outbound 19,560 auto vehicle trips would occur in the post-event hour (4:30–5:30 P.M.).

For a Weekday Evening event, it is estimated that approximately 5,040 patrons would walk or bike to the stadium, about 14,400 would take transit, and the remaining 52,560 would arrive by car in approximately 19,467 cars. Of the total 19,467 inbound auto vehicle trips, 9,733 would occur in the pre-event hour (4:30–5:30 P.M.). About 14,600 of the outbound 19,467 auto vehicle trips would occur in the post-event hour (9:00–10:00 P.M.).

Event centers (stadiums) by their nature do not operate on a regular daily basis at fixed times. Unlike many land use developments projects which function on a regular daily basis, the Proposed Project includes an Event Center where events would not occur every day or on a regular schedule, but rather would occur irregularly and only on those days and at those times when events are scheduled. Event centers stage events for large numbers of people only every so often. Because stadiums provide capacity for large numbers of people to gather, they create high peaks of travel demand which typically cause temporary “peaked” impacts for a short period of time on the transportation system. Further, it is not practical or feasible to provide additional freeway or roadway infrastructure improvements just to handle event traffic for short periods of time. Transportation impacts at Event Centers and stadiums due to these temporarily high peaks are therefore normal, are typically expected, and are generally accepted by event attendees.

Transportation mitigations are thus more appropriately focused on operational measures that would address the short-term and temporary nature of impacts by managing and maximizing the capacity of the existing roadway infrastructure on a temporary basis during events, rather than physical infrastructure improvements that would not be necessary for mitigation for most of the time, and which might through roadway capacity increases encourage further auto use contrary to policies to increase transit use. Given the Proposed Project’s stated policies and goals of increasing transit use and decreasing auto use, physical improvements to transportation infrastructure are focused on transit rather than highways. However, the mitigation plan will include certain “spot” or localized highway improvements to reduce traffic impacts and to facilitate efficient traffic operations where feasible. A comprehensive Transportation Management Plan (TMP) will be developed and implemented for the Proposed Project in coordination with the Los Angeles Department of Transportation (LADOT), Metro, Los Angeles Police Department (LAPD), Caltrans, and other transportation agencies, including an Event Coordination Plan, which will provide the framework and details for managing all aspects of transportation for events at the Proposed Project.

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*(d) Intersections*

The Proposed Project would result in significant traffic impacts at 11 intersections in the Sunday Day Pre-Event Hour, at 18 intersections in the Sunday Day Post-Event Hour, at 31 intersections in the Saturday Day Pre-Event Hour, at 36 intersections in the Saturday Day Post-Event Hour, at 77 intersections in the Weekday Evening Pre-Event Hour and at 9 intersections in the Weekday Evening Post-Event Hour.

Physical intersection improvements are not feasible at the majority of locations because of the developed and highly urbanized nature of the area. However, the intersection mitigation measures for the Proposed Project include improvements at 11 intersections, as well as improvements to the City's traffic signal control system including upgrades to traffic signal controllers at 73 intersections and installation of nine new closed circuit television (CCTV) cameras. The mitigation program would reduce the number of significantly impacted intersections from 11 to 4 during the Sunday Day Pre-Event Hour, and would partially mitigate a further 3 intersections. It would increase the number of significantly impacted intersections from 18 to 20 during the Sunday Day Post-Event Hour (increase due to temporary street closures), and would partially mitigate a further 9 intersections. It would reduce the number of significantly impacted intersections from 31 to 28 during the Saturday Day Pre-Event Hour, and would partially mitigate a further 24 intersections. It would increase the number of significantly impacted intersections from 36 to 42 during the Saturday Day Post-Event Hour (increase due to temporary street closures), and would partially mitigate a further 12 intersections. It would reduce the number of significantly impacted intersections from 77 to 72 during the Weekday Evening Pre-Event Hour, and would partially mitigate a further 41 intersections. It would decrease the number of significantly impacted intersections from 9 to 6 during the Weekday Evening Post-Event Hour, and would partially mitigate a further 4 intersections.

Significant unavoidable impacts would remain at 4 intersections in the Sunday Day Pre-Event Hour, at 20 intersections in the Sunday Day Post-Event Hour, at 28 intersections in the Saturday Day Pre-Event Hour, at 42 intersections in the Saturday Day Post-Event Hour, at 72 intersections in the Weekday Evening Pre-Event Hour, and at 6 intersections in the Weekday Evening Post-Event Hour. The intersection mitigations would be effective in eliminating or substantially reducing the number of intersections operating at LOS F before and after events.

These impacts would not however occur on a daily or regular basis, and would occur irregularly associated only with events at the Event Center. The number of impacts would be reduced further by implementation of the Transportation Management Plan, and would also reduce with the implementation of additional trip reduction and greater use of transit measures to be implemented as part of the SB 292 program. Additional traffic management measures to be incorporated in the TMP will include the use of portable

surface street changeable message signs (“CMS”), installation of permanent surface street CMS, and installation of fixed signage.

*(e) Transit*

The Proposed Project would result in significant transit impacts (transit policy load factors being exceeded) for certain transit lines in the Sunday Day Pre-Event Hour, the Sunday Day Post-Event Hour, the Saturday Day Pre-Event Hour, the Saturday Day Post-Event Hour, and the Weekday Evening Post-Event Hour. There would be no significant transit impacts in the Weekday Evening Pre-Event Hour as sufficient transit capacity would exist at that time period. These impacts would be due largely to the fact that transit service currently operates at reduced schedules during weekends and the late evenings (the time of the majority of events). It was also concluded that only relatively modest increases in transit services would be necessary to reduce the impacts to a less than significant level. Additional Metro rail/bus service required to accommodate patron demand would be subject to MTA Board approval as part of MTA’s annual operational budget. With the implementation of these increases by Metro, impacts on the transit system would be reduced to a less than significant impact and there would be no remaining unavoidable significant impacts.

*(f) Project Access*

The impact analysis identified that there would be no significant access impacts as a result of the Proposed Project. No mitigation measures would be necessary, and there would be no remaining unavoidable significant impacts.

*(g) Neighborhood Intrusion*

The impact analysis identified that while it would be unlikely, there would be the potential for significant traffic and parking impacts to occur on local streets in the Pico-Union neighborhood as a result of the Proposed Project. With the implementation of the proposed mitigation of a Neighborhood Traffic and Parking Management Program, neighborhood intersection impacts would be less than significant, and there would be no remaining unavoidable significant impacts. However, if the community rejects proposed effective measures, then potential traffic and parking impacts could remain significant and unavoidable.

*(h) Freeways*

The impact analysis identified that the Proposed Project would result in a number of significant freeway impacts on freeway mainline segments, and freeway off-ramps and on-ramps during pre-event and post-event hours. These impacts would not occur on a regular daily basis but irregularly during events. Mitigation measures will therefore focus more

appropriately on trip reduction and traffic management measures than on infrastructure improvements.

### Freeway Segments

The Proposed Project would result in 4 significant impact locations during the Sunday Day Pre-Event Hour, 9 significant impact locations during the Sunday Day Post-Event Hour, 6 significant impact locations during the Saturday Day Pre-Event Hour, 13 significant impact locations during the Saturday Day Post-Event Hour, 13 significant impact locations during the Weekday Evening Pre-Event Hour, and 3 significant impact locations during the Weekday Evening Post-Event Hour. It would be expected that these impacts would be reduced through the implementation of the TMP, and would be further reduced (and in some cases perhaps eliminated) by the trip reduction and greater use of transit measures to be implemented as part of the TMP and SB 292. Nevertheless, it is conservatively concluded for the purposes of this EIR that these would all remain unavoidable significant impacts.

### Freeway Off-Ramps

The Proposed Project would result in significant freeway off-ramp impacts at 4 locations in the Sunday Day Pre-Event Hour, at 5 locations in the Saturday Pre-Event Hour, and at 8 locations in the Weekday Evening Pre-Event Hour. With the implementation of the mitigation measures at two ramp locations, there would be 3 remaining significant impacts in the Sunday Day Pre-Event Hour, 5 remaining significant impacts in the Saturday Day Pre-Event Hour, and 7 remaining significant impacts in the Weekday Evening Pre-Event Hour. While it is expected that these impacts would be reduced through the implementation of the TMP, and would be further reduced (and in some cases perhaps eliminated) by the trip reduction and greater use of transit measures to be implemented as part of the TMP and SB 292, it is conservatively concluded for the purposes of this EIR that these would all remain unavoidable significant impacts.

### Freeway On-Ramps

The Proposed Project would result in significant freeway on-ramp impacts at 7 locations in the Sunday Day Post-Event Hour, at 11 locations in the Saturday Post-Event Hour, and at 6 locations in the Weekday Evening Post-Event Hour. No feasible physical improvement mitigation measures were identified for these impacts. While it is expected that these impacts would be reduced through the implementation of the TMP, and would be further reduced (and in some cases perhaps eliminated) by the trip reduction and greater use of transit measures to be implemented as part of the TMP and SB 292, it is conservatively concluded for the purposes of this EIR that these would all remain unavoidable significant impacts.

Additional freeway measures to be implemented by the Proposed Project will include installation of 5 new CMS signs, installation of fixed directional signage, a \$1,600,000 contribution to freeway ramp metering upgrades in the downtown, and traffic management measures in the TMP. The Proposed Project will also make a one-time fixed fee financial contribution of \$2,400,000 towards a regional scale improvement project that would add an auxiliary lane to the westbound US-101 Hollywood Freeway between the four-level interchange and Alvarado Street (this project would correct merge-weave related traffic congestion that cause significant backups on both the westbound US-101 and the northbound US-110 freeways).

*(i) Congestion Management Program*

The Proposed Project would cause no significant traffic impacts at CMP monitoring intersections, but would cause nineteen significant impacts at freeway monitoring locations. These impacts would not occur on a regular daily basis but would occur only infrequently as there would be few weekday evening events starting at 5:30 P.M. No feasible mitigation measures were identified for these infrequent mainline freeway impacts. However, it would be expected that these impacts would be reduced through the implementation of the TMP, and would be further reduced (and in some cases perhaps eliminated) by the trip reduction and greater use of transit measures to be implemented as part of the TMP and SB 292. Nevertheless, it is conservatively concluded for the purposes of this EIR that these would all remain unavoidable significant impacts.

*(j) Transportation Management Plan*

The overall transportation strategy for the Proposed Project will be comprehensive and will focus on: (1) encouraging the maximum use of transit and other non-auto modes, and minimizing auto use; (2) the efficient utilization of existing parking resources in the downtown area, and distributing traffic over many access/egress routes; and (3) the effective use of traffic management to maximize the capacity of existing transportation facilities during events. A comprehensive Transportation Management Plan will be developed and implemented for the Proposed Project in coordination with LADOT, Metro, LAPD, Caltrans, and other transportation agencies, including an Event Coordination Plan, which will provide the framework and details for managing all aspects of transportation for events at the Proposed Project. This plan will build on the successful implementation of existing similar plans for STAPLES Center, L.A. LIVE, and the Convention Center. The Plan will provide an initial blueprint for transportation and traffic management, but will also be dynamic, flexible, and capable of responsiveness to the actual transportation conditions that may occur once the Proposed Project in operation. It will be a multi-modal plan that addresses transit, autos, parking, pedestrians, and bicycles. It is expected that the Transportation Management Plan will address the following subjects:

- Event Center Site Description and Operations
- Event Center Scheduling
- Event Coordination Plan
- Trip Generation Levels
- Parking Management and Access/Egress Plans
- Transit Service
- Pedestrian Circulation
- Transportation Demand Management and Trip Reduction (visitors and employees)
- Traffic Management
- Pico-Union Neighborhood Traffic and Parking Management Plan
- Bicycle Access Plan

It is also expected that the Transportation Management Plan will include, but not necessarily be limited to, the following types of measures:

- Parking Locations by Type of Parking, and Parking Management Measures
- Access and Egress Routes to Parking
- Access and Egress Routes to Transit
- Event Ticket Bundling with Parking and Transit Passes
- Transit Service Provisions
- Integrated Transit Fare Measures
- Private Bus, Taxi, and Limousine, Provisions
- Pedestrian Signage and Wayfinding
- Pedestrian Circulation Management
- Use of Traffic Control Officers
- Potential Temporary Street Closures

- Potential Temporary Turn Restrictions
- Potential Temporary Traffic Lane Closures and/or Reassignments
- Use of Changeable Message Signs
- Emergency Vehicle Provisions
- Temporary diversion of bus service in the vicinity of the Proposed Project during street closures and/or events
- Coordination measures for concurrent events at the Event Center and Dodger Stadium and the Event Center and the Los Angeles Coliseum

The Proposed Project will provide an appropriately sized building on the Project Site to accommodate a Field Operations Center. This facility will provide space for the on-site coordination of security staff, the LAPD, LADOT, Metro, and Caltrans. In addition to functioning as the command center for security, the TMP will also provide for the centralized coordination of all transportation and parking management activities during events.

*(k) Greater Use of Transit and Auto Trip Reduction*

A key transportation improvement measure to be funded by the Proposed Project will be the expansion of the Pico Station between 12th Street and Pico Boulevard from a one-platform to a two-platform station, thereby substantially increasing the passenger-handling capacity and improving access to the station platforms.

Other measures to increase the use of transit and reduce auto trips, and which would be implemented as part of the TMP, could include the following:

- Additional Metro and Metrolink Service
- Special Metrolink Trains
- Express Bus Park-and-Ride
- Charter Bus Service
- Encourage and Incentivize Transit Use
- Programs to Increase Auto Occupancy
- Programs to Encourage Use of Alternative Modes

The Proposed Project would make a one-time fixed fee financial contribution of \$250,000 to the City's recently established Bicycle Trust Fund.

To support a local Mobility Hub the Proposed Project will provide space on or in the vicinity of the Project Site for a car-share program (approximately 300 sq. ft. for a rental office and parking for up to 20 car-share vehicles). The Proposed Project would also make a one-time fixed fee financial contribution of \$750,000 to LADOT's Mobility Hub Program.

As it is difficult to quantify accurately the increased transit and trip reduction benefits of these measures at this time, the traffic analysis conservatively takes no trip credits. Instead, the trip reductions will be monitored as part of the SB 292 process. Therefore, the impact analysis represents a very conservative assessment and likely substantially overstates the Proposed Project's actual traffic impacts.

## b. Project Design Features

The following improvements and programs would be incorporated directly into the Project Description for the Proposed Project and would therefore constitute Project Design Features:

### *(1) Project Area Street Modifications*

The Proposed Project will make improvements and modifications to the streets listed below in order to achieve wider sidewalks.

#### *(a) L.A. Live Way (Collector Street)*

**Project Design Feature B.1-1:** L.A. Live Way between Pico Boulevard and Chick Hearn Court/11th Street shall be modified to comprise an 89 foot right-of-way, and a 64-foot curb-curb width, with a 10-foot sidewalk on the west side of the street and a 15-foot sidewalk on the east side of the street. The existing lane configuration shall remain, except for the elimination of one midblock northbound lane, (as shown on Figure A.10.4.1.1 of Appendix A of the Transportation Study, contained in Appendix I of the Draft EIR). This shall be completed by the Event Center Applicant prior to issuance of a certificate of occupancy for the Event Center.

#### *(b) Chick Hearn Court (Collector Street)*

**Project Design Feature B.1-2:** Chick Hearn Court between L.A. Live Way and Georgia Street shall be modified to comprise a 72-foot curb-to-curb width with a 15-foot sidewalk on the north side of the street and a

20-foot sidewalk on the south side of the street, between L.A. Live Way and the east-most driveway to the L.A. LIVE West Garage; and a 60.5-foot curb-curb width with a 26.5 foot sidewalk on the north side and a 20-foot sidewalk on the south side of the street between the east-most driveway of the L.A. LIVE West Garage and Georgia Street; and the existing 107-foot right-of-way for the entire block shall be maintained (as shown on Figure A.10.4.1.2 of Appendix A of the Transportation Study, contained in Appendix I of the Draft EIR). The existing lane configuration shall be maintained. This shall be completed by the Event Center Applicant prior to issuance of a certificate of occupancy for the Event Center.

*(c) Pico Boulevard (Modified Secondary Highway)*

**Project Design Feature B.1-3:** Pico Boulevard between Figueroa Street and a point approximately 600 feet west of Figueroa Street shall be modified to comprise a 70-foot curb-curb width, with three eastbound lanes and two westbound lanes, and with a minimum 20-foot sidewalk on the north side of the street and a minimum 20-foot sidewalk on the south side of the street, (of which 10 feet may be on Convention Center property). From the point approximately 600 feet west of Figueroa Street to L.A. Live Way, the existing roadway width of 80 feet curb-to-curb and lane configuration shall be maintained, and a minimum 20-foot sidewalk provided on both the north and south side of the street (all of which in each case may be provided on Convention Center property). The existing street right-of-way of 100 feet shall be maintained between Figueroa Street and L.A. Live Way. (See Figure A.10.4.1.3 of Appendix A of the Transportation Study contained in Appendix I of the Draft EIR). This shall be completed by the New Hall Applicant prior to issuance of a certificate of occupancy for the New Hall.

*(2) Trip Reduction Measures*

**Project Design Feature B.1-4:** The Proposed Project shall coordinate its planning with the City on the City's current plans to provide a Bike Station on or in the vicinity of the Project Site.

**Project Design Feature B.1-5:** The Proposed Project shall coordinate its planning with the concept plans currently being evaluated in the Figueroa Corridor Study for providing a bike lane in each direction on Figueroa Street between USC and downtown, provided such plans do not include a raised curb delineating the bike lanes in the vicinity of the Project Site as they would create pedestrian safety impacts.

### *(3) Green Transportation Measures*

The following two measures will be implemented to improve air quality and reduce carbon emissions. Because these measures would improve air quality but would not reduce vehicle trips, no trip credits were taken in the traffic analysis.

**Project Design Feature B.1-6:** Prior to issuance of a certificate of occupancy for the parking garages, the Event Center Applicant shall provide up to 12 electric vehicle charging stations in one or more of the on-site parking garages to facilitate and encourage the use of electric vehicles.

**Project Design Feature B.1-7:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall provide priority parking locations for alternative fueled and electric vehicles, to facilitate and encourage the use of these vehicles.

### *(4) Construction Truck Trips*

**Project Design Feature B.1-7a:** The Project Applicants shall limit construction related truck trips to off-peak periods to the extent practical.

### *(5) Transportation Management Center*

**Project Design Feature B.1-8:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall provide an appropriately sized building (approximately 2,000 square feet) on the Project Site to accommodate a Field Operations Center (FOC). This facility shall provide space for the on-site coordination of security staff, the LAPD, LADOT, Metro, and Caltrans, and communications capabilities to each agency's main control center. In addition to functioning as the security and safety management center, the FOC shall also provide for the centralized coordination of all transportation and parking management activities during events.

## c. Mitigation Measures

### *(1) Mitigation Program Overview*

The mitigation program is a comprehensive multi-modal program that includes a wide range of measures, and that focuses on encouraging transit use, reducing auto trips, implementing traffic management and operational measures, and implementing physical improvements in certain locations where feasible and beneficial to all transportation modes.

Unlike many land use development projects which function on a regular daily basis, the Proposed Project includes an Event Center where events would not occur every day or on a regular schedule, but rather would occur irregularly and only on those days and at those times when events are scheduled. Transportation mitigations are thus more appropriately focused on operational measures that would address the short-term and temporary nature of impacts by managing and maximizing the capacity of the existing roadway infrastructure on a temporary basis during events, rather than on physical infrastructure improvements that would not be necessary for mitigation for most of the time, and which might through roadway capacity increases encourage further auto use contrary to policies to increase transit use, or otherwise interfere with transportation-related goals on non-event days. Given the Proposed Project's stated policies and goals of increasing transit use and decreasing auto use, physical improvements to transportation infrastructure are focused on transit rather than highways. However, the mitigation plan does include certain "spot" or localized highway improvements to reduce traffic impacts and to facilitate efficient traffic operations where feasible.

## *(2) Transit Measures*

The mitigation program includes the following measure and the Trip Reduction Measures set forth in subparagraph (3) below that are aimed at increasing ridership on transit. As it is difficult to accurately quantify the trip reduction benefits of these measures at this time, the traffic analysis has conservatively taken no trip credits for the measures listed below. Instead, the trip reductions will be monitored as part of the SB 292 process.

### *(a) Improve Pico Metro Station*

**Mitigation Measure B.1-1:** Prior to issuance of a building permit for the Event Center, the Event Center Applicant shall enter into an agreement with Metro requiring the Event Center Applicant to fund improvements to the Pico Station in accordance with a mutually agreed development schedule and design with a total estimated cost of \$10.35 million. The Pico Metro Station shall also be improved prior to the operation of the Event Center. The Pico Metro Station, located on Flower Street between 12th Street and Pico Boulevard one block from the Project Site, is currently a single platform station with limited capacity access to the platform from the east sidewalk of Flower Street. Metro will use the Event Center Applicant's contribution to (a) add a second platform parallel to the existing Pico Metro Station platform, and (b) refurbish the existing station platform to improve the passenger handling capacity.

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(3) *Trip Reduction Measures*

(a) *Encourage Use of Alternative Modes*

(i) Bicycle Use

**Mitigation Measure B.1-2:** During operation of the Proposed Project, the Event Center Applicant shall provide for an on-site Bicycle Valet Program that shall be operated during major events.

**Mitigation Measure B.1-3:** Prior to issuance of a building permit for the Event Center, the Event Center Applicant shall make a one-time, fixed financial contribution of \$250,000 to the City's recently established Bicycle Trust Fund, for the purposes of improving bicycle facilities in the vicinity of the Proposed Project.

(ii) Mobility Hub<sup>4</sup>

**Mitigation Measure B.1-4:** To support a local Mobility Hub, prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall provide space on or in the vicinity of the Project Site for a car-share program (i.e., approximately 300 sq. ft. for a rental office and parking for up to 20 car-share vehicles).

**Mitigation Measure B.1-5:** Prior to issuance of a building permit for the Event Center, the Event Center Applicant shall make a one-time, fixed financial contribution of \$750,000 to LADOT's Mobility Hub Program.

(4) *Traffic Management Measures*

Due to the irregular nature of activities at event centers, and the fact that many events occur outside of the typical peak traffic hours on the highway system, traffic management and operations measures are typically considered the most effective strategies to mitigate or minimize the temporary impacts from event traffic. Rather than build unnecessary transportation infrastructure improvements that would only be used by the peak event traffic sporadically (generally before and after events), the traffic management measures seek to maximize the operational efficiency of the existing infrastructure to better accommodate the temporary nature of the event traffic impacts.

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<sup>4</sup> LADOT has received funding to implement the Integrated Mobility Hubs project within Downtown Los Angeles. This program would provide secure bicycle parking and a fleet of shared bikes and cars in an attempt to enhance urban mobility and serve as an extension of the current transportation network. Integrated mobility hubs provide an opportunity to customize the first and last mile experience by providing the end-user with vehicle options that would meet their particular needs for the day.

These measures will not reduce vehicle trips, but will instead improve traffic flows in and around the Event Center and may therefore partially mitigate traffic impacts. As their precise effect cannot be accurately quantified, the traffic analysis conservatively took no trip credits or reductions in intersection volume to capacity ratios for these measures. The proposed traffic management measures include the following:

*(a) Portable Surface Street Changeable Message Signs (CMS)*

**Mitigation Measure B.1-6:** The Event Center Applicant shall obtain and use up to 25 portable CMS trailers for use in traffic operations management during events. Their specific use shall be determined in the Transportation Management Plan.

*(b) Permanent Surface Street Changeable Message Signs (CMS)*

**Mitigation Measure B.1-7:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall obtain and install new permanent surface street Changeable Message Signs (CMS) signs (up to a total cost of \$1,200,000) to be used in conjunction with the existing CMS signs on streets in the area around the Project Site to provide specific traffic and parking messages as needed. Their specific use shall be determined in the Transportation Management Plan. These shall be smaller and less visually intrusive than the existing CMS signs in the area, and shall be used to expand and augment the existing system.

*(c) Fixed Signage*

**Mitigation Measure B.1-8:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall implement a fixed signage program (up to a total cost of \$500,000) that provides directional information to parking zones, parking facilities and preferred access/egress routes, as defined in the TMP.

*(5) Pico-Union Neighborhood Traffic and Parking Management Plan*

To mitigate potential impacts to certain local residential streets in the Pico-Union area due to possible cut-through traffic, and the potential for significant parking impacts in the area, the following Mitigation Measure is included:

**Mitigation Measure B.1-9:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall develop and implement a Neighborhood Traffic and Parking Management Plan to minimize potential impacts to local residential streets due to possible

cut-through traffic and parking impacts. The Plan area shall include Pico Union, South Park and South Los Angeles. The Plan, which shall include up to \$75,000 for traffic and parking signage, and up to \$250,000 for potential traffic and parking control measures shall be developed in coordination with LADOT and the community.

*(6) Street Intersection Improvements*

The Proposed Project is located in the central Los Angeles area, where the street system is essentially fully built out and is already often striped for the maximum capacity and operational effectiveness within the available right-of-way. In most cases, street widenings are not feasible due to the following: sufficient right-of-way is not available and right-of-way acquisition is not possible; the street widening might cause secondary impacts by displacing on-street parking; or because it is not practical or desirable to reduce sidewalk widths due to secondary impacts that could occur to pedestrian flows through a degraded pedestrian environment.

In addition, for the downtown area to function effectively from an access and circulation standpoint, it is critical for the transportation system to achieve a balance in serving vehicular traffic, transit, and pedestrians. Roadway widenings, while benefiting vehicular traffic, often have adverse impacts on pedestrians by reducing sidewalk widths and may have adverse impacts on bus transit service by relocating or impacting bus stops. Therefore, even where roadway mitigations may physically be possible, they may be considered detrimental in the overall context of multi-modal transportation and circulation and are thus considered infeasible in many locations.

*(a) Reversible Lanes*

The potential benefits and effectiveness of temporary reversible lanes on key arterial roadways during pre-event and/or post-event hours was evaluated as a traffic management measure. This evaluation indicated that reversible lanes were either not needed, were not an effective solution, or were not feasible. For example, on east-west arterials west of the Project Site, reversible lanes could theoretically be beneficial during the pre-event hour for a weekday evening event. However, as eastbound and westbound traffic volumes are very similar at that time, the roadway capacity in the “reverse” direction is not available. Reversible lanes were therefore not included in the mitigation program.

*(b) Specific Intersection Improvements*

The feasibility of specific intersection improvements was investigated for the intersection locations where the Project would cause significant traffic impacts. This evaluation, which was conducted in conjunction with LADOT staff, looked at the feasibility of re-striping traffic lanes and/or adding traffic lanes to modify intersection lane

configurations, roadway widenings, and potential changes to signal timing and phasing. In conjunction with LADOT, it was determined that in general the following types of intersection improvements were not feasible:

- Roadway widenings were not a feasible measure due to the lack of available right-of-way because of existing buildings or improvements or lack of control over adjacent right-of-way;
- Roadway lane re-striping was not a feasible measure at a majority of the impacted intersections as it would result in inadequate lane widths, reduce sidewalk widths (which would degrade the pedestrian environment and could cause secondary impacts), or require the removal of on-street parking (which would also cause secondary impacts to the adjacent land uses); and,
- Signal timing/phasing changes were not feasible as they would worsen rather than improve intersection operations or potentially cause other problems and/or impacts elsewhere.

Specific physical mitigation improvements were deemed to be feasible at the following intersection locations.

(i) Blaine Street at SR-110 Southbound Off-Ramp

**Mitigation Measure B.1-10:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall restripe the westbound approach to Blaine Street on the SR-110 SB Off-Ramp to change one of the exclusive right-turn lanes into a shared left and right lane. This will modify the approach from the existing configuration of one left-turn lane and two exclusive right-turn lanes to a configuration of one left-turn lane, one shared left and right lane, and an exclusive right turn lane. It will not require any widening or additional right-of-way but would require the approval of Caltrans. (The concept improvement plan for this location is shown in Figure A.10.5.7.1 in Appendix A of the Transportation Study, provided as Appendix I of the Draft EIR).

(ii) Blaine Street at 11th Street

**Mitigation Measure B.1-11:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall restripe the westbound approach to Blaine Street on 11th Street to include one exclusive left-turn lane and one shared left-through lane. This will modify the existing approach from the configuration of one shared left-through lane and one through lane, to a configuration of one exclusive left-turn lane and one shared left-through lane. This

measure will provide two left-turn lanes to the SR-110 Southbound On-Ramp at this intersection rather than the existing one left turn lane, thereby increasing access capacity to the ramp for outbound traffic from the Proposed Project. This measure will require widening on the south-east corner of the intersection. This measure would require the approval of Caltrans. (The concept improvement plan for this location is shown in Figure A.10.5.7.2 in Appendix A of the Transportation Study, provided as Appendix I of the Draft EIR).

(iii) The 17th Street and 18th Street Corridor Between Los Angeles Street and Grand Avenue

This is a key access and egress corridor from the I-10 freeway from the east (and thereby from I-5 and SR-60) to the Project Site. The mitigation program for this corridor includes freeway ramp improvements and street restriping and improvements to enhance traffic flow in this corridor. As provided for below under the specific mitigation measures, the I-10 Westbound Off-Ramp at Los Angeles Street (the westbound approach at the Los Angeles Street & 17th Street intersection), shall be widened from two lanes to three lanes to provide additional capacity for traffic exiting the freeway. An additional traffic lane shall be provided westbound on 17th Street and eastbound on 18th Street between Olive Street and Los Angeles Street. Access shall be improved to the I-10 Eastbound On-Ramp at Los Angeles Street. Specific intersection improvements to be implemented under this overall mitigation measure are identified below. Except where identified, these measures can be implemented within the existing curb-to-curb roadway widths and within existing rights-of-way. (The concept improvement plans for this location are shown in Figures A.10.5.7.3 and A.10.5.7.4 in Appendix A of the Transportation Study, provided as Appendix I of the Draft EIR).

(iv) Los Angeles Street at 17th Street

**Mitigation Measure B.1-12:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall widen the westbound approach on the I-10 Westbound Off-Ramp to add a through lane. This will modify the existing configuration of one shared left-through lane and one shared through-right lane to a configuration of one shared left-through lane, one through lane, and one shared through-right lane. This measure will require widening on the south side in the Caltrans right-of-way, and would require the approval of Caltrans.

(v) Main Street at 17th Street

**Mitigation Measure B.1-13:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall restripe the westbound approach on 17th Street to add an additional through lane. This will modify the existing configuration of one shared left-through lane and one shared through-right lane to a configuration of one shared left-through lane, one through lane and one shared through-right lane.

(vi) Broadway at 17th Street

**Mitigation Measure B.1-14:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall restripe the westbound approach on 17th Street to add an additional through lane. This will modify the existing configuration of one shared left-through lane and one shared through-right lane to a configuration of one shared left-through lane, one through lane and one shared through-right lane.

(vii) Hill Street at 17th Street

**Mitigation Measure B.1-15:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall restripe the westbound approach on 17th Street to add an additional through lane. This will modify the existing configuration of one shared left-through lane and one shared through-right lane to a configuration of one shared left-through lane, one through lane and one shared through-right lane.

(viii) Olive Street at 17th Street

**Mitigation Measure B.1-16:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall restripe the westbound approach on 17th Street to add an additional through lane. This will modify the existing configuration of one through lane and one shared through-right lane to a configuration of two through lanes and one shared through-right lane.

(ix) Grand Avenue at 17th Street

**Mitigation Measure B.1-17:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall restripe the westbound approach on 17th Street to add an additional through lane. This will modify the existing configuration of one shared left-through lane and one through lane to a configuration of one shared left-through lane and two through lanes.

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(x) Hill Street at 18th Street

**Mitigation Measure B.1-18:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall restripe the eastbound approach on 18th Street to add an additional through lane. This will modify the existing configuration of one shared left-through lane and one shared through-right lane to a configuration of one shared left-through lane, one through lane, and one shared through-right lane.

(xi) Broadway at 18th Street

**Mitigation Measure B.1-19:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall restripe the eastbound approach on 18th Street to add an additional through lane. This would modify the existing configuration of one left turn lane, one through lane and one shared through-right lane to a configuration of one shared left-through lane, one through lane, and one shared through-right lane.

(xii) Los Angeles Street at 18th Street

**Mitigation Measure B.1-20:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall widen the eastbound approach on 18th Street to add an additional left-turn lane. This will modify the existing configuration of one left-turn lane, one through lane, and one shared through-right lane to a configuration of two left-turn lanes, one through lane, and one shared through-right lane. This measure will require widening into the Caltrans right-of-way on the northwest corner of the 18th Street and Los Angeles Street intersection, and would require the approval of Caltrans.

*(7) ATSAAC System Upgrades*

**Mitigation Measure B.1-21:** Prior to issuance of a certificate of occupancy for the Event center, the Event Center Applicant shall install, or shall pay LADOT to install a fixed amount of \$1,200,000 to provide for the design and installation of, traffic signal controller upgrades and additional CCTV cameras as defined in Mitigation Measures B.1-21A and B.1-21B below. These improvements shall be implemented either by the Applicant through the City's B-Permit process, or through payment of the \$1,200,000 fixed fee to LADOT who shall then design and install the improvements (if the latter then payment shall be made prior to the issuance of a building permit for the Event Center).

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*(a) Intersection Traffic Signal Controller Upgrades*

The traffic signal controllers at some study intersections are currently older model Type 170 Controllers. Where possible, the City is implementing upgrades to newer Type 2070 Controllers, which provides for enhanced real time operation of traffic signal timing. The newer controllers, which are required in the following Mitigation Measure, allow LADOT to respond to real time traffic situations by making immediate adjustments to an intersection's signal timing and providing for more efficient traffic flows.

**Mitigation Measure B.1-21A:** The Applicant shall install or fund (as defined above) the upgrade of the signal controllers from the older model Type 170 Controllers to the newer Type 2070 Controllers at the following 73 intersection locations:.

1. Griffith Avenue & 16th Street
2. San Pedro Street & 16th Street
3. Maple Avenue & 16th Street
4. Maple Avenue & 18th Street
5. Maple Avenue & 23rd Street
6. Maple Avenue & Adams Boulevard
7. Los Angeles Street & 16th Street
8. Los Angeles Street & 17th Street
9. Los Angeles Street & 18th Street
10. Main Street & 16th Street
11. Main Street & 17th Street
12. Main Street & 18th Street
13. Main Street & 23rd Street
14. Broadway & Alpine Street
15. Broadway & Ord Street
16. Broadway & 16th Street
17. Hill Street & 1st Street
18. Hill Street & 2nd Street
19. Hill Street & 3rd Street
20. Hill Street & 4th Street
21. Hill Street & 16th Street
22. Hill Street & 17th Street
23. Hill Street & 18th Street
24. Hill Street & Adams Boulevard
25. Olive Street & 16th Street
26. Grand Avenue & 16th Street
27. Grand Avenue & Adams Boulevard
28. Hope Street & 2nd Street
29. Hope Street & 4th Street
30. Hope Street & Wilshire Boulevard
31. Hope Street & 8th Street
32. Hope Street & 9th Street

33. Hope Street & 11th Street
34. Hope Street & 12th Street
35. Hope Street & Pico Boulevard
36. Flower Street & 9th Street
37. Flower Street & 11th Street
38. Figueroa Street & Olympic Boulevard
39. Figueroa Street & Convention Center Bus Exit
40. Figueroa Street & Venice Boulevard
41. Figueroa Street & 18th Street
42. Figueroa Street & 23rd Street
43. Francisco Street & 8th Street
44. Georgia Street & 9th Street
45. Convention Center Drive & Venice Boulevard
46. Lucas Street & Wilshire Boulevard
47. L.A. Live Way & 11th Street
48. Blaine Street & SR-110 SB Off-Ramp
49. Blaine Street & 11th Street
50. Albany Street & Pico Boulevard
51. Valencia Street & 11th Street
52. Valencia Street & Pico Boulevard
53. Oak Street & Washington Boulevard
54. Union Avenue & 11th Street
55. Union Avenue & 12th Street
56. Union Avenue & Venice Boulevard
57. Union Avenue & Washington Boulevard
58. Union Avenue & 23rd Street
59. Bonnie Brae Street & Pico Boulevard
60. Burlington Avenue & Venice Boulevard
61. Alvarado Street & 11th Street
62. Alvarado Street & 12th Street
63. Alvarado Street & Pico Boulevard
64. Hoover Street & Pico Boulevard
65. Hoover Street & Washington Boulevard
66. Hoover Street & 20th Street
67. Hoover Street & I-10 EB Ramps
68. Magnolia Avenue & Pico Boulevard
69. Magnolia Avenue & Venice Boulevard
70. Magnolia Avenue & Washington Boulevard
71. Westmoreland Avenue & Venice Boulevard
72. Catalina Street & Pico Boulevard
73. Loyola High School Driveway & Venice Boulevard

*(b) Closed Circuit Television (CCTV) Cameras*

An integral part of the City's ATSAC/ATCS traffic signal control system is CCTV cameras at key intersection locations. These provide visual information to the City's

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ATSAC Traffic Control Center, and allow LADOT to monitor traffic operations and respond in real time to traffic conditions that delay vehicles and transit service.

**Mitigation Measure B.1-21B: CCTV Camera Installation Locations.** The Applicant shall install or fund (as defined above) new CCTV cameras (including necessary mounting poles, fiber optic and electrical connections) at the following nine intersection locations:.

1. Broadway & 3rd Street
2. Broadway & 17th Street
3. Broadway & 18th Street
4. Grand Avenue & 1st Street
5. Flower Street & 3rd Street
6. Flower Street & 9th Street
7. Figueroa Street & 2nd Street
8. Figueroa Street & 5th Street
9. Figueroa Street & Adams Boulevard

*(8) Freeway Measures*

The freeway system is part of the regional transportation infrastructure, and in the heavily developed and built-up area of Central Los Angeles, there is very little if any right-of-way available for freeway widenings. Freeway improvement projects are therefore generally not very common and usually only carried out as part of major regional infrastructure improvement plans. In addition, unlike many land use development projects which function on a regular daily basis, the Proposed Project includes an Event Center where events would not occur every day or on a regular schedule, but rather would occur irregularly and only on those days and at those times when events were scheduled. Transportation mitigations are thus more appropriately focused on operational measures that would address the short-term and temporary nature of impacts by managing and maximizing the capacity of the existing roadway infrastructure on a temporary basis during events, rather than on physical infrastructure improvements that would not be necessary for mitigation for most of the time, and which might through roadway capacity increases encourage further auto use contrary to policies of increased transit use.

The Event Center Applicant has agreed with Caltrans to a program of freeway improvements and traffic management measures for a total of \$11,000,000, with Caltrans having the flexibility to re-allocate monies between the specific measures as may be necessary or appropriate in their implementation. The specific measures are described below under Mitigation Measures B.1-22 through B.1-27. To provide a conservative analysis, no mitigation credit has been taken for these measures, except for the ramp improvements.

(a) *Freeway Ramps*

A review of the Proposed Project's impacts on the freeway system revealed no feasible off-ramp or on-ramp mitigation measures that the Proposed Project could implement at most locations. The freeway system in downtown Los Angeles is complex, with many ramps in close proximity and often tied into collector-distributor lanes, which make the improvement of one ramp or freeway segment infeasible without major changes to larger segments. In other cases, freeway segments are on structures or where right-of-way for improvements is not available, thus making improvements infeasible. Major changes to freeway infrastructure are only made at a regional level as part of long-term plans and are beyond the capacity of individual development projects to implement. However, the following ramp improvements appear to be feasible and are thus proposed in the Mitigation Program for the Proposed Project as follows.

(i) SR-110 Southbound Off-Ramp to Blaine Street (Olympic Boulevard)

**Mitigation Measure B.1-22:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall restripe the westbound approach to Blaine Street on the SR-110 SB Off-Ramp to change one of the exclusive right-turn lanes to a shared left and right lane. This would modify the approach from the existing configuration of one left-turn lane and two exclusive right-turn lanes to a configuration of one left-turn lane, one shared left and right lane, and an exclusive right turn lane. This measure would enhance the capacity of the off-ramps for Event Center traffic inbound to the parking garages at the Proposed Project. This measure would not require any widening or additional right-of-way but would require the approval of Caltrans. (See also Mitigation Measure B.1-10)

(ii) I-10 Westbound Off-Ramp at Los Angeles Street

**Mitigation Measure B.1-23:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall widen the westbound approach on the I-10 Westbound Off-Ramp to add a lane. This would modify the existing configuration of one shared left-through lane and one shared through-right lane to a configuration of one shared left-through lane, one through lane, and one shared through-right lane. This measure would require widening on the south side in the Caltrans right-of-way but would require the approval of Caltrans. (See also Mitigation Measure B.1-12).

(iii) Ramp Metering Upgrades

**Mitigation Measure B.1-24:** Prior to issuance of a building permit for the Event Center, the Event Center, Applicant shall make a one time, fixed

contribution of \$1,600,000 to Caltrans for the purpose of implementing upgrades to ramp meters on on-ramps in the downtown area. These would also facilitate event traffic management. Installation locations would be determined in conjunction with Caltrans and LADOT and incorporated along with all other ramp metering locations in the downtown area into the Transportation Management Plan. This measure would require the approval of Caltrans.

*(b) Freeway Mainline Segments*

A review of the Proposed Project's impacts on the freeway system revealed no feasible mainline segment mitigation measures that the Proposed Project could implement. However, the following measures are proposed that would facilitate traffic flows and operations and that could reduce impacts:

(i) Contribution to Regional-Level Improvement

**Mitigation Measure B.1-25:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall make a one-time, fixed contribution of \$2,400,000 to Caltrans towards the mainline freeway improvement project in Downtown Los Angeles that would add an auxiliary lane to the northbound US-101 Hollywood Freeway between the Four-Level Interchange (with SR-110) and Alvarado Street. This improvement would correct merge-weave related traffic congestion that causes significant backups on both the westbound US-101 and the northbound SR-110 freeways. This contribution would fund initial engineering studies and a Project Study Report (PSR) or other appropriate report that would represent a necessary initial step toward implementing the freeway improvement project and make it available for state and federal funding. This measure would require the approval of Caltrans.

(ii) CMS Signs

**Mitigation Measure B.1-26:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall install, in conjunction with Caltrans, five additional mainline freeway changeable message signs (CMS) on the freeway systems surrounding and/or approaching downtown (up to a total cost of \$2,500,000) to facilitate event traffic management. Installation locations will be determined in conjunction with Caltrans and LADOT and incorporated into the Transportation Management Plan. This measure would require the approval of Caltrans. If Caltrans elects to install these signs, then prior to issuance of a building permit for the Event Center, the Event

Center Applicant shall make a payment of \$2,500,000 to Caltrans for installation of the signs.

(iii) Fixed Directional Signage

**Mitigation Measure B.1-27:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall install fixed directional signage on the freeway system approaching and surrounding the downtown (up to a total of \$2,000,000) to provide information on access routes to the parking areas for the Proposed Project to help manage traffic flows in a distributed manner as specified in the parking management strategy. This measure would require the approval of Caltrans.

(iv) Additional Freeway Service Patrols

**Mitigation Measure B.1-28:** During operation of the Event Center, the Event Center Applicant shall fund additional Freeway Service Patrols (up to four additional tow trucks with driver) through Metro's program to increase patrols on the freeway system around downtown before and after events.

*(9) Develop and Implement a Transportation Management Plan*

**Mitigation Measure B.1-29:** Prior to operation of the Event Center, the Event Center Applicant shall develop and implement a comprehensive Transportation Management Plan (TMP) for the Proposed Project, for approval by LADOT. The TMP shall be developed in coordination with LADOT, Metro, LAPD, Caltrans, and other transportation agencies as appropriate. The TMP will provide the framework and details for managing all aspects of transportation for events at the Proposed Project. This plan will build on the successful implementation of existing similar plans for STAPLES Center, L.A. LIVE, and the Convention Center. The Plan will provide an initial blueprint for transportation management, but will also be dynamic, flexible, and capable of responsiveness to the actual transportation conditions that may occur once the Proposed Project is in operation. The Plan will be a multi-modal plan that addresses transit, autos, parking, pedestrians, and bicycles. The Transportation Management Plan will include the following subjects:

- Event Center Site Description and Operations
- Event Center Scheduling

- Event Coordination Plan
- Trip-Generation Levels
- Overall Parking Strategy
- Parking Management and Access/Egress Plans
- Transit Service
- Pedestrian Circulation
- Transportation Demand Management and Trip Reduction (visitors and employees)<sup>5</sup>
- Traffic Management
- Pico-Union Neighborhood Traffic and Parking Management Plan
- Bicycle Access Plan

The Transportation Management Plan will include, but not necessarily be limited to, the following types of measures:

- Parking Locations by Type of Parking, and Parking Management Measures
- Access and Egress Routes to Parking
- Access and Egress Routes to Transit
- Event Ticket Bundling with Parking and Transit Passes
- Transit Service Provisions
- Integrated Transit Fare Measures
- Private Bus, Taxi, and Limousine Provisions
- Pedestrian Signage and Wayfinding
- Pedestrian Circulation Management
- Use of Traffic Control Officers
- Potential Temporary Street Closures
- Potential Temporary Turn Restrictions
- Potential Temporary Traffic Lane Closures and/or Reassignments
- Use of Changeable Message Signs

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<sup>5</sup> *Including requirements of the City of Los Angeles and the CMP for the Transportation Demand Management Plan as applicable for the Proposed Project.*

- Emergency Vehicle Provisions
- Temporary diversion of bus service in the vicinity of the Proposed Project during street closures and/or events
- Coordination measures for concurrent events at the Event Center and Dodger Stadium and the Event Center and the Los Angeles Coliseum

*(a) Potential Measures to Reduce Vehicle Trips*

The TMP may include, but not be limited to, the following types of programs to increase transit ridership and increase vehicle occupancies beyond the levels identified in the Draft EIR impact analysis in order to reduce the number of vehicle trips.

- Additional Metro and Metrolink Service

Additional passengers could be carried by the Metro lines serving the Project Site and on the Metrolink six-county commuter rail lines serving Union Station. During certain time periods such increases might be accommodated by existing service levels. For other event scenarios, additional transit service would need to be provided by adding rail cars to trains, or by additional trains, to increase the frequency and capacity of the service.

- Special Metrolink Trains

Metrolink could run special event trains, similar to those currently operated to Major League Baseball games at Angel Stadium of Anaheim and those that have been operated to Fontana Speedway and to concerts at Angel Stadium of Anaheim.

- Express Bus Park-and-Ride

The Event Center could run an Express Park-and-Ride service where patrons could park in remote parking locations and ride Express Bus Service directly to the Event Center. This could operate in a similar fashion to the existing Hollywood Bowl Park-and-Ride service. While this service would be coordinated and managed by the Event Center, it would most likely be operated by private transit operators.

- Charter Bus Service

The Event Center could encourage a resident football team to promote the use of charter buses for team fans to use to attend games rather than driving. These would be an efficient method of bringing fans who would travel longer distances to games (for

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example outside of Los Angeles County), and could also be organized by fan supporter and/or booster clubs.

- Encourage and Incentivize Transit Use

The use of transit would be encouraged and heavily promoted by the Proposed Project. This would include bundling of transit passes with event ticket sales, where patrons could purchase a transit ticket at the same time as the event ticket so patrons would not need to buy a transit ticket on the day of the event. The Proposed Project will work with transit operators to achieve a process where a single transit ticket/pass could be used on all connecting transit links to facilitate transfers. This would also include extensive use of marketing and promotional materials to ensure patrons would be aware of the availability, convenience, and benefits of all transit options, including use of electronic distribution methods such as web-site and cell phone applications. This measure could also include special offers and/or programs to encourage the use of transit, such as potentially offering discounts on merchandise or at restaurants, or running a “Transit Club” or “Transit Fan Appreciation Program” where continued use of transit provides patrons with certain benefits.

- Increase Auto Occupancy

Measures to increase auto occupancy could be aimed at increasing auto occupancy for events over the 3.00 persons per car assumed for weekend events and the 2.75 persons per car assumed for weekday events in the traffic analysis. Measures could include reduced parking rates for cars with 4+ people, and providing preferred parking locations for cars with 4+ people. The Proposed Project could also encourage the use of vanpools by facilitating the organization of vanpool programs for Event Center events, and by providing priority parking for vanpool vehicles

**Mitigation Measure B.1-29a:** Prior to the issuance of a building permit for the Event Center, the Event Center Applicant and the owners of the Los Angeles Dodgers and Dodger Stadium and its affiliated properties (“Dodgers”) shall jointly develop event coordination measures (“Coordination Measures”) for the purpose of coordinating concurrent events at the Event Center and Dodger Stadium. The Event Center Applicant shall include the Coordination Measures within its proposed Transportation Management Program (“TMP”). One year prior to the anticipated opening of the Event Center, the Event Center Applicant shall coordinate with LADOT, Metro, LAPD, Caltrans, and other transportation agencies as appropriate regarding inclusion of the Event Coordination Measures in the TMP.

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(10) *Construction Impacts*

**Mitigation Measure B.1-30:** Prior to issuance of a building permit for the Proposed Project, the Event Center Applicant shall prepare Construction Traffic and Parking Management Plans for all phases of construction activity at the Project Site for review and approval by LADOT. These Plans shall include, but not be limited to the following: specific provisions for truck routes and staging; roadway lane closures; maintenance of transit service; and maintenance of access/egress for all travel modes to the Project Site. Specifically, these plans shall include, but not be limited to the following elements, as appropriate:

- Coordination of construction activities with event schedules at Convention Center, STAPLES Center, and L.A. LIVE. Identification of truck staging areas, and management of truck access/egress to minimize truck impacts on the street system.
- Worksite Traffic Control Plans, including temporary traffic controls, lane reconfigurations, temporary traffic signal operation, signage, detour plans as appropriate, and provisions for flag personnel, etc.
- Construction Worker Transportation Demand Management Plan to encourage use of transit and ridesharing to minimize parking needs, and shuttles from remote parking sites used by construction workers.
- Construction Worker Parking Management Plan to provide sufficient parking, including multiple dispersed off-site parking locations to minimize potential associated off-site traffic impacts, and to prevent construction workers from using on-street parking in the Pico-Union area.
- Alternate routing, protection barriers, covered walkways where necessary and feasible, and other safety precautions for pedestrians and bicyclists through the Project Area.
- Event Construction Parking Plan to develop and implement temporary parking strategies for events for the Convention Center, STAPLES Center, and L.A. LIVE during construction.
- Pico-Union Construction Traffic and Parking Management Plan to minimize impacts in the Pico-Union area.
- Schedule construction-related deliveries, other than concrete and earthwork-related deliveries, to reduce travel during peak commute periods.
- Freeway Truck Management Plan to be submitted to Caltrans.

- Coordinate with Metro regarding possible bus stop relocations and/or bus line/re-routings to minimize inconvenience to transit riders.
- Reroute construction trucks away from congested streets or sensitive receptor areas to the extent practical.
- Provide dedicated turn lanes for movement of construction trucks and equipment, where space is available and would not result in a safety concern for pedestrians and motorists, where feasible and acceptable to LADOT.
- Provide signal synchronization on construction truck routes where feasible and acceptable to LADOT.

**Mitigation Measure B.1-31:** The Event Center Applicant shall submit grading, utility plans, and a hydrology report as soon as they are available for Caltrans review purposes.

## B.2 Parking

### a. Project Impacts

A Parking Supply Area (PSA) was identified for study purposes that included the area bounded by 4th Street in the north, Broadway in the east, Adams Boulevard in the south, and the I-110/SR-110 Freeway to the west, which essentially covers the extensive parking supply in downtown within a 15- to 20-minute walking distance from the Project Site. When the Proposed Project opens there will be a total of 45,756 off-street parking spaces in this Parking Supply Area, of which 6,670 spaces will be on-site in the Specific Plan area (the Project Site) and 39,086 spaces will be off-site.

#### *(1) Construction*

During construction of the Project, an adequate number of on-site parking spaces would be available at all times or the Project would provide a shuttle to an off-site parking location for the construction workers. Therefore, Project construction would result in a less than significant impact with regard to the availability of on-site parking spaces.

#### *(2) Operation*

The Proposed Project will provide a net additional 1,112 parking spaces at the Project Site after replacement of existing parking that will be demolished and replaced in new parking garages. The Proposed Project will construct two new parking garages, the Bond Street Garage (928 spaces) and the L.A. Live Way Garage (2,950 spaces). The Proposed Project will provide a total of 250 new bicycle parking spaces in the on-site parking garages, and a bicycle valet parking system during major events. The Proposed

Project will provide up to 12 electric vehicle charging stations in the on-site parking garages to facilitate and encourage the use of electric vehicles, and will also provide priority parking locations for hybrid and electric vehicles, to facilitate and encourage the use of these vehicles.

The impact analysis identified that in combination with the extensive supply of available parking in the adjacent downtown areas, there would be a sufficient parking supply for the Proposed Project. This supply would be adequate within the defined Primary Parking Area for most events. For certain infrequent event combinations at the Project Site, some of the abundant parking supply beyond the Primary Parking Area would also need to be utilized. The Proposed Project would arrange remote parking outside the Primary Parking Area when necessary and would provide connecting shuttle bus service to the Project Site as necessary (some remote parking locations would be connected to the Project Site by rail transit lines such as the Red Line, and the Blue/Exposition Lines). Remote parking plans will be included in the Transportation Management Plan.

With the parking management measurements identified as Project Description Features and in the mitigation program, parking impacts would be less than significant, and there would be no remaining unavoidable significant impacts.

The Proposed Project will coordinate with LADOT's Downtown *ExpressPark* Program to coordinate the efficient use of the parking supply. This will involve including the on-site parking garages in the City's Program (for monitoring of occupancy and utilization), and coordinating information sources, types, and distribution methods for parking locations and access/egress routes during events.

In developing the Parking Management Plan, the Proposed Project will encourage the participation of other parking garages in the downtown in the *ExpressPark* Program. The Proposed Project will also fund a study for the City of Los Angeles to explore ways of extending parking garage participation in the *ExpressPark* Program (up to a total of \$200,000).

The Proposed Project will also make a one-time fixed fee contribution of \$1,000,000 to the Downtown *ExpressPark* Program, and a total three year contribution of \$300,000 (\$100,000 per year) to support ongoing maintenance of the *ExpressPark* Program.

## b. Cumulative Impacts

As discussed above, the future total off-site parking supply in the primary Parking Supply Area would total 39,086 spaces, including 3,518 spaces at L.A. LIVE and 35,748 spaces in the remainder of downtown. This accounts for a reduction of

3,836 spaces from the existing supply of 42,922 spaces, as it takes into account the spaces that would be eliminated from the supply as future development from related projects occurs on currently entitled surface parking lots. As shown above in the analysis of Saturday day events, Sunday day events, and Weekday evening events, an off-site parking supply surplus will exist for all operational scenarios of the Proposed Project. Similarly, all related projects would be required to comply with the regulatory parking requirements specific to their land uses, and each related project would be analyzed on a case-by-case basis to determine its impact to the parking supply and to verify compliance with applicable regulatory standards. Therefore, it is not anticipated that the Proposed Project in conjunction with the 133 related projects would result in a significant cumulative impact to parking supply.

### c. Project Design Features and Mitigation Measures

#### *(1) Project Design Features*

**Project Design Feature B.2-1:** The Proposed Project will provide an additional 1,112 parking spaces after replacement of existing parking that will be demolished and replaced in new parking garages. The Proposed Project will construct two new parking garages, the Bond Street Garage (928 spaces) and the LA Live Way Garage (2,950 spaces which would be 2,092 spaces above the existing 858 spaces to be demolished by the Proposed Project).

**Project Design Feature B.2-2:** The Proposed Project will provide a total of 250 new bicycle parking spaces in the on-site parking garages.

**Project Design Feature B.2-3:** The Event Center Applicant shall not schedule a ticketed event at the Event Center at the same time as a ticketed event at STAPLES Center where the combined attendance at both venues would exceed 72,000 spectators.

#### *(2) Mitigation Measures*

##### Transportation Management Plan

**Mitigation Measure B.2-1:** During operation of the Proposed Project, the Event Center Applicant shall implement parking strategies as part of the Transportation Management Plan designed such that patrons park in the targeted parking areas generally within the 20-minute walk contour in the most efficient manner, in order to minimize overall travel time and circulating traffic and to spread traffic across a multiplicity of arrival and departure routes. This plan may consist of, but not be limited to: the publishing and distribution of promotional materials advising patrons of available parking areas and preferred access/egress routes; pre-selling parking tickets with event tickets,

based on ZIP Code origin; and directing patrons to the various appropriate access/egress routes through freeway and street signage, published materials, and real time media such as web sites, smart phones, and Southern California's 511 information system.

### ExpressPark Program

The *ExpressPark* Project is a one-year pilot program that will use technology and demand-based pricing to provide an innovative parking management strategy in Downtown Los Angeles. It is one component of the Los Angeles Congestion Reduction Demonstration that is intended to increase the availability of limited parking spaces, reduce traffic congestion and air pollution, and encourage use of alternative modes of transportation.

The Event Center Applicant shall implement the following measures in coordination with LADOT's Downtown *ExpressPark* Program:

**Mitigation Measure B.2-2:** During operation of the Proposed Project, the Proposed Project shall coordinate with LADOT's Downtown *ExpressPark* Program to facilitate the efficient use of the parking supply. This shall involve including the on-site parking garages in the City's Program (for monitoring of occupancy and utilization), and coordinating information sources, types, and distribution methods for off-site parking locations and access/egress routes during events.

**Mitigation Measure B.2-3:** During development of the TMP and during operation of the Proposed Project, the Event Center Applicant shall encourage the participation of other parking garages in the downtown in the *ExpressPark* Program. The Event Center Applicant shall also fund a study (up to a total of \$200,000) for the City of Los Angeles to explore ways of extending parking garage participation in the *ExpressPark* Program.

**Mitigation Measure B.2-4:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall make a one-time fixed contribution of \$1,000,000 to the Downtown *ExpressPark* Program.

**Mitigation Measure B.2-5:** The Event Center Applicant shall make a total 3-year annual contribution to the Downtown *ExpressPark* Program of \$100,000 per year for three years to be used by LADOT for system maintenance of the *ExpressPark* Program. Payments shall begin one year after opening of the Event Center.

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### Off-Site and Remote Parking

**Mitigation Measure B.2-6:** During operation of the Event Center, the Event Center Applicant shall provide off-site parking for employees who drive and shall provide shuttle bus service from the remote parking locations to the Project Site, similar to the programs successfully deployed for STAPLES Center and L.A. LIVE.

**Mitigation Measure B.2-7:** Use of Remote Parking When Necessary. During operation of the Event Center, for the occasional times when determined to be necessary (as defined in the TMP), the Event Center Applicant shall arrange remote parking outside the Primary Parking Area (for example, on Bunker Hill, at Union Station, east of Broadway, in Central City West (north of Olympic Boulevard), and south of the Project Site in the general USC/Coliseum area including the Shrine Auditorium), and shall provide connecting shuttle bus service to the Project Site as necessary (some remote parking locations would be connected to the Project Site by rail transit lines such as the Red Line, and the Blue/Expo Lines). The Event Center Applicant shall coordinate with potential additional parking facilities based on availability and willingness to participate. Remote parking plans shall be included in the Transportation Management Plan.

#### d. Level of Significance After Mitigation

With the implementation of the project design features and mitigation measures identified above, the Proposed Project's impacts on parking would be less than significant.

## **B.3 Pedestrian Circulation and Bicycle and Pedestrian Safety**

### a. Environmental Impacts

#### *(1) Construction*

Pedestrian and bicycle safety during Project construction would be addressed through the placement of construction fencing along most of the Project perimeter, installation of protected walkways, and the implementation of the Project's Construction Traffic Management Plan. In addition, to further enhance pedestrian safety, pedestrians would be encouraged through signage to use the sidewalks on the opposite side of the street from Project construction, whenever feasible. This option is safely facilitated by the signals and crosswalks present throughout the Project area. Additionally, the street pattern in the Project area, being mostly a grid, is such that alternative pathways that completely avoid the Project Site during construction are readily available without substantially

increasing the travel distance for the pedestrian. As a result, impacts on pedestrian circulation as well as bicycle and pedestrian safety during construction would be less than significant.

### *(2) Operation*

The Proposed Project will widen sidewalks on L.A. Live Way, Chick Hearn Court, and Pico Boulevard adjacent to the Event Center and New Hall, and will provide enhanced wider crosswalks at twelve intersections in the vicinity of the project Site. The impact analysis identified 4 locations where significant pedestrian circulation impacts would occur for Weekend Day Post-Event Hours, and 3 locations for a Weekday Evening Post-Event Hour. With the identified mitigation measures of certain post-event temporary street closures to eliminate vehicle-pedestrian conflicts in the immediate vicinity of the Event Center, all pedestrian impacts would be reduced to a less than significant level and there would be no remaining unavoidable significant impacts.

### b. Cumulative Impacts

Construction impacts with regard to pedestrian circulation as well as bicycle and pedestrian safety would only occur if the Proposed Project's construction time period is concurrent with the construction of the related projects. To the extent that cumulative construction impacts do occur, the types of impacts generated by the construction of the related projects are anticipated to be the same or very similar to those of the Proposed Project. It is also anticipated that each related project would individually address the potential impacts during their respective construction periods using the same or similar measures as those identified below with regard to the Proposed Project with an equal level of effectiveness. Based on the above, the overall level of cumulative impact would be less than significant.

The related projects during their operation would result in increased development throughout the downtown area and beyond. Combined with the maturing light rail and bus transit systems in the City, as well as changing attitudes towards bicycles as a viable transportation alternative, the level of pedestrian and bicycle travel in the greater Project area is anticipated to increase notably in the future. This increase in non-automobile travel would place greater importance on pedestrian circulation as well as bicycle and pedestrian safety. In anticipation of these changes, continued implementation of existing City policies and programs that are being implemented via the City's Downtown Design Guide, 2010 Bicycle Plan, and the Project area streetscape program would create the means by which cumulative impacts with regard to these issues would be appropriately addressed. Further, all future bicycle facilities implemented per the City's Bicycle Plan would take into consideration bicycle safety issues and thereby reduce any potential cumulative impacts attributable to the related projects in conjunction with the Proposed Project to a less than

significant level. The existing sidewalk widths in the Project area along with continued implementation of existing City policies and programs are anticipated to reduce potential cumulative impacts with regard to pedestrian circulation as well as bicycle and pedestrian safety to a less than significant level.

### c. Project Design Features and Mitigation Measures

#### (1) Project Design Features

**Project Design Feature B.3-1:** Prior to issuance of a certificate of occupancy for the Event Center, the Event Center Applicant shall construct wider crosswalks (up to 30 feet) with differential paving (as was done for certain intersections for L.A. LIVE) at the following 12 intersections:

- L.A. Live Way & Chick Hearn Court
- L.A. Live Way & 12th Street
- L.A. Live Way & Pico Boulevard
- Georgia Street & Olympic Boulevard
- Francisco Street & Olympic Boulevard
- Francisco Street & James Wood Boulevard
- Figueroa Street & Pico Boulevard
- Figueroa Street & 9th Street
- Flower Street & Pico Boulevard
- Flower Street & 12th Street
- Flower Street & 11th Street
- Flower Street & Olympic Boulevard

**Project Design Feature B.3-2:** To further facilitate pedestrian safety in the immediate area of the Event Center, the east sidewalk of L.A. Live Way between Pico Boulevard and Chick Hearn Court shall be widened from 10 feet to 15 feet; the south sidewalk of Chick Hearn Court between L.A. Live Way and Georgia Street shall be widened from 10 feet to 20 feet; and the north and south sidewalks of Pico Boulevard between Figueroa Street and L.A. Live Way shall be widened from 10 feet to 20 feet. These widenings shall be implemented in conjunction with Project Design Features B.1-1, B.1-2, and B.1-3.

**Project Design Feature B.3-3:** As part of the Proposed Project, it is expected that the following streets would be closed to thru traffic (local access and transit vehicles allowed) before, during, and after events, in order to minimize the conflicts between vehicles and pedestrians:

- L.A. Live Way, between Pico Boulevard and Chick Hearn Court
- Chick Hearn Court between L.A. Live Way and Georgia Street
- Georgia Street, between Chick Hearn Court and West Road
- 12th Street, between Figueroa Street and Flower Street
- Chick Hearn Court, between Figueroa Street and Georgia Street (closed to all traffic)

Final configuration of the traffic closures on Event Days shall be determined upon completion of the Transportation Management Plan.

*(2) Mitigation Measures*

*(a) Temporary Street Closures*

**Mitigation Measure B.3-1:** During operation of the Proposed Project, the Event Center Applicant in conjunction with LADOT shall effect the temporary closure of certain street segments after major events, as defined in the TMP. These could include the following:

- Figueroa Street: both directions, between Olympic Boulevard and Pico Boulevard
- Flower Street: both directions, between Olympic Boulevard and Pico Boulevard
- 11th Street: both directions, between Figueroa Street and Hope Street
- 12th Street: both directions, between Figueroa Street and Hope Street
- Pico Boulevard: westbound direction only, between Flower Street and L.A. Live Way

The actual street closure program shall be determined in the Transportation Management Plan. Where streets shall be closed, they shall be closed to all traffic, including transit vehicles, except for local access to adjacent properties. It is expected that these street closures would not need to occur for more than approximately one hour after a major event and may only be closed for a shorter period of time. The exact location, duration and details of closure shall be determined in the Transportation Management Plan.

#### d. Level of Significance After Mitigation

With the implementation of the project design features, Project impacts with regard to bicycle circulation and safety would be less than significant. With the implementation of the project design features and mitigation measures, Project impacts with regard to pedestrian circulation and bicycle safety would be less than significant.

### C. Aesthetics/Visual Resources

#### a. Project Impacts

##### (1) *Aesthetics/Visual Character*

##### (a) *Construction*

The visual appearance of the Project Site would be altered during construction due to the removal of existing development, landscaping and street trees and the presence of construction activities, which would be visible from off-site. Based on the use of temporary construction fencing along the periphery of active construction areas to screen much of the construction activity from view at the street level, as well as monitoring of the Project Site for graffiti and contracting with a graffiti removal company, as needed, in general short-term construction activities would not substantially and adversely alter or degrade the existing visual character of the Project Site.

It is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall because under the *Los Angeles CEQA Thresholds Guide* historic resources are considered to be visual resources. As such, given that demolition of the West Hall would occur during the construction phase, construction-related impacts are therefore conservatively considered to be significant in the event that the West Hall were to be determined eligible as a historic resource.

##### (b) *Operation*

Implementation of the Proposed Project would result in an increase in the height, density and mass of on-site structures as compared to existing conditions. However, the new development would incorporate architectural design features such as pedestrian-scaled entrances and variations in building planes to reduce the effect of massing and would introduce new and enhanced outdoor plazas networked by pedestrian pathways and improved streetscapes. More specifically, the Project structures would feature varied rooflines, variations in façade treatment, pedestrian-scaled entrances, and building step-

backs and/or overhangs to reduce building massing. Entrances would be well-marked and articulated with a pedestrian scale, compatible with the architectural style and integrity of the buildings. While the Event Center would have a height of up to 220 feet, the New Hall would have a maximum building height of 90 feet, similar to that of the 80-foot tall South Hall and lower than the 135-foot West Hall main entry tower and the 160-foot South Hall main entry tower which would remain on-site. These new heights would not be out of character with surrounding development, which includes mid- to high-rise buildings. Furthermore, a variety of pedestrian-oriented improvements including pedestrian-oriented lighting, pedestrian wayfinding signage, enhanced sidewalks and crosswalks, and pedestrian amenities (e.g., street furniture) would be introduced to create a human scale throughout the Project Site. The creation of defined entry areas along with the wide and varying sidewalks would serve to demarcate building entrances and the adjacent plazas and create visual interest along the adjoining streets.

With respect to outdoor areas and gathering spaces, the Proposed Project would develop a series of plazas, including Event Center Plaza, the New Hall entry plaza and the redesigned Gilbert Lindsay Plaza, which may include kiosks and temporary event tents and potentially a café in Gilbert Lindsay Plaza, thus promoting pedestrian activity and fostering connectivity between the on-site buildings and the outdoor plaza areas. Gilbert Lindsay Plaza may also include a water feature, potentially coupled with public art, to define the experience of the plaza area, and the existing statue of Gilbert Lindsay would remain but may be relocated within the plaza. Additionally, the bronze statues within Star Plaza would remain, and the existing hockey puck installations just northwest of STAPLES Center may be relocated or recreated by the same artist. The Proposed Project's public art component would generate visual interest by creating focal points, define some of the plazas on-site and enhance the image of the Project area and Downtown as a whole.

The Project parking garages would be integrated with the on-site buildings through the use of pedestrian bridges and well-marked at-grade crossings and would be consistent with the Project's architectural design. Parking and loading uses on ground floor levels would be obscured from view from the adjacent streets, and vehicular drop-off areas would be located so as to minimize obstruction to pedestrian activity. The existing South Hall loading dock area would continue to be visible from the adjacent freeway interchange, but all other loading areas on-site would be enclosed or underground.

The Proposed Project's streetscape improvements would establish a hierarchy of outdoor spaces, including streets and intersections, that would connect the plazas and pedestrian paths proposed on-site and build on the existing streetscape improvements and associated standards in place for the adjacent LASED area. Streetscape features such as decorative paving materials, new crosswalks, light fixtures and street furniture would be introduced, and street trees would be planted similar to those established in the previously

approved LASED Specific Plan and consistent with those that exist along portions of Figueroa Street and Chick Hearn Court adjacent to the Project Site. Implementation of the proposed streetscape improvements would thus visually integrate the Convention Center, Event Center and STAPLES Center with L.A. LIVE and the surrounding area, promote the walkability of and around the Project Site and encourage pedestrian activity.

The proposed signage program would also represent an important Project component and a strong visual element that would influence the aesthetics of the Project Site. The Proposed Specific Plan or Sign District (SD), referred to herein as the Proposed Project's Signage Regulations, would limit the types, amounts, locations, sizes, operating hours and illumination of permitted signs. The types and extent of permitted signage would emphasize the event- and entertainment-oriented aspect of the Project Site and complement the existing sign district in the adjacent LASED area, including L.A. LIVE. Central to this concept is the goal of establishing a unique visual identity for the Project Site, which would be achieved in part through dynamic signage. Project signage would be clearly visible from various off-site vantage points and would include large electronic digital displays, static wall signs, temporary event signs and smaller Event Center, Convention Center and retail/tenant identity signs oriented for pedestrians. The electronic signs facing the adjacent freeways would not have flashing images or continuous motion.<sup>6</sup> Images would be static and remain at a constant brightness for eight seconds and then complete an instant refresh to the next image, which would then be static for eight seconds. By design, Project signage would be consistent with the character of a sports and entertainment district (i.e., a bright and active environment with substantial pedestrian activity including nighttime activity), such as that which already exists on-site and within the surrounding area, and would further promote the Project area's evolving sense of place. In addition, the Signage Regulations would: take into account critical safety issues such as the minimization of potential traffic hazards; provide that street views and views of scenic vistas are protected; and provide that visual clutter is limited so as to protect and enhance the visual character of major commercial corridors and properties throughout the Project area. Further, the signage program would support advertising and the naming rights to the Event Center.

Project lighting would also influence the visual character of the Project Site. Overall, Project lighting would be used to visually enhance and activate the Project Site, resulting in a vibrant, safe and visually appealing pedestrian environment. As with the signage program, Project lighting would not be out of character with that which currently exists within and around the Project Site, particularly at L.A. LIVE, and the Proposed Project

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<sup>6</sup> *The Outdoor Advertising Act defines "flashing" as a light or message that changes more than once every four seconds.*

would not introduce elements that substantially detract from the visual character of the Project area.

In summary, while the Proposed Project would not degrade the general visual character of the Project Site, it would substantially alter some of the visual resources on-site and would introduce elements that may contrast with the current aesthetic image of the Project Site. As previously indicated, construction-related impacts are conservatively considered significant due to the removal of the West Hall. The impact created during construction would extend to operation of the Proposed Project. Although the West Hall exhibits substantial building massing and lacks façade articulation, pedestrian-scaled entrances, inviting outdoor entry plazas and any ground level activity designed to activate the public realm or promote walkability, and the Proposed Project would be, on the whole, more consistent with adopted City policies and guidelines regarding architecture, walkability, the public realm and streetscapes than the West Hall, it is assumed herein that the removal of the West Hall would result in a significant aesthetic impact in the event that the West Hall were to be determined eligible as a historic resource.

## (2) Views

### (a) Public Views

Due to the generally flat topography in the area, public viewing locations or vantage points within the Project area are generally limited to public streets, sidewalks and elevated freeway locations that have existing views of identified view resources. Visual resources in the Project area include the statues and art installations located in and around Gilbert Lindsay Plaza and Star Plaza, the 54-story Marriott/Ritz tower (due to its prominent size and visibility and its resulting contribution to the skyline) and the Downtown Los Angeles skyline. In addition, the Central City Community Plan designates SR-110 as a scenic freeway, as it offers northbound views of the Downtown skyline and San Gabriel Mountains in the distance.<sup>7,8</sup> This freeway, however, is not a State-designated scenic highway nor is it designated on a Citywide level within the General Plan Transportation Element; it is only mapped as a scenic freeway on the Land Use Map for the Central City Community Plan.

Proposed development would affect public views from various vantage points surrounding the Project Site. Given the increased building heights associated with the Event Center and the proposed parking garages as compared to the West Hall and existing

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<sup>7</sup> City of Los Angeles, *Central City Community Plan, General Plan Land Use Map*, July 7, 2009.

<sup>8</sup> In addition, the *South Los Angeles and Southeast Los Angeles Community Plans* designate I-110, from I-10 south to Martin Luther King Jr. Boulevard, as a scenic freeway.

garages, the Proposed Project's structures would be more visible and take up a greater proportion of some viewsheds, and the Project Site would appear denser. Project signage would also be highly visible on building façades along adjacent streets and freeways. With respect to nighttime views, the Project Site would appear more brightly lit, and illuminated signage would be visible. From most public vantages, however, expansive sky views would continue to be available above the new buildings, the Marriott/Ritz tower and Downtown skyline to the north would remain visually prominent, and views of visual resources in the Project area would not be obstructed.

In particular, views of the developed street frontage along Figueroa Street would not change substantially from existing views, with the exception of the addition of new signage. The view along Pico Boulevard from L.A. Live Way (i.e., within the Pico Passage) would change considerably with Project implementation. The Concourse would no longer be visible, and the view of the sky above would be blocked by the New Hall structure above the roadway. However, no views of visual resources would be affected. In addition, no views of visual resources would be obstructed in easterly views from west of SR-110, as the elevated freeway would continue to obstruct the lower portions of Project Site development.

The proposed Event Center would be clearly visible in views of and across the Project Site from nearby locations along I-10. High-rise buildings in the background and the Downtown skyline to the north would continue to be visible beyond the Project Site. The lower stories of the Marriott/Ritz tower, along with those of other surrounding buildings, would be obstructed from view from certain vantage points by the Event Center, but overall views of the Downtown skyline would not be affected by the Proposed Project.

With respect to views from SR-110 northbound, the L.A. Live Way and Bond Street Parking Garages would appear prominently in the foreground, behind which part of the Event Center would be visible, and the upper portion of the Marriott/Ritz tower, would remain distinctive in the background. Nearly all of the view of the Downtown skyline to the north would be blocked by Project development from certain vantage points, which would be considered the loss of a recognized view. It is acknowledged that freeway views vary considerably by their inherent nature as a viewer's location changes with high travel speeds. View impacts along SR-110 would be relatively brief in duration and limited to certain vantage points. Nonetheless, the obstruction of skyline views along much of an approximately 0.5-mile segment of the scenic freeway (roughly from the SR-110/I-10 interchange to Chick Hearn Court) would be a significant impact. In addition, the removal of the West Hall would represent the loss of a recognized view in the event that the West Hall were to be determined eligible as a historic resource.

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*(b) Private Views*

Private viewing locations within the Project vicinity include nearby residential mid- and high-rise buildings, most of which are located to the east and north. The significance thresholds cited in the *L.A. CEQA Thresholds Guide* do not consider impacts to individual private views from residential or other private properties to be significant. Nonetheless, view impacts affecting such properties are discussed herein for informational purposes only.

As with public views, proposed development would affect private views from certain vantage points surrounding the Project Site. In general, views from high-story buildings would continue to offer expansive urban panoramas that include the Project Site in the foreground or mid-ground and much of the Los Angeles basin to the south and/or west in the background. From some vantages, views would be substantially unchanged, as intervening mid- to high-rise development would continue to obstruct much of the Project Site. Where such views currently exist, the 54-story Marriott/Ritz tower would continue to clearly punctuate the horizon, and the mountains would be visible in the distance on a clear day. In nighttime views, the brightness of the Event Center and illuminated signage would blend with that of the existing STAPLES Center and L.A. LIVE, while the general view and brightness of the southern portion of the Project Site would appear relatively unchanged.

The Event Center may obstruct a portion of the horizon from vantage points in close proximity and/or at lower stories. This type of obstruction already occurs due to the presence of the Marriott/Ritz tower and is not unexpected in a Downtown area. Further, the Proposed Project would block a limited portion of such views and would only impact a limited number of viewpoints. In particular, views from the lower stories of the Marriott/Ritz tower may experience view obstruction. However, floors 1 through 27 of the tower comprise hotel uses which are not considered to have the same view sensitivity as residential uses due to the temporary occupancy of hotel guests, as well as the expectation that hotel stays in a highly urbanized area are likely to include views of urban development. Overall, the Proposed Project would not substantially obstruct existing views of most visual resources from private vantage points. However, as previously indicated, the removal of the West Hall would represent the loss of a recognized view, resulting in a significant impact.

## b. Cumulative Impacts

Of future development through 2017 (the Proposed Project buildout analysis year) in the surrounding area, only those projects that are sufficiently close to influence the visual character of the immediate Project area or that fall within the same viewshed as the Project Site could pose cumulative aesthetics or view effects in conjunction with the Proposed Project. These include Related Project Nos. 27, 60 and 91 located across Figueroa Street, and to a lesser extent Related Project Nos. 2, 7, 28, 34, 64 and 65 located within an

approximately two to three block radius of the Project Site to the north and east. Many of these related projects consist of infill development, and in general, would reinforce existing and emerging land use patterns (e.g., high-rise development) in the area rather than introduce new development characteristics to the Project area. Furthermore, those related projects that involve mid- to high-rise structures are primarily located in or near the Financial Core and South Park, where similar development already exists.

### *(1) Aesthetics/Visual Character*

Each related project would be analyzed on a case-by-case basis to determine its impact on aesthetics and to verify compliance with applicable regulatory standards. In particular, buildout of the LASED District as part of Related Project No. 27 would be required to adhere to standards set forth in the LASED Specific Plan and the LASED Streetscape Plan, which largely form the basis of the plans established for the Proposed Project. To the extent the related projects may involve the removal or alteration of any visual resource(s), those projects would be subject to mitigation and/or would be expected to incorporate features or elements that contribute positively to the visual environment. With respect to signage, the related projects would be expected to either comply with existing regulatory requirements or undergo review and approval by the City for modified signage rights. As it relates specifically to Related Project No. 27, based on previously granted signage rights, buildout of the LASED District could introduce new signage that is expected to be consistent with the character-defining signage that currently exists at L.A. LIVE. Overall, it is anticipated that the related projects would not substantially and adversely alter or degrade the existing visual character of the Project area or introduce elements that substantially detract from its visual character. Cumulative impacts would be less than significant.

### *(2) Views*

Due to the relatively flat topography and developed nature of the Project area, including the presence of the elevated freeways which obstruct many views, public views from street level locations are largely limited to short-range views of the immediately surrounding urban landscape (i.e., building façades, signage, roadway infrastructure, etc). Nonetheless, future development of mid- or high-rise structures may affect views from some viewing locations. In particular, views up and down Figueroa Street are likely to change due to the concentration of new development adjacent to the Project Site to the east. However, the slight bend in the roadway's alignment at Pico Boulevard is such that northerly views of Downtown from Figueroa Street south of the Project Site would still be available. Furthermore, the addition of new high-rises in the area would merely add the kind of elements to the Downtown skyline that make it a recognized view. The same would be true of views from the adjacent freeways, and in particular the portion of the SR-110 Freeway that is designated a scenic freeway in the Central City Community Plan. From

these vantage points, skyline views would not be obstructed, but rather if anything would increase as the extent of high-rise development spreads throughout the Downtown area. Accordingly, cumulative impacts on public views would be less than significant.

While private views could be affected by the introduction of intervening development, in general only those related projects consisting of high-rise buildings located directly adjacent to private viewing locations would have the potential to cause substantial obstruction of privately available long-range panoramic views. Such conditions are not anticipated to affect a substantial number of views. It is also acknowledged that the Proposed Project may be visible from future locations within many of the related projects, specifically from high-rise buildings planned to the north and east. Due to their proximity, Related Project Nos. 27, 60 and 91 located across Figueroa Street would have the greatest potential to experience view obstruction. The effect of such impacts would decrease as elevation increases (i.e., vantage points on a 20<sup>th</sup> story or higher would experience reduced view obstruction, as the Event Center would have a height comparable to that of a 20-story building). In any case, such views are not afforded protection under CEQA.

### c. Project Design Features and Mitigation Measures

#### *(1) Project Design Features*

**Project Design Feature C-1:** Temporary construction fencing shall be placed along the periphery of active construction areas to screen much of the construction activity from view at the street level.

**Project Design Feature C-2:** The Project Applicant shall monitor the Project Site for graffiti and contract with a graffiti removal company, as needed.

#### *(2) Mitigation Measures*

##### *(a) Construction Mitigation Measures*

The following mitigation measure is proposed to provide that construction-related aesthetic impacts are less than significant:

**Mitigation Measure C-1:** The Applicant shall provide through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

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*(b) Operational Mitigation Measures*

The following mitigation measures are proposed to reduce aesthetic impacts associated with Proposed Project operations to the extent feasible and to assure that specific design features would be implemented:

**Mitigation Measure C-2:** The proposed streetscape improvements shall be reviewed and approved by the City's Department of Public Works Street Tree Division prior to issuance of the first grading permit.

**Mitigation Measure C-3:** All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of Planning during the building permit process.

**Mitigation Measure C-4:** All new sidewalks along the Project Site's street frontages shall be paved with concrete, pavers, or other safe, non-slip material.

Additional relevant project design features and mitigation measures are provided in Sections IV.D.1, Natural Light (Shading), and IV.D.2, Artificial Light and Glare, of the Draft EIR.

d. Level of Significance After Mitigation

*(1) Aesthetics/Visual Character*

The majority of construction activities would result in less than significant aesthetics/visual character impacts. However, removal of the West Hall during construction would result in a significant and unavoidable impact in the event that the West Hall were to be determined eligible as a historic resource. With respect to ongoing operations, although the Proposed Project would incorporate features in the design of its architecture, outdoor plazas, signage, lighting and streetscape that build on many of the existing visual character-defining elements within and near the Project Site and support City policies and guidelines regarding design and walkability, the impact created during construction would extend to operation of the Proposed Project and would constitute a significant and unavoidable impact.

*(2) Views*

Although the Proposed Project would not substantially obstruct views of the majority of the visual resources in the Project area from most nearby vantage points, the obstruction of views of the Downtown skyline along an approximately 0.5-mile segment (roughly from

the SR-110/I-10 interchange to Chick Hearn Court) of SR-110, a designated scenic freeway, would be a significant and unavoidable impact. In addition, the removal of the West Hall would represent the loss of a visual resource, resulting in a significant and unavoidable view impact in the event that the West Hall were to be determined eligible as a historic resource.

## D.1 Natural Light (Shading)

### a. Project Impacts

Shade-sensitive uses per the *L.A. CEQA Thresholds Guide* include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. Fourteen shade-sensitive uses were identified in the area of potential impact (see Figure IV.D.1-1 in Section IV.D.1, Natural Light (Shading), of the Draft EIR). The Proposed Project would not cast any new or additional shadows on any of the identified sensitive uses during the winter solstice, summer solstice, fall equinox, or spring equinox. Therefore, significant natural light (shading) impacts would not occur.

### b. Cumulative Impacts

Eight related projects would be located within proximity of the Project Site so as to have the potential to cast shadows on the identified shade-sensitive uses. The Proposed Project would not cast any new or additional shadows on any of the identified sensitive uses during the winter solstice, summer solstice, fall equinox, or spring equinox. Thus, while the related projects may have the potential to shade some of the identified sensitive uses, there would be no potential for shadows from the related projects to combine with shadows from the Proposed Project and cumulatively create a significant shading impact. In addition, the Proposed Project would have a less than significant impact with regard to the casting of shadows onto any related projects that include a shadow-sensitive use. Therefore, cumulative natural light (shading) impacts would be less than significant.

### c. Project Design Features and Mitigation Measures

#### *(1) Project Design Features*

**Project Design Feature D.1-1:** Project building heights and massing shall substantially conform to the design guidelines and standards set forth in the proposed Convention and Event Center Specific Plan.

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(2) *Mitigation Measures*

Impacts associated with natural light (shading) would be less than significant. Therefore, no mitigation measures are required.

d. **Level of Significance After Mitigation**

Impacts associated with natural light (shading) would be less than significant.

## **D.2 Artificial Light and Glare**

a. **Project Impacts**

(1) *Construction*

The Proposed Project would request an extended hours permit to allow construction activities to occur during nighttime hours. Consequently, increased nighttime lighting effects would occur throughout the duration of Proposed Project construction. However, this effect would be temporary and would cease upon completion of construction. With implementation of the construction lighting project design feature, construction lighting contained within the bowl of the Event Center would not be visible from beyond the Project Site boundary. Conversely, construction lighting at elevations of 80 feet or higher on the Event Center (above the parking garages) would be visible from beyond the Project Site boundary. Construction lighting at this elevation would result in significant impacts to sensitive receptors located to the west and north of the Project Site. In addition, construction light sources located at grade, including safety lighting, emergency lighting or temporary supplemental lighting used for repair or construction on the Project Site by the City or government agencies, and temporary supplemental lighting provided by public agencies for the purposes of directing or navigating vehicular traffic, may cause spill light beyond the Project Site boundary. These temporary lighting sources would result in significant impacts with respect to spill light and glare. Therefore, temporary impacts from nighttime construction lighting associated with the Proposed Project would be significant.

(2) *Operation*

As shown in Figure IV.D.2-1 in Section IV.D.2, Artificial Light and Glare, of the Draft EIR, ten Receptor Locations that are representative of the surrounding uses and lighting conditions in the vicinity of the Project Site were identified. The Receptor Locations include light-sensitive land uses, as defined by the *L.A. CEQA Thresholds Guide*, as well as roadway locations where light and glare from the Proposed Project could result in adverse effects to driver visibility/distraction. Potential artificial lighting impacts include spill light at the Project Site boundary, spill light at sensitive receptors, glare, and impacts to motorists.

Illuminance values from architectural lighting and luminaires at the Project Site would not exceed 8 lux (0.7 foot-candles (fc)) at any Project Site boundary except Chick Hearn Court, which is not a significant boundary with respect to light trespass since it borders L.A. LIVE. Therefore, impacts with respect to spill light beyond the Project Site boundary would be less than significant.

During normal sky conditions, Proposed Project lighting would be subject to the following limitations: exterior light sources would not produce a light intensity exceeding 21.5 lux (2.0 fc) at the property line of any sensitive use represented by the identified Receptor Locations; illuminated signage would not produce a light intensity exceeding 32.3 lux (3.0 fc) at the property line of any sensitive use represented by the Receptor Locations; façade luminance of proposed buildings would not exceed 10 candelas per square meter ( $\text{cd}/\text{m}^2$ ) at any of the Receptor Locations; nighttime signage luminance would not exceed  $800 \text{ cd}/\text{m}^2$ ; and visible luminance would not exceed 500 footlamberts (fL) at any of the Receptor Locations located along roadways. However, when low cloud ceilings with high reflectance or albedo (+50 percent) are present, the hotel and residential uses located within the Marriot/Ritz tower (Receptor Location 8) are likely to experience lighting in excess of the spill light significance thresholds. These climatic conditions are likely to occur, in conjunction with the sports lighting being turned on, during less than five percent of the year. Nonetheless, impacts from these infrequent events are considered significant and unavoidable.

With regard to field event lighting, there may be some non-roadway locations at which the 55 Glare Rating threshold would be exceeded, namely locations that have a direct line of sight to the bank of lights proposed to light the playing field. Three of the non-roadway sensitive Receptor Locations would have direct and unimpeded views to the spectator lighting included in the Event Center. Based on this, it is anticipated that isolated locations throughout the Project Site vicinity would experience glare levels that would exceed the 55 Glare Rating threshold. This would constitute a significant glare impact.

A variety of temporary lighting installations could be used for productions and special events, including but not limited to traveling shows, concerts, and performances. The type, intensity, direction, and distribution of these temporary lights cannot be clearly identified for all types of events due to the uniqueness of each event and the myriad of different lighting configurations that could be required. With respect to special events both internal and external to the Event Center, the illuminance intensities of temporary special event lighting are unlikely to exceed most of the thresholds of significance for light impacts, with the exception of that pertaining to Project Site boundary impacts. Temporary luminaires in close proximity to the Project Site boundary would have the potential to cause spill light conditions in excess of the 8 lux threshold of significance. Additionally, temporary lighting sources would represent a possible source of glare that could result in significant

glare impacts when viewed directly by sensitive receptors beyond the Project Site boundary. Pyrotechnics would also have the potential to exceed spill light and glare thresholds, despite their temporary and intermittent nature. As such, impacts associated with special events and pyrotechnic displays would be significant with respect to the thresholds of significance for Project Site boundary impacts and glare.

Light emissions associated with the use of pyrotechnics and/or fireworks that are not contained within the Event Center (i.e., visible above the roof line) would result in significant lighting and glare impacts to proximate receptors with a line of sight to the emission source, albeit on a temporary and short-term basis. As it is anticipated that some pyrotechnic and/or firework displays would reach heights above the Event Center roofline, it is conservatively concluded that impacts from pyrotechnic events would be significant, although such impacts would be temporary and intermittent.

With regard to other light sources, including sky-tracker searchlights and headlight glare in the proposed parking garages, impacts would be less than significant with implementation of the project design features. In addition, sky glow impacts associated with the Proposed Project would be less than significant.

#### b. Cumulative Impacts

While the Proposed Project would request an extended hours permit to allow construction activities during nighttime hours, it is anticipated that construction activities associated with most, if not all, of the related projects would occur during daytime hours in accordance with LAMC Section 41.40. However, since this cannot be known with certainty and given both the proximity of some of the related projects to the Project Site and the potential for simultaneous construction activities, it is conservatively concluded that cumulative construction-related artificial light and glare impacts would be significant.

Upon completion of construction, development of the Proposed Project and the related projects would introduce new and expanded sources of artificial light in Downtown Los Angeles. Lighting from several related projects could be seen within the same fields of view as the Proposed Project, as viewed from light-sensitive uses. Consistent with the use of the Project Site as a major sports and entertainment complex and the highly urbanized nature of the surrounding area, the additional artificial light sources represented by the related projects are not anticipated to be of a sufficient magnitude to substantially alter the artificial light environment that currently exists in Downtown Los Angeles. In the event that other projects involve extensive artificial light components that could cause a cumulative impact, it is anticipated that these projects would be regulated via their respective project approval processes (including, in most cases, CEQA review) such that significant cumulative impacts would be precluded. The Proposed Project's building materials would

not generate substantial glare, and the related projects are not located sufficiently close to the Project Site such that significant cumulative glare impacts could occur. Furthermore, the related projects would be subject to LAMC regulations and other applicable regulations. Thus, cumulative artificial light impacts would be less than significant with regard to building façades, interior lighting, public plazas, parking garages, signage, sky tracker searchlights, and sky glow at all of the Receptor Locations.

As it relates specifically to spill light impacts at the Marriot/Ritz tower (Receptor Location 8) under atypical atmospheric conditions involving a low cloud ceiling with high albedo (+50 percent) concurrent with a night event at the Event Center, the potential exists for the related projects (particularly Related Project 27, located adjacent to the Marriot/Ritz tower) to increase artificial light levels near the Project Site. Such increases would have the potential to add to the Proposed Project's significant spill light impact. Therefore, cumulative spill light impacts under this atypical atmospheric condition are also considered significant and unavoidable.

With respect to glare impacts at locations that have direct and unimpeded views of the spectator lighting at the Event Center, to the extent lighting associated with any related projects would also be visible from the same locations, a significant cumulative glare impact would result.

Additionally, light and glare generated by the related projects, particularly Related Project 27 located adjacent to the Marriot/Ritz tower, would have the potential to add to the Proposed Project's significant impacts associated with temporary luminaires during special events and the temporary and intermittent use of pyrotechnics. Therefore, cumulative light and glare impacts from temporary special events and pyrotechnics are also considered significant and unavoidable.

### c. Project Design Features and Mitigation Measures

#### (1) *Project Design Features*

##### (a) *Architectural Lighting Project Design Features*

The following architectural design features and constraints shall be implemented as part of the Proposed Project to minimize lighting from proposed structures:

**Project Design Feature D.2-1: Event Center Architecture:** The Event Center architectural design includes the structure, façade, and the upper portion of the stadium structure supporting the deployable roof in the open position. The architectural design shall provide equivalent or reduced light transmissions when compared to the configurations of

material properties shown in Figure 6.1.5.1 and Figure 6.1.5.2 of the Lighting Report included as Appendix K of the Draft EIR. These transmission limits shall reduce emissions from some field event lighting (located within the bowl) and other bowl light sources.

**Project Design Feature D.2-2: Screening on Parking Garages:** Exterior screening shall be installed to minimize the spill light from luminaires within open structure buildings from reaching beyond the Project Site. The screening shall also be installed so as to minimize the views and potential glare of headlights of motor vehicles within the garage from beyond the Project Site boundary. Screening measures may include, but are not limited to, shielding attached to the luminaire, building, or site structures.

**Project Design Feature D.2-3: Building Façades:** The maximum measurable luminance of the illuminated building façade shall not exceed 40 cd/m<sup>2</sup>. Additionally, an area weighted average of field measurements shall not exceed 10 cd/m<sup>2</sup> for any single contiguous façade area greater than 7,500 square feet in area.

**Project Design Feature D.2-4:** Glass used in building façades shall be anti-reflective or treated with an anti-reflective coating in order to minimize glare.

**Project Design Feature D.2-5:** Light levels from permanent light fixtures shall not exceed 10 fc (average, horizontal at the ground) within Gilbert Lindsey Plaza.

*(b) Luminaire Project Design Features*

The following design and specification constraints for luminaires shall be implemented as part of the Proposed Project to minimize light emissions from lighting equipment:

**Project Design Feature D.2-6:** Illuminance from specified light sources shall not exceed 21.5 lux (2.0 fc) at the property line of the nearest residential property or light sensitive receptor.

**Project Design Feature D.2-7:** Luminaires illuminating the building façade with intensities greater than 10,000 candelas shall be shielded from view beyond the Project Site boundary.

**Project Design Feature D.2-8:** Luminaires not illuminating the building façade with intensities greater than 10,000 candelas shall be shielded or rated as cut-off per the Illuminating Engineering Society of North America.

**Project Design Feature D.2-9:** Luminaires within the Bond Street and L.A. Live Way Garages shall be equipped with screening measures that limit

light spill beyond the north and west sides of the garage toward to Project Site's northern and western boundaries, which are adjacent to sensitive receptors.

**Project Design Feature D.2-10:** Luminaires shall be shielded, reduced in intensity, or otherwise protected from view such that the brightness of a light source within 10 degrees from a driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except when minimum values are less than 10 fL. If minimum values are below 10 fL, the source brightness shall not exceed 500 fL plus 100 times the angle, in degrees, between the driver's line of sight and the light source.

**Project Design Feature D.2-11:** Luminaires used for field lighting within the Event Center shall be aimed, shielded, or screened from view so that the Glare Rating does not exceed 45 for motorists and vehicles operated on roadways. Prior to the issuance of the first building permit for the Event Center structure, the Event Center Applicant shall prepare a study of the Glare Ratings at all roadways that have a direct line of sight to the Event Center's Spectator Event luminaires located within a 1-mile radius of the Project Site. The lighting study shall demonstrate to the satisfaction of the City of Los Angeles Department of Building and Safety that the Event Center's design does not result in a Glare Rating above 45 at any roadway location within a 1-mile radius of the Project Site.

**Project Design Feature D.2-12:** The aiming of Sky-Tracker luminaires shall be regulated to prevent the high intensity beam from striking any building façades. Sky-Tracker luminaires shall not project light more than 25 degrees from zenith. Use of Sky-Tracker luminaires shall adhere to the aiming constraints shown diagrammatically in Figure IV.D.2-2 on page IV.D.2-22.

*(c) Illuminated Signage Project Design Features*

The following design and specification constraints for illuminated signage shall be implemented as part of the Proposed Project to minimize light emissions from illuminated signs:

**Project Design Feature D.2-13:** The measured illuminance from Proposed Project signage shall not exceed 32.3 lux (3.0 fc) at the property line of the nearest residential property or light sensitive receptor.

**Project Design Feature D.2-14:** The measured luminance from Proposed Project signage shall not exceed 800 cd/m<sup>2</sup> after sunset or before sunrise.

**Project Design Feature D.2-15:** Self-illuminated signs and/or luminaires intended to illuminate signs shall be shielded, or reduced in intensity, or

otherwise protected from view such that the brightness of a light source within 10 degrees from a driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except when minimum values are less than 10 fL. If minimum values are below 10 fL, the source brightness would not exceed 500 fL plus 100 times the angle, in degrees, between the driver's line of sight and the light source.

**Project Design Feature D.2-16:** The intensity of illuminated signage shall be controlled with a photocell with an adjustable set-point that measures available daylight. This set-point shall be used to control the intensity of the sign output to either the daytime or nighttime luminous intensity.

*(d) Construction Lighting Project Design Features*

The following project design feature shall be implemented as part of the Proposed Project to minimize light emissions from Proposed Project construction activities:

**Project Design Feature D.2-17:** Light sources associated with Proposed Project construction shall be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. However, construction lighting shall not be so limited as to compromise the safety of construction workers.

*(e) Special Event Lighting Project Design Features*

The following project design feature shall be implemented as part of the Proposed Project to minimize light emissions from special events within the Event Center:

**Project Design Feature D.2-18:** Any Sky-tracker luminaire within the Event Center that is aimed out of the open roof structure shall be aimed within 25 degrees of zenith.

In addition, the following project design feature shall be implemented as part of the Proposed Project to minimize light emissions from special events external to the Event Center:

**Project Design Feature D.2-19:** All luminaires installed on a temporary basis on the Project Site shall be aimed so that the direct beam illuminance is directed on the event activity.

In addition, the following project design feature shall be implemented as part of the Proposed Project to minimize light impacts on sensitive receptors from pyrotechnic events:

**Project Design Feature D.2-20:** The number of fireworks displays at the Event Center shall be limited to 15 times per year. Each fireworks display shall not exceed 20 minutes in duration. Isolated use of firework devices during events would also be permitted.

*(f) Interior Lighting Project Design Features*

The following project design features shall be implemented as part of the Proposed Project to minimize light emissions from interior light sources (i.e., light sources located within proposed structures):

**Project Design Feature D.2-21:** The interior lighting for the Proposed Project and associated luminances or interior surfaces shall be designed, specified, and installed so that maximum candela direct beam illuminance (from luminaires) is not directed out of the building envelope.

*(1) Mitigation Measures*

*(a) Construction Mitigation Measures*

Nighttime construction is required for the Proposed Project in order to achieve the Project Objectives. Thus, no feasible mitigation measures beyond the project design features exist to reduce Proposed Project-level and cumulative construction impacts to a less than significant level.

*(b) Operational Mitigation Measures*

To mitigate glare impacts on sensitive receptors from field event lighting equipment, the following mitigation measure shall be implemented:

To mitigate glare impacts on sensitive receptors from field event lighting equipment, the following mitigation measure shall be implemented:

**Mitigation Measure D.2-1:** Luminaires used for field lighting within the Event Center shall be aimed, shielded, or screened from view in an effort to prevent the Glare Rating from exceeding 55 at all residences that have a direct line of sight to the Event Center's Spectator Event luminaires located within a one-mile radius of the Project Site. Prior to the issuance of the first building permit for the Event Center structure, the Event Center Applicant shall prepare a study of the Glare Ratings at all such residences located as specified above to determine whether the Glare Rating at such residences from the Event Center's Spectator Event luminaires exceeds a Glare Rating of

55. For those residences located as specified above that exceed a Glare Rating of 55, the Event Center Applicant shall offer to install, at the Event Center Applicant's expense, window coverings that reduce the Glare Rating to a level of 55 or below.

To mitigate light emissions from special events within the Event Center, the following mitigation measure shall be implemented:

**Mitigation Measure D.2-2:** As part of the building approval process, the Event Center Applicant shall submit a lighting plan to the satisfaction of the Director of Planning. The lighting plan shall include the following:

- the location(s) of Sky-tracker searchlights; and
- the locations of architectural lighting, as that type of lighting is defined in the Proposed Convention and Event Center Specific Plan.

To mitigate light emissions from signage visible from the freeway, the following mitigation measure shall be implemented:

**Mitigation Measure D.2-3:** The Director of Planning shall have the authority to limit the refresh rate on any Animated Sign or Electronic Message Display Sign visible from the freeway to refresh no more frequently than once every four seconds, with an interval between messages of not less than one second, and with an unchanged intensity of illumination.

**Mitigation Measure D.2-4:** The Applicants' lighting design expert shall implement the following protocol to confirm compliance with all City Code requirements and lighting regulations (including without limitation, LAMC Section 93.0117 and the requirements of the Signage Supplemental Use District) and the lighting mitigation measures (including Project Design Feature D.2-3, D.2-5 through D.2-8, D.2-10, D.2-13 through D.2-15). The results of the foregoing testing shall be provided to the Los Angeles Department of Building and Safety (and copied to the Department of City Planning) immediately prior to initial signage operation, and immediately prior to initial stadium operation, with a follow-up compliance test to be performed 12 months after certificate of occupancy.

- A representative testing site shall be established on or next to those light-sensitive receptors which have the greatest exposure to signage and stadium lighting on each of the façades of the Proposed Project.

- A light meter mounted to a tripod at eye level, facing the Proposed Project buildings, shall be calibrated and measurements shall be taken to determine ambient light levels with the signage on, and when the stadium is in operation.
- An opaque object (e.g., a board) shall also be used to block out the view of the sign, and the stadium, from the light meter, at a distance of at least 4 feet away from the tripod and blocking the light meter's view of the building. A reading shall be taken to determine the ambient light levels with the sign off.
- The difference between the ambient light levels with the signage being illuminated, and with the signage being off, would be the amount of light the signage casts onto the sensitive receptor.
- The difference between the ambient light levels when the stadium is in operation and when it is not in operation would be the amount of light the stadium casts onto the sensitive receptor.
- An alternative method to measure light levels would be to use the same tripod and same light meter, but to turn on and off the signage, and to turn the stadium lighting on and off. This method takes more coordination, but is more accurate.

In addition, if at any time the Los Angeles Department of Building and Safety has good cause to believe the Proposed Project's signage lighting is not in compliance with the Los Angeles Municipal Code, regulations or mitigation measures, the Los Angeles Department of Building and Safety may request the protocol be implemented to determine compliance, at the expense of the Applicants. If the testing determines that the signage, or the stadium lighting, is not in compliance with the Los Angeles Municipal Code, regulations, mitigation measures, or project design features, the Applicants shall adjust the signage and/or lighting to bring it into compliance immediately.

#### d. Level of Significance After Mitigation

Proposed Project and cumulative glare impacts associated with daytime construction activities would be less than significant, as would operational impacts related to the use of skytrackers, illuminated signage, driver visibility/distraction, building/façade lighting, plaza lighting, headlights within the parking garages, daytime glare, and sky glow. With implementation of the proposed project design features and the mitigation measures identified above, Proposed Project and cumulative lighting impacts would also be less than significant with regard to light trespass and lighting levels at the analyzed Receptor Locations (from both architectural and signage lighting sources).

Mitigation Measure D.2-1 would reduce potentially significant impacts with respect to Event Center lighting used to light the playing field. However, it may not be possible to achieve a Glare Rating of 55 or less at all locations, and it is possible that some locations would not elect to have window coverings installed. For those locations where the Glare Rating exceeds 55 that do not elect to have window coverings installed, artificial lighting impacts would be significant and unavoidable during those times when the Event Center's luminaires are in use. Therefore, impacts due to spectator event lighting at the Event Center are conservatively considered to be significant and unavoidable.

Project-level and cumulative lighting impacts would be significant during nighttime construction, as well as during Proposed Project operations in association with special event lighting, pyrotechnics, and unusual atmospheric conditions. Construction lighting impacts would only be significant when Event Center construction lighting occurs at elevations of 80 feet or higher (i.e., above the proposed parking garages), as viewed from locations to the west and north of the Event Center. Nighttime construction cannot be avoided in order to complete the Proposed Project within the timeframe identified in the Project Objectives.

With respect to temporary lighting associated with productions and special events, it is not possible to identify specific mitigation measures due to the unique lighting requirements of each event and the different lighting configurations that could be required. As such, no feasible mitigation measures beyond the project design features exist that could reduce this impact to a less than significant level. It is conservatively concluded that significant and unavoidable Proposed Project and cumulative lighting impacts would occur with respect to temporary lighting during productions and special events.

Light impacts related to pyrotechnic and firework events could only be reduced by eliminating such events. However, such features are integral to the fan experience associated with the Event Center, as set forth in the Project Objectives. As such, no feasible mitigation measures exist that could reduce this impact to a less than significant level, and this impact would be significant and unavoidable.

Significant spill light impacts would also occur at Receptor Location 8 when low cloud ceilings with high albedo (+50 percent) are present in conjunction with the sports lighting being used. These specific conditions are likely to occur during less than five percent of the year. No feasible mitigation measures have been identified that could reduce this impact to a less than significant level during these infrequent weather events. Therefore, this impact would be significant and unavoidable.

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## E. Noise

### a. Environmental Impacts

#### *(1) Construction*

To determine the overall noise impacts from Proposed Project construction, an evaluation of the potential composite noise level increase due to the Proposed Project construction was conducted. As determined by this analysis, the highest on-site construction noise would occur during the foundation phase for the Bond Street Garage, the New Hall and the Event Center construction and during the concrete/steel/precast framing phase for the L.A. Live Way Garage construction.

The maximum increase in ambient noise levels at all receptor locations due to the Bond Street Garage construction would be below the significance threshold for construction occurring during the daytime hours with the exception of receptor R26. However, the estimated composite construction noise levels would exceed the late evening significance thresholds at off-site receptors R4, R5, R6, and R26, which would result in significant impacts.

In addition, the composite construction noise due to the New Hall construction would exceed the daytime significance thresholds at receptors R1, R3, R5, R6, and R26 and additional receptors during the late evening hours (R1, R3, R4, R5, R6, R7, R21, R23, R25, and R26). Therefore, the composite construction impacts due to the New Hall construction would be significant during the daytime and late evening hours.

The estimated composite construction noise levels for construction of the L.A. Live Way Garage would be below the daytime significance thresholds at all off-site noise-sensitive receptors except for R6. During the late evening hours the composite construction noise levels would exceed the late evening significance threshold at the following additional off-site receptors: R5, R6, and R7. As such, the composite construction noise impacts associated with the L.A. Live Way Garage would be significant during the daytime and late evening hours.

The composite construction noise levels at the off-site noise sensitive receptors attributable to the Event Center would be less than significant for daytime hours with the exception of Receptors R1, R5, R6, and R7. During the late evening hours the composite construction noise levels would exceed the late evening significance threshold at the following additional off-site receptors: R1, R3, R4, R5, R6, R7, R8, R21, R23, and R25. As such, the composite construction noise impacts associated with the Event Center would be significant during the daytime and late evening hours.

Composite noise levels due to overlapping construction activities would exceed the daytime significance threshold at receptors R1, R3, R4, R5, R6, R7, R9, and R26. During the late evening hours, the overlapping construction activities would exceed the significance threshold at receptors R1 through R8, R16, R20, R21, R22, R23, R25, and R26.

Construction activities that would occur within the Project Site, particularly during demolition, grading, excavation, and foundation would also have the potential to generate ground-borne vibration. Construction vibration impacts were analyzed in terms of damage to existing structures and impacts with regard to human annoyance. In terms of building damage to off-site receptors, a less than significant impact would occur at all of the identified off-site sensitive receptors during construction. However, vibration impacts would be potentially significant with respect to human annoyance.

## *(2) Operations*

Project operations would require building mechanical equipment, including indoor air handling units, outdoor cooling towers, chillers, and exhaust-air fans to support the intended functions of the Project. The Project's major building mechanical equipment, including chillers and pumps, would be placed inside a dedicated central plant. Cooling towers and exhaust air fans would be located outside of the building. The noise levels generated by the new central plants and exhaust fans would be below the stated significance thresholds for both daytime and nighttime hours. As such, noise impacts associated with building mechanical equipment operations would be less than significant.

The Project includes two new parking garages, the Bond Street Garage, which would replace the existing Bond Street surface parking lot, and the L.A. Live Way Garage, which would replace the existing Cherry Street Garage. Various noise events would occur periodically from the parking facilities including activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals. The estimated maximum noise levels generated by the proposed parking garages would be below the significance threshold during the daytime hours (7 A.M. to 10 P.M.) at all off-site receptors, except for receptors R5 and R6. The estimated noise levels from the parking operations would exceed the late evening significance threshold at sensitive receptors R4, R5, R6, R7, R23, and R25. Therefore, noise impacts associated with the proposed Parking Garage operations would be potentially significant at these locations.

The Project includes three loading dock areas, one for the Event Center, one for the New Hall, and one involving an expansion to the existing South Hall loading dock. The refuse collection (i.e., trash compactors) for the Event Center and New Hall would be located at the loading dock areas. The noise levels generated by the loading dock and

refuse collection operations would be below the significance thresholds for both daytime and nighttime hours. As such, noise impacts associated with loading dock and refuse collection operations would be less than significant.

The existing bus loading areas at the Gilbert Lindsay Plaza would be relocated to a new area along the Pico Passage (under the New Hall). It is anticipated that there would be up to 20 buses loading/unloading along the Pico Passage at any given time. Noise levels generated by bus operations would be below the significance thresholds for both daytime and nighttime hours. As such, noise impacts associated with bus operations would be less than significant.

Gilbert Lindsay Plaza, Event Center Plaza, and L.A. Live Way Plaza all provide outdoor gathering places for visitors to the Event Center and would be used during the Pre-Event and Post-Event hours. The estimated noise levels from the outdoor plazas at the off-site sensitive receptors would exceed the daytime significance threshold at R1, R2, R3 and R13. The estimated outdoor plazas noise levels would exceed the nighttime significance threshold at receptors R1, R2, R3, R13, and R14. Therefore, impacts associated with the outdoor plazas would be potentially significant at these locations.

Sound levels from the in-house sound system used during the sports event would exceed the daytime significance thresholds at receptors R1, R3, R5, R6, and R9. In addition, the crowd cheering noise levels would exceed the daytime significance thresholds at receptors R1, R5, R6, R7, and R8. At other receptors, both the sound system and crowd related noise levels would be below the daytime significance threshold. When compared with the nighttime significance threshold, the in-house sound system would exceed the nighttime significance threshold at receptors R1, R3, R5 through R9, R14, R21, R23, and R25. The crowd cheering noise levels would exceed the nighttime significance thresholds at receptors R1, R5 through R9, R13, R23, R24, and R25. Therefore, noise levels associated with a sports event at the Event Center would result in potentially significant impacts at these locations.

In addition, it is estimated that sound levels from the concert touring sound system (at the Event Center) would exceed the daytime significance thresholds at receptors R1, R3 through R9, R17, R21, R22, R23, R25, and R26. When compared with the late evening hours, the sound levels from the concert touring sound system would exceed the significance thresholds at receptors R1 through R10, R14, R15, R17, and R21 through R26. Crowd noise levels are estimated to be similar to those of the sports event, which would exceed the significance thresholds at receptors R1, R5, R6, R7, R8, R9, R13, R23, R24, and R25. As such, noise impacts associated with the music concert event at the Event Center would be potentially significant at these locations.

It is anticipated that there would be up to 15 firework displays annually associated with events occurring at the Event Center. Isolated use of firework devices during events would also occur from time to time. The firework noise levels would exceed the stated significance threshold at all off-site receptors and would result in temporary and intermittent but significant impacts.

Future roadway noise levels were calculated along 81 off-site roadway segments in the vicinity of the Project Site. The roadway segments selected for the noise analysis were based the proximity to noise sensitive uses along the roadway segments and with the most increases in traffic volume from the proposed Project, to represent the worst case conditions. Roadway noise levels would be less than significant on most segments for all analysis scenarios (Proposed Project and Proposed Project with Convention Center Dark), event days (Sunday, Saturday, and weekday), and time periods, with the exception of five roadway segments: Grand Avenue—between 17th Street and Washington Avenue; West 11th Street—between Blaine Street and L.A. Live Way; West 39th Street—east of I-110 Freeway; West 18th Street—West of Grand Avenue; and West 18th Street—West of Flower Street.

As described in the Project's Transportation Study, it is estimated that 20 percent of the Event Center's patrons would use public transit on a weekday and 15 percent would use public transit on a weekend. The estimated increase in noise from the transit operations during the Pre-Event hour would be below the significance threshold. In addition, any increase in noise from the Red Line during the Weekday Post-Event hour would be contained within the underground subway structure. Thus, significant noise impacts would not be expected from the increase in the number of cars for the Red Line. Moreover, any increase in noise from the Green Line would not be significant as there are no sensitive receptors near the Green Line. Therefore, noise impacts from the increase in the Green Line operation would be less than significant. Additionally, the estimated noise level from the operation of buses along the Silver Line would be lower than the existing ambient noise levels along the bus line. Conversely, the Blue Line would result in a noise level increase that would exceed the stated significance threshold and result in a significant impact.

Although not operated by the Project Applicants, it is anticipated that there would be media helicopters flying near the Event Center for news or event coverage. The noise levels from media helicopters to the nearby noise sensitive receptors are expected to be similar to existing conditions; however, it is anticipated that the number of media helicopters would increase due to the events at the Event Center. Therefore, although helicopter noise would be temporary in nature, it would exceed the ambient noise levels at all nearby noise sensitive receptors on a temporary and intermittent basis, which would

exceed the stated significance threshold. Therefore, noise impacts associated with media helicopters would be considered significant.

In addition to the above analysis, an evaluation of composite noise levels, including all Project-related noise sources plus the existing ambient level, was conducted to identify the overall potential Project-related noise level increase that may occur at studied noise-sensitive receptor locations during Project operations. Specifically, during a typical event day without a fireworks show, the Proposed Project's composite noise impacts would be below the significance threshold at all off-site noise-sensitive receptors, except for receptors R1, R2, R3, R13, and R23. The increase in ambient noise levels at receptor R23 would be below the significance threshold, which would not result in a significant impact. However, the increase in ambient noise levels at receptors R1, R2, R3, and R13 would be above the significance threshold. Therefore, the composite noise level impacts due to the Project would be significant at four receptor locations for typical event days without a fireworks show. In addition, the Proposed Project's composite noise impacts during a typical event day with a fireworks show would exceed the significance threshold at receptors R1 through R9, R11, R13, R14, R16, R17, and R19 through R26. Therefore, the composite operation noise levels would result in potentially significant impacts at these locations.

#### b. Cumulative Impacts

Noise from construction activities for two projects within 1,000 feet of each other could contribute to a cumulative noise impact for receptors located between the two construction sites or near the construction sites if the construction sites are close together. While the majority of the related projects are located farther than 1,000 feet from the Project Site, four related projects (Related Project Nos. 27, 60, 64, and 91) are within 1,000 feet of the Proposed Project construction areas. Concurrent construction activities from the nearby related projects would generate noise at each site and cumulative construction noise could exceed ambient noise levels at the nearest noise sensitive uses between the Proposed Project and the related project sites.

If construction of Related Project No. 27 was to occur concurrently with the Project construction, the construction noise from the Related Project No. 27 and the Proposed Project could together contribute to a cumulative impact on the nearby noise sensitive receptors R1 and R10. If construction of Related Project No. 60 and Related Project No. 91 were to occur concurrently with Proposed Project construction, the construction noise from these related projects and the Proposed Project could together contribute to a significant cumulative impact on noise sensitive receptors R2 and R3. In addition, if construction of Related Project No. 64 were to occur concurrently with Project construction, the construction noise from Related Project No. 64 and the Proposed Project could

together contribute to a significant cumulative impact on noise-sensitive receptors R13 and R14. However, as with the Project, construction-related noise levels from the related projects would be intermittent and temporary. Additionally, noise associated with cumulative construction activities would be reduced through proposed mitigation measures for each individual related project and through compliance with locally adopted and enforced noise ordinances. Nonetheless, if construction of the nearest related projects were to occur concurrently with the Proposed Project's construction, the Proposed Project's contribution to cumulative construction related noise impacts could be considerable and would thus represent a significant cumulative impact.

In addition to on-site construction activities, noise from off-site construction haul/deliver trucks could contribute to the cumulative noise impacts. However, it is anticipated that due to the size and locations of the related projects, construction management plans would be prepared and submitted to LADOT for approval. Notwithstanding, if construction trucks from the related projects were to travel on the same routes and within the same hours as the Proposed Project, the Proposed Project's contribution to cumulative off-site construction related truck traffic noise impacts could be considerable and would thus represent a significant cumulative impact.

Due to the rapid attenuation characteristics of ground-borne vibration, there is no potential for a cumulative construction impact with respect to building damages from the ground-borne vibration. However, ground-borne vibration from heavy construction equipment, such as impact pile drivers and vibratory rollers, could impact nearby vibration-sensitive uses (i.e., residential uses or the Nokia Theater), if used within 320 feet of this vibration sensitive use. Although there could be construction equipment operating at a related project site and the Project Site, the vibration levels from each piece of construction equipment would likely not be additive (in terms of the maximum levels), due to the rapid rate that vibration levels attenuate and the likelihood of multiple pieces of equipment impacting the ground surface with the same vibration characteristics (i.e., frequency and amplitude) and at the same time. Therefore, cumulative construction impacts with respect to vibration sensitive uses would be less than significant.

Once developed, the Project along with overall development in the surrounding area would generate noise that would contribute to cumulative noise from a number of community noise sources, including vehicle travel and mechanical equipment. Noise levels from stationary sources, such as outdoor air-conditioning equipment, would be less than significant at the property line for each related project due to the City's exterior noise limits. However, since noise from the Proposed Project's on-site stationary-sources would potentially result in significant impacts and there are related projects within 500 feet of the Project Site (Related Project Nos. 60 and No. 91), on-site stationary-sources noise impacts attributable to cumulative development of the related projects and the Proposed Project

would potentially result in significant impacts at noise-sensitive receptors located between the Project Site and these related projects.

The Project and other related development in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. Significant cumulative noise impacts would occur at 11 analyzed roadway segments for the Sunday scenario, along 18th Street (west of Grand Avenue). For the Saturday scenario, significant cumulative noise impacts would occur at eight roadway segments, along 11th Street (west of Grand Avenue). In addition, during the Weekday scenario, significant cumulative noise impacts would occur at 12 roadway segments, along Grand Avenue (between 17th Street and Washington Avenue). Therefore, cumulative traffic from the Proposed Project and the related projects would result in significant cumulative noise impacts.

### c. Project Design Features and Mitigation Measures

#### (1) *Project Design Features*

##### (a) *Construction*

**Project Design Feature E-1:** Project construction shall utilize drilled piles during the late evening hours (between 9 P.M. and 12 A.M.), in order to reduce potential construction noise and vibration impacts.

**Project Design Feature E-2:** Project contractor shall equip all construction equipment used at the Project Site with properly operated and maintained, commercially available noise shielding and/or muffling devices that are consistent with the manufacturer's standards.

##### (b) *Operation*

**Project Design Feature E-3:** The Event Center in-house sound system would utilize a distributed speakers system capable of aiming the sound toward the seating areas, to minimize sound spillage to the exterior of the Event Center.

**Project Design Feature E-4:** Building mechanical/electrical equipment shall be designed to meet the noise limit requirements of LAMC, Chapter XI, Section 112.02.

**Project Design Feature E-5:** Loading dock and trash/recycling areas for the Event Center and STAPLES Center shall be located in the subterranean level, which shall preclude noise from this source at exterior locations.

**Project Design Feature E-6:** All rooftop mechanical equipment shall be enclosed or screened from view with appropriate screening walls.

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(2) *Mitigation Measures*

(a) *Construction*

Project construction-related noise has the potential to result in significant impacts. Thus, the following measures are recommended to reduce the construction-related noise impact.

**Mitigation Measure E-1:** A temporary, continuous and impermeable noise barrier shall be provided as follows:

- A) During the Event Center construction, a noise barrier wall providing a minimum 5 dBA noise reduction at the first-floor level shall be erected along the Project northern boundary along the Project northern boundary between the Event Center construction area and Receptor R1 (Ritz Hotel and Residences and Marriott Hotel at L.A. LIVE).
- B) During construction of the New Hall, a noise barrier wall providing a minimum 7 dBA noise reduction shall be erected between the New Hall construction area and off-site noise sensitive receptor R26 (southern boundary of New Hall construction area).
- C) During construction of the Pico Station Second Platform, a noise barrier wall providing a minimum 11 dBA noise reduction shall be erected between the Pico Station Second Platform construction area and off-site noise sensitive receptors R2 and R3, along Pico Boulevard (southern construction area boundary) and a portion of Flower Street (extending approximately 100 feet from Pico Boulevard).

**Mitigation Measure E-2:** Power construction equipment shall be equipped with noise shielding and muffling devices. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

**Mitigation Measure E-3:** Stationary source construction equipment that may have a flexible specific location on-site (e.g., generators and compressors) shall be located so as to maintain the greatest distance from sensitive land uses and unnecessary idling of equipment shall be prohibited.

**Mitigation Measure E-4:** Engine idling from construction equipment such as bulldozers and haul trucks shall be limited. Idling of haul trucks shall be limited to five (5) minutes at any given location as established by the South Coast Air Quality Management District.

**Mitigation Measure E-5:** The use of vibratory rollers within 150 feet, or impact pile driving within 320 feet, of the Nokia Theatre shall be limited to time

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periods that do not coincide with events occurring at the Nokia Theatre.

**Mitigation Measure E-6:** The use of impact pile drivers within 320 feet of the Nokia Theater shall be coordinated with the Nokia Theatre to avoid conflicts.

#### d. Level of Significance After Mitigation

##### *(1) Construction*

Implementation of Mitigation Measure J-1 would reduce construction-related noise at receptor R1, R2, R3, and R26. In addition, the recommended noise barriers would reduce noise impacts at R2, R3 and R26 to a less than significant level. However, the temporary construction noise barrier would only be effective in reducing the construction noise impacts at the ground level. It would not be technically feasible to construct a noise barrier that would effectively reduce the construction-related noise to the upper floors of the Ritz Hotel and Residences and Marriott Hotel (Receptor R1). As noise sensitive receptors R4, R5, R6, R7 and R23 are located west of the elevated I-110 Freeway and are therefore shielded from the Project Site by the intervening freeway structure, it would not be technically feasible to construct a noise barrier that would provide additional noise reduction to the receptors west of the I-110 Freeway. Noise level reductions attributable to Mitigation Measures J-2 and J-3, although not easily quantifiable, would also provide that the noise impacts associated with construction activities would be reduced to the extent practicable. Implementation of Mitigation Measure J-4 would further limit the noise generated by hauling trucks idling at the staging areas. Vibration impacts at the Nokia Theatre associated with the use of impact pile driver and vibratory roller for the Event Center construction would be reduced to a less than significant level. Implementation of all described mitigation measures would reduce noise impacts associated with Proposed Project construction activities to the extent feasible; however, such impacts would remain significant and unavoidable.

As previously discussed, if the identified related projects were to occur concurrently with the Project's construction, cumulative construction noise impacts could be significant. Noise impacts would be reduced through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Therefore, the noise impacts generated by the construction activities for each of the related projects would likely be reduced, but given the dense urban environment found within the Project area, impacts of the related projects are likely to be significant and, thus, cumulative impacts would remain significant.

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## *(2) Operations*

Implementation of Proposed Project design features would provide that the on-site building mechanical equipment, bus loading at the Pico Passage, and loading docks would not result in any significant noise impacts to off-site noise sensitive receptors during long-term Project operations.

There are no feasible mitigation measures to reduce the outdoor amplified sound system or crowd cheering noise to a less than significant level. Noise mitigation in the form of barriers would reduce the potential noise impacts from the outdoor plazas to the off-site sensitive receptors. However, the noise barriers would be constructed along the Project Site to block the line-of-site between the sound sources and the off-site receptors, which would not be feasible with respect to architectural/functional design of the outdoor plazas. Other mitigation measures, such as limiting the sound levels from the outdoor amplified sound system, would preclude creating the environment required pursuant to the Project objectives. Therefore, noise impacts associated with the outdoor plazas would be significant and unavoidable.

There are no feasible mitigation measures that would reduce the impacts from the Event Center operations to a less than significant level. Mitigation measures in the form of specifications to limit the in-house sound system (to reduce the impacts associated with the sound-system) or fully enclosing the stadium with a solid roof structure (to reduce both crowd and sound system noise) would not be feasible for the following reasons: (a) enclosing the stadium with a solid roof would not meet the basic Project objective of developing an Event Center with an open roof design that takes advantage of the Southern California climate; and (b) limiting the sound levels from the sound system would not allow for the intended operation of the Event Center for sporting events and concerts pursuant to the Project objectives. Therefore, noise impacts associated with Event Center operations would be significant and unavoidable.

There are no feasible mitigation measures that would reduce impacts associated with the parking garage and firework displays to a less than significant level. Impacts related to fireworks displays would be limited (up to 15 displays per year with isolated use of firework devices during events) and of short duration (up to 20 minutes per display show) but would still be significant and unavoidable.

Mitigation measures such as the construction of noise barrier walls to reduce the off-site traffic noise impacts would not be feasible as the barriers would obstruct access to private property. In addition, construction of noise barriers to reduce the impacts along the Metro Lines would be not feasible, as the Applicants have no control over the properties adjacent to the lines. There are no feasible mitigation measures to reduce the media

helicopter noise to a less than significant level since the Applicants do not control the operation of media helicopters in the area. As such, noise impacts from Project operations would be significant and unavoidable.

## F.1 Air Quality

### a. Project Impacts

#### (1) Construction

Construction of the Proposed Project has the potential to create air quality impacts through the use of heavy-duty construction equipment, deliveries of construction materials to the Project Site, the hauling off of dirt and/or construction debris, and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition, site grading/excavation, and construction activities. Mobile source emissions, primarily nitrogen oxides ( $\text{NO}_x$ ), would result from the use of construction equipment such as excavators, loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Daily emissions of particulate matter less than 10 microns in diameter ( $\text{PM}_{10}$ ), particulate matter less than 2.5 microns in diameter ( $\text{PM}_{2.5}$ ), and sulfur oxides ( $\text{SO}_x$ ) would be considered less than significant, as the estimated regional emissions for these pollutants would fall below their respective SCAQMD significance thresholds. However, daily emissions of VOC, CO, and  $\text{NO}_x$  would exceed the regional construction significance thresholds. As such, regional construction impacts associated with VOC, CO and  $\text{NO}_x$  emissions would be potentially significant before mitigation.

The conservative estimate of maximum on-site daily emissions for  $\text{NO}_x$ ,  $\text{PM}_{10}$ ,  $\text{PM}_{2.5}$ , and CO was compiled for each phase of construction and compared to the applicable SCAQMD screening threshold. Maximum localized construction emissions for off-site sensitive receptors would not exceed the localized screening thresholds for CO. However, localized  $\text{NO}_x$ ,  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$  emissions would exceed the applicable screening-level Localized Significance Thresholds (LSTs). Therefore, the localized effects from the on-site construction emissions of  $\text{NO}_x$ ,  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$  would be potentially significant before mitigation.

The greatest potential for toxic air contaminant (TAC) emissions during Proposed Project construction would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. Although the SCAQMD CEQA guidance document does not recommend a health risk assessment for short-term construction emissions, an assessment of diesel particulate emissions was conducted to assess this potential risk. The results of this analysis for the construction of the Proposed

Project yield a maximum incremental increase in off-site individual cancer risk of 3.1 in a million over the duration of construction and an excess cancer burden of less than 0.1, where the maximum impact occurs at residential uses north of the Project Site. The cancer risk would increase at this receptor to 5.2 in a million for the maximum incremental increase in off-site individual child cancer risk. The excess cancer burden was also less than 0.1. The chronic hazard index would be approximately 0.06 and 0.05 for adult and child exposure, respectively, and would be less than the SCAQMD significance threshold of 1.0.<sup>9</sup> As the Proposed Project would not emit carcinogenic or toxic air contaminants that individually or collectively exceed the maximum individual cancer risk of 10 in one million or result in an excess cancer burden of 0.5 or more, Project-related toxic emission impacts from construction activities would be less than significant.

During the Project's construction phase, activities associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes, and roofing may produce discernible odors typical of most construction sites. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents to further reduce the potential for odiferous emissions. Therefore, impacts associated with objectionable odors during Project construction would be less than significant

## *(2) Operational Impacts*

Regional air pollutant emissions associated with Proposed Project operations would be generated by future facility operations (e.g., boilers, maintenance equipment, generators, paint booths, charbroilers, cooling towers, and the use of consumer products), consumption of electricity and natural gas, additional transit operations, and by the operation of on-road vehicles. Since it is not possible to isolate where electricity is produced, these emissions are conservatively considered to occur within the South Coast Air Basin (Air Basin) and to be regional in nature. Regional emissions resulting from operation of the Proposed Project are expected to exceed the SCAQMD thresholds for NO<sub>x</sub>, VOC, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. Air quality impacts from Project operational emissions would be significant.

A CO hotspot analysis was conducted consistent with SCAQMD recommend methodology for intersections where the project causes the level of service at a study intersection to worsen from C to D, or a project increases the volume-to-capacity ratio at any intersection rated D or worse by 2 percent or more. All intersection meeting these

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<sup>9</sup> *Please note that diesel particulate matter does not have an acute exposure endpoint and, therefore, the SCAQMD acute index threshold of 1.0 is not applicable.*

criteria were analyzed and determined not to cause any new or exacerbate any existing CO hotspots.

Localized operational Project emissions would result from on-site stationary sources, area sources (e.g., loading dock operations), on-site idling at the parking structures and passenger loading/unloading areas, and vehicles entering the freeway network and arterial streets. Although the Project site exceeds five acres, it was conservatively assumed that all on-site emissions would occur within a five-acre area. This approach is recommended by SCAQMD for a screening-level analysis and would over-predict potential localized impacts (i.e., more pollutant emissions occurring within a smaller area and within closer proximity to potential sensitive receptors). Maximum localized operational emissions for off-site sensitive receptors would not exceed the localized screening threshold for CO or PM<sub>10</sub>. Due to concern expressed from the public during scoping meetings regarding emissions from increased traffic and particularly the freeway, Project-related traffic within one-quarter of a mile along arterial streets, freeways and on-/off-ramps was included in the localized analysis. The SCAQMD recommends a radius distance of one-quarter mile for analyzing potential impacts to proposed residential uses from existing freeways and, therefore, this distance was used as an appropriate distance to address potential impacts to nearby sensitive receptors from additional traffic on arterial streets and the freeway system. Because PM<sub>10</sub> emissions would not exceed the SCAQMD LSTs, detailed dispersion modeling would not normally be performed for this pollutant. However, it was determined that if PM<sub>10</sub> emissions from Project-generated traffic along the freeway system within one-quarter mile of the Project Site were included in the screening level analysis, dispersion modeling would be warranted. Therefore, the localized effects from the on-site operational emissions of NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> were analyzed using the EPA's preferred regulatory Gaussian Plume Air Dispersion Model (AERMOD).

The dispersion modeling results for NO<sub>2</sub> concentrations revealed that the maximum residential receptor would represent the worst-case impacts. A maximum hourly state NO<sub>2</sub> incremental concentration of 182.7 micrograms per cubic meter (µg/m<sup>3</sup>) and a maximum hourly federal NO<sub>2</sub> incremental concentration of 132.5 µg/m<sup>3</sup> are predicted to occur at the residential uses to the west of the Project Site in close proximity to the I-110 Blaine Street off-ramp, and a maximum annual federal NO<sub>2</sub> incremental concentration of 1.7 µg/m<sup>3</sup>, is predicted to occur at the same location. These concentrations would exceed their respective state and federal thresholds. Therefore, with respect to localized emissions from operational activities, NO<sub>x</sub> impacts would be significant before mitigation.

The dispersion modeling results for PM<sub>10</sub> and PM<sub>2.5</sub> revealed that the maximum residential receptor would represent the worst-case impacts. The maximum 24-hour PM<sub>10</sub> incremental concentration of 3.31 µg/m<sup>3</sup> was predicted to occur at the residential uses to the west of the Project Site near the I-110 Blaine Street off-ramp and would exceed the

significance threshold of  $2.5 \mu\text{g}/\text{m}^3$ . Please note that this exceedance was predicted to occur under the weekday scenario and that potential  $\text{PM}_{10}$  24-hour impacts under both the Saturday and Sunday scenarios resulted in less than significant localized  $\text{PM}_{10}$  impacts. Potential localized 24-hour weekday  $\text{PM}_{10}$  impacts (Project Event Day versus No Project-Event Day) could encompass sensitive land uses within the area bounded by Blaine Street off-ramp to the north, east of Blaine Street, north of West 11<sup>th</sup> Street, and west of I-110. The predominant source of  $\text{PM}_{10}$  impacts would be from Project-related traffic accessing the freeway system. Therefore, with respect to localized emissions from operational activities, 24-hour  $\text{PM}_{10}$  as well as 1-hour and annual  $\text{NO}_2$  impacts would be significant. The maximum 24-hour  $\text{PM}_{2.5}$  and annual  $\text{PM}_{10}$  concentrations would not exceed the localized significance thresholds.

The primary sources of potential air toxics associated with Proposed Project operations include diesel particulate matter (DPM) from on-site idling of diesel delivery trucks at loading docks, emergency backup generators, and charbroilers. The SCAQMD recommends that health risk assessments be conducted for substantial sources of DPM (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.<sup>10</sup> The CARB siting guidelines define a warehouse as having more than 100 truck trips or 40 refrigerated truck trips per day and recommend siting such facilities at least 1,000 feet away from sensitive land uses. While the closest sensitive receptor is located within 300 feet of the closest existing loading dock and 750 feet from the closest proposed loading dock, the Proposed Project is only expected to add 35 daily truck trips to existing conditions for a total of 71 truck trips per day, of which approximately 10 percent would be refrigerated trucks. Based on SCAQMD guidance, the Proposed Project would not be considered a substantial source of DPM warranting a refined health risk assessment (HRA). However, to be conservative a refined HRA was conducted for the Proposed Project which includes both on-site sources as well as mobile sources on freeways and arterials within one-quarter of the Project Site.

The results of the HRA indicate a maximum off-site incremental individual cancer risk of 4.7 in a million at the residences located to the north of the Project Site and an excess cancer burden of less than 0.1. The maximum chronic and acute risk occurs within this same area. The maximum incremental chronic and acute risk is 0.07 and 0.20, respectively. DPM was the predominate TAC, and the diesel emergency generators were the predominant TAC source. As the Proposed Project would not emit carcinogenic or toxic air contaminants that result in impacts which exceed the maximum individual cancer

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<sup>10</sup> SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, August 2003.

risk of 10 in one million, an excess cancer burden of 0.5, or the chronic or acute index of 1.0, Project-related toxic emission impacts would be less than significant.

The Proposed Project would not include any uses identified by the SCAQMD as being associated with odors. As the proposed uses would not be a source of odors, odor impacts would be less than significant.

The determination of AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Air Basin. Project development would not have a significant long-term impact on the region's ability to meet state and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of the significant emissions of CO, VOC, PM<sub>10</sub>, PM<sub>2.5</sub>, and NO<sub>x</sub>. Also, the Proposed Project would be consistent with the goals and policies of the AQMP for control of fugitive dust. The Proposed Project's long-term influence would also be consistent with the goals and policies of the AQMP and, therefore, the Proposed Project is considered consistent with the SCAQMD's AQMP.

### *(3) Concurrent Construction and Operational Impacts*

As portions of the Project Site would be completed and operational while construction of later Project components continues, concurrent construction and operational impacts were evaluated. Based on a review of the Project components, it was determined that the maximum concurrent emissions could potentially occur during excavation for the Event Center and completion of the New Hall. Concurrent construction and operational regional emissions of VOC, NO<sub>x</sub>, and CO would exceed SCAQMD regional thresholds. Additionally, concurrent construction and operational localized emissions of NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> would exceed their respective localized thresholds prior to implementation of mitigation measures.

## **b. Cumulative Impacts**

### *(1) Construction*

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. Construction-related daily mass emissions at the Project Site would exceed the SCAQMD's significance threshold for CO, NO<sub>x</sub>, and VOC, thus resulting in a cumulative impact. In terms of localized air quality impacts, construction of the Proposed Project would have a cumulative impact due to NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions. Other construction projects in the vicinity of the Project Site could also contribute emissions that

would cumulatively increase these concentrations. As such, cumulative impacts to air quality during Proposed Project construction would be significant and unavoidable.

Similar to criteria pollutants, according to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended significance thresholds for project-specific impacts would also result in a cumulatively considerable impact with regards to TACs. As discussed earlier, the Proposed Project's greatest potential for TAC emissions would involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction activities at each related project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. It is therefore not meaningful to evaluate long-term cancer impacts from construction activities which occur for a relatively short duration. Nonetheless, an HRA was prepared. It shows that the Proposed Projects TAC emission impacts during construction would be less than significant. As such, cumulative TAC emission impacts during construction would not be cumulatively considerable and are therefore concluded to be less than significant.

Also similar to the Proposed Project, potential sources that may emit odors during construction activities at each related project would include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Via mandatory compliance with SCAQMD Rules, it is anticipated that construction activities or materials used in the construction of the related projects would not create objectionable odors. Thus, odor impacts from the related projects are anticipated to be less than significant individually, as well as cumulatively in conjunction with the Proposed Project.

## *(2) Operation*

According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. Regional operational emissions from the Proposed Project would exceed the SCAQMD's thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. Localized emissions from the Proposed Project would exceed SCAQMD thresholds for PM<sub>10</sub> and NO<sub>x</sub>. Therefore, the emissions of non-attainment pollutants and precursors generated by Project operation in excess of the SCAQMD project-level thresholds would also constitute a significant cumulative impact.

With respect to TAC emissions, neither the Proposed Project nor any of the related projects (which are largely residential, retail/commercial, and light industrial uses), would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities.

Based on recommended screening level siting distances for TAC sources, as set forth in the California Air Resources Board's (CARB) Land Use Guidelines, the Proposed Project and related projects would not result in a cumulative impact requiring further evaluation. However, the Proposed Project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products, landscape maintenance activities, among other things. Pursuant to California Assembly Bill 1807, which directs the CARB to identify substances as TAC and adopt airborne toxic control measures (ATCMs) to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the Proposed Project would not result in any sources of TACs that have been identified by Land Use Guidelines, and thus, would not contribute to a cumulative impact.

With respect to potential odor impacts, neither the Proposed Project nor any of the related projects would have a high potential to generate odor impacts.<sup>11</sup> Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement Best Available Control Technology (BACT) to limit potential objectionable odor impacts to a less than significant level. Thus, potential odor impacts from related projects are anticipated to be less than significant individually and cumulatively.

### *(3) Consistency with Air Quality Policies*

The Proposed Project would not jeopardize the attainment of AQMP air quality standards for the South Coast Air Basin or the Los Angeles County portion of the Air Basin. As such, the Proposed Project would not have a cumulatively considerable contribution to a potential conflict with or obstruction of the implementation of applicable air quality plans.

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<sup>11</sup> *Ibid.*

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## c. Project Design Features and Mitigation Measures

### (1) Project Design Features

**Project Design Feature F.1-1:** The Project would comply with SCAQMD Rule 403 regarding fugitive dust control through implementation of the following measures:

- Use watering to control dust generation during the demolition of structures.
- Clean-up mud and dirt carried onto paved streets from the site.
- Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site.
- Include provisions in contracts with contractors to enforce requirement that trucks and equipment hauling material such as debris or any fill material operating at the Project site or traveling to or from the Project site must be fully covered, and post signs on-site regarding this requirement.
- Suspend earthmoving operations or implement additional watering to meet Rule 403 criteria if wind gusts exceed 25 mph.
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. A bilingual Spanish speaking construction relations officer shall be appointed to act as a community liaison concerning construction-related issues and on-site activity, including investigation and resolution of issues related to fugitive dust generation.

**Project Design Feature F.1-2:** The roof specification for the New Hall shall meet the standards of a “cool roof.”

**Project Design Feature F.1-3:** Outdoor lighting levels shall be reduced during non-event time periods to the extent that the reduced levels do not create an unsafe condition.

**Project Design Feature F.1-4:** The Applicants shall provide information to vendors as to the nearest locations of electronic charging and alternative fuel stations, which will be updated as additional stations come on-line in the vicinity.

**Project Design Feature F.1-5:** The Project Applicants shall only test one emergency back-up diesel generator for maintenance purposes on a given day and no emergency back-up diesel generator would be tested on days with events at the Event Center.

**Project Design Feature F.1-6:** The Project Applicants shall use alternative fueled steam cleaner heaters (e.g., propane) in lieu of diesel.

**Project Design Feature F.1-7:** The Pico Passage shall be equipped with carbon monoxide sensors which would trigger operation of ventilation fans when needed to ensure compliance with ambient air quality standards.

**Project Design Feature F.1-8:** The Event Center Applicant shall evaluate low carbon footprint concrete and consider it for potential uses in the construction to the greatest extent practical.

**Project Design Feature F.1-9:** L.A. Live Way and Bond Street Garages shall both provide a minimum ground floor clearance of 8 feet 2 inches for van pool access.

*(2) Mitigation Measures*

The following mitigation measures are set forth a program of air pollution control strategies designed to reduce the Proposed Project's air quality impacts to the extent feasible during construction.

*(a) Construction*

**Mitigation Measure F.1-1:** The Project representative shall make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of construction activities for the Project. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided onsite at the time of mobilization of each applicable unit of equipment. Off-road diesel-powered equipment that will be used an aggregate of 40 or more hours during any portion of the construction activities for the Project shall meet the Tier 3 standards and off-road equipment greater than 300 horsepower shall be equipped with diesel particulate filters. Beginning in January 2015, the requirement shall increase to Tier 4 equipment where commercially available. Construction contractors supplying heavy duty diesel equipment greater than 50 horsepower shall be encouraged to apply for AQMD SOON funds. Information including the AQMD website shall be provided to each contractor which uses heavy duty diesel for on-site construction activities.

**Mitigation Measure F.1-2:** All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

- Mitigation Measure F.1-3:** Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues will have their engines turned off after 5 minutes when not in use, to reduce vehicle emissions. In addition, the Applicant shall also require contractors to limit idling of construction equipment, trucks and vehicles to the extent practical.
- Mitigation Measure F.1-4:** Emission generating construction activities shall be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.
- Mitigation Measure F.1-5:** To the extent practical, electric powered construction equipment shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.
- Mitigation Measure F.1-6:** Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the Project to reduce VOC emissions to the maximum extent practicable.
- Mitigation Measure F.1-7:** Construction equipment shall incorporate, where commercially available, emissions-saving technology such as hybrid drives and specific fuel economy standards upon promulgation (e.g., CAFÉ Standards).
- Mitigation Measure F.1-8:** Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable.
- Mitigation Measure F.1-8a:** During construction, the Project shall use contractors for soil import/export with haul trucks meeting EPA Model Year 2007 NO<sub>x</sub> emissions levels when such equipment is reasonably available to achieve a goal that at least 33 percent of the haul truck fleet meets this standard, provided that such usage is consistent with the Event Center Applicant's MBE/WBE goals.
- Mitigation Measure F.1-8b:** Utilize low sulfur diesel fuel, bio-diesel or LNG for any use of portable generators to power construction machinery.
- Mitigation Measure F.1-8c:** Finish materials that include Triclosans in public areas shall not be used.

*(b) Operation*

The mitigation measure below is proposed to minimize emissions associated with deliveries to the Project Site. As noted above, the Proposed Project also incorporates a number of design features that would minimize emissions associated with operation of the Proposed Project. Among these features is a Transportation Management Plan (TMP) that

would encourage the maximum use of transit and other non-auto modes, use of existing parking resources in the downtown area, and use of traffic management to maximize the capacity of existing transportation facilities during events. The TMP is described in detail in Section IV.B.1, Transportation. In addition, as discussed above and in Section I.V.2, Air Quality—Climate Change, per SB 292, the Event Center must achieve and maintain carbon neutrality by reducing to zero the net emissions of greenhouse gases from private automobile trips to and from Spectator Events at the Event Center through: (1) implementation of the TMP; (2) investment in local community projects that reduce greenhouse gas emissions; and (3) purchase of carbon offsets. Programs that would reduce GHG emissions would also generally reduce emissions of criteria air pollutants.

**Mitigation Measure F.1-9:** The Applicant shall work with vendors and suppliers to schedule as many deliveries as practical during off-peak traffic periods to encourage the reduction of trips during the most congested periods.

**Mitigation Measure F.1-10:** Lower emissions fireworks shall be used to the extent feasible for “proximate fireworks” where it would achieve a similar fireworks effect.

**Mitigation Measure F.1-11:** New proposed diesel-fueled emergency generators shall be equipped with diesel particulate filters.

**Mitigation Measure F-1-12:** Landscape maintenance lawn mower and leaf blower equipment shall be powered by electricity.

**Mitigation Measure F-1.13:** New proposed sweepers shall be electric or alternatively fueled with HEPA filters, where commercially available.

**Mitigation Measure F-1.14:** The Applicant shall utilize water-based or low VOC cleaning products where a suitable replacement product is commercially available.

#### d. Level of Significance After Mitigation

##### *(1) Construction*

Implementation of the mitigation measures would reduce construction emissions for all pollutants. However, the Proposed Project would remain in exceedance of the SCAQMD regional significance thresholds for VOC, CO and NO<sub>x</sub> during the most intense construction period. As such, Proposed Project construction would continue to result in a significant and unavoidable regional impact even with incorporation of all feasible mitigation measures.

Implementation of the mitigation measures would reduce localized PM<sub>10</sub>, PM<sub>2.5</sub>, and NO<sub>x</sub> emissions by an average of 46, 50, and 54 percent, respectively. Even with

incorporation of mitigation measures, the project would remain in exceedance of the SCAQMD LST threshold for  $\text{NO}_x$ . Therefore, the localized effects from the on-site construction emissions of  $\text{NO}_x$  were analyzed using the AERMOD dispersion model. The maximum hourly  $\text{NO}_2$  incremental concentrations of  $38.8 \mu\text{g}/\text{m}^3$  and 98th percentile hourly incremental threshold concentration of  $32.5 \mu\text{g}/\text{m}^3$  would not exceed the state 1-hour threshold or federal 1-hour threshold at any of the identified sensitive receptors, respectively. However, the annual  $\text{NO}_2$  incremental concentration of  $1.3 \mu\text{g}/\text{m}^3$  would exceed the federal threshold. This impact would occur at the Ritz-Carlton Residences and would be representative of pollutant concentrations for either residential or commercial land uses in the immediate vicinity of the Project Site. Although hourly  $\text{NO}_2$  concentrations would not exceed the state and federal thresholds at sensitive receptors, the area of impact for non-sensitive receptors would encompass areas immediately north of the Project Site between L.A. Live Way and Figueroa Street. Potential localized state 1-hour  $\text{NO}_2$  impacts above the incremental threshold of  $113 \mu\text{g}/\text{m}^3$  on the peak construction day could extend northward approximately 150 feet and encompass portions of the existing parking structure on the corner of Chick Hearn Court and L.A. Live Way and a portion of the Nokia Theatre. Potential localized federal 1-hour  $\text{NO}_2$  impacts above the incremental threshold of  $46 \mu\text{g}/\text{m}^3$  on the peak construction day could extend northward approximately 280 feet and also encompass the existing parking structure on the corner of Chick Hearn Court and L.A. Live Way and the Nokia Theatre. Potential localized federal annual  $\text{NO}_2$  impacts above the incremental threshold of  $0.8 \mu\text{g}/\text{m}^3$  during the peak year of construction could extend northward to Olympic Blvd and would also encompass the Ritz-Carlton Residences. All land uses (e.g., commercial, retail, office, industrial, and residential) within these areas could potentially be impacted by localized  $\text{NO}_2$  concentrations in excess of the state and federal standards during construction. This impact would be temporary in nature, lasting only for the construction period, and would not have a long-term impact on the region's ability to meet state and federal air quality standards. Therefore, with respect to localized emissions from construction activities,  $\text{NO}_x$  impacts would be temporary but significant and unavoidable.

Actual construction activities would on average occur at a somewhat reduced level compared to the maximum predicted day and would have a corresponding reduction in pollutant emissions. Therefore, the modeled set of conservative assumptions overstates the potential localized impacts. However, the conclusion remains that Proposed Project impacts during construction would be significant and unavoidable even with incorporation of all feasible mitigation measures. Cumulative construction impacts would also remain significant.

No notable impacts related to TAC emissions during construction are anticipated to occur under the Proposed Project. The mitigation measures provided above would further reduce diesel exhaust emissions associated with on-site heavy equipment and haul trucks

during the construction period. As detailed in Appendix M, the maximum incremental increase in off-site individual adult cancer risk would be reduced to 1.4 in a million over the duration of construction and an excess cancer burden of less than 0.1, where the maximum impact occurs at residential uses north of the Project Site. The cancer risk at this receptor for child exposure is reduced to 2.4 in a million with an excess cancer burden less than 0.1. The chronic hazard index would be reduced to less than 0.1 and 0.2 for adult and child exposure, respectively. As such, potential impacts would be less than significant.

The Proposed Project is not anticipated to generate a substantial amount of objectionable odor emissions during construction. Via mandatory compliance with SCAQMD Rules, construction activities or materials would create objectionable odors. As such, potential impacts would be less than significant.

## *(2) Operation*

Although the Proposed Project would incorporate numerous project design features to reduce operational emissions, regional operational emissions would still exceed the SCAQMD daily emission threshold for regional NO<sub>x</sub>, VOC, PM<sub>10</sub>, PM<sub>2.5</sub>, and CO after implementation of feasible mitigation measures. Therefore, operation of the Proposed Project would have a significant and unavoidable impact on regional air quality. Cumulative operational air quality impacts would also remain significant. Localized operational emissions would still exceed their respective state and federal thresholds. Therefore, with respect to localized emissions from operational activities, PM<sub>10</sub> and NO<sub>x</sub> impacts would be significant and unavoidable. The exceedance of NO<sub>x</sub> is primarily a function of very high ambient background concentrations as reflected in the fact that the background annual NO<sub>2</sub> concentration represents approximately 98.5 percent of the federal standard, and the background 1-hour NO<sub>2</sub> concentration represents approximately 77 percent of the national standard and 67 percent of the state standard. The 2007 Air Quality Management Plan projects that NO<sub>x</sub> emissions in the South Coast Air Basin will decrease by approximately 28.9 percent by Year 2023, which suggests that the NO<sub>2</sub> background concentration and the Project contribution (e.g. vehicle emissions of NO<sub>2</sub> are anticipated to decrease in subsequent years) will also substantially decrease over time.<sup>12</sup> Given the Project's comparatively minor effect on ambient concentrations and given the 2007 Air Quality Management Plan's projections regarding the likely substantial decrease in ambient nitrogen dioxide concentrations in subsequent years, an analysis of operational emissions that took the likely decrease in NO<sub>2</sub> concentrations into account would be

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<sup>12</sup> SCAMD, 2007 Air Quality Management Plan, Appendix III. Annual Average Emissions by Major Source Category shows a decrease of 41 percent from 2008 (853.7 tons per day) to 2023 (506.35 tons per day), [www.aqmd.gov/aqmp/07aqmp/index.html](http://www.aqmd.gov/aqmp/07aqmp/index.html).

expected to demonstrate that Project operations would not cause an exceedance of ambient air quality concentrations. For these reasons, the Project would be consistent with the long-term planning goals of the AQMP, as a whole. Detailed modeling results are provided in Appendix M of the Draft EIR. No significant impacts related to local CO concentrations would occur under the Proposed Project. Project development would be consistent with the air quality policies set forth in the SCAQMD's AQMP and the City of Los Angeles General Plan Air Quality Element, resulting in a less than significant impact.

In addition, significant localized PM<sub>10</sub> concentration levels would occur in certain areas surrounding the Project Site when there is a 72,000 attendee Event Center event, a 90<sup>th</sup> percentile Convention Center event, and worst case meteorological conditions. As this is likely to occur seldom, if ever, and significant impacts would occur only a limited number of days per year at most and only for a few hours per day, requiring permanent full time mitigation would not be appropriate

### *(3) Concurrent Construction and Operational Emissions*

Concurrent construction and operational regional emissions of VOC, NO<sub>x</sub>, and CO would exceed SCAQMD regional thresholds. Additionally, concurrent construction and operational localized emissions of NO<sub>x</sub> would exceed their respective localized thresholds. Because construction represents approximately 94 percent of the NO<sub>x</sub> impact, localized dispersion modeling is expected to yield results similar to those completed for construction. It is expected that localized emissions will remain significant for the national 1-hour and State annual standards, but that these emissions may be intensified by up to 6 percent over those attributable to Proposed Project construction only. As such, localized emissions that result from concurrent construction and operations would result in a significant and unavoidable impact.

## **F.2 Air Quality—Climate Change**

### **a. Project Impacts**

#### *(1) Construction*

Construction emissions represent episodic greenhouse gas emissions and would be associated with site preparation, excavation, grading, and construction. Emissions are also associated with the operation of construction equipment and the disposal of construction waste, as well as episodic water use for fugitive dust control and annual water consumption. Only greenhouse gas emissions from on-site demolition and construction activities and off-site hauling and construction worker commuting are considered Project-generated.

A total of 54,985 metric tons of carbon dioxide equivalent would be generated during Proposed Project construction, which equates to 1,833 metric tons annually if amortized over the Proposed Project's lifetime.

### *(2) Operational Impacts*

Sustainability project design features would be implemented via the Sustainability Plan included as Appendix E to the Draft EIR. As set forth therein, the Proposed Project would incorporate sustainability as one of its key design and operational criteria. In so doing the Proposed Project would meet all aspects of the City of Los Angeles Green Building Code. The Event Center would be designed to achieve LEED® certification. The New Hall would be designed with the intent of achieving a LEED® Gold certification.

As part of SB 292, the Event Center must achieve and maintain carbon neutrality by reducing to zero the net emissions of greenhouse gases from private automobile trips to and from Spectator Events at the Event Center. This objective would be realized via the following programs: (1) implementation of the Event Center's Transportation Demand Management (TDM) plan; (2) investment in local community projects that reduce greenhouse gas emissions; and (3) the purchase of carbon offsets. In addition, the Proposed Project must achieve and maintain a vehicle trip ratio (defined as the total annual number of private automobiles arriving at the Event Center for Spectator Events divided by the total number of spectators at the events) that is no more than 90 percent of the trip ratio at any other stadium serving a team in the National Football League. This would reduce traffic congestion and further reduce greenhouse gas emissions.

Greenhouse gas emissions from the operational-phase of the Proposed Project are associated with the operation of mobile sources, electricity, natural gas, water usage/wastewater generation, and solid waste generation and disposal. With the incorporation of project design features and state mandates, the Proposed Project would result in a total of 34,864 metric tons of an equivalent mass of CO<sub>2</sub> (MTCO<sub>2</sub>e). This represents an increase of 14,191 MTCO<sub>2</sub>e over existing conditions and an increase of 15,799 MTCO<sub>2</sub>e over the No Project condition. The Project with incorporation of project design features and state mandates would achieve a 48 percent reduction from business as usual (BAU). With the achievement of a 48 percent total reduction from BAU, the Project's climate change impacts with regard to GHG emissions would be less than significant. It should also be noted that SB 292 would require the offset of 21,907 MTCO<sub>2</sub>e attributable to private automobile traffic to Spectator Events at the Event Center.

### **b. Cumulative Impacts**

Although the Proposed Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental

effect. Rather, it is the increased accumulation of GHGs in the atmosphere from more than one project and many sources that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, the California Air Resources Board is in the process of establishing and implementing regulations to reduce statewide GHG emissions. However, currently there are no applicable significance thresholds, specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative level. Therefore, consistent with OPR's recommended significance threshold, an evaluation of whether the Proposed Project conflicts with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs (e.g., the Attorney General's Global Warming Measures, the Governor's Office of Planning and Research (OPR) CEQA and Climate Change GHG Reduction Measures, and GHG reduction strategies set forth by the 2006 California Climate Action Team (CAT) Report) was conducted.

As discussed in more detail in Section IV.F.2, Air Quality—Climate Change, the Proposed Project would effectively implement the Energy efficiency measures provided by the California Attorney General's Office. In meeting these goals, the Renewable Energy and Storage measures would also be considered (e.g., solar panels) and implemented where commercially feasible. Further, the nature of the Proposed Project, the location of the Project Site, and the various proposed project design features would effectively implement the Water Conservation and Efficiency, Solid Waste, and Land Use, and Transportation and Motor Vehicle measures. Similarly, the Proposed Project would effectively implement the Land Use and Transportation, Urban Forestry, Green Buildings, Energy Conservation, VMT Reduction and Solid Waste measures provided in the OPR's Technical Advisory. The Proposed Project would also be consistent with applicable recommendations and strategies presented in the California CAT Report.

The Proposed Project would be consistent with the approach outlined in the CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. The location and design of the Proposed Project reflect and support these core objectives. In addition, as recommended by CARB's Climate Change Scoping Plan, the Project would use green building features as a framework for achieving cross-cutting emissions reductions. Given the Proposed Project's consistency with State and City GHG emission reduction goals and objectives, the Project's contribution to cumulative climate change would be less than significant and would not conflict with any applicable plan, policy or regulation of an agency

adopted for the purpose of reducing the emissions of GHGs. Similarly, the related projects would be anticipated to comply with these same emissions reduction goals and objectives.

### c. Project Design Features and Mitigation Measures

#### *(1) Project Design Features*

**Project Design Feature F.2-1:** The Applicants shall implement a Sustainability Program as set forth in Appendix E of the Draft EIR.

#### *(2) Mitigation Measures*

As noted previously, with implementation of the project design features described above, impacts related to climate change would be less than significant, and no mitigation measures are recommended or required.

### d. Level of Significance After Mitigation

With implementation of the Project's design features and emission reduction strategies, impacts with regards to climate change would be less than significant.

## **G. Geology and Soils**

### a. Project Impacts

No known active or potentially active faults with the potential for surface rupture cross or project toward the Project Site. The closest active fault to the Project Site is the Hollywood Fault, and the Project Site would be subject to strong seismic ground shaking typical of areas within Southern California. The Puente Hills Thrust Fault does underlie the site, but does not have the potential for surface rupture. The Proposed Project would not cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, nor expose people to substantial risk of injury from strong seismic ground shaking. Impacts associated with surface fault rupture, seismicity, and ground shaking would be less than significant.

The Project Site is not located within a State-designated seismic hazard zone for liquefaction potential or within a City-designated liquefiable or potentially liquefiable area. Prior borings drilled to a depth of 100 feet in the vicinity of the Project Site did not report groundwater above that depth, except for minor seepage between approximately 17 and 36 feet below ground surface. The Project Site is not located within an area of known subsidence associated with oil or groundwater withdrawal, peat oxidation, or hydro-compaction. It is anticipated that site soils that could be susceptible to seismic-induced

settlement would be removed during excavation; therefore, the risk of seismic-induced settlement is considered low. Impacts associated with liquefaction, groundwater, subsidence, and settlement would therefore be less than significant.

Temporary excavations at the Project Site with slopes steeper than approximately 1:1 may not be stable, thus slope stability impacts would be potentially significant. Mitigation Measure G-2 has been included to provide that impacts related to slope stability during construction would be less than significant.

The expansion potential of fine-grained soils at the Project Site is expected to range from low to medium. Project Site soils are expected to be mildly to severely corrosive to ferrous metals, aggressive to copper, and exposure of concrete to sulfate attack is expected to be negligible to moderate. Mitigation Measure G-3 is included to provide that potential impacts associated with expansive and corrosive soils would be reduced to a less than significant level.

The Project Site is located approximately 12 miles from San Pedro Bay and at an elevation of 230 to 235 feet above mean sea level. The Project Site is not within a tsunami or seiche hazard zone, and the risk of tsunami or seiche affecting the site is low. However, a very small portion of the southeastern corner of the Project Site is within a potential inundation hazard zone. The potential for inundation at the Project Site as a result of an earthquake-induced dam failure is considered low. Therefore, the Proposed Project would not expose people to substantial risk of injury due to inundation by seiche/dam failure, and impacts with respect to tsunamis, inundation, flooding and seiches would be less than significant.

The Project Site is situated above the Los Angeles Downtown oil field and is located in a City of Los Angeles methane zone. Please refer to Section L, Environmental Hazards, below for a discussion of potential impacts associated with oils wells and methane gas.

Sedimentation and erosion could potentially occur from exposed soils during Proposed Project construction. However, construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. During operation, the Proposed Project may result in a limited degree of soil erosion effects within vegetated areas. Further discussion of sedimentation and erosion effects is provided below in Section H.1, Surface Water Quality.

There are no distinct or prominent geologic or topographic features (e.g., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or in the immediate vicinity. Therefore, the Proposed Project would not

destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. Impacts associated with landform alteration would not occur.

### b. Cumulative Impacts

Geotechnical impacts related to future development in the City of Los Angeles would involve hazards associated with site-specific soil conditions, erosion, and ground shaking during earthquakes. The impacts on each site would be specific to that site and its users and would not be common or contribute to the impacts on other sites. In addition, development on each site would be subject to uniform site development and construction standards that are designed to protect public safety, including the requirements specified by the LAMC and the California Building Code. Therefore, cumulative geology and soil impacts would be less than significant.

### c. Project Design Features and Mitigation Measures

#### *(1) Project Design Features*

**Project Design Feature G-1:** All Project construction shall conform to the requirements of the LAMC, which incorporates the requirements of the CBC, including all provisions related to seismic safety.

#### *(2) Mitigation Measures*

**Mitigation Measure G-1:** Prior to issuance of the building permit for the New Hall, Event Center, and new garages a site-specific geotechnical report shall be prepared in accordance with the City of Los Angeles requirements, including those set forth in the LAMC, which incorporates the CBC. The recommendations contained within the site-specific geotechnical report, including those pertaining to site preparation, fill placement, and compaction, seismically induced ground acceleration, liquefaction; foundations; pavement design; footings; and foundations shall be implemented. The site-specific geotechnical reports shall include all applicable recommendations included in the *Report of Geotechnical Investigation* prepared by AMEC E&I, Inc. included as Appendix N to the Draft EIR.

**Mitigation Measure G-2:** Pursuant to the geotechnical report prepared in accordance with LADBS requirements, a temporary shoring system shall be implemented during Proposed Project construction to ensure slope stability during excavation activities. If the necessary space is available, temporary excavations up to 25 feet in depth may be sloped back at a 1:1 (horizontal to vertical), in lieu of shoring. Deeper excavations shall be sloped at an inclination of 1.25:1.

Where there is not sufficient space for sloped embankments, temporary shoring shall be erected, to a reasonable satisfaction of the LADBS. This may include, but is not limited to, installing steel soldier piers in drilled holes that would be backfilled with concrete and restrained with tie-in anchors. The shoring shall be designed by a professional geotechnical engineer with experience in the design of excavation shoring. The excavation shoring design shall be approved by LADBS prior to its installation.

**Mitigation Measure G-3:** Testing of Project Site soils by a certified engineering geologist and/or geotechnical engineer shall be performed as part of the site-specific geotechnical report, and structure and site improvements shall be designed to resist the effects of expansive and corrosive soils.

#### d. Level of Significance After Mitigation

Implementation of the mitigation measure listed above and compliance with applicable regulations would reduce all Proposed Project impacts related to geology and soils to a less than significant level.

## H.1 Water Resources—Hydrology and Surface Water Quality

### a. Project Impacts

#### *(1) Hydrology*

##### *(a) Construction*

Construction activities associated with the Proposed Project would have the potential to temporarily alter existing drainage patterns and flows by exposing the underlying soils and making the Project Site temporarily more permeable. However, construction of new drainage facilities would be required in a manner and sequence that would preclude flooding. Specifically, any new storm drain connections would be installed to support development and would be in place and functioning as development progresses to serve their respective catchments. Installation of the new connections would primarily occur on-site and the new connections would be sized appropriately to convey runoff to the existing storm drain piping network in accordance with City standards. In addition, during construction, a Storm Water Pollution Prevention Plan (SWPPP) would be implemented to provide for temporary stormwater management. This plan would prevent construction from adversely affecting the amount of surface water in a water body. In addition, the Proposed Project would be required to comply with applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Thus, construction of the Proposed Project would not cause flooding, substantially increase or decrease the amount of surface water in a water body, or result in a permanent, adverse change to the movement of surface water. As such, construction-related impacts to hydrology would be less than significant.

*(b) Operation*

The Proposed Project would involve the development of new buildings, paved areas, and landscaping. Through the provision of additional landscaped areas, the Proposed Project would serve to reduce the impervious surface area from 94 percent to 93 percent of the Project Site, thereby resulting in a corresponding decrease in surface water flows. Thus, the Proposed Project would not result in an incremental increase in stormwater runoff and therefore would not adversely impact the capacity of the existing storm drain system. Furthermore, runoff from the Project Site would continue to follow the same discharge paths and drain to the same outlet pipes as under existing conditions, thus maintaining existing drainage patterns. Since the Proposed Project's peak flow rates would be unchanged from existing peak flow rates, no detention facilities would be required for hydrologic purposes. Nonetheless, Standard Urban Stormwater Mitigation Plan (SUSMP) and Low Impact Development (LID) requirements would be implemented throughout the operational life of the Proposed Project. As part of these requirements, the Proposed Project would incorporate BMPs to ensure that at a minimum, no increase in flows from existing conditions would result with the Proposed Project. Therefore, as the Proposed Project would not result in on- or off-site flooding during a 50-year storm event, would not substantially reduce or increase the amount of surface water in a water body, would not result in a permanent adverse change to the movement of surface water, nor impact the existing storm drain system serving the Project Site, impacts to hydrology during operation of the Proposed Project would be less than significant.

The Project Site is not located within a Federal Emergency Management Agency (FEMA) or City of Los Angeles designated 100- or 500-year flood plain. In addition, the Proposed Project does not include a residential component. However, according to the City of Los Angeles General Plan Safety Element, within the Project Site, the southeast corner near Venice Boulevard and Figueroa Street is located within a potential inundation area. This area includes a small portion of the existing Venice Boulevard Garage, which would remain under the Proposed Project. Except for this area, none of the Project Site is located within a potential inundation area. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. Mitigation of potential seiche hazards has also been implemented by the Los Angeles Department of Water and Power (LADWP) through regulation of the level of water in its storage facilities and the provision of walls of extra height to contain seiches and prevent overflow or inundation. In addition, dams and reservoirs are monitored during

storms, and measures are instituted in the event of potential overflow. These measures apply to facilities within the City's borders and facilities owned and operated by the City within other jurisdictions. Appropriate measures to be implemented in the event of potential overflow are specific to each dam and are based on the risk level associated with the dam. The City determines the risk of each dam that would impact the City based on the age and design of the dam, the holding capacity, as well as the density of existing and planned development within the inundation area. In addition, the City's Local Hazard Mitigation Plan 2011, contains a comprehensive set of more than 400 hazard mitigation projects and programs designed to reduce the potential risks associated with the hazard categories identified in the City's Local Hazard Mitigation Plan 2011, including dam failure. Mitigation measures include a broad range of approaches to hazard mitigation including retrofit/relocation, code enforcement, development of new regulations, public education, surveillance and security, development of redundant facilities, among others. Thus, the risk of flooding from inundation by a seiche or a dam failure is considered low and impacts related to inundation by seiche/dam failure would be less than significant.

## *(2) Surface Water Quality*

### *(a) Construction*

Construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of construction materials could contribute to pollutant loading in stormwater runoff. However, a site-specific SWPPP would be implemented which would specify BMPs to be used during construction that would reduce or eliminate the discharge of potential pollutants from stormwater runoff to the maximum extent practicable. In addition, the Project Applicants would be required to comply with City grading permit regulations, which require standard measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion. Therefore, construction-related impacts on surface water quality would be less than significant.

### *(b) Operation*

As is typical of most major urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. However, SUSMP requirements would be implemented throughout the operational life of the Proposed Project which would include BMPs to address water quality in stormwater runoff. Source control BMPs would be used to prevent pollutants from entering into stormwater discharges and may include effective site design and landscape planning, storm drain signage, properly managed maintenance bays and docks, properly managed trash storage areas, proper design and maintenance of outdoor material storage areas, and proper maintenance of structural/treatment control BMPs. Treatment BMPs remove pollutants

from stormwater discharges and may include vegetative systems, vortex/hydrodynamic systems, catch basin systems, infiltration/retention, pervious pavement, and media filtration. LID BMPs use the aforementioned to address infiltration, capture and use, and biofiltration of stormwater runoff. In addition, the Proposed Project would reduce impervious surfaces slightly through the introduction of additional landscaped areas, thus increasing opportunities to direct stormwater flows through the planting media where pollutants are filtered, absorbed, and biodegraded by the soil and plants, prior to infiltrating to the ground below. In addition, nitrates often used in landscaping fertilizers would be controlled through the selection of native plants and minimal use of nitrogen-based fertilizers in on-going landscape maintenance. Based on the above, operational impacts on surface water quality would be less than significant.

### b. Cumulative Impacts

The Proposed Project in conjunction with forecasted 2017 growth in the Ballona Creek watershed (inclusive of the related projects) would cumulatively increase stormwater runoff flows, potentially resulting in cumulative impacts to surface water hydrology. However, in accordance with City requirements, the related projects and other future development projects would be required to implement BMPs such that post-development peak stormwater runoff discharge rates would not exceed the estimated pre-development rates. Furthermore, the City of Los Angeles Department of Public Works would review each future development project on a case-by-case basis to provide that sufficient local and regional drainage capacity is available to accommodate stormwater runoff. Similar to the Proposed Project, forecasted growth in the Ballona Creek watershed also would be subject to National Pollutant Discharge Elimination System (NPDES) requirements regarding water quality for both construction and operation. Moreover, since the identified related projects are located in a highly urbanized area, future development and land use changes are not likely to cause substantial changes in regional surface water quality. It is also anticipated that related projects and other future development projects would be subject to SUSMP requirements and implementation of measures to comply with total maximum daily loads. Therefore, with compliance with all applicable laws, rules, and regulations, cumulative impacts on surface water hydrology and surface water quality would be less than significant.

### c. Project Design Features and Mitigation Measures

#### *(1) Project Design Features*

The following project design features shall be implemented as part of the Proposed Project:

**Project Design Feature H.1-1:** Prior to the issuance of a grading permit, the Project Applicants shall provide evidence to the City of Los Angeles Department of Public Works, as appropriate, that a Notice of Intent has been filed with the State Water Resources Control Board for coverage under the General Construction Permit and a certification that a Storm Water Pollution Prevention Plan has been prepared. Such evidence shall consist of a copy of the Notice of Intent stamped by the State Water Resources Control Board or Regional Board, or a letter from either agency stating that the Notice of Intent has been filed. The Stormwater Pollution Prevention Plan shall include a menu of Best Management Practices to be selected and implemented based on the phase of construction and the weather conditions to effectively control erosion.

**Project Design Feature H.1-2:** Prior to approval of B-Permit Plans or issuance of building permit, the Project Applicants shall prepare and submit for review and approval a Standard Urban Stormwater Mitigation Plan that shall include Best Management Practices (e.g., infiltration systems, bio-filtration, structural treatment systems) and demonstrate compliance with Low Impact Development Ordinance requirements to the City of Los Angeles Department of Public Works or Department of Building and Safety, as applicable.

**Project Design Feature H.1-3:** The Project Applicants shall control nitrates through the selection of native plants and minimal use of nitrogen-based fertilizers in on-going landscape maintenance.

*(2) Mitigation Measures*

With compliance with regulatory requirements and implementation of the project design features described above, Project-level impacts on surface water hydrology and surface water quality would be less than significant. In addition, cumulative impacts on surface water hydrology and surface water quality would be less than significant. Therefore, no mitigation measures would be required.

d. Level of Significance After Mitigation

Project-level and cumulative impacts on surface water hydrology and surface water quality would be less than significant, and, no mitigation measures would be required.

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## H.2 Water Resources—Groundwater

### a. Project Impacts

#### (1) Construction

##### (a) Groundwater Level

Construction of the Proposed Project would require excavations with average depths ranging from one foot for the New Hall to a maximum depth of approximately 50 feet for the Event Center. Since the historic high groundwater level in the vicinity of the Project Site is approximately 90 feet below ground surface and prior borings drilled to a depth of 100 feet in the vicinity of the Project Site did not report groundwater above that depth (except for minor seepage between approximately 17 and 36 feet), it is not expected that groundwater would be encountered during construction. Thus neither temporary nor permanent dewatering operations would be required. Therefore, the Proposed Project would not have an impact on groundwater levels during construction.

##### (b) Groundwater Quality

The Proposed Project would necessitate soil export in conjunction with site excavations. In accordance with regulatory requirements, any contaminated soils within the Project Site would be captured within the volume of excavated material, removed from the site, and remediated at an approved disposal facility.

During on-site grading and building construction, hazardous materials (e.g., fuels, paints, solvents, concrete additives, etc.) could be used and therefore would require proper management and disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials releases into groundwater. However, compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would effectively reduce the potential for construction of the Proposed Project to release contaminants into groundwater that could expand the area or increase the level of groundwater contamination or cause the violation of regulatory water quality standards at an existing production well as defined in the California Code Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. In addition, as there are no groundwater production wells or public water supply wells within one mile of the Project Site, construction activities are not anticipated to affect existing wells. Therefore, Proposed Project construction would not result in any substantial increase in groundwater contamination through hazardous materials releases, and impacts would be less than significant.

## *(2) Operation*

### *(a) Groundwater Level*

Through the provision of additional landscaped areas, the Proposed Project would involve a decrease in impervious surface area from 94 percent to 93 percent of the Project Site. This slight decrease in impervious surfaces would not result in a substantial change associated with percolation of irrigation water or precipitation. Based on the historic high groundwater level of 90 feet below ground surface and the absence of groundwater in on-site borings to a depth of 100 feet (except for minor seepage between approximately 17 and 36 feet, it is not expected that groundwater would be encountered or that permanent dewatering operations would be required. In addition, there are no existing wells or spreading grounds within one mile of the Project Site, and the Proposed Project would not include new injection or supply wells. Furthermore, since infiltration of stormwater as a means of stormwater treatment and management through LID practices is a top tier priority for the Watershed Protection Division of the City of Los Angeles, appropriate measures would be considered along with other treatment options during the design phase of the Proposed Project. Based on the above, operation of the Proposed Project would not result in significant impacts associated with groundwater levels.

### *(b) Groundwater Quality*

Operation of the Proposed Project would not require direct discharge to or extraction from the groundwater supply. In accordance with NPDES requirements, the Proposed Project may utilize infiltration as a means of treatment and disposal of the first flush or 0.75 inch of rainfall of any rain event. Incidental percolation of irrigation water and precipitation from landscaped areas may also contribute marginal volumes of runoff to groundwater. The majority of pollutants of concern for stormwater runoff would be captured and filtered out by soils, with the exception of nitrates often used in landscaping fertilizers. Nitrates would be controlled through the selection of native plants and minimal use of nitrogen based fertilizers in on-going landscape maintenance.

The Proposed Project would also result in increased activity at the Project Site, which would result in an increase in the usage of fuels, lubricants and other potential pollutants. Surface spills from the handling of hazardous materials most often involve small quantities and can be cleaned up in a timely manner, resulting in little threat to groundwater. Compliance with applicable regulations and plans would prevent the Proposed Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. In addition, there are no production water wells within a one-mile radius of the Project Site that would have the potential to be affected by

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operation of the Proposed Project. Based on the above, operation of the Proposed Project would not result in significant impacts associated with groundwater quality.

## b. Cumulative Impacts

### *(1) Groundwater Level*

Cumulative groundwater level impacts could result from construction activities located in close proximity to the Project Site. However, since the historic high groundwater level on-site is at a depth of 90 feet below grade, it is not expected that groundwater would be encountered and temporary or permanent dewatering operations would not be required. Additionally, there are no production wells, spreading grounds, or injection wells within a one-mile radius of the Project Site. Therefore, cumulative impacts to groundwater levels resulting from construction activities or due to interruptions to wells or spreading grounds would be less than significant.

Cumulative groundwater level impacts could also result from the over-utilization of groundwater basins located in proximity to the Project Site. To the extent that public supply wells are located within or near the related project sites and the related projects involve groundwater extraction, the cumulative utilization of groundwater could adversely affect groundwater levels. However, it is expected that the related projects would typically depend on public water supply systems, and since all significant local groundwater basins are adjudicated, they are essentially protected from over-production due to limitations on water rights. Any cumulative increase in water demand would be met by other sources (e.g., recycled and imported water). Consequently, no significant cumulative impacts to groundwater are anticipated.

Cumulative groundwater hydrology impacts could result from the net conversion of existing pervious surfaces to impervious surfaces (or vice-versa), which has the potential to change groundwater levels. However, the Proposed Project and related projects are located in a highly urbanized area, and any change in groundwater recharge would be minimal from a regional groundwater basin perspective. Cumulative groundwater level impacts from changes in the amount of impervious surfaces resulting from the Proposed Project and related projects would be less than significant.

Finally, cumulative groundwater level impacts could result from stormwater infiltration. However, stormwater treatment systems are designed to infiltrate only small storm events or the first 0.75 inch of rainfall. As a result, cumulative impacts to groundwater levels due the infiltration of stormwater as a means of stormwater treatment and management through LID practices would be less than significant.

## *(2) Groundwater Quality*

Although development of the related projects could involve groundwater remediation, development associated with the Proposed Project is not expected to include activities that would require groundwater remediation that could affect groundwater quality. Therefore, the Proposed Project would not contribute to cumulative groundwater quality impacts. In addition, the related projects are unlikely to cause or increase groundwater contamination based on existing statutes that prohibit new contamination and require remediation of existing contamination. Moreover, the Proposed Project is not anticipated to affect the rate or direction of movement of existing contaminants, expand the areas affected by contaminants, increase the level of groundwater contamination, or cause regulatory water quality standards of existing production wells to be violated. Thus, cumulative groundwater quality impacts associated with the Proposed Project and related projects would be less than significant.

### c. Project Design Features and Mitigation Measures

#### *(1) Project Design Features*

Sections IV.L, Environmental Safety, and IV.H.1, Hydrology and Surface Water Quality, of the Draft EIR include project design features that also address groundwater level and groundwater quality. No additional project design features are proposed with regard to groundwater level and groundwater quality.

#### *(2) Mitigation Measures*

##### *(a) Groundwater Level*

As discussed above, no significant impacts associated with groundwater level would result from construction or operation of the Proposed Project. Therefore, no mitigation measures are required.

##### *(b) Groundwater Quality*

As discussed above, no significant impacts associated with groundwater quality would result from construction or operation of the Proposed Project. Therefore, no mitigation measures are required.

### d. Level of Significance After Mitigation

Project impacts with respect to groundwater would be less than significant, and no mitigation measures are required.

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## I.1 Cultural Resources—Historical Resources

### a. Project Impacts

As determined in the Historical Resources Assessment (see Appendix S to the Draft EIR), the Project Site does not include any buildings that appear eligible for listing in the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register) or as a City of Los Angeles Historic-Cultural Monument (HCM) under any criteria. In particular, the West Hall, which would be removed as part of the Proposed Project, has not been demonstrated to be associated with events that have made a significant contribution to the broad patterns of our history.<sup>13</sup> While the West Hall hosts and has hosted many events each year since its completion in 1971, none appear to rise to a level of significance. Furthermore, the building was not one of the first or one of the largest post World War II convention centers; it simply reflected the trend in major cities in the United States to construct large, open flexible space to serve the growing convention trend. The West Hall also has not been demonstrated to be associated with the lives of persons important in our past.<sup>14</sup> Although the West Hall is closely associated with both Neil Petree and Dick Walsh, neither individual appears to rise to the level of importance to warrant eligibility under this criterion. While Halls A and B are named for Mayor Sam Yorty, the West Hall is not the location most closely associated with him, or particularly associated with him at all.

The West Hall does not embody the distinctive characteristics of a type, period, region, or method of construction, nor does it represent the work of an important creative individual.<sup>15</sup> Even when it was built, architectural critics described the West Hall as “a building of no special or consistent character.” Designed in the mid-1960s, the architectural style is unoriginal and commonplace. The only distinctive feature of the building is its large size, and even its size and the ability to see large portions of the West Hall have been diminished over the years with construction of adjacent buildings, such as the South Hall and Concourse Building, STAPLES Center, and most recently, L.A. LIVE. In addition, it has not been shown that the West Hall’s project architect, Samuel Moody

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<sup>13</sup> As set forth as Criterion A of the National Register, and Criterion 1 of both the California Register and the City of Los Angeles Cultural Heritage Ordinance. Refer to Appendix S—The Convention and Event Center Historical Resource Assessment, Regulatory Setting, pp. 4-8.

<sup>14</sup> As set forth as Criterion B of the National Register, and Criterion 2 of both the California Register and the City of Los Angeles Cultural Heritage Ordinance. Refer to Appendix S—The Convention and Event Center Historical Resource Assessment, Regulatory Setting, pp. 4-8.

<sup>15</sup> As set forth as Criterion C of the National Register, and Criterion 3 of both the California Register and the City of Los Angeles Cultural Heritage Ordinance. Refer to Appendix S—The Convention and Event Center Historical Resource Assessment, Regulatory Setting, pp. 4-8.

Burnett, or the architectural firm Charles Luckman and Associates were significant architects. Finally, the West Hall cannot be reasonably expected to yield information important in prehistory or history.<sup>16</sup> Historical photographs of its construction show the site has been redeveloped numerous times.

As no significance has been established, there is no need to apply the exceptional significance criteria. Based on results of the Historical Resources Assessment, demolition of the West Hall to accommodate construction of the new Event Center would not result in a significant impact to a historical resource under CEQA. However, it is possible a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall.

### b. Cumulative Impacts

As previously indicated, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall, and to the extent that the related projects could affect a historical resource, cumulative impacts would also be potentially significant.

### c. Project Design Features and Mitigation Measures

#### (1) *Project Design Features*

No project design features are proposed with regard to historical resources.

#### (2) *Mitigation Measures*

As discussed above, based on the *Historical Resources Assessment*, the Project Site does not include any buildings that appear eligible for inclusion in the National Register, California Register, or for local HCM under any criteria. Nonetheless, due to the

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<sup>16</sup> As set forth as Criterion D of the National Register, and Criterion 4 of the California Register. Refer to Appendix S—*The Convention and Event Center Historical Resource Assessment, Regulatory Setting*, pp. 4-8.

potential for a significant impact, as described above, the following mitigation measure is proposed to reduce this potential impact:

**Mitigation Measure I.1-1: Recordation.** Prior to issuance of a demolition permit for the West Hall, photographic documentation noting the exterior elevations and interior features of the West Hall shall be conducted. Photographs shall be 35 mm, black and white taken by a professional photographer familiar with the recordation of historical buildings. Archival copies of the photographs along with existing drawings of the West Hall should be submitted to the Los Angeles Public Library, Central Library.

#### d. Level of Significance After Mitigation

As discussed above, based on the Historical Resources Assessment, the Project Site does not include any buildings that appear eligible for inclusion in the National Register, California Register, or for local HCM under any criteria. However, as set forth above, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall. Implementation of the mitigation measure above would minimize this impact. However, this impact would remain significant and unavoidable.

## I.2 Cultural Resources—Archaeological Resources

### a. Project Impacts

#### *(1) Construction*

Since the entire Project Site has been previously disturbed by past development projects that included extensive earth-moving and the construction of large buildings with deep foundations and subterranean parking structures, it is likely that any archaeological resources that may have been present at one time have been eliminated. No prehistoric archaeological sites or isolated cultural resources were identified on-site during recent field surveys or archaeological literature research. No Native American remains or sacred sites were identified on-site during a search of the Native American Heritage Commission's Sacred Lands File. Significant impacts to previously undiscovered and unrecorded archaeological sites, therefore, are not anticipated during the Proposed Project's earth-moving phases. There is a possibility that some archaeological resources, including items of importance to Native Americans, could be present in the western and northern subsurfaces of the Project Site, where past construction has not involved deep

excavations, and such impacts would be considered significant. In the event that archaeological resources are found, the mitigation measures proposed below would ensure that potential impacts would be reduced to a less than significant level.

### *(2) Operation*

Operation of the Proposed Project would not cause ground disturbances with the potential to encroach or disturb unknown archaeological resources. Therefore, no operational impacts to archaeological resources would occur.

## b. Cumulative Impacts

Although no archaeological sites have been found in the Project Site and uncovering of archaeological resources is not anticipated during proposed construction activities, implementation of the recommended mitigation measures regarding the protection of such resources would ensure that potential Project-level impacts would be reduced to a less than significant level, and the Proposed Project would not contribute to cumulative impacts to archaeological resources that might occur at other future development sites. Under the City of Los Angeles' standard development project review process, which includes evaluation of potential effects on archaeological resources for projects subject to CEQA, other pending development projects would be subject to review for the possible presence of archaeological resources and would also be subject to construction monitoring, where appropriate. Thus, the combined cumulative impacts on archaeological resources associated with the Project's incremental effect and the effects of the other projects would be less than significant.

## c. Project Design Features and Mitigation Measures

### *(1) Project Design Features*

No Project Design Features are proposed with regard to archaeological resources.

### *(2) Mitigation Measures*

The following mitigation measures are proposed to ensure that potential impacts to archaeological resources would be less than significant:

**Mitigation Measure I.2-1:** Prior to starting ground-disturbing activities, such as construction work on the Project Site in the areas identified as archaeologically sensitive in Figure IV.I.2-1, the Project shall retain a Project archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards and is eligible for or listed in the Register of Professional Archaeologists.

**Mitigation Measure I.2-1a:** The Event Center Applicant shall retain a Native American Heritage Commission recognized representative of the Gabrieleño Band of Mission Indians to monitor excavation activities for the Event Center. A monitoring schedule with a maximum of eight man-hours per week during excavation of the Event Center and an “on-call” program shall be established by the Event Center Applicant in coordination with the City of Los Angeles to ensure adequate oversight of earth disturbance activities.

**Mitigation Measure I.2-2:** If potential archaeological resources are identified during monitoring of ground-disturbing activity, the archaeologist shall order the temporary diversion of work outside a 200-foot radius around the discovery until the archaeologist has evaluated whether they are eligible for the listing in the California Register of Historical Resources or National Register of Historic Places. After the archaeologist determines that the resources are not significant, or if significant, have been successfully recovered (per Mitigation Measure 1.2-3), work may resume in the area where the archaeological resources were encountered.

**Mitigation Measure I.2-3:** If archaeological resources are found to be eligible and thus are significant historical resources under CEQA, a data recovery plan shall be developed and implemented. This data recovery plan shall include methods for hand-excavation, analysis, and report writing and shall also provide procedures for the curation of any collected material and associated Project material at a facility meeting federal standards. The historical resource shall be recorded in accordance with requirements of the Office of Historic Preservation (i.e., using Department of Parks and Recreation 523 Series forms).

**Mitigation Measure I.2-4:** If potential human remains are encountered during ground-disturbing activities, all work shall halt, and the Los Angeles County Coroner’s Office and the Los Angeles Police Department shall be notified, as prescribed in Public Resources Code §5097.98 and Health and Safety Code §7050.5. If the Coroner determines that the remains are of Native American origin, the Coroner shall proceed as directed in §15064.5(e) of the State CEQA Guidelines. The Proposed Project shall follow the guidelines set forth in Public Resources Code §§5097.98 and 5097.94(k).

**Mitigation Measure I.2-5:** If significant archaeological resources are found, draft reports on archaeological findings shall be prepared by the project archaeologist for submission to the City of Los Angeles for review. Final versions of these reports shall be submitted to the City of Los Angeles and the South Central Coastal Information Center at California State University, Fullerton.

#### d. Level of Significance After Mitigation

Implementation of the mitigation measures would ensure that any potential impacts associated with archaeological resources would be reduced to a less than significant level.

### J.1 Police Protection

#### a. Project Impacts

##### *(1) Construction*

Construction activities at the Project Site could potentially affect emergency vehicle access within the Project area from temporary lane closures and the introduction of construction traffic, which could add to congestion problems on the surrounding street and highway network and impede traffic flow and possibly emergency vehicle access. Potential traffic problems could be compounded during those construction phases that occur at the same time as a major daytime event is occurring within the Project Site or at a nearby venue. However, a construction traffic management program will be implemented to provide that adequate and safe access and parking remains available within the Project Site and surrounding area throughout the construction process, consistent with Los Angeles Fire Department requirements. In addition, truck queuing, equipment staging, and construction worker parking would be confined to the Project Site (off-street) and/or would occur at a nearby off-site lot or lots or streets, in order to minimize disruptions to emergency access. The LAPD would also be notified of the days, times, and locations of any lane closures, and appropriate detour signage would be employed as necessary to provide that emergency access is maintained to the Project Site and that traffic flow is maintained on adjacent street rights-of-way. With implementation of these project design features, together with the features set forth in the Proposed Project's Construction Traffic Management Plan set forth in Section IV.B.1, Transportation, of the Draft EIR, emergency access impacts from construction activities would be less than significant.

In addition, impacts associated with the potential for theft and vandalism of on-site construction materials, equipment, vehicles, temporary offices, or other communication centers would be reduced with incorporation of the project design features set forth below. Moreover, the temporary increase in the number of construction workers to the Project area is expected to be negligible as construction workers would be occupied with construction activities during work hours and would likely return to their place of residence upon completion of daily construction activities. Therefore, construction-related impacts associated with police protection services would be less than significant.

## *(2) Operation*

### *(a) Crime*

The LAPD notes that the predominant crime type in the Project area is currently property crime, including burglary from motor vehicles, theft of motor vehicles, grand theft auto, and personal theft. In addition, large entertainment venues are often the scene of ticket scalping, fraud, pick-pocketing, theft of property and merchandise, and other civil and criminal violations. Moreover, tailgating (i.e., drinking (sometimes alcohol) and eating in small groups within vehicle parking areas prior to an event) can lead to drunk and disorderly conduct in the parking lots, en route to the Event Center and at the Event Center. As such, with the increases in numbers of people and vehicles and in the number and size of events, the Proposed Project would result in a potential increase in the aforementioned types of crimes. However, through the implementation of the proposed Comprehensive Security Plan (CSP) and associated project design features, the potential crimes described above would be minimized. In addition, both Applicants would expressly prohibit traditional tailgating activities within any and all parking facilities that are under their direct control and would host pre-game festivities within the public plazas that connect the on-site buildings. With implementation of the CSP and associated project design features, crime impacts associated with the Proposed Project would be reduced to a less than significant level.

### *(b) Crowd Management*

The Proposed Project would result in an increase in the number and frequency of events within the Project Site, and on some days would attract a larger number of people when compared with existing conditions. Thus, crowd management associated with the Proposed Project has the potential to create an additional demand for LAPD services. However, crowd management features would be implemented as part of the Proposed Project to minimize the number of police personnel required to secure special events, facilitate crowd management strategies as needed, and minimize the effect of pedestrian crowds on traffic. Implementation of crowd management features would reduce potential impacts to less than significant levels.

### *(c) Traffic Flow and Management*

Concurrent events within the Event Center, the Convention Center, Staples Center and other nearby venues in the area have the potential to impact traffic flow in the Project vicinity. However, as set forth in Mitigation Measure B.1-9 of Section IV.B.1, Transportation, of the Draft EIR, the Proposed Project would implement a Neighborhood Traffic and Parking Management Program to reduce potential parking and traffic impacts. In addition, traffic flow features would be implemented as part of the Transportation Management Plan (TMP) presented in Section IV.B.1, Transportation, of the Draft EIR,

which would include directional and information signage, use of traffic cameras to provide real-time traffic information to the personnel staffing the Unified Field Command Center, and measures to encourage the use of transit. With implementation of the proposed Neighborhood Traffic and Parking Management Program and the TMP, potential impacts on police protection services associated with parking, traffic, and traffic flow and management would be reduced to less than significant levels.

*(d) Event Management and Command Operations*

LAPD has stated that policing and securing the Project Site would be complex and dynamic, requiring the collective capabilities and efforts of many organizations. The proposed CSP would include features related to event management, including a dedicated Unified Field Command Center, training of event management and security supervisors, and partnerships in the development of internal security plans. With implementation of these CSP and associated project design features, impacts on LAPD services associated with command and control would be less than significant.

*(e) Terrorist Attack Response*

Commercial Facilities and Mass Gathering Venues, such as the Proposed Project, are classified as soft targets. Local, state, and federal law enforcement agencies have indicated that soft targets are a priority for terrorists determined to inflict damage within the United States. Prevention of a terrorist attack is a combination of multiple proactive systems and programs all working together to detect, deter, prevent, protect against, and mitigate the consequences of potential incidents. The CSP would include features to address potential terrorist threats including early design planning prior to the beginning of actual construction, development of a Unified Field Command Center, identification of secure staging areas for responders, and screening. With implementation of the CSP and associated project design features, impacts to police protection resources resulting from prevention and response to terrorist threats would be reduced to a less than significant level.

*(f) Natural Disasters, Special Events and Unified Emergency Response*

The City of Los Angeles is an area susceptible to natural disasters such as earthquakes, wildfires, and severe weather, and human induced events. In addition to natural events that could rise to the level of disaster, the City has numerous large-scale special events (including demonstrations) that occur throughout the year. LAPD indicates that these incidents (spontaneous) and events (preplanned) require a substantial response of personnel and equipment from the LAPD. In the case of no warning or short notice incidents, there may be little time to obtain personnel and equipment from external sources to support a large-scale rapid response. This would be further compounded by the size,

complexity, and density of the Proposed Project and its anticipated maximum attendee population (and other large-scale venues in the vicinity of the Project Site). Thus, a natural disaster or a special event impacting the Project area has the potential to result in a substantial demand for LAPD services and the services of other agencies. However, as part of the Proposed Project, ongoing training programs would be developed with a specific focus on the California Large Stadium Initiative (CA-LSI), emergency response, evacuation, hazardous devices, persons with Access and Functional Needs (AFN), and active natural disaster and special event response. The CSP would include bi-yearly CA-LSI hazard training, specific training for LAPD personnel responding to the Project Site, and specific planning for AFN populations. With implementation of the CSP and associated project design features, potential police protection impacts associated with natural disasters and large-scale special events would be less than significant.

*(g) Other Considerations*

Increased vehicular traffic generated by the Proposed Project would result in significant impacts at a number of intersections, freeway ramps and segments of mainline freeways in the Downtown area, on the peak Event days or nights, including weekday and weekend events. During these periods of heightened traffic levels, response times to the Project Site and immediately adjacent locations could be significantly impaired as emergency vehicles find it more difficult to move through the heavy traffic. However, the drivers of emergency vehicles are highly experienced in navigating through areas of high traffic volumes using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, the Proposed Project's Transportation Management Plan, as described further in Section IV.B.1., Transportation, of the Draft EIR, would include features to facilitate emergency vehicle access/egress. With implementation of these measures, temporary traffic impacts would result in a less than significant impact on emergency vehicle access to the Project Site and other parts of Downtown Los Angeles.

Additionally, the Proposed Project would generate revenues to the City's General Fund which could be applied toward the provision of new police facilities, with related staffing. Specifically, the Proposed Project would generate revenues to the City of Los Angeles amounting to \$27.3 million on an annually recurring basis, a portion of which may be used to fund police resources as deemed appropriate by the Los Angeles City Council.

**b. Cumulative Impacts**

Projects with construction underway during the same timeframe as the Proposed Project may result in an increased need for security measures to prevent theft and vandalism of construction materials, supplies, equipment, and vehicles at all active construction sites. As with the Proposed Project, the related projects would be expected to implement similar security measures as part of construction. Thus, cumulative impacts

associated with the provision of police protection services during construction would be less than significant.

As with the Proposed Project, related projects also have the potential to result in construction activities that could have negative impacts on traffic. However, like the Proposed Project, it is expected that the related projects would also implement transportation management plans that would include traffic management personnel (flag persons) and provisions for truck queuing, equipment staging, and construction worker parking. Furthermore, adequate emergency access along roadways adjacent to the related projects would be provided throughout the construction process, consistent with LAPD and LAFD requirements. In addition, every related project would be reviewed by LAPD as part of the normal building permit process, and appropriate measures would be identified to address potential impacts on LAPD resources. Thus, the combined cumulative impacts on police protection associated with the Project's incremental effect and the effects of the related projects during construction would be less than significant.

Numerous related projects are located within the service area of the Central, Rampart, Southwest, and Newton Police Stations. These projects would be completed at various times over the next several years, and, as this additional development occurs, both daytime and night time populations within the Project area would increase. While it is difficult to predict the exact impact that these related projects could have on LAPD resources, it is reasonable to conclude that additional staffing, facilities, equipment and vehicles may be needed to maintain the City's desired level of service for the police department. Thus, cumulative impacts on police protection have the potential to be significant. However, some of the increased demand for police protection services associated with the related projects would be met through security features designed into future projects. The LAPD would also continue to evaluate the need for its services on a regular basis, including the review of individual development projects as they are in the City permitting process to identify project-level measures relative to impacts on LAPD resources. LAPD would also continue to make adjustments in capital investment and staffing resources, based on an on-going analysis of crime data, population density, and other variables that could change over time. In addition, similar to the Proposed Project, the identified related projects would generate revenues to the City that could be applied to the provision of police facilities and/or related staffing. Based on the above, while the cumulative impacts of the related projects on police protection may remain significant, the Proposed Project's contribution to these impacts, taking into account the Proposed Project's design features and mitigation measures, would not be cumulatively considerable.

Emergency access impacts during operations would be reduced to less than significant levels during design review of each of the related projects which occurs during the normal building permit process. In addition, while traffic levels would increase during

operations of the related projects, each related project would be required to implement all feasible transportation mitigation measures which would reduce impacts to emergency response times to some degree. Further, the drivers of emergency vehicles are highly experienced in navigating through areas of high traffic volumes using their sirens to clear a path of travel or driving in the lanes of opposing traffic. The combination of these factors results in less than significant cumulative impacts with regard to emergency response times.

### c. Project Design Features and Mitigation Measures

#### (1) *Project Design Features*

Provided below are those project design features that shall be implemented to address Project impacts on police services and facilities. In addition to the project design features listed below, the Applicants shall prepare, and implement, a Construction Management Plan, which would outline measures to ensure emergency vehicle access during all aspects of Project construction, including, but not limited to, the use of flaggers during partial street closures on streets surrounding the Project Site to facilitate traffic flow until construction is complete. In addition, the Applicants shall also implement a Transportation Management Plan that addresses pedestrians and traffic flows, pedestrian flows, and pedestrian safety, including crowd management. Please refer to Section IV.B.1, Transportation, of the Draft EIR for additional information regarding the Project's Construction Management Plan and the Project's Transportation Management Plan,

**Project Design Feature J.1-1: Comprehensive Security Plan.** The Applicants, in conjunction with the LAPD, shall finalize the preliminary Comprehensive Security Plan (CSP) through further consultation with the California Department of Transportation (Caltrans), Los Angeles Fire Department (LAFD), California Highway Patrol (CHP), Los Angeles County Sheriff's Department (LASD), and Metropolitan Transit Authority (Metro) as the Proposed Project proceeds through its final design phases and prior to operation. The Applicants shall implement the final CSP during operation of the Proposed Project.

The Comprehensive Security Plan shall include provisions for closure of streets and other security measures as may be appropriate for protection of Pico Passage depending on the size and nature of events. Further, in the course of finalizing the Comprehensive Security Plan and the design of the New Hall over Pico Blvd, the Applicant shall engage a qualified consultant to evaluate security risks, and in particular how to address the potential for blast related events both in design and operations, and make recommendations that may be appropriate based on the provisions of the Comprehensive Security Plan. The Applicant shall submit the

consultant's report and recommendations to, and consult with LADBS, LACC, LAPD, the New Hall design team and BOE, regarding appropriate operational and design measures in consideration of the report and recommendations.

**Project Design Feature J.1-2: Security Features during Construction.** During construction of the Proposed Project, both Applicants shall implement private security measures including security fencing, lighting, locked entry, and security patrol on the Project Site.

*(2) Mitigation Measures*

**Mitigation Measure J.1-1:** The Los Angeles Police Department (LAPD) and the Event Center Applicant shall agree to a Memorandum of Agreement (MOA) prior to the opening of the Event Center. This MOA shall ensure appropriate public safety and security deployment by the Applicant's layered security resources (plain-clothed and uniform security officers) such that there would not be an impact on service levels provided by the LAPD, including response times or other delays in service.

The MOA shall ensure scaled levels of police and security staffing based upon identified, objective standards, including, but not limited to: anticipated crowd size, historical data associated with crowd or fan behavior, event type, etc.

The MOA should include provisions for:

- Standard supervision/management-to-officer ratios;
- A minimum of one full-time Police Manager (Police Captain);
- A minimum of two support staff members; and
- Applicant's use of uniformed, off-duty LAPD officers and the LAPD deployment of on-duty uniformed resources.

In addition, the MOA shall:

- Identify the secure staging location, within the Project Site, for first responders (such as Bomb Squad, Hazmat, and other appropriate LAPD units); and
- Identify a mutually agreed upon dedicated location for explosives detection equipment storage and additional first responder equipment.

The MOA shall ensure that any measures to mitigate or avoid significant adverse changes are fully enforceable. Full implementation of the MOA's stipulations shall also be required.

#### d. Level of Significance After Mitigation

Based on the above analysis that includes incorporation of specific project design features, as well as implementation of Mitigation Measure J.1-1 set forth above, and Mitigation Measures B.1-9 and B.1-29 included in Section IV.B.1, Transportation, of the Draft EIR, Project impacts would be less than significant.

## J.2 Fire Protection

### a. Project Impacts

#### *(1) Construction*

The primary concern with regard to fire protection services during the Project's construction phases would involve temporary closures of public street lanes and limited street segments that currently provide vehicular access for LAFD response units. Closures could affect a single lane, multiple lanes or the entire roadway segment for periods of up to one year associated with the construction of the New Hall and the two new parking garages, and one lane on L.A. Live Way and Chick Hearn Court for up to three years for construction of the Event Center. As a consequence, response times from the local fire stations when they travel adjacent to the Project Site could be adversely impacted. However, a Construction Traffic Management Plan would be implemented throughout the construction phases, to minimize disruptions to through traffic flow, efficiently redistribute traffic to alternate routes, and to provide that emergency vehicle access to the Project Site and neighboring land uses is maintained at all times. In addition, impacts associated with the potential for accidental on-site fires during construction from the operation of mechanical equipment and the use of flammable construction materials would be minimized through the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur. Therefore, based on the above, construction-related impacts related to fire protection services would be less than significant.

#### *(2) Operation*

##### *(a) Facilities and Equipment*

Based on current forecasts most events at the Event Center would occur on a weekend day, and in the evenings during the weekday. A large portion of the service population for the fire stations located in the Project area relate to the large daytime population associated with the Downtown business community. As such, the operating hours of the Event Center would not coincide with the time periods when the greatest demands currently occur for the local fire stations. Moreover, the increase in service

population brought about by activities at the Event Center is anticipated to be well below what occurs during the current daytime weekday period. However, due to the overall size of the facility and the nature of the incidents that may occur, additional resources, particularly with regard to the delivery of emergency medical services, would be required. In recognition of these potential impacts, project design features have been identified and a Fire Life Safety Resources Management Plan would be prepared. In addition, the LAFD would be one of the public agencies that would staff the Unified Command Center and participate in the preparation and implementation of the Proposed Project's Comprehensive Security Plan. While unlikely and highly infrequent, the potential also exists for a major fire event or natural disaster (e.g., earthquake) to occur that would require response by multiple fire stations in the area. However, the proposed Fire Life Safety Resources Management Plan would include an emergency plan that sets forth, among other provisions, the pre-deployed on-site and off-site resources required to respond to a major emergency event at the Event Center. Therefore, with the provisions set forth within the Fire Life Safety Resources Management Plan, the LAFD's participation in the Proposed Project's Comprehensive Security Plan and staffing of the Unified Command Center, Proposed Project impacts to LAFD facilities and equipment would be reduced to a less than significant level.

*(b) Response Distance and Access*

The Project Site is well within required distances from existing truck and engine-equipped fire stations, with Station No. 10, the first-in-responder, located 0.6 miles away. Three other truck and/or engine equipped fire stations are located less than 1.5 miles from the Project Site. As such, impacts with regard to distances to LAFD facilities would be less than significant.

Multiple points of access to the Project Site would be provided. As a result, the Proposed Project would not result in significant impacts due to inadequate emergency vehicle access. However, increased vehicular traffic generated by the Proposed Project would result in significant impacts at a number of intersections, freeway ramps and segments of mainline freeways in the Downtown area, on the peak event days or nights, including weekday and weekend events. During these periods of heightened traffic, response times to the Project Site and immediately adjacent locations could be significantly impaired as emergency vehicles find it more difficult to move through the heavy traffic. However, the drivers of emergency vehicles are highly experienced in navigating through areas of high traffic volumes using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, the Proposed Project's Transportation Management Plan would include features to facilitate emergency vehicle access/egress. With implementation of these measures, as well as the project design features provided below, impacts with regard to distances to LAFD facilities and access would be less than significant.

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(c) *Fire Flow*

The LAFD has set the fire flow requirement for the Proposed Project at 12,000 gallons per minute flowing from eight hydrants. Upgrades to the existing water infrastructure serving the Project site may be required to meet City Fire Code fire flow standards for the new Event Center and the New Hall. This could involve replacement of one or more of the water mains, replacement/relocation/additional fire hydrants, and possibly water storage facilities on-site. Specific water infrastructure improvements required to achieve fire flow standards would be determined by the Los Angeles Department of Water and Power through hydraulic modeling, as part of the City's standard construction plan check and permitting process. Construction of required water infrastructure improvements, as set forth in Section IV.K.1, Utilities—Water, of the Draft EIR, would reduce fire flow impacts to a less than significant level.

b. Cumulative Impacts

(1) Construction

As with the Proposed Project, construction activities associated with the related projects could involve temporary closures of public street lanes and limited street segments that currently provide vehicular access for LAFD response units. However, like the Proposed Project, it is expected that the related projects would also implement transportation management plans throughout the construction process that would minimize disruptions to through traffic flow, efficiently redistribute traffic to alternate routes, and to ensure that emergency vehicle access is maintained at all times. In addition, every related project would be reviewed by the LAFD as part of the normal building permit process, and appropriate measures would be identified to address potential impacts on LAFD resources. Thus, the combined cumulative impacts on LAFD resources associated with the Project's incremental effect and the effects of the related projects during construction would be less than significant.

Projects with construction underway during the same timeframe as the Proposed Project may also result in an increased potential for accidental on-site fires from the operation of mechanical equipment and the use of flammable construction materials. As discussed above, construction contractors and work crews would implement measures to minimize these hazards during construction of the Proposed Project, such as the maintenance of mechanical equipment in good operating condition, careful storage of flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials. Similar measures would also be expected to be imposed on related projects during the normal building permit process and would be implemented as part of the construction of these related projects. Thus, cumulative impacts associated with the provision of fire protection services during construction would be less than significant.

## (2) Operation

The Proposed Project in combination with related projects could have a potential to increase the cumulative demand for LAFD resources. However, as these projects would occur within the existing urban area of the City, they would be located within an acceptable distance of one or more existing fire stations. In addition, each project would be subject to the City's routine construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire life safety, as well as coordinating with LADWP to provide that local fire flow infrastructure meets current code standards for the type and intensity of land use involved. Moreover, LAFD would continue to monitor population growth and land development throughout the City, and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatus, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. However, in the current economic climate, many funding sources for a variety of City services, including the LAFD, have been significantly reduced, which could hamper and delay funding of additional fire department resources that may be needed to respond to growth, as well as impact current service levels. Though the Project would not worsen this situation directly, by increasing potential demand on the LAFD, especially if there is a multiple alarm fire on-site, the Proposed Project would indirectly contribute to a potentially adverse cumulative effect occurring on a City-wide basis, and specifically involving the five fire stations that would serve the Project Site and the Central City area. However, Proposed Project-related impacts would be reduced to less than cumulatively considerable through implementation of a Fire Life Safety Resources Management Plan. Through the implementation of the project design features identified below, the impact of the Proposed Project would be reduced such that they would not be cumulatively considerable. Therefore, the Proposed Project's cumulative impacts would be less than significant.

Emergency access impacts during operations would be reduced to less than significant levels during design review of each of the related projects which occurs during the normal building permit process. In addition, while traffic levels would increase during operations of the related projects, each related project would be required to implement all feasible transportation mitigation measures which would reduce impacts to emergency response times to some degree. Further, the drivers of emergency vehicles are highly experienced in navigating through areas of high traffic volumes using their sirens to clear a path of travel or driving in the lanes of opposing traffic. The combination of these factors results in less than significant cumulative impacts with regard to emergency response times.

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## c. Project Design Features and Mitigation Measures

### (1) Project Design Features

**Project Design Feature J.2-1:** Construction managers and personnel shall be trained in emergency response and fire safety operations.

**Project Design Feature J.2-2:** Fire suppression equipment specific to Project construction shall be maintained on the construction sites in accordance with OSHA and Fire Code requirements.

**Project Design Feature J.2-3:** Develop a response/access plan for both construction and operations in consultation with the LAFD. This plan shall be prepared in coordination with the Proposed Project's Transportation Management and Comprehensive Security Plans.

**Project Design Feature J.2-4:** Fire inspector(s) shall be assigned to the Project Site as needed during relevant construction phases.

**Project Design Feature J.2-5:** A plot plan shall be submitted to the LAFD for approval prior to approval of the first building permit. The plot plan shall include the following minimum design features:

- Fire lanes, where required, shall be a minimum of 20 feet in width clear to sky, posted with a sign of no less than three square feet in area and/or painted with "Fire Lane No Parking," and have an adequate approved turning area. When a fire lane must accommodate the operation of LAFD aerial ladder apparatus or where fire hydrants are installed, those portions would not be less than 28 feet in width;
- Access for LAFD apparatus and personnel to and into all structures would be provided;
- Identify the locations and sizes of all fire hydrants; and
- All structures would be within 300 feet of an approved fire hydrant.

**Project Design Feature J.2-6:** The Convention Center Applicant and Event Center Applicant shall develop a first responder communications plan for their respective structures in consultation with, and approved by, the LAFD. The plan shall address the need for communications equipment. The first responder communications plan shall be updated from time to time based on information that may be learned during operation of the Proposed Project, potential changes in LAFD's available resources, and possible competing demands on these resources due to cumulative development.

**Project Design Feature J.2-7:** The operator of the Event Center shall provide or cause to be provided ambulance services such that one ambulance

is on-site in accordance with the provisions of the Fire Life Safety Resources Management Plan.

**Project Design Feature J.2-8:** The operators of the Convention Center and Event Center shall provide an ambulance station with adequate resources for basic life support and advanced life support services at all Event Center events, per the provisions of the Fire Life Safety Resources Management Plan (see Project Design Feature J.2.6).

**Project Design Feature J.2-9:** A Fire Life Safety Resources Management Plan shall be developed in consultation with, and approved by, the LAFD, prior to issuance of a certificate of occupancy for the Event Center. In the development of the Fire Life Safety Resources Management Plan, the Applicant and LAFD shall consult regarding the need for personnel, equipment and facilities. As part of the Plan, the Applicant shall provide funding as needed for event-day deployment of personnel and equipment in a manner that is appropriate to the type and size of events at the Event Center and consistent with measures undertaken for other large attendance venues. The Fire Life Safety Resources Management Plan shall be updated from time to time based on information that may be learned during operation of the Proposed Project, potential changes in LAFD's available resources, and possible competing demands on these resources due to cumulative development.

#### *(2) Mitigation Measures*

With the implementation of the project design features identified above the LAFD's participation in the Proposed Project's Comprehensive Security Plan, and staffing of the Unified Command Center, Proposed Project impacts with regard to fire protection services during construction and operations would be reduced to a less than significant level. As such, no mitigation measures are required.

#### d. Level of Significance After Mitigation

With implementation of the project design features identified above, the LAFD's participation in the Proposed Project's Comprehensive Security Plan, and staffing of the Unified Command Center, potential construction and long-term operations impacts on LAFD services would be reduced to a less than significant level.

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## K.1 Utilities—Water

### a. Project Impacts

#### (1) Water Supply

##### (a) Construction

Proposed Project demolition and construction activities would require minimal water demand and are not anticipated to result in an adverse impact on available water supplies and infrastructure. Construction activities associated with installation of a proposed new water main would primarily be confined to trenching and would not extend beyond Pico Boulevard between L.A. Live Way and Figueroa Street. Any associated temporary vehicle and pedestrian access or traffic impacts would be reduced with the implementation of a Construction Management Plan, which would provide for safe pedestrian access, vehicle travel, and emergency vehicle access throughout the construction period. Such impacts would be of a relatively short-term duration and would cease to occur once installation of the water main is complete. Therefore, Project impacts on water supply and infrastructure associated with short-term construction activities would be less than significant.

##### (b) Operation

Development of the Proposed Project would result in an increase in long-term water demand associated with water consumption, operational uses, maintenance, and other activities on the Project Site. Based on the forecasted annual attendance at the Project Site, buildout of the Proposed Project, with incorporation of the City's water efficiency requirements, is projected to result in a total annual potable water demand of approximately 84.3 million gallons or 258 acre-feet (AF) per year. However, incorporation of the Applicants' specified commitments with respect to water conservation would result in water savings amounting to approximately 3.1 million gallons or 10 AF per year. Thus, the net increase in water demand, after accounting for water conservation measures and water consumption associated with the existing Project Site uses to be removed, would be approximately 63.5 million gallons or 194 AF per year. In addition, the Proposed Project's net daily impact when accounting for water conservation measures and existing uses to be removed would be 640,683 gallons per day (gpd). For comparison, the Proposed Project's net daily impact when accounting for water conservation measures on days when there is no existing Convention Center activity would be 742,853 gpd.

Based on LADWP's 2010 Urban Water Management Plan (UWMP) water projections, the Citywide water demand in 2017 (i.e., the Proposed Project's buildout year) during average year hydrological conditions is expected to reach 629,700 AF. During a single-dry year water demand could reach 667,500 AF, and during a multiple-dry year (during years 2016 to 2020) water demand is forecasted to reach 661,200 AF. As the

UWMP anticipates adequate water supplies under normal, single-dry, and multi-dry year conditions through 2035, the Proposed Project's estimated net increase in water demand would be within the available and projected water supplies through 2035. In addition, as stated within the Water Supply Assessment for the Proposed Project (see Appendix V of the Draft EIR), the City Council found that LADWP can provide sufficient domestic water supplies to the Proposed Project. Thus, LADWP would be able to meet the water demand of the Proposed Project, as well as the existing and planned future water demands of its service area. As such, the Proposed Project's impacts on water supply would be less than significant.

## *(2) Water Infrastructure*

Pressure fluctuations in the existing water distribution system due to the additional domestic water demand associated with the Proposed Project would range from 0.2 to 3.1 pounds per square inch (psi), as would pressure fluctuations on days when no existing Convention Center activity occurs. Based on the Proposed Project's pressure fluctuations compared to existing conditions, pipe pressures for the Proposed Project would be generally comparable to the average pipe pressure of 53 psi in the Project vicinity. Furthermore, pipe pressures from the Proposed Project would be within acceptable pressure levels within the 386 water distribution system elevation zone, which range from 38 to 120 psi. Thus, as the anticipated pipe pressures associated with the Proposed Project would be within the acceptable pressure levels for the water distribution system elevation zone and as flow levels would vary by no more than 9.3 percent, the incremental impact on pressure and flow in the water mains surrounding the Project Site due to the Proposed Project's additional domestic water demands would be less than significant.

The pressure fluctuations in the water distribution system due to the worst-case fire flow scenario would be less than 15 psi, with the exception of the existing 8-inch main in Pico Boulevard, which would drop by over 37 psi to below the minimum 20 psi requirement for fire emergencies. In addition, the average pipe velocity in the 8-inch main would increase to 112.1 percent of the pipe capacity. Therefore, the Proposed Project would result in a potentially significant impact to the existing water infrastructure system. However, with implementation of Mitigation Measure K.1-1, the lowest pressure would increase from 19 psi to 35 psi, well above the Fire Department's minimum pressure requirement of 20 psi. In addition, the pipe velocity would decrease from 112.1 percent to 48 percent of the pipe capacity. Thus, after implementation of mitigation, the existing water infrastructure would be adequate to accommodate the water demands of the Proposed Project, and impacts would be reduced to a less than significant level.

## b. Cumulative Impacts

### (1) *Water Supply*

Based on the service area reliability assessment conducted for its 2010 UWMP, LADWP determined that it will be able to reliably provide water to its customers through the year 2035. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive water supply assessment for every new development project (as defined in Section 10912 of the Water Code) within its service area. Such water supply assessments must evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed. Moreover, SB 221 requires that for residential subdivisions with 500 units or more that are in non-urban areas, written verification from the water service provider be submitted indicating that sufficient water supply is available to serve the proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are or will be available prior to completion of the project. Furthermore, the City's *Securing L.A.'s Water Supply* serves as a blueprint for creating sustainable sources of water for the City of Los Angeles in order to reduce dependence on imported supplies by expanding water conservation efforts through public education, installing high efficient water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding its recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. In addition, compliance by the Proposed Project and future development projects with regulatory requirements that promote water conservation such as the LAMC, including the City's Green Building Ordinance, as well as AB 32, would assist in assuring that adequate water supply is available on a cumulative basis. As a result, it is anticipated that LADWP would be able to supply the demands of the Proposed Project and future growth through 2017 (the Proposed Project's buildout year) and beyond. Therefore, cumulative impacts on water supply would be less than significant.

### (2) *Water Infrastructure*

New development projects would be subject to LADWP review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Furthermore, LADWP, the Los Angeles Department of Public Works, and the City of Los Angeles Fire Department would conduct ongoing evaluations to provide that facilities are adequate. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

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## c. Project Design Features and Mitigation Measures

### (1) Project Design Features

**Project Design Feature K.1-1:** As indicated in the Applicant's Sustainability Program (see Appendix E of the Draft EIR) the New Hall and the Event Center will achieve a water use reduction of 33 percent and 35 percent of the estimated baseline.<sup>17</sup> These water reduction requirements shall be met by specific measures which may include the following:

#### Commercial/Public Facility Water Conservation Features

- Install high-efficiency toilets that use a maximum of 1.28 gallons per flush.
- Install high-efficiency urinals (0.125 gallon/flush) for the Convention Center, and waterless urinals for the Event Center.
- Install low-flow faucets for public and most private locations with a maximum flow rate of 0.5 gallon per minute. Low-flow faucets will be of a self-closing design (i.e., that would automatically turn off when not in use).
- Install no more than one showerhead per shower stall, having a flow rate no greater than 2 gallons per minute.
- Install Prep and Service faucets with low-flow aerators that use 1.8 gallons per minute in lieu of the standard 2.2 gallons per minute.
- Install high efficiency dishwashers that are Energy Star rated or equivalent within kitchen/food preparation areas minimum per City ordinance requirements.
- Install high-efficiency clothes washers with a water factor of 6.0 or less that are Energy Star rated, when possible. Includes both large and small washers to accommodate variances in load sizes.
- Cooling Tower Conductivity Controllers or Cooling Tower pH Conductivity Controllers.
- For Cooling Towers: Install purple piping and associated connections (i.e., reclaimed water infrastructure) to the property line for potential future connection to LADWP reclaimed water

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<sup>17</sup> *Water Baseline calculated according to the maximum allowable water use per plumbing fixture and fittings as required by the California Building Standards Code as cited in 2010 Los Angeles Green Building Code.*

supply, pending confirmation of water chemical profile for acceptable use.

#### Landscaping Water Conservation Measures

- Install high-efficiency irrigation systems, including weather-based irrigation controllers with rain shutoff technology.
- Install matched precipitation (flow) rates for sprinkler heads.
- Install drip/microspray/subsurface irrigation, where appropriate.
- Achieve minimum irrigation system distribution uniformity of 85 percent.
- Install a separate water meter (or submeter), flow sensor, and master valve shut-off for irrigated landscape areas totaling 5,000 square feet and greater.
- Use water efficient landscaping such as proper hydro-zoning.
- Use landscape contouring to minimize precipitation runoff.
- Use artificial turf for the proposed Event Center playing surface.
- For irrigation systems: Install purple piping and associated connections (i.e., reclaimed water infrastructure) to the property line for potential future connection to LADWP reclaimed water supply, pending confirmation of water chemical profile for acceptable use.
- Use best current landscaping practices that balance water use, shade, CO<sub>2</sub> removal, aesthetics and practical design concerns.

#### Water Performance

- Install, at minimum, whole building water meters that measure total potable water use for the entire building. Install submeters on cooling towers and irrigation subsystems per above.

### *(2) Mitigation Measures*

**Mitigation Measure K.1-1:** Prior to issuance of a certificate of occupancy, the Proposed Project shall coordinate with the City of Los Angeles Department of Water and Power for the anticipated upgrade of the existing 8-inch water main located on the south side of Pico Boulevard between L.A. Live Way and Figueroa Street to a 12-inch water main in accordance with all applicable City standards.

#### d. Level of Significance After Mitigation

With the implementation of the project design features and mitigation measure identified above, Project-level and cumulative impacts on water supply and water infrastructure would be less than significant.

## K.2 Utilities—Wastewater

### a. Project Impacts

#### *(1) Construction*

Construction of the Proposed Project would result in a temporary and incremental increase in wastewater generation as a result of construction workers on-site. However, such generation would be nominal and is not anticipated to substantially or incrementally exceed the future scheduled capacity of any treatment plant beyond that anticipated in the City of Los Angeles Integrated Resources Plan (IRP).

As part of the Proposed Project, a portion of an existing 66" PVC lined Reinforced Concrete Pipe (RCP) sanitary sewer line in the northeast corner of the Event Center would need to be relocated to accommodate a new connection between the Event Center loading dock and the existing STAPLES Center loading dock (below grade). The relocation would be subject to review and approval of the City of Los Angeles Department of Public Works under a type B-Permit. Prior to construction, the contractor would be required to prepare and implement a sewer by-pass plan and emergency spill prevention plan to the satisfaction of the City Engineer. Construction impacts associated with infrastructure upgrades would primarily be confined to trenching for the sewer lines that connect the individual buildings to the City's existing in-street infrastructure, would be relatively short-term in duration, and would cease installation is complete. Therefore, construction impacts to the wastewater system would be less than significant.

#### *(2) Operation*

##### *(a) Wastewater Generation and Infrastructure*

The Proposed Project would generate an annual wastewater flow of 70.14 million gallons. When accounting for the existing buildings and central plants that would be removed under the Proposed Project, which currently generate an annual flow of 6.78 million gallons, the Proposed Project would result in an annual net increase of 63.36 million gallons. On a daily basis, the Proposed Project would generate a net increase of 640,754 gpd (0.641 million gallons per day (mgd)), of which the Convention Center and its ancillary uses would generate approximately 0.004 mgd. Proposed Project net daily generation on days with no existing Convention Center activity (referred to in the analysis as the Daily Project Impacts with No Existing Convention Center Activity scenario) would be 727,635

gpd (0.728 mgd), of which the Convention Center and its ancillary uses would generate approximately 90,537 gpd (0.091 mgd).

Based on existing wastewater flows and constraints within the local sewer systems, up to 22,000 gpd (0.022 mgd) of Project flows could discharge to System 1, with the balance discharging to System 2, or the entire Proposed Project could discharge to System 2. The Convention Center currently discharges to System 1, which would have sufficient available capacity (i.e., 0.022 mgd) to accommodate the additional forecasted flows of 0.004 mgd from the Convention Center. The total flow from the Convention Center under the Daily Project Impacts with No Existing Convention Center Activity scenario would be 0.091 mgd. However, since 0.08 mgd of this total is from existing flows, the incremental flow would be the same as the additional daily projected flows of 0.004 mgd. Accordingly, System 1 would also have sufficient available capacity to accommodate the forecasted flows of the Convention Center under the Daily Project Impacts with No Existing Convention Center Activity scenario. With respect to System 2, the City Bureau of Sanitation has indicated that the remaining capacity of System 2 would be able to sufficiently accommodate the increased flow generated by the Proposed Project. In addition, if the Proposed Project were to connect to System 2, a local sewer line would need to be constructed that would feed into the existing 66-inch line.

As sufficient capacity is available within System 2, the impacts of the Proposed Project as well as under the Daily Project Impacts with No Existing Convention Center Activity scenario would be less than significant. The final decision as to whether the Proposed Project would connect to a combination of the two systems or only System 2 would be made during the final design stage based on available capacity and whichever approach is more efficient from a design perspective. Further, as required by the Bureau of Sanitation, detailed gauging and evaluation would also be needed as part of the normal permit process to identify a specific sewer connection point.

#### *(b) Wastewater Treatment*

Wastewater generated by the Proposed Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant (HTP), which is part of the Hyperion Service Area (HSA). Based on the IRP, the existing effective capacity of the HTP is approximately 450 mgd.<sup>18</sup> Based on these forecasts and the City Bureau of Sanitation's analysis, the Proposed Project's increase in wastewater generation

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<sup>18</sup> *City of Los Angeles, Integrated Resources Plan, December 2006.*

would be adequately accommodated by the HTP. Thus, operation of the Project would have a less than significant impact on wastewater treatment facilities.

*(c) Consistency with Regulations*

In accordance with Goal 9A of the City's General Plan Framework, the Proposed Project would connect to the existing sewer system which has been shown to have adequate capacity to meet the demands of the Proposed Project. The Proposed Project would be required to obtain an S-permit pursuant to LAMC Sections 64.11 and 64.12 and pay a Sewerage Facilities Charge to connect to the existing sewer system. Payment of the fees provides that the Proposed Project would pay for its fair share for any necessary expansions of the sewer system, additional improvements to conveyance, treatment, and disposal facilities.

The City would be required to perform a Sewer Capacity Availability Request (SCAR) analysis in accordance with LAMC Section 64.15 to confirm that there is adequate capacity in the sewer collection system to safely convey project-generated wastewater to HTP. This determination would be indicated by acceptance of plans and specifications for plan check and issuance of the Project's S-permit. Additionally, all Project-related wastewater infrastructure improvements and individual building connections would be designed to meet applicable requirements, including those set forth in the Bureau of Engineering's Special Order No. SO06-0691. Therefore, impacts relative to consistency with regulations would be less than significant

**b. Cumulative Impacts**

*(1) Wastewater Conveyance*

Related project development within the Project area would be anticipated to add wastewater flows to the local sewer systems. To the extent that some of the related projects may connect to Systems 3 and 4, cumulative impacts would not occur in conjunction with the Proposed Project. However, capacity constraints could occur with respect to Systems 1 and 2, to which the Proposed Project could connect. New development would be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit (S-Permit) prior to connection to the sewer system. If system upgrades are required as a result of a given related project's additional flow, construction of necessary improvements would be required. As such, cumulative wastewater conveyance impacts would be less than significant.

*(2) Wastewater Treatment*

Cumulative impacts on wastewater treatment facilities were analyzed in the context of growth projected in the HSA through 2020. The IRP projects average flow for the HTP

to be approximately 435 mgd in 2020. Therefore, based on the HTP's projected design capacity of 450 mgd in 2020, the HTP would have an available capacity of 15 mgd. The Proposed Project would generate a maximum increase of 0.641 mgd in average daily flows, or 0.728 mgd under the Daily Project Impacts with No Existing Convention Center Activity scenario. Under either scenario, the wastewater flows generated by the Proposed Project combined with the HTP's forecasted 2020 flow would increase the total cumulative wastewater flow to less than 436 mgd, well within the HTP's 2020 design capacity of 450 mgd. Therefore, cumulative impacts on wastewater treatment systems would be less than significant.

### c. Project Design Features and Mitigation Measures

#### *(1) Project Design Features*

Refer to Section IV.K.1, Utilities—Water, of the Draft EIR, for a list of the indoor water use conservation measures that would be implemented as part of the Proposed Project. Incorporation of these measures would also serve to reduce wastewater generation associated with the Proposed Project.

#### *(2) Mitigation Measures*

**Mitigation Measure IV.K.2-1:** Sewer connections between the Proposed Project and the existing municipal sewer systems would be designed to conform to the standards of the Department of Public Works.

**Mitigation Measure IV.K.2-2:** The Event Center Applicant shall construct a local sewer line that connects into System 2's 66-inch line.

### d. Level of Significance After Mitigation

With the implementation of the mitigation measures identified above, the Proposed Project's impacts and cumulative impacts on wastewater conveyance and wastewater treatment systems would be less than significant.

## **K.3 Utilities—Solid Waste**

### a. Project Impacts

#### *(1) Construction Impacts*

##### *(a) Waste Stream*

Based on the United States Environmental Protection Agency's (U.S. EPA) rates, the Project would generate approximately 95,869.05 tons of demolition and construction debris

over the construction life cycle of the Proposed Project. The Applicants would target 75 percent of the non-hazardous construction and demolition debris by weight to be recycled and/or salvaged for reuse.

Assuming approximately 272 days of demolition, the projected total demolition of 87,851.6 tons would result in approximately 323 tons of demolition debris on a daily basis. With regard to construction waste, assuming approximately 1,422 days of construction, and not accounting for diversion, the amount of daily construction waste would be an average of 5.6 tons per day on non-demolition days. When accounting for diversion, based on the forecasted need to dispose of approximately 81 tons per day of demolition over the assumed 272 days when demolition activity would occur, the Proposed Project's demolition waste would represent 4.7 percent of the maximum permitted daily capacity of the County's inert landfills open to the City of Los Angeles (1,710 tpd), and 5.1 percent of the expected average daily tonnage capacity at the Chiquita Canyon Landfill (1,574 tpd), which also accepts construction and demolition waste.<sup>19,20,21</sup> In addition, the disposal of approximately 1.41 tons per day of non-demolition construction debris over the course of the Proposed Project's construction period would represent 0.08 percent of the maximum permitted daily capacity of the County's inert landfills open to the City of Los Angeles (1,710 tpd) and 0.09 percent of the expected average daily tonnage capacity at the Chiquita Canyon Landfill (1,574 tpd). While it is unlikely that the quantity of construction and demolition waste generated would be distributed evenly throughout the construction period, even on peak construction days, the amount of daily construction waste would not approach the maximum daily remaining capacity at the inert landfills within Los Angeles County that are open to the City of Los Angeles. Furthermore, the Applicants' demolition and construction debris recycling plan would require recycling during all phases of site preparation and building construction. In comparison to the forecast of demolition and construction waste presented in the Draft EIR, the amount of demolition and construction waste sent to the County's unclassified landfills is less, due to the higher diversion rate for the Event Center (i.e., from 50 to 75 percent), despite the fact that the total amount of demolition and construction waste generated before recycling increases incrementally. Construction impacts to solid waste facilities would therefore remain less than significant.

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<sup>19</sup> *County of Los Angeles Department of Public Works; Los Angeles County Integrated Waste Management Plan 2010 Annual Report, October 2011, Appendix E-2, Table 1,*

<sup>20</sup> *Based on communication with the County Department of Public Works, construction and demolition waste at Chiquita Canyon landfill is used as ground cover for the landfill. Thus, being beneficial, there is no limit of the amount that can be accepted beyond that of the 5,000 tpd of total solid waste. December 2011*

<sup>21</sup> *Although the available capacity at Chiquita Canyon is 5,000 tons per day, for a conservative analysis, the proposed daily demolition is compared to the expected average daily tonnage available at Chiquita Canyon of 1,574 tpd.*

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## (2) Operational Impacts

### (a) Solid Waste Disposal Facilities

Proposed Project operations are forecasted to generate approximately 8,391.7 tons of solid waste per year (before recycling). Taking recycling into account, the Proposed Project would generate a net solid waste generation of 2,267.57 tons per year that would require transport to a landfill, and 6,124.13 tons per year that would be recycled. Project-generated solid waste would be collected by a private solid waste hauler and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles.<sup>22</sup>

The maximum daily solid waste generation level associated with the Proposed Project would occur during a Spectator Event at the Event Center coupled with the Event Center's ancillary uses, Convention Center usage, and Convention Center ancillary uses. Calculations for the Proposed Project with existing Convention Center activity (Daily Proposed Project Impacts) and the Proposed Project with no existing Convention Center activity (Daily Project Impacts with No Existing Convention Center Activity) were determined based on the daily attendance of the Project Site multiplied by the existing per capita solid waste generation and industry standard solid waste generation factors for the ancillary uses. Daily Proposed Project Impacts would involve the generation of 123.716 tons per day of solid waste. Daily Project Impacts with No Existing Convention Center Activity would involve the generation of 132.216 tons per day of solid waste. With the incorporation of recycling, these levels of solid waste generation drop to 31.263 tons per day under the Proposed Project with existing Convention Center activity, and 35.513 tons of solid waste compared to no existing Convention Center activity.

The County would continue to address landfill capacity through the preparation of annual CIWMPs. The preparation of each annual CIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's SWIRP objective to achieve a 70 percent diversion goal by 2015. While it is anticipated that future iterations of the CIWMPs would provide for improvements beyond 2014 to serve future waste disposal needs, it is conservatively assumed, based solely on existing permitted landfill capacity, that the County may not be able to accommodate the disposal needs of the Project. Therefore, impacts to solid waste disposal facilities at

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<sup>22</sup> *Private solid waste haulers hold individual contracts with landfill operators for the disposal of waste. Thus, it is unknown at this time which landfills would ultimately accept Project-generated waste. However, it is anticipated that Project-generated waste would generally be disposed of at a Class III landfill open to the City of Los Angeles.*

Project development buildout in 2017 are conservatively concluded to be potentially significant.

### b. Cumulative Impacts

Cumulative development in the City of Los Angeles, prior to recycling, would generate approximately 894,694.696 tons of non-hazardous construction debris between 2011 and 2017. When the Proposed Project's 95,869.05 tons of demolition and construction debris is added to this amount, it brings the total to approximately 990,563.746 tons of non-hazardous construction debris that would need to be disposed of over the Proposed Project's five-year construction cycle. In addition, the Proposed Project's net to landfill disposal of 24,903.30 tons of non-hazardous construction debris would account for 5.6 percent of the cumulative non-hazardous construction waste disposed of throughout the Los Angeles City during the five year construction period for the Proposed Project. As the Proposed Project's contribution to the depletion of regional inert landfill capacity is not cumulatively considerable, the Project's cumulative construction impacts would be less than significant.

Cumulative development within the City of Los Angeles with a diversion rate of 55 percent would generate 193.1 tons per day in 2017. When the increase in solid waste generated from Proposed Project is added to the forecasted growth in the City solid waste to be landfilled, the total becomes 224.372 tons per day, of which the Proposed Project's increase would be 31.3 tons per day, or approximately 13.9 percent. On days where the Proposed Project impacts with no existing Convention Center activity would occur, the net City waste to be landfilled would 226.163 tons per day, of which the Proposed Project would contribute 35.5 tons per day, or approximately 15.5 percent. With successful implementation of planned landfill facilities, cumulative impacts would be less than significant. However, as landfill capacity may not be available to meet the cumulative solid waste disposal needs of the Proposed Project and related projects, it is conservatively concluded that the Proposed Project may make a considerable contribution to a significant cumulative impact with respect to landfill capacity.

Furthermore, the cumulative solid waste generation associated with the development of the related projects could create a need for additional solid waste collection routes to adequately handle future solid waste generated by this development, which is considered a potentially significant cumulative impact. However, as no Project-related impacts would occur, the Proposed Project's contribution to cumulative impacts with regard to solid waste collection routes is concluded to be less than significant.

### c. Project Design Features and Mitigation Measures

#### *(1) Project Design Features*

**Project Design Feature K.3-1:** The Applicants will extend the existing on-site solid waste recycling programs to include both the Event Center and the New Hall.

#### *(a) Convention Center*

**Project Design Feature K.3-2:** A minimum of 20 percent of all building materials and products for development will consist of recycled content or be manufactured regionally or use rapidly renewable resources.

**Project Design Feature K.3-3:** Divert a combined minimum of 75 percent of construction waste and/or debris from landfill storage for both the demolition and new construction phases.

**Project Design Feature K.3-4:** The New Hall would divert at least 50 percent of its solid waste during operation.

#### *(b) Event Center*

**Project Design Feature K.3-5:** Seventy-five percent of solid waste will be diverted during construction and operation of the Event Center. The Event Center will divert waste from landfill through robust recycling, the donation of durable goods, and implementing a front of house composting program that includes sourcing of biodegradable concessions packages.

#### *(2) Mitigation Measures*

As Project impacts during construction and operations would be reduced to the extent feasible through the above project design features, no mitigation measures are required.

### d. Level of Significance After Mitigation

Construction of the Proposed Project would not create a need for additional inert solid waste disposal facilities; thus, construction-related waste would result in a less than significant impact with respect to landfill capacity. Likewise, the Proposed Project would result in a less than significant impact associated with the disposal of hazardous wastes and solid waste collection routes during construction.

Operation of the Proposed Project would involve the continued implementation of on-site waste management and recycling programs to divert solid waste generated at the Project Site from requiring disposal at regional landfills. The Los Angeles County Integrated Waste Management Plan (CIWMP) 2010 Annual Report identifies multiple scenarios in which sufficient and on-going landfill capacity would be available. Should one of these scenarios be realized, then both Proposed Project and cumulative impacts would be less than significant. However, due to the uncertainty in the availability of future landfill capacity, it is conservatively assumed that the Proposed Project's operational impacts with regard to landfill capacity would remain significant and unavoidable. Likewise, as diversion measures cannot be provided for related projects, cumulative impacts with regard to regional landfill disposal capacity would also remain significant and unavoidable. Other than waste minimization and diversion, which are project design features, no other feasible mitigation measures have been identified to address this potential impact.

## **K.4 Utilities—Electricity**

### **a. Project Impacts**

#### *(1) Construction*

Electrical power would be consumed during construction of the Proposed Project buildings and facilities. This demand would be supplied from existing electrical services within the Project Site and would not affect other services as there is sufficient existing capacity to also meet the Project's construction demands. Overall, demolition and construction activities would require minimal electricity consumption and would not be expected to have any adverse impact on available electricity supplies and infrastructure. Therefore, Project impacts on electricity supply and infrastructure associated with short-term construction activities would be less than significant.

Construction impacts associated with Project Construction infrastructure upgrades would primarily be confined to trenching. As discussed further in Section IV.B.1, Transportation, of the Draft EIR, to reduce any temporary pedestrian access and traffic impacts, the contractor would implement a Construction Management Plan, which would provide for safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. Overall, when considering impacts resulting from the installation of any required electrical infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Additional information regarding the construction impacts associated with the installation of on-site upgrades to the electrical system are addressed in Sections IV.E, Noise, and IV.F.1, Air Quality, of the Draft EIR.

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(2) Operation

(a) Electricity Consumption

Electrical consumption during a Spectator Event would consume the highest daily level of electricity of the four operating conditions analyzed. As such, this level of electrical consumption would be added to that of the other Proposed Project components to determine the maximum daily consumption of electricity. The projected increase in electrical consumption under the Proposed Project is forecasted to be 33,542 megawatt-hours (MWh) per year at Project build out. On an annual basis, the Event Center would consume 20,203 MWh (60.2 percent of the Proposed Project total), the Convention Center would consume 10,267 MWh (30.6 percent of the Proposed Project total), and the new Parking Garages would consume 3,072 MWh per year (9.2 percent of the Proposed Project total).

At buildout, the Proposed Project's forecasted electrical usage would be approximately 33,542 MWh per year, which would represent a 26,023 MWh annual net increase from existing conditions. Daily Project consumption, is forecasted to be 151,768 kilowatt-hours (kWh), which would represent a 131,170 kWh net increase from existing conditions. Daily Project Impacts with No Existing Convention Center Activity would be an increase in consumption of 151,768 kWh per day.<sup>23</sup> The Los Angeles Department of Water and Power forecasts that energy consumption within its service area would increase from 23,493 gigawatt-hours (GWh) per year in the 2010–2011 fiscal year to 24,795 GWh in fiscal year 2016-2017, an increase of 1,302 GWh over the next 6 years.<sup>24</sup> Based on the Proposed Project's projected increase in electrical consumption of 33,542 MWh per year within the Project Site, this increase in consumption accounts for only 2.57 percent of the Los Angeles Department of Water and Power's projected increase in electrical consumption over the next six years. The Proposed Project's percentage of the total increase in consumption is sufficiently low to support the conclusion that the Proposed Project's impacts relative to electricity consumption are less than significant.

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<sup>23</sup> *To provided for a conservative analysis, Proposed Project Impacts with No Existing Convention Center Activity assumes zero electricity consumption for all Convention Center facilities. Therefore the net increase of Proposed Project impacts with No Existing Convention Center Activity would be equal to that of the Total Proposed Project less the electricity consumption of the existing STAPLES Center central plant.*

<sup>24</sup> *Los Angeles Department of Water and Power, 2010 Integrated Resource Plan, Table A-1.*

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*(b) Electricity Demand*

The projected peak electrical demand associated with the operation of the Proposed Project would be a net increase of 8,861 kilovolt amperes (kVA). Projected peak electrical demand associated with the operation of the Proposed Project with No Existing Convention Center Activity would be a net increase of 19,286 kVA.<sup>5</sup> Based on LADWP's analysis, the Convention Center's existing electrical infrastructure system may not be adequate to meet the Project's demand and system upgrades may be required. As a result a significant impact with regard to electrical infrastructure would occur. To respond to this shortfall in capacity, an additional redundant 35 kV underground electrical feeder may be added by LADWP in Pico Boulevard paralleling the existing feeders to increase service capacity and reliability to the Project Site. Additional LADWP transformation and switching equipment is anticipated to be added to the existing below grade vault south of Pico Boulevard and east of Convention Center Way. New LADWP transformation and switching equipment is also anticipated in the lot between Convention Center Way and L.A. Live Way in an above ground screened location, to serve the New Hall and Central Plant loads at the west end of the complex.

To expand service to the Event Center, two 34.5 KV circuits from the intersection of Figueroa Street and Chick Hearn Court or from the intersection of Figueroa Street and Pico Boulevard are anticipated to be constructed. The circuits would be extended in concrete encased conduits with manholes located approximately 300 feet on center to a new LADWP vault at the Event Center. The conduits, manholes and vault would be installed per LADWP requirements. With the implementation of these improvements, if determined to be required by LADWP, adequate electrical infrastructure would be in place to serve the Convention Center, Event Center, and other Project components. In the event impacts on electrical demand loads exceed available capacity, potentially significant impacts would result. Should this occur, mitigation measures would be implemented, which would reduce impacts to a less than significant level.

**b. Cumulative Impacts**

*(1) Cumulative Electricity Consumption*

The Proposed Project electricity impacts presented above are assessed in the context of the LADWP service area. Since overall growth within the LADWP service area extends beyond the geographic area which the related projects list is located, the LADWP service area is used for the purposes of conducting the Proposed Project's cumulative impacts. Forecasted growth is anticipated to substantially increase the overall

consumption of electricity within the LADWP service area. The LADWP currently supplies approximately 23,493 GWh of electricity a year to approximately 1.4 million customers located within the City of Los Angeles.<sup>25</sup> In 2017, the buildout year for the Proposed Project, the LADWP forecasts a total available annual capacity of 27.99 million MWh and total annual sales of 24.795 million MWh, which includes cumulative growth, within the Los Angeles Department of Water and Power service area. Thus, there would be 3.195 million MWh of available capacity beyond projected sales. This projected forecast in consumption, coupled with the Proposed Project, would yield a total of roughly 24.821 million MWh per year of electricity consumption. As such, the Proposed Project's consumption represents 0.81 percent of the 3.195 million MWh of the forecasted excess annual capacity in 2017. As this level of cumulative consumption is below the LADWP forecasted available capacity in 2017, a less than significant cumulative impact would result.

Converting these annual forecasts to daily levels, the IRP forecasts daily sales of 67.93 million kWh of electricity and a daily capacity of 76.69 million kWh, which yields an excess daily capacity of 8.76 million kWh. The Proposed Project would account for approximately 0.19 percent of cumulative consumption (68,062,677 kWh) and approximately 1.4 percent of the daily capacity (8,753,424 kWh) not used by others. These small increases would also occur under the Proposed Project with No Existing Convention Center Activity; at approximately 0.22 percent of cumulative consumption (68,083,275 kWh) and approximately 1.73 percent of the daily capacity not used by others (8,753,424 kWh). Thus, cumulative impacts would also be less than significant.

## *(2) Cumulative Electricity Demand*

The IRP forecasts increases in peak demand as well as the increases in consumption which are described above. The peak demand is forecasted to increase from 5,797,000 kVA during the 2010–2011 fiscal year to 6,152,000 kVA in the 2016–2017 fiscal year, an increase in peak demand of 355,000 kVA.<sup>26</sup> Based on the forecasts the Proposed Project would utilize approximately 2.49 percent of the forecasted unused peak demand capacity. Furthermore, under the Proposed Project with No Existing Convention Center Activity analysis, the percentage increases to approximately 5.43 percent. It is anticipated that the IRP's forecasted peak demand levels would be sufficient to meet cumulative demand, particularly given the decrease, rather than increase in peak demand over the 2006–2007 to 2008–2009 period. Furthermore, the IRP does not forecast excess peak

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<sup>25</sup> Los Angeles Department of Water and Power, 2010 Integrated Resource Plan, Table A-1: Trend Case Energy Sales and Peak Demand.

<sup>26</sup> LADWP "Power Integrated Resources Plan (IRP), 2010.

demand capacity. For these reasons, the Proposed Project's impact on system capacity would not be cumulatively considerable and would be less than significant.

With regard to local infrastructure capacity, developers of individual future projects, as well as the Proposed Project, would provide for all Los Angeles Department of Water and Power required improvements to facilitate the provision of electrical services to each individual development site. Thus, through this process, the Los Angeles Department of Water and Power would continue to have the ability to meet demand to accommodate future growth and maintain acceptable levels of service. Furthermore, Project-related impacts would contribute to cumulative off-site effects in the surrounding area since Project related impacts would be significant with regard to electrical infrastructure. Therefore, the Proposed Project's cumulative impacts with regard to local electrical infrastructure would also be significant, but reduced to a less than significant level with the implementation of the mitigation measures identified below.

### c. Project Design Features and Mitigation Measures

#### (1) Project Design Features

**Project Design Feature K.4-1:** The New Hall would implement additional efficiency measures to achieve a 20 percent reduction in energy consumption relative to the California Energy Efficiency Standards and would also comply with the required measures of the 2010 Los Angeles Green Building Code.

**Project Design Feature K.4-2:** The Event Center would implement additional efficiency measures to achieve a 14 percent reduction than the estimated baseline.<sup>27</sup>

**Project Design Feature K.4-3:** The L.A. Live Way Garage and the Bond Street Garage shall feature energy efficient lighting.

**Project Design Feature K.4-4:** A minimum total of 12 electric car charging stations shall be provided within the on-site parking garages.

**Project Design Feature K.4-5:** Install solar panels which, at a minimum, will replace the output of the solar panels that currently exist at LACC.

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<sup>27</sup> Energy Baseline calculated according to Title 24 2008 as cited in the City of Los Angeles Green Building Code.

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(2) *Mitigation Measures*

(a) *Convention Center*

**Mitigation Measure K.4-1:** Construct, if determined to be required by the LADWP, an additional redundant 35 kV underground electrical feeder in Pico Boulevard paralleling the existing feeders, or other improvements determined by the LADWP.

**Mitigation Measure K.4-2:** Construct additional LADWP transformation and switching equipment to the existing below grade vault south of Pico Boulevard and East of Convention Center Way.

**Mitigation Measure K.4-3:** Construct new LADWP transformation and switching equipment in the lot between Convention Center Way and L.A. Live Way, in an above ground screened location. The exact location of the electrical feeder and LADWP vault, and transformation and switching equipment would be determined as plans for the Project are further refined.

(b) *Event Center*

**Mitigation Measure K.4-4:** Construct two (2) 34.5 kV circuits from the intersection of Figueroa Street and Chick Hearn Court or from the intersection of Figueroa Street and Pico Boulevard. The circuits shall be extended in concrete encased conduits with manholes located approximately 300 feet on center to a new LADWP vault at the Event Center. The conduits, manholes and vault shall be installed per LADWP requirements.

d. **Level of Significance After Mitigation**

Implementation of the Proposed Project would result in increased electrical consumption and demand within the service area of the Los Angeles Department of Water and Power. However, with the implementation of the project design features and mitigation measures, Proposed Project and cumulative impacts would be less than significant.

## **K.5 Utilities—Natural Gas**

a. **Project Impacts**

(1) *Construction Impacts*

Construction activities for the Proposed Project would not require the consumption of natural gas. Construction impacts associated with the installation of new natural gas distribution lines would primarily involve trenching and would not have any significant

impacts for the Project Site or to adjoining property, including the upsizing of the existing 4-inch natural gas line to a proposed 6-inch natural gas line within Chick Hearn Court between L.A. Live Way and Georgia Street. Prior to ground disturbance, Project contractors would coordinate with Southern California Gas (SCG) to identify the locations and depth of all lines. Further, SCG would be notified in advance of proposed ground disturbance activities to avoid natural gas lines and disruption of natural gas service.

As discussed further in Section IV.B.1, Transportation, of the Draft EIR, to reduce any temporary pedestrian access and traffic impacts, the contractor would implement a Construction Management Plan, which would provide for safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. Overall, when considering impacts resulting from the installation of any required natural gas distribution lines, all impacts would be of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Additional information regarding the construction impacts associated with the installation of on-site upgrades to the natural gas distribution lines are addressed in Sections IV.E, Noise, and IV.F.1, Air Quality, of the Draft EIR. Therefore, Project impacts on natural gas associated with construction activities would be less than significant.

### *(2) Operational Impacts*

The Proposed Project would increase the demand for natural gas resources within the Project Site. The connected load for the Event Center and the peak demand in terms of therms per hour for the Event Center and the Convention Center based on usage type (i.e., boilers, kitchen cooking, or water heaters). The Proposed Project is forecasted to result in an increase in peak demand from 158 therms per hour to 706 therms per hour. While the Event Center represents a completely new source, a 72 percent increase in peak demand is forecasted for the Convention Center, while the total forecasted Proposed Project would represent a 346 percent increase in peak demand over existing conditions. This increase in natural gas consumption would result from the following two factors: (1) the New Hall would be heated by natural gas whereas the existing West Hall is heated via electricity; and (2) the increase in annual attendance from approximately 2.7 million annual patrons under existing conditions to approximately 4.0 million annual patrons under the Proposed Project. Even though there would be a substantial increase in peak demand, the existing infrastructure is capable of delivering this increase in demand except for the natural gas line located in Chick Hearn Court between L.A. Live Way and Georgia Street. To provide adequate service to the Event Center, this particular line would be upgraded from a 4-inch to a 6-inch line.

At buildout, the forecasted natural gas usage for the Event Center would be approximately 356,596 therms per year. The forecasted increase in natural gas usage at the Convention Center would be 88,140 therms per year, which would account for a

154 percent increase in natural gas consumption at the Convention Center. As described above, the increase in peak demand at the Convention Center would be due to the use of natural gas to heat the New Hall and the increase in annual patronage at the Convention Center. Overall, the Proposed Project is forecasted to consume approximately 501,835.7 therms per year, a four-fold increase under the Proposed Project. Under the Proposed Project and No Existing Convention Center Activity scenario, the increase in daily natural gas consumption and demand would be the same as that forecasted for the Proposed Project. This would result since under this scenario natural gas consumption would not occur at those portions of the Project Site that are analyzed in the Draft EIR. As these increases constitute a small percentage of the supply available to SCG, long-term impacts associated with the consumption of natural gas would be less than significant.

### b. Cumulative Impacts

The SCG service area extends from Mono County on the north to Orange and San Bernardino Counties on the south. As population and growth forecasts are not available for this entire service area, the County of Los Angeles is selected as the geographic area of analysis. Therefore, in estimating the cumulative projected increase in natural gas demand within this service area, the Southern California Association of Governments population and growth forecasts between 2011 and 2017 for Los Angeles County was used.

The Proposed Project, as well as cumulative growth in the region, would result in a substantial increase in demand for natural gas. Based on forecasted growth within Los Angeles County, an increase in demand amounting to 2,485.6 million therms per year would be consumed. With the addition of the Proposed Project's 444,735.7 therms per year, cumulative natural gas demand would increase to approximately 2,486.04 million therms per year. Based on these forecasts, the Project constitutes approximately 0.017 percent of the forecasted cumulative natural gas demand. It is anticipated that the forecasted growth would incorporate design features and energy conservation measures, as required by Title 24, which would lessen the impact on natural gas demand. Additionally, the 2010 California Gas Report prepared by the California Gas and Electric Utilities forecasts that California natural gas demand is expected to be flat for the next 20 years due to modest economic growth, decline in commercial and industrial demand, renewable goals, and savings linked to advanced metering methods. These facts in conjunction with the relatively small increase in demand represented by the Proposed Project as well as the fact that all system deficiencies related to Proposed Project development are mitigated to a less than significant level, demonstrates that the Proposed Project's incremental effects are not cumulatively considerable. As a result, the Proposed Project's natural gas impact would not be cumulatively considerable and would be less than significant.

c. Project Design Features and Mitigation Measures

*(1) Project Design Features*

No project design features are proposed with regard to natural gas consumption.

*(2) Mitigation Measures*

**Mitigation Measure K.5-1:** In the event that the Event Center final building design requires connection to the existing natural gas line in Chick Hearn Court, then the Event Center Applicant shall upgrade or cause to be upgraded the existing 4-inch natural gas line located in Chick Hearn Court between L.A. Live Way and Georgia Street to a 6-inch line prior to the completion of construction of the Event Center.

No mitigation measures are required to support the construction of the New Hall, the Bond Street Garage, the L.A. Live Way Garage or any other on-site improvements constructed as part of the Proposed Project.

d. Level of Significance After Mitigation

With the implementation of the mitigation measure, natural gas impacts would be less than significant.

## IV.L. Environmental Hazards

a. Project Impacts

*(1) Prior Uses of the Project Site*

It is possible that development within the areas designated as HSA1, HSA2, HSA3, and HSA4 could encounter contaminated soil or underground features such as USTs and an abandoned oil well. However, Mitigation Measures L-1, L-2, and L-12 would be incorporated to provide that any contaminated soils encountered during Proposed Project construction be treated or disposed of properly. In addition, Mitigation Measure L-3 would provide that any USTs uncovered during construction be removed in accordance with applicable regulations. Moreover, Mitigation Measure L-4 would provide that Proposed Project construction activities meet construction requirements associated with the former on-site oil well as well as provide that if construction activities uncover remnants of, or materials associated with, the former oil well or additional currently unknown oil wells these would be treated in accordance with applicable regulations. Therefore, with incorporation of applicable mitigation measures, impacts would be reduced to a less than significant level.

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*(2) Hazards Associated with Hazardous Sites Listing and Regulatory Agency Review*

While the Project Site is identified in the databases reviewed in the EDR report, the potential environmental impact from a majority of these listings is considered low due to the type of regulatory listings and involvement of a regulatory agency in remedial efforts. However, three listings associated with the Convention Center are considered recognized environmental conditions based on potential soil contamination in the form of total petroleum hydrocarbons (TPH), volatile organic compounds, and/or metals. Therefore, it is possible that contaminated soil or underground features such as USTs exist below portions of the Project Site. However, Mitigation Measures L-1 through L-3, L-5, and L-12 would be incorporated to provide that any contaminated soils or USTs that are encountered are treated in accordance with applicable regulations. With incorporation of these mitigation measures, potential impacts would be reduced to a less than significant level.

*(3) Hazardous Materials Use, Storage, and Management*

During on-site grading and building construction, fuel, and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, could be used, handled, and stored on the Project Site. The use, handling, and storage of these materials could increase the possibility for exposure of people and the environment to hazardous materials. However, compliance with the project design features as well as existing regulations and plans at the Project Site during construction would reduce this risk. Therefore, impacts associated with hazardous materials usage, storage, and management during construction would be less than significant.

The Proposed Project has the potential to increase the acquisition, use, handling and storage of existing hazardous materials on-site through the expansion of existing facilities and development of new facilities. With continued implementation of hazardous materials management at the Project Site and continued compliance with applicable laws, as well as implementation of the identified project design features, impacts associated with the use, storage, and management of hazardous materials during operation of the Proposed Project would be less than significant.

The Project Site also contains several grease interceptors and three-stage clarifiers. Construction activities associated with the Proposed Project may require removal of these facilities. Therefore, Mitigation Measure L-6 is proposed below to provide that all local sanitation district requirements and regulations are followed for proper removal and disposal. As such, with implementation of Mitigation Measure L-6, no significant impacts associated with the removal of on-site interceptors and clarifiers are anticipated.

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#### *(4) Hazardous Waste*

There is the potential for on-site grading to increase the use, handling and storage of hazardous materials, and encounter contaminated soil, resulting in a corresponding increase in hazardous waste. Implementation of the Proposed Project design features, Mitigation Measures L-1, L-2, L-7, L-11, and L-12, as well as existing regulations and plans at the Project Site during construction of the Proposed Project would prevent exposure of people to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with hazardous waste generation and disposal during construction of the Proposed Project would be less than significant.

Existing hazardous waste at the Project Site includes asbestos containing waste, PCB-containing waste, fuel components/tank sludge, unspecified oil-containing waste, aqueous solutions, oxygenated solvents, waste oil/mixed oil, paint sludge, oil/water separator sludge, liquids with halogenated solvents, and other organic solids. Additional environmentally regulated hazardous wastes identified or presumed to be at the Project Site include universal, electronic, and radioactive wastes including, but not limited to, fluorescent light tubes, thermostats, fire detection/alarm devices, exit signs, CRTs, batteries, and aerosol cans. With implementation of the Proposed Project, it is anticipated that hazardous waste generating activities could increase. However, in compliance with the Hazardous Waste Source Reduction and Management Review Act (i.e., Senate Bill 14), source reduction measures to reduce the generation of hazardous waste on-site would be implemented. For example, under STAPLES Center's ISO 14001 Environmental Management System, hazardous materials are subject to hazardous waste management programs and all chemicals brought into the site are subject to review and approval by management. With the implementation of existing hazardous waste reduction efforts on-site, and the fact that the majority of typical/operational hazardous waste is conveyed to licensed treatment, disposal, and resource recovery facilities, impacts associated with hazardous waste generation and disposal during operation of the Proposed Project would be less than significant.

Other potential environmental impacts related to the increased generation of hazardous waste are associated with potential releases of hazardous materials. Hazardous waste releases may result in potential injury if exposure takes place and, if not mitigated, result in soil and/or groundwater impacts. Compliance with applicable regulations related to the handling, storage and disposal of hazardous waste would ensure that no significant impact associated with the release of hazardous wastes occurs.

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*(5) Asbestos and Lead-Based Paints*

The demolition of several structures within the Project Site would have the potential to encounter asbestos and lead-based paints. However, Project Design Features L-2 and L-3, would require that a comprehensive asbestos-containing materials survey is conducted prior to renovation or demolition and that all procedural requirements and regulations are followed for proper removal and disposal of any lead-based paint found on site. In addition, as the removal of asbestos is regulated by SCAQMD Rule 1403, any asbestos found on-site would be removed by a certified asbestos containment contractor in accordance with applicable regulations prior to demolition. Furthermore, per applicable regulations, workers associated with the Proposed Project would be protected by worker safety requirements. Therefore, construction of the Proposed Project would not expose people to substantial risk resulting from the release of or exposure to asbestos, asbestos-containing materials, or lead-based paint in excess of regulatory standards and no significant impact associated with these hazardous materials is anticipated from construction of the Proposed Project.

New on-site construction and/or renovation due to the Proposed Project would include use of commercially sold construction materials that would not include asbestos, asbestos-containing materials, or lead-based paint and are therefore not anticipated to increase the occurrence of friable asbestos, asbestos-containing materials, or lead-based paint at the Project Site. As such, operation of the new development proposed at the Project Site is not anticipated to expose persons to friable asbestos or lead-based paint. Therefore, no significant impact associated with asbestos, asbestos-containing materials, and lead-based paint is anticipated from operation of the Proposed Project.

*(6) Polychlorinated Biphenyls*

Multiple secured transformer enclosures, hydraulic escalators, hydraulic lifts, passenger elevators (hydraulic and cable-traction), and hydraulic compactors were observed throughout the Project Site. In addition, given the original date (1971) of construction of portions of the Project Site, there is a potential for capacitors and fluorescent lighting unit ballasts to contain polychlorinated biphenyls (PCBs). The demolition of structures within the Project Site would have the potential to remove on-site transformers, hydraulic equipment and ballasts, resulting in a potential for exposure to PCBs. Therefore, Mitigation Measure L-8 is provided below to provide that all procedural requirements and regulations are followed for proper removal and disposal of PCB-containing materials. With implementation of Mitigation Measure L-8, no significant impact associated with PCBs is anticipated from construction of the Proposed Project.

The new electrical systems to be installed in the Proposed Project would not contain PCBs. Therefore, during operation of the Proposed Project, maintenance of such electrical

systems would not expose people to PCBs. In addition, the Applicants would continue to comply with applicable laws regulating PCBs. As such, the operation of the Proposed Project would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, no significant human exposure to PCBs is anticipated from the operation of the Proposed Project.

*(7) Aboveground and Underground Storage Tanks*

Proposed Project-related grading could uncover or disturb existing known and unknown USTs, which could lead to soil and/or groundwater impacts and the potential exposure of people and the environment to hazardous materials. If USTs or impacted soils are encountered, existing comprehensive policies and programs specifically related to this potential environmental hazard would continue to be implemented. In addition, Mitigation Measures L-1, L-2, and L-12 would be incorporated to provide that any contaminated soils encountered during Proposed Project construction be treated or disposed of properly and Mitigation Measure L-3 would provide that any USTs uncovered during construction be removed in accordance with applicable regulations. Therefore, a less than significant impact is anticipated.

Expanded operations on the Project Site could require the installation and operation of additional aboveground storage tanks (ASTs) for the storage of motor oil, vegetable oil, propane, and other substances and additional underground storage tanks to accommodate increased hazardous materials demand. The increase in the number of ASTs and USTs on-site could potentially increase the potential for accidental releases and subsequent impacts to soil and surface water and groundwater, as well as the potential for environmental and human exposure to hazardous materials. However, new ASTs and USTs would be installed and maintained in accordance with applicable regulatory requirements. As such, implementation of the identified project design features and continued compliance with applicable laws associated with ASTs and USTs would minimize impacts to human health and the environment associated with ASTs and USTs, and no significant impacts are anticipated.

*(8) Oil and Gas*

Construction of the Proposed Project would require excavation of subsurface materials for building foundations, etc. As a result, construction workers could potentially be at risk during excavation activities if methane gases are present in high concentrations. Therefore, appropriate precautionary measures shall be taken to provide for construction worker safety. Mitigation Measure L-10 below will provide that potential methane impacts during construction are reduced to a less than significant level.

Given the location of the Project Site in a Methane Zone, new buildings and paved areas of the Proposed Project would be required to comply with the City's Methane Seepage Regulations and the specifications of the City of Los Angeles Department of Building and Safety as set forth in Section 91.7101, *et seq.* of the City's Municipal Code and as described in Mitigation Measure L-10 below. Compliance with these regulations would assure that methane concentrations would be below the level that would present a risk to human health and safety. Thus, potential methane impacts during operation of the Project would be reduced to a less than significant level.

The Environmental Data Resources report identified the presence of one abandoned oil well beneath the "Blue" parking zone of the West Hall and is reportedly plugged. To the extent that Proposed Project construction occurs in proximity to this well, the California Department of Oil, Gas and Geothermal Resources may require the re-abandonment of this well in accordance with current regulatory requirements. Through this process, any potential significant impacts would be reduced to a less than significant level.

#### *(9) Emergency Response*

Construction of the Proposed Project could temporarily interfere with local and on-site emergency response. Local streets adjacent to the Project Site would be used for construction traffic; however, construction traffic would conform to all traffic work plans and access standards to allow adequate emergency access. Implementation of construction traffic management plans and access standards would reduce the potential for the impacts on emergency response during construction of the Proposed Project. Therefore, construction of the Proposed Project is not anticipated to significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan. Therefore, no significant impact regarding emergency response during construction of the Proposed Project is anticipated.

The Proposed Project includes the widening of sidewalks to accommodate pedestrian travel and would impact the streets immediately adjacent to the Project Site including Pico Boulevard, L.A. Live Way, and Chick Hearn Court. However, Proposed Project development would not alter the basic layout of the local street system and would generally maintain the operational parameters that occur under existing conditions. In addition, the Project Site's existing emergency response and/or evacuation plan would be updated to include the Proposed Project thereby reducing the potential for impact on emergency response during operation of the Proposed Project. Furthermore, as described in Section IV.B.1, Transportation, of the Draft EIR, while certain streets may be closed at certain times before, during, or after an event, these closures would not close streets to all vehicles and would continue to allow for local and emergency vehicle access. Access by such vehicles would actually be facilitated by the proposed street closures requiring use of

traffic control officers at key intersections. Additionally, the Transportation Management Plan will address emergency vehicle provisions. Therefore, operation of the Proposed Project would not affect emergency response to the Project Site or the surrounding area. As such, a less than significant impact is anticipated.

### b. Cumulative Impacts

Development of the Proposed Project in combination with the related projects has the potential to increase the risk for an accidental release of hazardous materials. However, each of the related projects would require evaluation for potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, asbestos-containing materials, lead-based paint, polychlorinated biphenyls, and oil and gas would be required to comply with all applicable local, state, and federal laws, rules and regulations. Since environmental hazards issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. Therefore, with full compliance with all applicable local, state, and federal laws, rules and regulations, cumulative impacts would be less than significant.

### c. Project Design Features and Mitigation Measures

#### (1) *Project Design Features*

The following are the existing plans, programs and policies that address potential impacts from Proposed Project implementation due to the use, storage, and creation of hazardous materials:

**Project Design Feature L-1:** The Applicants shall prepare and implement a Soil Management Plan approved by the Department of Toxic Substances Control, pursuant to Department of Toxic Substances Control's Voluntary Cleanup Program, or other applicable state or local regulatory agency providing oversight, to address potential contamination in soil within the Project Site. The approved Soil Management Plan shall include procedures for soil sampling and remedial options that may include removal (excavation), treatment (*in-situ* or *ex-situ*), or other measures, as appropriate. If soil contamination is suspected to be present, prior to excavation and grading, the South Coast Air Quality Management District's (SCAQMD) Rule 1166 shall be implemented, as appropriate. If soil contamination is not suspected, but is observed (i.e., by sight, smell, visual, etc.) during excavation and grading activities, excavation and grading shall be temporarily halted and redirected around the observed area(s) until the appropriate evaluation and follow-up

measures are implemented, as contained in SCAQMD's Rule 1166. The contaminated soil discovered shall then be evaluated and managed in accordance with the approved Soil Management Plan in order for grading activities to resume.

**Project Design Feature L-2:** A comprehensive asbestos-containing materials survey shall be conducted on all structures prior to renovation or demolition. If any Regulated Asbestos-Containing Materials (RACM), Category I/Class I Non-Friable and Category I/Class II Non-Friable ACMs that may become friable are determined to be present, they shall be removed prior to renovation or demolition activities taking into account the following: EPA's National Emission Standards for Hazardous Air Pollutants (NESHAPs) and South Coast Air Quality Management District's Rule EPA's NESHAPs 1403. EPA Guidance Document 340/1-92-013 "A Guide to Normal Demolition Practices under the Asbestos NESHAPs" shall be referred to prior to initiation of a proposed demolition project. In addition to asbestos regulations that control the release of asbestos to the ambient environment, federal and State OSHA regulations outlining specific work practices for handling ACMs shall be followed.

All asbestos removal shall be performed by an experienced, state-licensed, Cal/OSHA- and SCAQMD-registered asbestos contractor. All work shall take place under the guidance of an independent, California Certified Asbestos Consultant. The Consultant shall be responsible for reviewing the redevelopment drawings, designing engineering controls used to control airborne asbestos contamination, visual inspections of engineering controls, and ambient air monitoring to determine airborne fiber levels.

**Project Design Feature L-3:** A comprehensive lead-based paint survey shall be conducted on all structures prior to renovation or demolition. In the event that lead-based paint is present, all removal activities shall conform to federal and California OSHAs regulations (e.g., Interim Final Rule found in 29 CFR Part 1926.62).

**Project Design Feature L-4:** The Applicants shall submit to the City Fire Department and City Department of Building and Safety, as applicable, an updated emergency response and/or evacuation plan, as appropriate, to include operation of the Proposed Project. The emergency response plan shall include but not be limited to the following: mapping of evacuation routes for vehicles and pedestrians, and the location of the nearest hospital and fire departments. The update to this plan shall be coordinated with the Proposed Project's Construction Traffic and Management Control Plan (see Mitigation Measure B.1-30, Section IV.B.1, Transportation).

## *(2) Mitigation Measures*

Compliance with all applicable laws, rules, and regulations associated with hazardous materials management during design, construction and operation would minimize impacts to human health and the environment. In addition, the following mitigation measures would further minimize potential hazardous materials impacts during construction:

**Mitigation Measure L-1:** A Geophysical Survey of the West Hall, Cherry Street Garage, and the surface parking lot located south of Pico Boulevard, between L.A. Live Way and Bond Street shall be conducted to assess the presence of undocumented USTs, or other subsurface impoundments, in these locations. A subsurface soil investigation and soil gas survey shall also be conducted in order to investigate the presence of residual contaminants in the soil in these areas. The data from the investigation shall be included in a Soil Management Plan for the Project Site, which shall indicate the proper characterization, removal, and disposal requirements for contaminated soils identified, and shall be submitted to the Department of Toxic Substances Control for approval prior to the redevelopment of the Project Site.

**Mitigation Measure L-2:** In the event that USTs, fill materials or undocumented areas of contamination are encountered during construction or redevelopment activities, work in the affected areas shall be discontinued until appropriate health and safety procedures are implemented. The LAFD shall be notified regarding the contamination. The appropriate program shall be selected based on the nature of the contamination identified. The contamination remediation activities shall be conducted in accordance with pertinent regulatory guidelines, under the oversight of the appropriate regulatory agency. If contaminated soil is to remain in place, it shall be evaluated for vapor intrusion concerns and if vapor intrusion issues are present, all overlying structures shall be designed to mitigate the vapor intrusion risk.

**Mitigation Measure L-3:** All USTs and ASTs shall be removed following all applicable local, state and federal regulations. Applicable permits shall be obtained from local oversight agencies including the City of Los Angeles Fire Department and South Coast Air Quality Management District, as applicable. An experienced environmental professional, along with LAFD representatives, shall provide oversight and monitoring of the removal and soil collection process during the tank removal. Laboratory testing of the soil shall be performed to evaluate the presence of contamination. Once a site has been initially evaluated via soil and/or groundwater collection

and analysis, further site investigation and remediation activities may be warranted. Where indicated as required by this further investigation, clean-up measures to mitigate the soil contamination, vapor intrusion risk, and/or groundwater contamination shall be undertaken. Local oversight by the City of Los Angeles Fire Department and/or Regional Water Quality Control Board is required. An environmental professional (i.e., Professional Geologist) is required to provide oversight and project monitoring to ensure the health and safety of all workers. A remedial plan shall be developed by a Professional Geologist and submitted to local agencies, as required. Once approved, the remedial plan shall be implemented. Environmental closure shall be granted prior to construction, if practical. If environmental closure is not granted prior to commencement of construction of structures, then appropriate steps shall be implemented that allow for later assessment, remediation, and prevention of vapor intrusion. The environmental regulatory oversight agency shall approve the appropriate steps that are being proposed to allow for the later assessment, remediation, and prevention of vapor intrusion.

**Mitigation Measure L-4:** Prior to any construction activities beneath the West Hall, the California Division of Oil, Gas and Geothermal Resources and the City of Los Angeles shall be contacted regarding construction requirements associated with the former on-site oil well. If demolition or construction activities encounter remnants of, or materials associated with the former oil well, evaluation by the DOGGR and the City of Los Angeles, including possible re-abandonment in accordance with all applicable regulations shall occur.

**Mitigation Measure L-5:** Soil sampling at the northwestern corner of L.A. Live Way and Pico Boulevard and verification of the former 2,000-gallon gasoline UST closure/remediation status with the Convention Center and LAFD shall be conducted prior to any soil disturbance in this area. This former UST shall be closed to current regulatory standards, in accordance with all LAFD regulations.

**Mitigation Measure L-6:** Regularly scheduled pumping and maintenance of all on-site clarifiers and interceptors shall continue as long as they remain in use on-site. Interceptors/clarifiers to be removed shall comply with local sanitation district and/or environmental health permitting, which may include inspection and/or sample collection. Applicable permits shall be obtained from local oversight agencies including the City of Los Angeles Sanitation District and City of Los Angeles Building and Safety Department, as applicable. An experienced environmental professional shall provide oversight and monitoring of the removal and soil collection process during the removal. Laboratory testing of the soil shall be performed to evaluate the presence of contamination. Where indicated as required by this further

investigation, clean-up measures to mitigate the soil contamination shall be undertaken. An environmental professional (i.e. Professional Geologist) shall be required to provide oversight and monitoring to ensure the health and safety of all workers. A remedial plan shall be developed by a Professional Geologist and submitted to local agencies, as required.

**Mitigation Measure L-7:** Universal, electronic, and radioactive wastes shall be removed prior to demolition activities and set aside for re-use or disposal/recycling by a licensed recycler or specific licensee. Light tubes, lamps, or monitors shall be re-used on-site or recycled at a licensed universal/electronic/radioactive waste facility. Recycling facilities shall be authorized by the Cal-EPA—Department of Toxic Substances Control or the state in which they are located. Bill(s) of lading shall accompany each load of universal, electronic, or radioactive, waste that leaves the site, including the name and address of the generator, contractor, pick-up site, disposal site, and quantity of universal waste disposed. The recycler shall provide a statement certifying recycling/disposal/destruction of the identified wastes, including the date(s) of recycling/disposal/destruction, and identifying the disposal/destruction process used.

**Mitigation Measure L-8:** Electrical transformers, hydraulic elevator equipment, light ballasts, and other equipment suspected to contain PCBs shall be inspected for the presence of PCBs prior to any disturbance or removal. All equipment found to contain PCBs shall be removed and disposed in accordance with all applicable local, state and federal regulations including, but not limited to CCR Title 22 and EPA 40 CFR. In addition, a thorough assessment of any stained areas for the potential impact of PCBs and/or hydraulic oil are recommended. If impacted soil is identified, it should be properly characterized, removed and disposed of by a licensed hazardous materials contractor.

**Mitigation Measure L-9:** During subsurface excavation activities, including borings, trenching, and grading, Cal-OSHA worker safety measures shall be implemented as required to preclude an exposure to unsafe levels of soil gases, including but not limited to methane.

**Mitigation Measure L-10:** Site testing of subsurface geological formations shall be conducted in accordance with the City's Methane Mitigation Standards. The site testing shall be conducted under the supervision of a licensed Architect or registered Engineer or Geologist, and shall be performed by a testing agency approved by the Los Angeles Department of Building and Safety. The licensed Architect, registered Engineer or Geologist, shall indicate in a report to the Los Angeles Department of Building and Safety the testing procedure, the testing instruments used to measure the concentration and

pressure of the methane gas. The measurements of the concentration and pressure of the methane gas shall be used to determine the Design Methane Concentration (i.e., the highest concentration of methane gas found during site testing) and the Design Methane Pressure (i.e., the highest pressure of methane gas found during site testing). The Design Methane Concentration and the Design Methane Pressure shall determine the Site Design Level which shall be required within the proposed site buildings.

**Mitigation Measure L-11:** Projects that disturb more than one acre shall adhere to the requirements of the General Construction Permit issued by the Regional Water Quality Control Board. One of the requirements of the permit is the implementation of a storm water pollution prevention plan, which includes measures to prevent the accidental release of hazardous materials used during construction. Any storage or use of hazardous materials related to the fueling and maintenance of construction equipment would require a Hazardous Materials Business Plan with the LAFD, and compliance with local, state and federal regulations regarding the handling of hazardous materials. All development and redevelopment shall require the use of construction Best Management Practices to control handling of hazardous materials during construction to minimize the potential negative effects from accidental release to groundwater, stormwater runoff, and soils.

**Mitigation Measure L-12:** Prior to the start of construction, a hazardous materials expert shall train designated construction personnel in the visual identification of hazardous materials that may be uncovered during excavation activities at the Project Site. In the event that hazardous materials are identified during the course of site excavation, all excavation activities shall cease in the immediate area of the potential contamination and a hazardous materials expert shall be called to the site to properly assess and develop recommendations, in accordance with all applicable regulatory requirements, regarding the proper handling and disposal of any hazardous materials that may be uncovered. Once the hazardous materials are appropriately handled, the hazardous materials expert shall determine when construction in the affected area can resume.

**Mitigation Measure L-13:** Mercury thermostats shall be removed and properly disposed of prior to the demolition of the West Hall.

#### d. Level of Significance After Mitigation

With implementation of the project design features and mitigation measures identified above, Proposed Project impacts would be less than significant.

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## 7. Summary of Alternatives

This Draft EIR considers a range of alternatives to the Proposed Project to provide informed decision-making in accordance with Section 15126.6 of the State CEQA Guidelines. As described below in greater detail, the alternatives to the Proposed Project analyzed in the Draft EIR include:

- Alternative 1: No Project—Status Quo;
- Alternative 2: No Project—Buildout per Existing Approvals;
- Alternative 3: Reduced Intensity;
- Alternative 4: Enclosed Stadium;
- Alternative 5: New Hotel and Expansion;
- Alternative 6: Maximum Convention Center Expansion; and
- Alternative 7: Rehabilitation of West Hall and Limited Expansion.

### A. Alternative 1: No Project—Status Quo

The No Project—Status Quo Alternative assumes that the Proposed Project would not be implemented and that on-site activities would be limited to the maintenance of the existing on-site structures (e.g., paint and carpeting), with no increase in floor area.

#### (a) Summary of Comparative Impacts

Alternative 1 would avoid the following significant impacts that would occur with the Proposed Project: transportation, visual resources/views, artificial light, air quality, noise, historical resources, and solid waste. Alternative 1 would also result in the avoidance of most of the adverse, less than significant impacts anticipated to occur with the development of the Proposed Project, including among other things: parking, pedestrian safety, natural light, public services; and utilities. On the other hand, impacts with regard to seismic, methane hazards, hydrology, groundwater, and land use plans are greater under Alternative 1. Further, Alternative 1 would eliminate the net beneficial effects that would otherwise occur with implementation of the Proposed Project, including: advancing key regional, City, and County land use policies; and creating new employment opportunities.

## (b) Relationship of this Alternative to Project Objectives

Alternative 1 would not achieve any of the Project's basic objectives. Specifically, Alternative 1 would not modernize or enhance the marketability of the Convention Center by replacing the outmoded West Hall with a modern New Hall contiguous to the existing South Hall or create a more efficient exhibit hall contiguous to the existing South Hall that would substantially improve the rank of the Convention Center and make it more competitive nationally. In addition, Alternative 1 would not construct a multi-purpose Event Center that complements and promotes the adjacent convention, sports and entertainment uses or promote General Plan goals, objectives and policies related to the ongoing revitalization of the Project area and Downtown Los Angeles. Furthermore, Alternative 1 would not meet the Project Objectives to design a project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events, and is consistent with smart growth and urban design principles, or that takes maximum advantage of existing and planned transportation infrastructure and efficiently utilize existing parking resources to conserve resources, reduce environmental impacts and improve access. Finally, Alternative 1 would not promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity, and tourism. Specifically, Alternative 1 would not construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship. In addition, it would not develop entertainment and sports facilities on public lands that provide a return to the City's General Fund.

## **B. Alternative 2: No Project—Buildout per Existing Approvals**

The No Project—Buildout Per Existing Approvals Alternative consists of constructing 323,329 square feet of additional Convention Center Floor Area, as permitted by the City's October 29, 1987 Conditional Use Permit (CPC-1987-0595-CU), and Convention Center related uses within a portion of the Los Angeles Sports and Entertainment District (LASED) Specific Plan area designated for this purpose. Upon implementation of this alternative, the Convention Center would consist of 1,862,000 square feet of Floor Area. Of the 323,329 square feet of new Floor Area, 250,000 square feet of Convention Center related uses would be developed in a new Event Deck Hall located in the Olympic West Subarea of the LASED Specific Plan area. The balance of the 323,329 square feet of new Floor Area, a total of 73,329 square feet, would be constructed within a new West Hall Annex, located north of the West Hall and south of Chick Hearn Court. With development of new Convention Center Floor Area, Alternative 2 would add 187,531 square feet of Rentable Area, thereby increasing the total available Rentable Area at the Convention Center from 886,093 square feet to 1,073,624 square feet, or a 21 percent increase in Rentable Area over existing conditions.

The West Hall Annex would be the same height as the existing West Hall, while the Event Deck Hall would be 60 feet in height above the existing Event Deck and connect to the West Hall Annex via a bridge over Chick Hearn Court that would also include meeting room space. The West Hall Annex would connect to the existing West Hall via a pedestrian bridge (which would not include Convention Center uses). This Alternative would provide a total of 7,294 parking spaces, an increase of 1,730 spaces over the existing supply. Under Alternative 2, the existing West Hall, South Hall and Venice Garages would remain, the Proposed Project's Bond Street Garage would be built (928 spaces as per the Proposed Project), and the L.A. Live Way Garage would be built but only to six levels above grade with 1,949 spaces (compared to 2,950 spaces with the Proposed Project). The Event Center would not be developed under Alternative 2.

### (a) Summary of Comparative Impacts

Alternative 2 would avoid the Proposed Project's significant impacts with regard to visual resources/views, artificial light, operational noise (with the exception of parking garage noise), and historical resources, and would lessen many of the other impacts, including those that would be significant under both the Proposed Project and Alternative 2. As such, Alternative 2, as is the case with the Proposed Project, would result in significant impacts with regard to traffic, air quality, construction noise, operational parking garage noise and solid waste disposal. However, this Alternative would have greater impacts than the Proposed Project with respect to land use plans, geology and hydrology during operations. While impacts for a number of other issues would also be reduced under Alternative 2, the change in uses as well as the reduced levels of development under this Alternative also serve to reduce the beneficial effects of the Proposed Project, particularly with regard to advancing key land use policies and the provision of new employment opportunities in an existing urbanized area located in proximity to multiple transit lines.

### (b) Relationship of this Alternative to Project Objectives

Alternative 2 would only partly meet some of the Project's basic objectives. Specifically, although this Alternative would provide additional exhibition space for the Convention Center, this Alternative would not meet the Project Objective to modernize, and enhance the marketability of the Convention Center to the same extent the Proposed Project would. In addition, Alternative 2 would not construct a multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent LASED area, which includes L.A. LIVE. Moreover, while Alternative 2 would realize the Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles, it would do so to a much lesser extent than the Proposed Project. Specifically, without an Event Center the Alternative would not promote the development of major sports, entertainment and Convention Center facilities in the Downtown Center and in close proximity to

transportation corridors and transit stations, or create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area. Additionally, Alternative 2 would not meet the Project Objective to design a project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events and is consistent with smart growth and urban design principles to the same extent as the Proposed Project. In addition, as this Alternative would not develop the Event Center, it would not take maximum advantage of existing and planned transportation infrastructure. Lastly, Alternative 2 would achieve the Project Objective to promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism but to a much lesser degree than the Proposed Project. Without the Event Center, the Alternative would not finance construction of the New Hall at no risk to the City's General Fund, as a private developer, including the Event Center Applicant, would not finance the West Hall unless it can construct the Event Center. In addition, Alternative 2 would not construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship. Similarly, this Alternative would not develop entertainment and sports facilities on public lands that provide a return to the City's General Fund.

### **C. Alternative 3: Reduced Intensity**

The Reduced Intensity Alternative includes the same land uses and structures as the Proposed Project but reduces the floor area of the New Hall by 37,799 square feet, the number of seats by 10,500 seats and the height of the Event Center from 220 feet to 200 feet, and the amount of parking provided in the L.A. Live Way Garage by 339 spaces. The Bond Street Garage would be the same as under the Proposed Project. The total Floor Area for the Convention Center under Alternative 3 would be 1,538,671 square feet, which is the same as what exists today. However, under Alternative 3 the Floor Area would be contiguous and would reflect the same configuration as the Proposed Project. The total Floor Area for the Event Center would be 1,494,500 square feet, which when combined with the Convention Center would result in 3,033,171 square feet of Floor Area at the Project Site. A total of 1,095,878 square feet of Rentable Area of exhibition space would be available at the Project Site under Alternative 3. However, the multi-purpose room would not be constructed under this Alternative.

The height of the New Hall would be reduced from the Project-proposed 90 feet to approximately 60 feet, and the L.A. Live Way Garage would be reduced to eight levels above grade. This Alternative would provide a total of 6,631 parking spaces, an increase of 773 spaces over the existing supply. Under Alternative 3, the existing South Hall and Venice Garages would remain, the Bond Street Garage would be built (928 spaces as per

the Proposed Project), and the L.A. Live Way Garage would be built but with 2,611 spaces (compared to 2,950 spaces with the Proposed Project).

### (a) Summary of Comparative Impacts

Alternative 3 would reduce the Event Center's seating by approximately 15 percent and reduce the Floor Area of the New Hall. As many of the Proposed Project's potential environmental impacts are directly related to the amount of development that occurs, Alternative 3 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. Even though most of the Proposed Project's significant impacts would be reduced under Alternative 3, they would not be sufficiently reduced to less than significant levels. As such, Alternative 3, as is the case with the Proposed Project, would result in significant impacts with regard to transportation, visual resources, artificial light, noise, air quality, historical resources, and solid waste. While impacts for a number of issues would be reduced under Alternative 3, the reduced levels of development under this Alternative also serve to reduce the beneficial effects of the Proposed Project, particularly with regard to advancing key land use policies and the provision of new employment.

### (b) Relationship of this Alternative to Project Objectives

Due to the reduced intensity proposed under Alternative 3, most of the Project Objectives would be achieved but to a lesser extent than under the Proposed Project. Specifically, although this Alternative would replace the outmoded West Hall with a modern New Hall contiguous to the existing South Hall and would enhance the marketability of the Convention Center by creating a more efficient exhibit hall contiguous to the existing South Hall, it would provide less overall new square footage and would not include a new multi-purpose room of a size that can function as exhibit hall space, meeting rooms or a ballroom. As such, Alternative 3 would not meet the Project Objective to modernize or enhance the marketability of the Convention Center to the same extent as the Proposed Project. In addition, Alternative 3 would meet the Project Objective related to constructing a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses, but to a lesser extent than the Proposed Project due to the reduced seating capacity of the Event Center. This Alternative would provide a state-of-the-art venue capable of attracting and maintaining up to two NFL teams and that could be used for event floor exhibit hall space. However, with the reduced seating capacity, the Event Center would be less attractive to NFL teams. Additionally, the Event Center would not be expandable to 76,250 seats to host occasional major events. Moreover, Alternative 3 would realize the Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles, but to a lesser extent than the Proposed Project due to the reduced square footage of exhibition space and reduced Event Center seating capacity.

For the same reason, this Alternative would not meet the following objectives to the same extent as the Proposed Project: design a Project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events and is consistent with smart growth and urban design principles; take maximum advantage of existing and planned transportation infrastructure; and promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism.

## **D. Alternative 4: Enclosed Stadium**

Alternative 4, the Enclosed Stadium Alternative, would be exactly the same as the Proposed Project with two exceptions: the Event Center's deployable roof would be replaced by a permanent fixed roof, and all Event Center façade openings would be eliminated. Other than this distinction, all other design elements would be identical to the Proposed Project. However, an Event Center with a fixed roof would take about six months longer to construct.

### **(a) Summary of Comparative Impacts**

Alternative 4 would result in significant impacts, as is the case with the Proposed Project, with regard to transportation, visual resources, construction and operational noise, air quality, historical resources, and solid waste (i.e., due to limitations on regional landfill capacity). By placing a fixed roof on the Event Center and façade treatments that keep the Event Center's lighting within the structure, the Proposed Project's significant artificial light impacts from Event Center operations would be reduced to a less than significant level. However, with the increased duration of construction activities, artificial light impacts during construction activities would increase relative to the Proposed Project. Under Alternative 4, a fixed Event Center roof would reduce the significant noise impacts attributable to crowd noise, the in-house sound system and fireworks during operation of the Event Center to a less than significant level. However, similar to the Proposed Project, significant noise impacts would continue to occur from the following sources under Alternative 4: (1) construction; (2) parking garage operations; (3) outdoor public areas; (4) off-site traffic; (5) public transit operations; and (6) media helicopters. In addition, due to the increased duration of construction activities, Alternative 4 would result in increased impacts associated with artificial light, traffic, noise, and regional air quality emissions during construction. With the permanently enclosed Event Center building, impacts associated with demand for electricity, GHG emissions, and environmental safety would also be increased under Alternative 4 when compared with the Proposed Project.

### (b) Relationship of this Alternative to Project Objectives

Alternative 4 would meet most of the Project Objectives. However, as this Alternative would not design the Event Center to include a deployable roof to enable a broad range of uses, including exhibition use by the Convention Center, this Alternative would not meet the Project Objective to construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses to the same extent as the Proposed Project. In addition, based on the increased duration of construction activities under Alternative 4, this Alternative would not achieve the Project Objective to construct the Project in a manner that limits disturbance to ongoing Convention Center operations, while still completing the Event Center prior to the 2016 National Football League (NFL) season.

## E. Alternative 5: New Hotel and Expansion

The New Hotel and Expansion Alternative includes the development of a 1,000-room convention hotel with approximately 50,000 square feet of banquet hall space within the Project Site. In addition, as with the Proposed Project, this Alternative would increase the size of the Convention Center through the development of the New Hall. Under this Alternative, the West Hall would be demolished and additional convention center Floor Area would be developed to the north of the New Hall within a new West Hall Replacement Building. In total, an additional 573,399 square feet of Convention Center Floor Area would be developed. The total Floor Area for the Convention Center under Alternative 5 would be 2,112,070 square feet. Alternative 5 would also add approximately 311,406 square feet of Rentable Area. Thus, a total of 1.20 million square feet of Rentable Area would be available at the Project Site under Alternative 5.

Under Alternative 5, the New Hall would be the same height as under the Proposed Project (90 feet), which would also be the height of the West Hall Replacement Building. The proposed hotel would be approximately 300 feet in height and would be configured as a tower similar to the Ritz-Carlton Hotel and Residences at L.A. LIVE. The Event Center would not be developed under Alternative 5.

This Alternative would provide a total of 7,546 parking spaces, an increase of 1,986 spaces over the existing supply. The existing South Hall and Venice Garages would remain, the Bond Street Garage would not be built, and the L.A. Live Way Garage would be built as per the Proposed Project. The West Hall Garage would be reconstructed under the new West Hall Replacement Building with 1,100 spaces, and 419 spaces would be provided under the hotel.

### (a) Summary of Comparative Impacts

Alternative 5 would result in significant impacts for most of the same issues as the Proposed Project. As this Alternative does not include the Event Center, significant impacts with regard to artificial light and aspects of operational noise associated with the Event Center would be avoided. In addition, as Alternative 5 would not involve nighttime construction, the significant nighttime noise and artificial light impacts that occur under the Proposed Project would also be avoided. As peak daily guest and attendance levels under Alternative 5 are considerably lower than those of an Event Day under the Proposed Project, the significant traffic impacts that occur under the Proposed Project would be reduced. In addition, as many of the Proposed Project's potential environmental impacts are directly related to the amount of development that occurs, Alternative 5 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. Even though most of the Proposed Project's significant impacts would be reduced under Alternative 5, they would not all be reduced to less than significant levels. As such, Alternative 5, as is the case with the Proposed Project, would result in significant impacts with regard to transportation, visual resources, construction and operational noise, air quality, historical resources, and solid waste. While impacts for a number of issues would be reduced under Alternative 5, the elimination of the Event Center also eliminates important beneficial effects of the Proposed Project. In summary, Alternative 5 would not introduce additional significant environmental impacts, would avoid the Proposed Project's significant impacts associated with artificial light and aspects of operational noise associated with the Event Center, and in many cases would lessen the Proposed Project's overall impacts as well as its beneficial effects.

### (b) Relationship of this Alternative to Project Objectives

This Alternative would generally meet the Project Objective to modernize and enhance the marketability of the Convention Center. However, Alternative 5 would not meet the Project Objective to construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses. In addition, without an Event Center, Alternative 5 would not realize the Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and Downtown Los Angeles to the same extent as the Proposed Project. Moreover, Alternative 5 would not meet the Project Objectives to design a project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events and is consistent with smart growth and urban design principles to the same extent as the Proposed Project. In addition, as Alternative 5 would not develop the Event Center, it would not take maximum advantage of existing and planned transportation infrastructure, as the Event Center would attract many more visitors who would use existing and planned transportation infrastructure, especially public transit. Furthermore, for the same reason, Alternative 5 would not achieve the Project

Objective to promote economic development and job creation in the Project area and greater Los Angeles area through increased private investment, event activity and tourism to the same degree as the Proposed Project. Without the Event Center, the Alternative would not finance construction of the New Hall at no risk to the City's General Fund, as a private developer, including the Event Center Applicant, would not finance the West Hall unless it can construct the Event Center. In addition, Alternative 5 would not construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship. Similarly, this Alternative would not develop entertainment and sports facilities on public lands that provide a return to the City's General Fund.

## **F. Alternative 6: Maximum Convention Center Expansion**

Under this Alternative, the New Hall would be developed as under the Proposed Project. The Event Center site would be developed with a two-level Convention Center structure located above one level of at-grade parking. This new structure, referred to as the West Hall Replacement Building, would provide approximately 940,000 square feet of Floor Area. When accounting for this Floor Area as well as the 500,000 square feet of Floor Area within the New Hall and the 250,000 square feet of Floor Area of the Event Deck Hall within the LASED area, Alternative 6 would provide a total of approximately 1.69 million square feet of Floor Area. With the existing South Hall and Concourse Building, the Convention Center would total approximately 2.76 million square feet of Floor Area and approximately 1.58 million square feet of Rentable Area. The New Hall would be the same height as under the Proposed Project (90 feet), which would also be the height of the West Hall Replacement Building. The Event Deck Hall would be 60 feet in height above the existing Event Deck, or a total of 93 feet above grade, and would connect to the West Hall Replacement Building via a bridge structure over Chick Hearn Court that would also include meeting room space. The West Hall Replacement Building would have direct connections to the New Hall, similar to how the Proposed Project connects the New Hall and the South Hall. Under Alternative 6, no changes to the existing Gil Lindsay Plaza would occur. The Event Center would not be developed under Alternative 6.

This Alternative would provide a total of 8,900 parking spaces, an increase of 3,342 spaces over the existing supply. The existing South Hall and Venice Garages would remain, the West Hall Garage would be rebuilt with 2,230 spaces, the Bond Street Garage would be built (928 spaces as per the Proposed Project), and the L.A. Live Way Garage would be built with 2,950 spaces as with the Proposed Project.

### (a) Summary of Comparative Impacts

As this Alternative does not include the Event Center, significant impacts with regard to artificial light and aspects of operational noise associated with the Event Center would be avoided. In addition, as this Alternative would not involve nighttime construction, the significant nighttime artificial light and noise impacts that occur under the Proposed Project would also be avoided. As traffic volumes under Alternative 6 would be lower than those of an Event Day under the Proposed Project, the significant traffic impacts that occur under the Proposed Project would be reduced. However, impacts with respect to lane closures would be greater under this Alternative than under the Proposed Project. In addition, as many of the Proposed Project's potential environmental impacts are directly related to the amount of development that occurs, Alternative 6 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. Even though a number of the Proposed Project's significant impacts would be reduced under Alternative 6, they would not be sufficiently reduced to less than significant levels. As such, both Alternative 6 and the Proposed Project would result in significant impacts with regard to transportation, visual resources, construction and operational noise, air quality, historical resources, and solid waste. The elimination of the Event Center also eliminates important beneficial effects of the Proposed Project. In summary, Alternative 6 would not introduce additional significant environmental impacts, would avoid two of the Proposed Project's significant impacts, and in many cases would lessen the Proposed Project's overall impacts including its beneficial effects.

### (b) Relationship of this Alternative to Project Objectives

Alternative 6 would meet the Project Objective to modernize or enhance the marketability of the Convention Center as it would provide more new exhibition space. However, without the development of an additional 4,000 to 5,000 hotel rooms, the potential of this Alternative to increase convention and trade shows attracting out of town visitors would not be realized as the required off-site facilities to support this Alternative would not occur. In addition, because the Event Center would not be developed, Alternative 6 would not meet the Project Objective to construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses. Additionally, Alternative 6 would not meet the Project Objectives to design a project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events and is consistent with smart growth and urban design principles to the same extent as the Proposed Project. Furthermore, without the Event Center, this Alternative would not take maximum advantage of existing and planned transportation infrastructure, as the Event Center would attract many more visitors who would use existing and planned transportation infrastructure, especially public transit. Lastly, without the Event Center, Alternative 6 would only partially achieve the Project Objective to promote economic development and job creation in the Project area and

greater Los Angeles area through increased private investment, event activity and tourism. Without the Event Center, a private developer, including the Event Center Applicant, would not finance the project. The City would not be able to undertake the cost of constructing the new Convention Center facilities and the general fund would be at risk. In addition, Alternative 6 would not construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship. Similarly, this Alternative would not develop entertainment and sports facilities on public lands that provide a return to the City's General Fund.

## **G. Alternative 7: Rehabilitation of West Hall and Limited Expansion**

Alternative 7 would retain the West Hall as it currently exists. No new Convention Center facilities would be constructed on the Project Site. The Convention Center Expansion Parcel located within the LASED area would be developed with an Event Deck Hall, a two-level building that would provide 216,000 square feet of Floor Area, with meeting rooms on top of a one-level exhibit hall. A pedestrian bridge would be constructed to connect the West Hall to the Event Deck Hall. This bridge would not include Convention Center uses. With the existing West Hall, South Hall, and Concourse Building, the Convention Center would total 1.75 million square feet of Floor Area and approximately 1.01 million square feet of Rentable Area. The Event Deck Hall would reach a height of 60 feet above the existing Event Deck, and the underside of the Chick Hearn Bridge would be 36 feet above the street. The Event Center would not be developed under Alternative 7.

This Alternative would provide a total of 6,300 parking spaces, an increase of 742 spaces over the existing supply. The existing West Hall, South Hall and Venice Garages would remain, the Bond Street Garage would not be built, and the L.A. Live Way Garage would be built but only to five levels and 1,600 spaces (compared to 2,950 spaces with the Proposed Project).

### **(a) Summary of Comparative Impacts**

Alternative 7 would avoid the Proposed Project's significant impacts with regard to visual resources, artificial light, operational noise (i.e., noise from crowd cheering, the use of the sound system at the Event Center, firework display shows, and the outdoor plazas) and historical resources. Alternative 7 would also lessen many of the other impacts, including those that are significant under the Proposed Project. However, this Alternative would have greater impacts than the Proposed Project with respect to land use plans, geology and hydrology during operations. Moreover, Alternative 7, as is the case with the Proposed Project, would result in significant impacts with regard to traffic, air quality, construction noise and solid waste disposal. While impacts for a number of the other

issues would also be reduced under Alternative 7, the change in uses as well as the reduced levels of development under this Alternative also serve to reduce the beneficial effects of the Proposed Project, particularly with regard to advancing key land use policies and the provision of new employment opportunities in an existing urbanized area located in proximity to multiple transit lines. In summary, Alternative 7 would not introduce additional significant environmental impacts, and in several cases would avoid or lessen the Proposed Project's significant impacts, while also lessening the Proposed Project's beneficial effects.

### (b) Relationship of this Alternative to Project Objectives

Although this Alternative would provide additional exhibition space for the Convention Center, this Alternative would not meet the Project Objective to modernize, and enhance the marketability of the Convention Center to the same extent the Proposed Project would. In addition, because the Event Center would not be developed, Alternative 7 would also not meet the Project Objective to construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses. Moreover, without an Event Center, this Alternative would not realize the Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and Downtown Los Angeles to the same extent as the Proposed Project. Additionally, Alternative 7 would not meet the Project Objectives to design a project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events and is consistent with smart growth and urban design principles to the same extent as the Proposed Project. Furthermore, without the Event Center, this Alternative would not take maximum advantage of existing and planned transportation infrastructure, as the Event Center would attract many more visitors who would use existing and planned transportation infrastructure, especially public transit. Finally, without replacement of the outmoded West Hall and development of the Event Center, Alternative 7 would not achieve the Project Objective to promote economic development and job creation in the Project area and greater Los Angeles area through increased private investment, event activity and tourism to the same extent as the Proposed Project. In addition, this Alternative would not develop entertainment and sports facilities on public lands that provide a return to the City's General Fund, nor would this Alternative finance construction of the New Hall at no risk to the City's General Fund.

## H. Environmentally Superior Alternative

The State CEQA Guidelines require the identification of an environmentally superior alternative to the Proposed Project and, if the environmentally superior alternative is the No Project Alternative, the identification of an environmentally superior alternative from among the remaining alternatives. An environmentally superior alternative is an alternative to the

Proposed Project that would reduce and/or avoid the significant, unavoidable environmental impacts associated with the Proposed Project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the Proposed Project.

The No Project Alternative—Status Quo (Alternative 1) would be the environmentally superior alternative, as it would have less impact in comparison to the Proposed Project than the other alternatives. However, as noted above, CEQA requires that when the No Project Alternative is the environmentally superior alternative, another alternative must be selected as environmentally superior. In accordance with this requirement, the Rehabilitation of the West Hall and Limited Convention Center Expansion Alternative (Alternative 7) would be the environmentally superior alternative.

Alternative 7 would reduce most of the Proposed Project's impacts, including most of the Proposed Project's significant impacts. Specifically, Alternative 7 would avoid the Proposed Project's significant impacts with regard to aesthetics/visual resources (both visual quality and views), artificial light and glare, noise during operations (except for parking structure noise), and historic resources. However, similar to the Proposed Project, impacts with regard to traffic during both construction and operations, noise during construction, parking structure noise during operations, solid waste during operations, and air quality during both construction and operations would remain significant under Alternative 7, although to a lesser extent than the Proposed Project. Conversely, Alternative 7 would result in greater impacts than the Proposed Project with respect to land use plans, geology, methane, and surface water hydrology, although these impacts would still be less than significant under Alternative 7. It should be noted that, other than the No Project Alternative—Status Quo (Alternative 1), none of the alternatives would eliminate the significant, unavoidable impacts related to traffic during construction and operations, noise during construction, parking structure noise during operations, solid waste during operations, and air quality during both construction and operations to levels that are less than significant.

Although selected as the environmentally superior alternative, Alternative 7 would only partially achieve some aspects of the Project Objective related to enhancing the marketability of the Convention Center. In addition, Alternative 7 would not achieve any of the Project Objectives related to the Event Center. As such, the beneficial effects of the Proposed Project, particularly with regard to advancing key land use policies and the provision of new employment opportunities in an existing urbanized area located in proximity to multiple transit lines, would be substantially reduced under Alternative 7. A full analysis of the degree to which Alternative 7 would achieve Project Objectives is provided in Section V.I.4, Alternatives, of the Draft EIR.