



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT



City Planning Commission

Date: September 13, 2012
Time: After 8:30 A.M.
Place: City Hall, Room 340

Public Hearing Completed: September 13, 2012
Appeal Status: Not Appealable
Expiration Date: December 1, 2012
Multiple Approval: N/A

Case No.: CPC-2012-0851-SP-DA
CEQA No.: ENV-2011-585-EIR
Incidental Cases: None
Related Cases: CPC-2012-0849-GPA-VZC-SP-SN-DA
Council No.: 9 - Hon. Jan Perry
Plan Area: Central City
Specific Plan: Los Angeles Sports and Entertainment District
Certified NC: Downtown Los Angeles
General Plan: Regional Center Commercial
Zone: LASED
Applicant: L.A Arena Land Company, LLC
Representative: William Delvac
Armbruster, Goldsmith and Delvac

PROJECT LOCATION: 1000 W. Olympic Boulevard, 1015 S. Georgia Street, 1005 W. Chick Hearn Court, Los Angeles 90015

PROPOSED PROJECT: In conjunction with the Convention and Event Center Project, an amendment to section 6.B.4 of the Los Angeles Sports and Entertainment District (LASED) Specific Plan and Section 3.1.3(a) of the LASED Development Agreement to allow development of the Convention Center Expansion site with any use permitted in the LASED upon whichever is the earlier; issuance of a Temporary Certificate of Occupancy for the New Hall of the Convention Center or October 21, 2021.

REQUESTED ACTION: ENV 2011-0585-EIR

1. Pursuant to Section 21082.1(c)(3) of the California Public Resources Code, the certification of the Environmental Impact Report, including the accompanying mitigation measures, the Mitigation Monitoring and Reporting Program, and the adoption of the related environmental findings and Statement of Overriding Considerations.

Filed Under CPC-2012-0851-SP-DA

2. Pursuant to LAMC Section 11.5.7.G, a **Specific Plan Amendment** to the LASED Specific Plan to remove the land use restriction for the Convention Center Expansion Parcel, Development Site 1a, in the Olympic West Subarea.
3. Pursuant to Section 65864-65869.5 of the California Government Code and the City implementing procedures, a **Second Amendment to Third Amended and Restated Development Agreement** to the LASED Development Agreement to modify Section 3.1.3(a), the land use restriction for Development Site 1a in the Olympic West Subarea.

RECOMMENDED ACTIONS:

1. **Recommend** that the City Council **Certify** that it has reviewed and considered the Environmental Impact Report, ENV-2011-0585-EIR (SCH No. 2011031049) including the accompanying mitigation measures, the Mitigation Monitoring and Reporting Program, and **Adopt** the related environmental findings, and Statement of Overriding Considerations as the environmental clearance for the proposed project and find that:
 - a) The Environmental Impact Report (EIR) for the Convention and Event Center Project, which includes the Draft EIR and the Final EIR, has been completed in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State and City of Los Angeles CEQA Guidelines; and
 - b) The Project's EIR was presented to the City Planning Commission (CPC) as a recommending body of the lead agency; and the CPC reviewed and considered the information contained in the EIR prior to recommending the project for approval, as well as all other information in the record of proceedings on this matter; and
 - c) The Project's EIR represents the independent judgment and analysis of the lead agency.
2. **Recommend** that the City Council **Approve** the requested Specific Plan Amendment, pursuant to LAMC Section 11.5.7.G, to modify Section 6.B.4 of the LASED Specific Plan to allow development of the Convention Center Expansion Parcel with any other use permitted by the Specific Plan upon the earlier of issuance of a Temporary Certificate of Occupancy for the New Hall of the Convention Center or October 21, 2021.
3. **Recommend** that the City Council, **Approve** the Second Amendment to the Third Amended and Restated Development Agreement pursuant to California Government Code Sections 65864-65869.5, by the Developer and the City of Los Angeles, as amended, subject to the terms of the agreement as attached, including but not limited to, a modification of Section 3.1.3(a) of the Amended and Restated Development Agreement to modify the existing use restriction on the Convention Center Expansion Parcel to provide that the Convention Center Expansion Parcel may be used for any uses permitted in the LASED Specific Plan upon completion of the New Hall and **Advise** the applicant that the Department of City Planning will create a separate case file (CPC 2012-2322-DA) associated with the amendment of the LASED Development Agreement.
4. **Recommend** that the City Council **Adopt** the attached findings.
5. **Advise** the Applicant that, pursuant to California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that **mitigation measures** are implemented and maintained throughout the life of the project and the City may require any necessary fees to cover the cost of such monitoring.
6. **Advise** the Applicant that pursuant to the State Fish and Game Code Section 711.4, a Fish and Game and/or Certificate of Game Exemption is now required to be submitted to the County Clerk prior to or concurrent with the Environmental Notices and Determination (NOD) filing.

MICHAEL J. LOGRANDE
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ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent out the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendaized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to this programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

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PROJECT ANALYSIS

PROJECT SITE DISCUSSION

A. Project Request

In conjunction with the Convention and Event Center Project (Case No. CPC-2012-0849-GPA-VZC-SP-SN-DA), L.A. Arena Land Company, LLC (the “Applicant”) proposes an Amendment to the Los Angeles Sports and Entertainment District Specific Plan (“LASED Specific Plan”) to modify Section 6.B.4 for the Convention Center Expansion Parcel Development Site 1a in the Olympic West Subarea Area (See Attachment “1”).

Section 6.B.4 of the LASED Specific Plan presently limits development of the Convention Center Expansion Parcel to 250,000 square feet of development for Convention Center expansion uses, parking or temporary uses and signage. Section 6.B.4 of the LASED Specific Plan provides that in the event the development of the Convention Center Expansion Parcel does not occur by October 21, 2021, the Convention Center Expansion Parcel may be used for any other use permitted by the LASED Specific Plan. This Specific Plan Amendment is proposed in conjunction with the Convention and Event Center Project which will be considered immediately prior to the consideration of this Specific Plan Amendment.

The Convention and Event Center Project includes an expansion of the Convention Center with the construction of a new convention center building (“New Hall”) and multi-purpose event center that could function as exhibit hall space (“Event Center”) on the Convention Center site. The New Hall would replace the outmoded West Hall with a modern facility contiguous to the existing South Hall. By creating a more efficient exhibit hall contiguous to the existing South Hall, the New Hall could enhance the marketability of the Convention Center by making it more competitive nationally. Further, the construction of the Event Center would complement and promote the Convention Center by providing a new, approximate 50,000 square-foot multi-purpose room that could provide additional meeting room space or function as exhibit hall space, or ballroom. This multi-purpose room, with direct, interior physical connections to the Convention Center, is an amenity that the Convention Center cannot currently offer. Construction of the New Hall would therefore obviate the need for a Convention Center Expansion Parcel in the LASED Specific Plan area.

The Applicant proposes to modify Section 6.B.4 of the Specific Plan to allow development of the Convention Center Expansion Parcel with any other use permitted by the Specific Plan upon the earlier of issuance of a Temporary Certificate of Occupancy for the New Hall of the Convention Center or October 21, 2021. The Applicant also proposes to amend the LASED Development Agreement which would be consistent with the above-requested Specific Plan Amendment.

The current Amended and Restated Development Agreement restricts the use of an airspace lot covering the southern portion of “Olympic West Properties” of the Los

Angeles Sports and Entertainment District (the “Convention Center Expansion Parcel,” defined in Section 1.10 of the Amended and Restated Development Agreement) for purposes of expanding the Los Angeles Convention and Exhibition Center. Because the construction of the New Hall and the Event Center would obviate the need for the Convention Center Expansion Parcel, the Parties desire to enter into this Second Amendment, pursuant to Section 6.8 of the Amended and Restated Development Agreement, to modify the existing use restriction on the Convention Center Expansion Parcel to provide that the Convention Center Expansion Parcel may be used for any uses permitted in the LASED Specific Plan upon completion of the New Hall.

Thus, the proposed Project will require the following entitlements:

- 1. Specific Plan Amendment (LAMC Section 11.5.7.G):** The applicant is requesting that an ordinance be adopted amending Ordinance Nos. 174,224, 178,134, 179,413 and 181,334 known as the Los Angeles Sports and Entertainment District Specific Plan, for a portion of the Central City Community Plan area in order to allow development of the Convention Center Expansion Parcel with any other use permitted by the Specific Plan upon the earlier of issuance of a Temporary Certificate of Occupancy for the New Hall of the Convention Center or October 21, 2021. The Specific Plan is to be amended as follows (also see Exhibit 2):

The definition for the term New Hall is added to Section 4 of Ordinance No. 174,224, which is amended to read:

“New Hall. A new convention and exhibition structure as depicted on Map 4 of the Convention and Event Center Specific Plan.”

Subdivision 4 of Subsection B of Section 6 of the Los Angeles Sports and Entertainment District Specific Plan is amended to read:

“Notwithstanding Subdivisions 1, 2 and 3, development on the Convention Center Expansion Parcel shall be limited to 250,000 square feet of development for the Convention Center Expansion Uses, surface parking, or construction staging, unless the Director of Planning determines that construction staging will interfere with Convention Center Expansion Uses. In the event the development of the Convention Center Expansion does not occur within twenty years from the effective date of this Specific Plan, the Convention Center Expansion Parcel may be used for any other use permitted by this Specific Plan. Notwithstanding the foregoing, upon the earlier of (a) issuance of a temporary Certificate of Occupancy for the New Hall or (b) October 21, 2021, the Convention Center Expansion Parcel may be used for any other use permitted by this Specific Plan.”

2. **Development Agreement Amendment (California Government Code Sections 65864-65869.5)** between the Developer and the City of Los Angeles, as amended, subject to the terms of the agreement including but not limited to, a modification of Section 6.8 of the Amended and Restated Development Agreement to modify the existing use restriction on the Convention Center Expansion Parcel to provide that the Convention Center Expansion Parcel may be used for any uses permitted in the Los Angeles Sports and Entertainment District Specific Plan upon completion of the New Hall. The Development Agreement is to be amended as follows (see Exhibit 3):

Section 1. Definition of New Hall. The Amended and Restated Development Agreement is amended to add a new Section 1.37 with the following language:

“New Hall” means a new convention and exhibition structure as further defined in the Convention and Event Center Specific Plan, adopted by the City pursuant to Ordinance No. _____.”

Section 2. Definition of Project. The second sentence of Section 1.30 of the Amended and Restated Development Agreement is amended to add the following language after phrase “Director of Planning,”:

“, except as provided in Section 3.1.3 of this Agreement;”

Section 3. Convention Center Expansion. The second sentence of Section 3.1.3.2 of the Amended and Restated Development Agreement is amended to add the following language:

“; provided, however, that on the earlier of the issuance of a Temporary Certificate of Occupancy for the New Hall or October 21, 2021, the Convention Center Expansion Parcel may be used for any other uses permitted by the LASED Specific Plan.”

3. **Environmental Impact Report:** The City of Los Angeles released the Final Environmental Impact Report (FEIR) ENV-2011-585-EIR, on August 30, 2012, detailing the relevant environmental impacts as a result of the Project. The EIR found the following impacts could be mitigated to a level of insignificance: Land Use, Parking, Pedestrian Circulation and Bicycle and Pedestrian Safety, Natural Light (Shading), Air Quality – Climate Change, Geology and Soils, Water Resources – Hydrology and Surface Water Quality, Water Resources – Groundwater, Cultural Resources – Archaeological Resources, Public Services – Police Protection, Public Services – Fire Protection, Utilities – Water, Utilities – Wastewater, Utilities – Electricity, Utilities – Natural Gas, and Environmental Hazards.

The EIR further identified the following areas where impacts could not be mitigated to a level of insignificance: Transportation, Aesthetics/Visual

Resources, Artificial Light and Glare, Noise, Air Quality, Cultural Resources – Historical Resources, and Utilities – Solid Waste. The City recognizes that significant and unavoidable impacts would result from implementation of the Project and therefore, includes a Statement of Overriding Considerations finding that the benefits outweigh and override the significant unavoidable impacts.

The proposed Specific Plan Amendment would be consistent with the EIR certified for the LASED Specific Plan (EIR No. 2000-3577, State Clearinghouse No. 2000091046) and was also evaluated for environmental impacts under EIR No. 2011-0585 (State Clearinghouse No. 2011031049).

B. Project Site

The LASED is comprised of approximately 27.1 acres over all or portions of six city blocks in the southwest section of downtown Los Angeles, approximately 1.5 miles southwest of Los Angeles City Hall, and 0.5 miles northeast of the Santa Monica Freeway and Harbor Freeway interchange. The LASED Specific Plan boundaries are generally Olympic Boulevard to the north, Cherry Street to the west, 11th Street to the south, and Figueroa Street to the east; the area generally bounded by 11th Street to the north, Figueroa Street to the west, Pico Boulevard to the south, and Flower Street to the east; and one partial block in the area generally immediately north of Olympic Boulevard between Georgia Street and Francisco Street (see Exhibit 1).

The LASED has been developed with uses that are oriented towards peak weekend and nighttime activity, including restaurant, nightclub, live theater and cinema uses. These uses, in conjunction with the Staples Center, have succeeded in creating a vibrant center of activity during nights and weekends. Subsequent amendments have sought to balance the existing uses with additional office and broadcasting/production uses, which are oriented towards weekday activity, in order to create a more active 24-hour downtown environment.

Streets and Circulation

Olympic Boulevard to the north, is dedicated to a 110-foot width, improved with curb, gutter and sidewalk and is designated as a Modified Major Highway II.

Chick Hearn Court to the south, is dedicated to a 102-foot width, improved with curb, gutter and sidewalk and is designated as a Modified Collector Street.

Georgia Street to the east, is dedicated to a 64-foot width, improved with curb, gutter and sidewalk and designated as a Collector Street.

Cherry Street to the west, is dedicated to a 30-foot width, improved with curb, gutter and sidewalk and designated as a Local Street.

Related Cases - Subject Property:

CPC 2012-0849-GPA-VZC-SP-SN-DA – On April 2, 2012, the applicant filed a request for a General Plan Amendment to change the Regional Center Commercial land use designation of portions of Staples Center to Public Facilities, an amendment to the General Plan Land Use Map for the Central City Community Plan to add a footnote establishing the proposed convention and Event Center Specific Plan as the land use regulatory document for the project and provide correspondence of the Public Facilities designation with Convention and Event Center (CEC) and reclassify a segment of 12th Street as a Local Street; Vesting Zone Change from PF-4D-O and C2-4D-O to CEC; Establishment of the CEC Specific Plan; Establishment of a Sign Supplemental Use District; Pursuant to California Government Code Sections 65864-65869.5 to enter into a Development Agreement; Pursuant to California Government Code Sections 65864-65869.5, amendment of the Staples Center Development Agreement.

CPC 2009-2677-SPA-ZC-DA – On September 21, 2010, the City Council adopted a Specific Plan Amendment to the LASED Specific Plan and Amendment to the Third Restated and Amended Development Agreement in order to: allow the development of 332,618 square feet of general office uses and 269,182 square feet of broadcasting studio and production uses, to be located in a 25-story building adjacent to Georgia Street; develop 206,500 square feet of hotel/ballroom uses to include 275 hotel rooms and 89,250 square feet of residential uses to include 65 residential dwelling units in a 25-story building adjacent to Francisco Street; and a Zone Change to annex four parcels to the Olympic North Subarea from the C2-4D Zone to the LASED Zone to add the parcels to the Specific Plan area.

CPC 2007-1238-SP-DA – On November 30, 2007, the City Council adopted Specific Plan Amendments to the LASED Specific Plan to: increase the overall floor area allowed in the Specific Plan area from 5,147,000 square feet to 5,515,101 square feet; increase the maximum tower height allowed on the Figueroa Central Subarea from 494 feet to 575 feet; modify the allowed lot coverage on the Figueroa Central Subarea to accommodate additional tower height; increase the allowed number of alcohol uses from 24 to 33; increase the number of on-site alcohol uses permitted to sell distilled spirits by the bottle from 3 to 4; and allow for one use that is permitted to have off-site alcohol sales to allow on-site consumption from 10:00 a.m. to 2:00 a.m.; and incorporate other related minor clarifications and modifications into the Specific Plan.

CPC 2006-7109-DA-SP-ZC – On December 6, 2006, the City Council adopted ordinances amending the LASED Specific Plan (Ordinance 174224) to: effect a Zone Change from C2-4D to "LASED" for the Olympic North properties in order to add the properties to the Specific Plan Area; amend the Amended and Restated Development Agreement to be consistent with this action and to incorporate amendments relative to alcoholic beverages; increase the maximum floor area permitted within the Specific Plan to 5,147,000 square feet; clarify that the Convention Center Hotel may include residential units and that ballroom/meeting facilities may be located on the Olympic West properties; clarify the boundary of the Convention Center Expansion Parcel;

modify signage regulations; modify on-site and off-site alcohol consumption regulations and Alcohol Use Approvals, modify Map 8 of the Specific Plan to realign Sign District A and C and incorporate other minor clarifications and modifications.

CPC 2000-5433-DA-GPA-SP-SUB-ZC-M1 – On September 21, 2005, the City Council approved an amendment to the Los Angeles Sports and Entertainment District (LASED) Development Agreement to clarify that the Developer is allowed to secure building permits simultaneously for both market rate and affordable residential units rather than requiring the Developer to complete a portion of the required affordable housing before the Developer could obtain a building permit for market rate housing.

Ordinance No. 174,224 – On October 21, 2001, this ordinance became effective establishing the Los Angeles Sports and Entertainment District (LASED) Specific Plan for the area bounded generally by Olympic Boulevard on the north; Flower Street on the east; Pico Boulevard on the south; and the 110 Freeway on the west in order to provide continued and expanded development of the project site as a major entertainment/mixed-use development providing hotel, retail, entertainment, residential (including residential condominium units), live theaters, movie theaters, sound stages, office, medical clinic/sports medicine center, tourism, and similar or related uses.

C. Conclusion

The Department of City Planning recommends approval of the requested entitlements. The requested amendments to the LASED Specific Plan and Development Agreement will remove development limitations on the Convention Center Expansion Parcel such that the parcel will not be used exclusively for Convention Center uses but may instead be used for any other use permitted by the LASED Specific Plan provided that the New Hall is constructed for Convention Center purposes. The requested entitlements will provide for the development of an overall, comprehensive project that will serve the region as well as the surrounding community.

The request would lead to a project that would be consistent with the Central City Community Plan in that it fulfills the Community Plan's Goals and objectives for commercial development by providing economic stimulation for Downtown Los Angeles and revenues for the City of Los Angeles.

The subject entitlements have been analyzed under Environmental Impact Report ENV-2011-585-EIR, and determined to not have any impact or create any impacts on any of the EIR environmental categories or impact areas. Therefore, no environmental conditions or mitigation measures are necessary for the subject project as all mitigation measures have been included in the related Convention and Event Center case (CPC 2012-849-GPA-VZC-SP-SN-DA).

The Specific Plan Amendments also would further the goals of the LASED Specific Plan and the Central City Community Plan to improve the performance of the Convention Center and to promote the development of business, conventions, trade shows and tourism in downtown by solidifying the Plan Area's identity as an entertainment district through the provision of broadcast, production and office uses.

FINDINGS

Specific Plan Amendment Findings

1. Findings under Charter Section 556: Conformance with the General Plan

Los Angeles City Charter Section 556 and Los Angeles Municipal Code (“LAMC”) Section 12.32(C)(2) require that prior to adopting a land use ordinance, the Planning Commission make findings that the ordinance is in substantial conformance with the purposes, intent and provisions of the City of Los Angeles General Plan (“General Plan”). The proposed amendment to the Los Angeles Sports and Entertainment District Specific Plan (“LASED Specific Plan”) would be in conformance with the purposes, intent and provisions of the General Plan in that it would conform to the goals, objectives and policies of the Central City Community Plan (“Community Plan”), General Plan Framework, Transportation Element and LASED Specific Plan as discussed below.

A. Central City Community Plan

The proposed amendment would modify a section of the LASED Specific Plan pertaining to Convention Center Expansion Parcel Development Site 1a in the Olympic West Subarea Area. Section 6.B.4 of the LASED Specific Plan presently allows development of 250,000 square feet for Convention Center expansion uses, parking, or temporary uses and provides that in the event the development of the Convention Center expansion uses does not occur by October 21, 2021, the Convention Center Expansion Parcel may be used for any other use permitted by the LASED Specific Plan. The proposed amendment would account for the construction of the Convention and Event Center Project, approved immediately prior to consideration of this LASED Specific Plan Amendment. The Convention and Event Center Project includes an expansion of the Convention Center with the construction of a new convention center building (“New Hall”) and multi-purpose event center that could function as exhibit hall space (“Event Center”) on the Convention Center site. The New Hall would replace the outmoded West Hall with a modern facility contiguous to the existing South Hall. By creating a more efficient exhibit hall contiguous to the existing South Hall, the New Hall would enhance the marketability of the Convention Center, making it more competitive nationally. Further, the Event Center would complement and promote the Convention Center by providing a new multi-purpose room of a size that could function as exhibit hall space, meeting rooms or a ballroom with direct physical connections to the Convention Center, an amenity that the Convention Center cannot currently offer. Construction of the New Hall would therefore obviate the need for a Convention Center Expansion Parcel in the LASED Specific Plan area. Thus, the applicant proposes to modify Section 6.B.4 to allow development of the Convention Center Expansion Parcel with any other use permitted by the LASED Specific Plan upon the earlier of issuance of a temporary Certificate of Occupancy for the New Hall

or October 21, 2021, the existing release date for the development restrictions pertaining to the Convention Center Expansion Parcel.

The LASED Specific Plan Amendment, especially in combination with the proposed Convention and Event Center Specific Plan, would promote the objectives, policies and goals of the Community Plan and the LASED Specific Plan by fostering a complete development of the Los Angeles Sports and Entertainment District. Objectives 2-2, 2-3 and 2-4 and Policy 2-4.1 of the Community Plan, which are set forth below, seek to promote a mixed-use, 24-hour downtown environment, including retail, dining, entertainment, night clubs, theaters and hotels that will advance the development of residential uses, business, conventions, trade shows and tourism.

Objective 2-2 *To retain the existing retail base in Central City.*

Objective 2-3 *To promote land uses in Central City that will address the needs of all visitors to Downtown for business, conventions, trade shows and tourism.*

Objective 2-4 *To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.*

Policy 2-4.1 *Promote night life activity by encouraging restaurants, pubs, night clubs, small theaters and other specialty uses to reinforce existing pockets of activities.*

The proposed LASED Specific Plan Amendment would meet the objectives and policies of the Community Plan by releasing the Convention Center Expansion Parcel from development restrictions earlier than the existing release date should the parcel no longer be needed for the Convention Center expansion because of construction of the New Hall. By removing such restrictions, the LASED Specific Plan Amendment would enable development on the parcel consistent with the LASED Specific Plan that will encourage tourism, commercial and retail activity in the Los Angeles Sports and Entertainment District. Thus, the proposed LASED Specific Plan Amendment will be consistent with the objectives and policies of the Community Plan.

B. General Plan Framework

The General Plan Framework, adopted in December 1996, establishes the City's long-range comprehensive growth strategy and provides guidance on Citywide land use and planning policies, objectives, and goals. The Framework defines Citywide policies for land use, housing, urban form and urban design, open space and conservation, transportation, infrastructure and public spaces. The LASED Specific Plan Amendment would be consistent with the following goals, objectives and policies of the General Plan Framework.

a. Land Use

The Los Angeles Sports and Entertainment District is situated in what the Framework terms as the “Downtown Center,” the location for “major cultural and entertainment facilities, hotels, high-rise residential towers, regional transportation facilities and the Convention Center.” The Framework element also states “nighttime uses should be encouraged and public safety enhanced to meet the needs of residents and visitors.” Objective 3.11 of the General Plan Framework provides for “the continuation and expansion of government, business, cultural entertainment, visitor-serving uses, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.” The proposed LASED Specific Plan Amendment would accomplish the intent of Objective 3.11 in that it will expand cultural, entertainment and visitor-serving uses within the Los Angeles Sports and Entertainment District by allowing development of the Convention Center Expansion Parcel with uses permitted by the LASED Specific Plan once such parcel is no longer needed for Convention Center expansion rather than holding the parcel for Convention Center expansion uses until 2021.

b. Economic Development

The LASED Specific Plan Amendment would further the goals and policies specified in the Economic Development chapter of the General Plan Framework. These include:

Policy 7.8.1 *Place the highest priority on attracting new development projects to Los Angeles which have the potential to generate a net fiscal surplus for the City.*

Policy 7.8.3 *Encourage mixed-use development projects, which include revenue generating retail, to offset the fiscal costs associated with residential development.*

By releasing the development restrictions on the Convention Center Expansion Parcel once the New Hall is constructed as part of the Convention and Event Center Project, the LASED Specific Plan Amendment would make available the parcel for development of uses consistent with the LASED Specific Plan. Releasing the use restrictions for the Convention Center Expansion Parcel once they are no longer needed would attract new development to the Los Angeles Sports and Entertainment District, including revenue generating retail, that would help generate a net fiscal surplus for the City.

c. Urban Form and Neighborhood Design

Objective 5.2 *Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.*

Policies 5.2.1 *Designate centers and districts in locations where activity is already concentrated and/or where good transit service is, or will be provided.*

Policy 5.2.2 *Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime.*

The LASED Specific Plan area constitutes a large part of the urban core of Los Angeles and is the City's sports and entertainment focal point. It is also situated within the center of Los Angeles' economic and government centers, within the highest density residential area, and within the major public transportation hub for the region. The proposed LASED Specific Plan Amendment would meet the above-noted objectives and policies by making available for development consistent with the LASED Specific Plan the Convention Center Expansion Parcel once such parcel is no longer needed for expansion of the Convention Center.

d. Transportation Element.

The LASED Specific Plan Amendment is consistent with applicable objectives and policies of the Transportation Element, including Objective 3, related to supporting development in regional centers, community centers, major economic activity areas and along mixed-use boulevards as designated in the Community Plan. The Los Angeles Sports and Entertainment District is a mixed-use district, designated as a regional center by the General Plan. Thus, the amendment would promote additional development within a designated regional center consistent with the LASED Specific Plan, consistent with the Transportation Element. Further, because the LASED Specific Plan already allows for development of the Convention Center Expansion Parcel with uses permitted in the LASED Specific Plan should development of the Convention Center Expansion Parcel not occur by October 21, 2021, the proposed amendment would not result in any significant transportation, parking or circulation issues that were not already analyzed in the EIR for the LASED Specific Plan.

Findings under Charter Section 558

Los Angeles City Charter Section 558 and LAMC Section 12.32(C)(2) require that prior to adopting a land use ordinance, the City Planning Commission make findings that the ordinance conforms with public necessity, convenience, general welfare and good zoning practice.

1. The LASED Specific Plan Amendment would conform to public necessity, convenience, general welfare and good zoning practice in the following respects:

The LASED Specific Plan Amendment is consistent with the goal to provide flexibility in the development of the Los Angeles Sports and Entertainment District while ensuring that environmental impacts do not exceed those analyzed in the LASED EIR. The proposed LASED Specific Plan Amendment would result in a complementary and compatible use of the Convention Center Expansion Parcel, which has the potential to be underutilized should construction of the New Hall obviate the need for additional Convention Center uses on the Convention Center Expansion Parcel. As demonstrated above, the proposed amendment would meet the goals, policies and objectives of the General Plan, including promoting land uses that address the needs of visitors to Downtown, encouraging a mix of uses to create an active Downtown environment, attracting new development projects which have the potential to generate a net fiscal surplus for the City and encouraging development along corridors served by transit. Thus, the proposed LASED Specific Plan Amendment would conform to the public necessity, convenience, general welfare and good zoning practice.

2. The Proposed LASED Specific Plan Amendment Would Be Consistent with LASED Specific Plan Purposes.

The proposed LASED Specific Plan Amendment would be consistent with the following LASED Specific Plan Purposes:

- *Provide continued and expanded development of the site as a major entertainment mixed-use development providing hotel, retail, entertainment, residential (including residential condominium units), live theaters, movie theaters, sound stages, office, medical clinic/sports medicine center, tourism, and similar or related uses within the Specific Plan area in conformance with the goals and objectives of local and regional plans and policies;*
- *Expand the economic base of the City, by providing additional employment opportunities and additional revenues to the region;*
- *Enhance the existing Convention Center and STAPLES Center development, by providing additional employment opportunities and additional revenues to the region.*

By releasing the Convention Center Expansion Parcel from development restrictions once the parcel is no longer needed for convention center uses, the LASED Specific Plan Amendment would enable additional development in the Los Angeles Sports and Entertainment District consistent with the LASED Specific Plan. This additional development would expand the economic base of the City and enhance the Convention Center and STAPLES Center development by providing additional employment opportunities and revenues to the region.

Development Agreement Amendment Findings

1. General Plan Land Use Designation. The subject site is located within the area covered by the Central City Community Plan adopted by the City Council on June 13, 1974. The Community Plan map designates the subject site for Regional Center Commercial and High Density Residential with a corresponding zone of LASED. The amendment request is consistent with this land use and zoning designation.
2. The Transportation Element of the General Plan will not be affected by the recommended action herein because the amendment request is to modify sections of an existing development agreement that was evaluated for transportation and other environmental impacts under EIR No. 2000-3577 (State Clearinghouse No. 2000091046) and No. 2011-0585 (State Clearinghouse No. 2011031049, and certified by the City Council on September 4, 2001 and _____, respectively. The scope of the project itself has not changed nor has any condition of approval.
3. Development Agreement Findings
 - A. State Government Code Sections 65868 authorizes the amendment of a previously approved development agreement.
 - B. The City of Los Angeles has adopted rules and regulations establishing procedures and requirements for consideration of development agreements under Citywide Development Agreement Procedures (CF 85-2313-S3), pursuant to which the City has approved that certain Third Amended and Restated Development Agreement dated April 2, 2008 and recorded on April 10, 2008 in the official records of Los Angeles County, California as Instrument No. 2008-0625541, as amended by that certain Amendment to the Third Amended and Restated Development Agreement dated December 21, 2010 and recorded on January 21, 2011 in the official records of Los Angeles County, California as Instrument No. 2011-0120808 (as so amended, the "Amended and Restated Development Agreement").
 - C. L.A. Arena Land Company, LLC has requested that the City consider further amending the Amended and Restated Development Agreement to provide for an earlier release of the restrictions in such agreement pertaining to a future Los Angeles Convention Center expansion parcel in the event that a new convention and exhibition structure is constructed to replace the existing Los Angeles Convention Center West Hall as part of the Convention and Event Center Project, approved immediately prior to this action, and does not otherwise affect the parties' obligations under the Development Agreement. The amendment process was initiated by L.A.

Arena Land Company, LLC and all proceedings have been taken in accordance with the City's adopted procedures.

- D. The Convention and Event Center Project includes a redevelopment of the Convention Center with the construction of a new convention center building ("New Hall") and multi-purpose event center that could function as exhibit hall space ("Event Center") on the Convention Center site. The New Hall would replace the outmoded West Hall with a modern facility contiguous to the existing South Hall. By creating a more efficient exhibit hall contiguous to the existing South Hall, the New Hall would enhance the marketability of the Convention Center, substantially improving the rank of the Convention Center, making it more competitive nationally. Further, the Event Center would complement and promote the Convention Center by providing a new multi-purpose room of a size that could function as exhibit hall space, meeting rooms or a ballroom with direct physical connections to the Convention Center, an amenity that the Convention Center cannot currently offer. As a result, construction of the New Hall would obviate the need for a Convention Center Expansion Parcel in the LASED Specific Plan area.
- E. The Amendment complies with all applicable City and State regulations governing development agreements.
- F. Pursuant to Section 65867.5 of the Government Code, the Amendment is consistent with the objectives, policies and programs specified in the City of Los Angeles General Plan, including the Central City Community Plan and the Los Angeles Sports and Entertainment Specific Plan.
- G. The Amendment will not be detrimental to the public health, safety and general welfare. Approval of the Amendment clarifies provisions in the Development Agreement regarding the location and timing of a future Los Angeles Convention Center expansion and does not otherwise affect the Applicants' obligations under the Development Agreement.
- H. The Amendment does not modify those provisions of the Development Agreement which specifically permit application to the Project of rules and regulations under City Municipal Code Section 91.0101 and 98.0606 relating to public health and safety.
- I. The Amendment is consistent with conditions of previous discretionary approvals for the subject property.
- J. The Amendment is necessary to strengthen the public planning process and to reduce the public and private costs of development uncertainty.

Based upon the above findings, the Amendment to the Development Agreement is deemed consistent with public necessity, convenience, general welfare and good zoning practice.

ENVIRONMENTAL FINDINGS

HAVING RECEIVED, REVIEWED, AND CONSIDERED THE FOLLOWING INFORMATION AS WELL AS ALL OTHER INFORMATION IN THE RECORD OF PROCEEDINGS ON THIS MATTER, THE CITY OF LOS ANGELES HEREBY FINDS, DETERMINES AND DECLARES AS FOLLOWS:

I. CEQA PROCESS

Pursuant to the California Environmental Quality Act, Public Resources Code Section 21000 et seq. ("CEQA"), the Department of City Planning of the City of Los Angeles ("City"), acting as Lead Agency, determined that preparation of an environmental impact report ("EIR"), in accordance with CEQA Guidelines Section 15081, would be the appropriate approach for the analysis of the proposed Project (defined below) proposed by L.A Convention Hall, LLC and L.A Event Center, LLC (collectively, the "Applicants").

In 2011 the California Legislature approved Senate Bill 292 (SB 292) pertaining specifically to the proposed Project. The statute added Section 21168.6.5 to the California Public Resources Code, which established specific CEQA procedures for the proposed Project. The City's CEQA process has implemented the requirements of SB 292.

A Notice of Preparation for the Draft EIR ("NOP") was circulated for a 30-day review period starting on March 17, 2011 and ending on April 18, 2011. In addition, a public scoping meeting was conducted on March 30, 2011. Appendix A of the Draft EIR includes copies of written comments submitted to the Planning Department in response to the NOP and at the public scoping meeting.

On April 5, 2012, the City released the Draft EIR for the Project for public comment. The Draft EIR was circulated for 47 calendar days, to May 21, 2012.

The lead agency received 105 comments on the Draft EIR from public agencies, groups and individuals and responses to these comments are included in Environmental Impact Report No. ENV-2011-0585-EIR (State Clearinghouse No. 2011031049) dated August 2012 (the "Final EIR"). Responses to comments in the Final EIR include both specific responses and topical responses to issues or topics repeated in several comments.

With regard to public comments and responses to comments, and in accordance with the express requirements of SB 292, the following notice was included in the Draft EIR and the Final EIR:

1. THE EIR FOR THE PROPOSED PROJECT IS SUBJECT TO SECTION 21168.6.5 OF THE PUBLIC RESOURCES CODE, WHICH PROVIDES, AMONG OTHER THINGS, THAT THE CITY OF LOS ANGELES 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 DRAFT 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 APPENDIX C OF THE DRAFT EIR.

The Final EIR has been completed in compliance with CEQA and SB 292, in connection with the approval by the City of the entitlements and other approvals required for development of the Project.

II. PROJECT DESCRIPTION

The Applicants are proposing 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, the construction of the Event Center, and related improvements are collectively referred to as the “Project” or “Proposed Project.” The implementation of the Project would occur pursuant to the proposed Convention and Event Center Specific Plan (“Specific Plan”), which permits existing uses and would guide the additional development of the approximately 68 acres of land owned by the City of Los Angeles. This area is generally bounded by the following major roadways: the Caltrans right-of-way adjacent to the SR-110 Harbor Freeway to the west;¹ Chick Hearn Court to the north; Figueroa Street to the east; and Venice Boulevard to the south (“Project Site” or the “Site”). The proposed Specific Plan provides the regulatory framework for the Project and establishes the maximum development envelope.

The Project includes the construction and operation of a new convention and exhibition structure (the “New Hall”) over Pico Boulevard to replace the existing West Hall, which would be removed. The New Hall would be of similar size to the West Hall (i.e., approximately 462,200 square feet for the existing West Hall as compared to the

¹ *The Project Site’s western boundary is currently established as the existing property line between the land owned by the City of Los Angeles and the Caltrans right-of-way adjacent to the SR-110 Harbor Freeway. The Event Center Applicant is proposing a Specific Plan boundary that accounts for a potential land exchange or transfer between Caltrans and the City. Pursuant to the transfer, Caltrans would transfer to the City three small remnant parcels of land owned by Caltrans. Upon the completion of such transfer, the Caltrans parcels, which are referred to “Add Areas”, would be added within the Specific Plan area. If the transfer is carried out as an exchange, the City would convey to Caltrans in exchange a remnant parcel owned by the City adjacent to the Caltrans right-of-way, and the City parcel, referred to as the “Exchange Parcel” would be excluded from the Specific Plan area. . 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 allowing a more efficient design of the L.A. Live Way Garage. For further details, see Map 1 of the proposed Convention and Event Center Specific Plan.*

proposed approximately 500,000 square foot New Hall). Development of the New Hall would increase the amount of contiguous floor area available at the Convention Center.

The existing West Hall would be demolished to allow for construction of the new Event Center. The Event Center would primarily function as the home venue for one or possibly two National Football League teams, as well as a host venue for a variety of other events. It would also provide exhibition and meeting space when not used for sports and entertainment events. Before development of the Project, approximately 1.1 million square feet of existing buildings would be demolished. The Project would result in an increase of approximately 1.97 million square feet of gross area to a total of approximately 5.01 million square feet.

The Project would also include construction of two parking garages immediately west of L.A Live Way to replace the existing: (i) Bond Street Parking Lot, (ii) Cherry Street Garage, and (iii) the parking area currently located beneath the existing West Hall. Under the Project 6,670 parking spaces would be available within the Project Site, an increase of 1,112 parking spaces as compared to existing conditions.

As set forth in the EIR, the Project includes “Design Features” which are considered part of the Project and are not mitigation measures. Design features are inherent components of the Project.

III. FINDINGS

A. Required CEQA Findings

Section 21081 of the California Public Resources Code and Section 15091 of the State CEQA Guidelines (the “Guidelines”) require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more of three possible findings for each of the significant impacts.

1. The first possible finding is that “changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.” (Guidelines Section 15091 (a)(1)).
2. The second possible finding is that “such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.” (Guidelines Section 15091(a)(2)).
3. The third possible finding is that “specific economic, legal, social, technological, or other considerations, including provision of

employment opportunities for highly trained workers, make infeasible, the mitigation measures or project alternatives identified in the final EIR.” (Guidelines, Section 15091(a)(3)).

The Department of City Planning served as the Lead Agency under CEQA with respect to the Final EIR. In recommending approval of the Project and making these findings, the City has considered all of the information in the administrative record of proceedings, including but not limited to: the applications for the Project Approvals, City staff reports, all public comments received both written and verbal, and the Final EIR. On the basis of all the foregoing information, the City finds:

1. Pursuant to Public Resources Code Section 21081(a)(1), that changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment as identified in the Final EIR; and
2. Pursuant to State CEQA Guidelines Section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the Final EIR; and
3. The Final EIR has been completed in compliance with CEQA and is adequate under CEQA for approval of the actions necessary to implement the project and all other City permits, entitlements, and discretionary approvals for the project; and
4. Project alternatives that substantially reduce or avoid the project’s significant environmental impacts are rejected as infeasible, for the reasons set forth in Section F below.

B. EIR Evaluation of Impacts.

The Final EIR evaluated the following potential project and cumulative environmental impacts: Land Use; Transportation; Parking; Pedestrian Circulation and Bicycle and Pedestrian Safety; Aesthetics/Visual Resources; Natural Light (Shading); Artificial Light and Glare; Noise; Natural Light (Shading); Artificial Light and Glare; Noise; Air Quality; Air Quality-Climate Change; Geology and Soils; Hydrology and Surface Water Quality; Water Resources-Groundwater; Cultural Resources-Historical Resources; Cultural Resources-Archaeological Resources; Public Services-Police Protection; Public Services-Fire Protection; Utilities-Water; Utilities-Wastewater; Utilities-Solid Waste; Utilities-Electricity; Utilities-Natural Gas; Environmental Hazards. Additionally, the Final EIR considered Significant Irreversible Environmental Changes, Growth Inducing Impacts and potential secondary effects of the Project. The significant environmental impacts of the Project, including cumulative environmental impacts of the project and

the significant environmental effects of seven alternatives to the Project, were also identified in the Draft EIR and Final EIR.

The severity of environmental impacts are grouped into four categories: 1) Impacts not reasonably likely to occur such that no further environmental impact analysis is warranted; 2) Impacts are less than significant without the need to implement and require mitigation measures; 3) Impacts that are potentially significant but are reduced to less-than-significant levels with the implementation of mitigation measures; and 4) Significant and unavoidable impacts that will remain significant despite implementation of all feasible mitigation intended to reduce the severity of the impact.

C. No Further Environmental Review Required

Substantial evidence in the administrative record shows that the following impact areas are not reasonably likely to occur and that no further environmental impact analysis is warranted: Agriculture and Mineral Resources, Biological Resources, Paleontological Resources, Population/Housing, Public Services: Schools, Parks and Libraries, and Recreation, as described in the Initial Study (Appendix B to the DEIR).

D. Certain Project Impacts and Cumulative Impacts of the Project Are Significant and Unavoidable; Remaining Impacts of The Project Are Less Than Significant

Substantial evidence in the administrative record shows that the Project will result in significant and unavoidable impacts in the following impact areas: Transportation (construction, intersections, freeway segments, freeway on- and off-ramps, and Congestion Management Program freeway monitoring locations); Air Quality (construction, operation and concurrent construction and operational emissions) Aesthetics/Visual Resources and Cultural/Historic Resources (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; Artificial Light and Glare; Noise (construction and operational); and Utilities/Solid Waste.

Except as set forth above, substantial evidence in the administrative record shows that all other impacts are either less than significant without mitigation or potentially significant but are reduced to less-than-significant levels with the implementation of mitigation measures set forth in the Mitigation Monitoring and Reporting Plan, as further described below. All of the relevant mitigation measures set forth in the Final EIR for the Project would be implemented and enforced as set forth therein and in the Mitigation Monitoring and Reporting Plan and required as conditions of approval. Notwithstanding the foregoing, the Final EIR determines and the City finds certain project related impacts of the Project, are significant and unavoidable impacts and that certain

cumulative impacts of the Project, which take into account the related projects listed in the Final EIR, are also cumulatively considerable and have significant and unavoidable impacts despite implementation of all feasible mitigation intended to reduce the severity of the impact.

E. Impact Area Findings

a. Agricultural and Forestry Resources

Facts: No agricultural or other related activities occur on the Project Site or within the vicinity. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project site is currently improved with the Convention Center, STAPLES Center and parking facilities and does not contain agricultural or forest land. The existing public facilities and commercial zoning designations applicable to the Project Site do not anticipate agricultural uses. In addition, the Project Site is not enrolled under a Williamson Act contract and development of the Project buildings would not involve the conversion of farmland or forest land.

Finding: The City finds based on substantial evidence that project and cumulative impacts to agricultural and/or forestry resources would be less than significant.

b. Mineral Resources

Facts: The Project Site is not located within an area containing significant mineral deposits (e.g., Mineral Resource Zone 2 Area – MRZ-2) nor is it located within a surface mining district. The Project site is zoned PF-4D-O and C2-4D-O, with the “O” qualification designating that the Project Site is located within the Downtown Los Angeles Oil Field. However, no active or inactive oil wells are located on the Project Site and development of the Project would not preclude future extraction of oil resources. Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Nor will the Project result in any impacts by contributing to the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Finding: The City finds based on substantial evidence that project and cumulative impacts to mineral resources would be less than significant.

c. Biological Resources

Facts: The Project Site is located in a highly urbanized area, surrounded by a major roadway network, including the Harbor and Santa Monica Freeways, and is currently developed with the Convention Center, STAPLES Center and parking facilities. Given

the built nature of the Project Site and vicinity, the likelihood of the presence of any endangered and/or threatened species is remote. The area in the vicinity of the Project Site is not located within a City designated biological resources area. Furthermore, there are no species identified by the California Department of Fish and Game (CDFG)'s Natural Diversity Database or by the U.S. Fish and Wildlife Service (USFWS) that have been designated as endangered and/or threatened within a half-mile radius of the Project Site. Accordingly, development of the Project will not impact endangered or threatened species.

Additionally, no riparian habitats or sensitive natural communities are located on-site, nor have they been identified in City or Regional plans, policies, or regulations of the CDFG or USFWS as being on site. As such, the Project will not impact riparian habitats or sensitive natural communities.

There are no federally protected waters or wetlands, as defined by Section 404 of the Clean Water Act (such as marsh vernal pools, costal, etc) that exist on or in the vicinity of the Project Site. As a result, the Project will not impact federally protected waters or wetlands by direct removal, filling, hydrological interruption, or by any other means.

The Project site and surrounding area do not contain, and are not a part of, any migratory wildlife corridors or native wildlife nursery sites and are not subject to a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Project Site is located in a highly urbanized area and does not contain natural areas or water features. Accordingly, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species. The developed nature of the Project Site as well as the extent and nature of the surrounding urban development further preclude the area from serving as a native resident or wildlife corridor.

Project implementation could disturb trees that may provide habitat for resident or migratory bird species that are not identified as sensitive or protected. The Project would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds do not occur. With implementation of Mitigation Measure Bio-1, impacts with regard to nesting and/or migratory birds would be less than significant.

Implementation of the Project would also not have a significant impact on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, nor would the Project impede the use of native wildlife nursery sites.

The Project is also not expected to conflict with any local policies or ordinances designed to protect any biological resources, such as oak trees or California walnut woodlands. As mentioned, the Project Site is improved with the Convention Center,

STAPLES Center and parking uses. Limited ornamental landscaping exists on the Site, mainly planted trees and shrubs. Although the exact species is unknown, compliance with Los Angeles Municipal Code requirements regarding tree removal would ensure potential impacts to any tree species would remain less than significant.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measure Bio-1 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to biological resources as identified in the Final EIR. Thus, after implementation of Mitigation Measure Bio-1 impacts to biological resources would be less than significant.

d. Population and Housing

Facts: The Project includes the expansion and modernization of the Los Angeles Convention Center including the construction of the Event Center and large, more efficient parking facilities to accommodate the new development. The Project does not include the development of any new housing. Nor will development of the Project site, which is improved with public facility uses, displace people or any existing housing so as to necessitate development of replacement housing elsewhere. Given the local labor pool and current unemployment rates it is expected that most, if not all, of the permanent and construction jobs created by the Project will be filled by individuals already residing in the area. It is not anticipated that the Project will induce substantial population growth by causing individuals to relocate to the area for employment opportunities. The Project Site is also located in a highly developed area with an established network of roads and other urban infrastructure. Therefore the Project would not require the extension of roads or infrastructure in a manner that would induce substantial population growth.

Finding: The City finds based on substantial evidence that project and cumulative impacts to population and housing would be less than significant.

e. Public Services - Schools

Facts: While the Project would not generate residents at the Project Site, the additional employment generated by the Project has the potential to generate new students that may attend Los Angeles Unified School District (LAUSD) schools. However, the potential for actual student generation is anticipated to be very limited because it is anticipated that Project employees would come from the existing labor pool and would not relocate as a result of working at the Project Site. Moreover, any increase in LAUSD enrollment that may occur under the proposed Project would be dispersed across many LAUSD schools as school attendance is primarily a function of the employee's residence rather than their place of work. Payment of fees mandated by the Leroy Greene School Facilities Act of 1998 is required prior to issuance of building

permits. Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less than significant levels.

Finding: The City finds based on substantial evidence that project and cumulative impacts to public services (libraries) would be less than significant.

f. Public Services – Parks and Recreation

Facts: Parks within the City's boundaries are operated and maintained by the Los Angeles City Recreation and Parks Department. While there are several parks in the greater Project area, there are no City parks located within convenient walking distance or adjacent to the Project Site. The proposed Project would not include a residential component. The Project is not anticipated to generate a demand for parks over existing conditions as the type and amount of development would be similar under the Project. The Project would increase onsite employment; however, parks in the Project area are not likely to be utilized during a typical employee break period given the limited time available and the travel distances between the Project Site and local parks. Due to the periodic, largely event-driven nature of the uses proposed onsite, as well as the lack of adjacent City parkland, it is unlikely that visitors and employees would utilize off-site public recreation facilities.

Finding: The City finds based on substantial evidence that project and cumulative impacts to public services (parks and recreation) would be less than significant.

g. Public Services – Libraries

Facts: Library services within the Project area are provided by the City's Public Library (LAPL). The LAPL assesses service capacity based on the residential population within a specified distance of City libraries. There are no LAPL libraries located within proximity of the Project Site. The proposed Project does not include a residential component. Further, the construction of the Replacement Hall would not generate a demand for libraries over existing conditions as the type and amount of development would be similar under the Project. Due to the periodic, largely event driven nature of the uses proposed onsite, as well as the lack of LAPL facilities in proximity to the Project Site, it is unlikely that the demand for LAPL facilities would increase as a result of Project-generated visitors and employees.

Finding: The City finds based on substantial evidence that project and cumulative impacts to public services (libraries) would be less than significant.

h. Aesthetics (Visual Resources)

i. Aesthetics/Visual Character (Project – Construction)

Facts: 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. With incorporation of Project Design Features C-1 and C-2 which require (i) 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 and (ii) monitoring of the Project Site for graffiti and contracting with a graffiti removal company, as needed, short-term construction activities would not substantially and adversely alter or degrade the existing visual character of the Project Site.

As discussed in detail in Section IV.I.1, Cultural Resources—Historical Resources, and the Historical Resources Assessment in Appendix S, of the Draft EIR, the Project Site does not appear to include any buildings eligible for inclusion in the National Register, California Register, or as a local Historic Cultural Monument designation under any criteria. However, 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 Historic Cultural Monument. If any such determination were to be made, a significant aesthetic 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. Given that demolition of the West Hall would occur during the construction phase, construction-related impacts are therefore conservatively considered to be significant and unavoidable in the event that the West Hall were to be determined eligible as a historic resource.

Finding: The City finds that although incorporation of Mitigation Measure C-1 would reduce the severity of construction related project impacts to aesthetics (visual character), impacts would remain significant and unavoidable.

ii. Aesthetics/Visual Character (Project – Operation)

Facts: 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. New and enhanced outdoor plazas networked by pedestrian pathways and improved streetscapes would also be incorporated as part of the Project. 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. 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 be in character with surrounding development, which includes mid- to high-rise buildings.

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.

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 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), 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. 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), compatible with existing conditions at the Site and within the surrounding area. In addition, the sign regulations would (i) account for critical safety issues such as the minimization of potential traffic hazards; (ii) ensure that street views and views of scenic vistas are protected; and (iii) limit visual clutter to protect and enhance the visual character of major commercial corridors and properties throughout the Project area.

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 be in character with existing conditions within and around the Project Site, particularly at L.A. LIVE, and the Proposed Project would

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

Although the Project would substantially alter some of the on-site visual resources and would introduce elements that may contrast with the current aesthetic image of the Site – it would not degrade the general visual character of the Project Site. On balance the Project would be more consistent with adopted City policies and guidelines regarding architecture, walkability, the public realm and streetscapes than the West Hall. However, it is assumed 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. The impact created during construction would extend to operation of the Proposed Project and would constitute a significant and unavoidable impact.

Finding: The City finds that although incorporation of Mitigation Measures C-2 through C-4 would reduce the severity of project related operational impacts to aesthetics (visual character), impacts would remain significant and unavoidable.

iii. Aesthetics/Visual Character (Cumulative)

Facts: 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 (as identified in the DEIR) 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.

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. 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 which 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.

However, it is assumed 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. The impact created during construction would extend to operation of the Proposed Project and would constitute a cumulative significant and unavoidable impact.

Finding: The City finds that although incorporation of Mitigation Measures C-1 through C-4 would reduce the severity of cumulative construction and operational impacts to aesthetics (visual character), impacts would remain significant and unavoidable.

iv. Aesthetics View Obstruction (Project)

Facts: 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. This freeway, however, is not a State-designated scenic highway nor is it designated on a Citywide level within the General Plan Transportation Element.

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 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 with Project implementation. Although 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, 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.

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. Although the Proposed Project would not substantially obstruct existing views of most visual resources from private vantage points, the *L.A. CEQA Thresholds Guide* do not consider impacts to individual private views from residential or other private properties to be significant.

Finding: The City finds that a significant and unavoidable impact would result to project related impacts to aesthetics (view obstruction) and that no feasible mitigation measures exist that would substantially reduce the severity of such impacts.

v. *Aesthetics View Obstruction (Cumulative)*

Facts: 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 Harbor 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. In any case, such views are not afforded protection under CEQA.

Finding: The City finds based on substantial evidence that project impacts with regard to cumulative aesthetics view obstruction would be less than significant.

i. **Aesthetics (Natural Light/Shading)**

i. *Project (construction and operational)*

Facts: 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. Thirteen 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.

Finding: The City finds based on substantial evidence that project impacts with regard to aesthetics (natural light/shading) would be less than significant.

ii. Cumulative

Facts: Eight related projects would be located within proximity of the Project Site that would 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 to create a cumulatively 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.

Finding: The City finds based on substantial evidence that cumulative impacts with regard to aesthetics (natural light/shading) would be less than significant

j. Artificial Light and Glare

i. Construction (Project and Cumulative)

Facts: 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 construction lighting project design feature D.2-17, construction lighting contained within the bowl of the Event Center would not be visible from beyond the Project Site boundary. However, 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 and impacts with respect to spill light and glare.

Finding: The City finds that a significant and unavoidable project and cumulative construction related impact would result to aesthetics (artificial light and glare) and that no feasible mitigation measures exist that would substantially reduce the severity of

such impacts.

ii. Operational (Project and Cumulative)

Facts: 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 would remain less than significant. With implementation of the proposed project design features and the mitigation measures, 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 by requiring that the applicant provide window coverings at effected residences to reduce the Glare Rating below 55. 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 Proposed Project operations in association with special event lighting, pyrotechnics, and unusual atmospheric conditions. 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 all together. However, such features are integral to the fan experience associated with the Event Center, as set forth in the project objectives outlined in the DEIR. 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 as noted in the DEIR 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.

Finding: The City finds that although incorporation of Mitigation Measures D.2-1 through D.2-4 would reduce the severity of project and cumulative operational impacts to aesthetics (light and glare), impacts would remain significant and unavoidable.

k. Air Quality

i. Construction (Project and Cumulative) – Odors

Facts: 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 reduce objectionable odors for the project as well as the related projects identified in the DEIR.

Finding: The City finds based on substantial evidence that construction related project and cumulative odor impacts caused by the project would be less than significant.

ii. Construction (Project) – PM10, PM2.5 and Sox

Facts: 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. Daily emissions of particulate matter less than 10 microns in diameter (“PM₁₀”), particulate matter less than 2.5 microns in diameter (“PM_{2.5}”), and sulfur oxides (“SO_x”) would be considered less than significant, as the estimated regional emissions for these pollutants would fall below their respective SCAQMD significance thresholds.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures F.1-1 through F.1-8a-c, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to regional construction related PM10, PM2.5 and SOx emissions. Thus, with implementation of these Mitigation Measures regional construction related PM10, PM2.5 and SOx impacts would be reduced to a level of less than significant.

iii. Construction (Project) – VOC, CO and NOx

Facts: 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.

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 VOC would exceed the regional construction significance thresholds. The Proposed Project would remain in exceedance of the SCAQMD regional significance thresholds for CO and NO_x during the most intense construction period. Although compliance with Project Design Feature F.1-1 and implementation of Mitigation Measures F.1-1 through F.1-8a-c would reduce the severity of CO and NO_x related construction impacts, they will not reduce the impacts to less than significant levels.

Finding: Although Mitigation Measures F.1-1 through F.1-8a-c will reduce the severity of regional VOC, CO and NO_x construction related impacts, they will not reduce the impacts to less than significant levels. Despite incorporation of this mitigation, construction related impacts resulting from VOC, CO and NO_x emissions will remain significant and unavoidable.

iv. Construction (Project) – Localized Significance Thresholds (CO, PM10 and PM2.5)

Facts: The SCAQMD’s LSTs for the Project area are based on the acreage of activity and distance to receptor and vary depending on the construction scenario analyzed. Therefore, localized impacts were evaluated using the individual project components, maximum onsite emissions, and maximum combined overlapping activities for combined project components. Maximum overlapping CO and NO_x emissions occur during New Hall Site Work/Landscaping, New Hall Interior/Exterior, L.A. Live Way Garage Foundations, L.A. Live Way Garage Concrete/Steel/Precast Frame, and Event Center Demolition phases overlap. Maximum localized construction emissions for off-site sensitive receptors would not exceed the localized screening threshold for CO for the maximum individual project components or maximum on-site emissions. Maximum localized construction emissions for off-site sensitive receptors would not exceed the localized screening threshold for CO for the maximum overlapping daily construction activities for combined project components

Implementation of Mitigation Measures F.1-1 through F.1-8a, b and c would reduce localized PM₁₀, PM_{2.5}, emissions by an average of 25, 39, and 54 percent, respectively. 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

Compliance with Project Design Feature F.1-1 and implementation of Mitigation Measures F.1-1 through F.1-8a, b and c would reduce localized construction emissions for PM10 and PM2.5 below the threshold of significance.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures F.1-1 through F.1-8a, 8b and 8c, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to localized construction related CO, PM10 and PM2.5 emissions. Thus, after implementation of these mitigation measures localized CO, PM10 and PM2.5 construction related emission impacts would be reduced to a level of less than significant.

v. Construction (Project) – Localized Significance Thresholds (NO_x)

Facts: The Proposed Project would remain in exceedance of the SCAQMD localized significance thresholds for NO_x during the most intense construction period. Although compliance with Project Design Feature F.1-1 and implementation of Mitigation Measures F.1-1 through F.1-6 would reduce the severity of NO_x related construction impacts by approximately 54 percent, they will not reduce the impacts to less than significant levels.

The localized effects from the on-site construction emissions of NO₂ were analyzed using the AERMOD dispersion model. The maximum NO₂ incremental concentrations of 38.8 µg/m³ would not exceed the State 1-hour threshold at the identified sensitive receptors. However, the 98th percentile hourly incremental concentration of 32.5 µg/m³ and annual NO_x incremental concentration of 1.3 µg/m³ would exceed their respective State and federal thresholds. This impact would occur at the Ritz-Carlton Residences north of the Project Site and would be representative of pollutant concentrations for residential and commercial land uses in the immediate vicinity. Potential localized federal 1-hour NO₂ impacts on the peak construction day could encompass the following areas: (1) about 200 feet to the west near Blaine Street; and (2) about 400 feet north near Olympic Boulevard. Potential localized federal annual NO₂ impacts could encompass the following areas: (1) about 200 feet to the west near Blaine Street; and (2) about 600 feet north near Olympic Boulevard. All land uses (e.g., commercial, retail, office, industrial, and residential) within these areas could potentially be impacted by localized NO₂ concentrations in excess of the federal thresholds. Therefore, with respect to localized emissions from construction activities, NO₂ impacts would be temporary but significant and unavoidable.

Finding: Although Mitigation Measures F.1-1 through F.1-8a, b and c will reduce the severity of localized construction related impacts resulting from NO_x, they will not reduce the impacts to less than significant levels. Despite incorporation of this mitigation, localized construction related impacts resulting NO_x emissions will remain significant and unavoidable.

vi. Construction (Project and Cumulative) – Toxic Air Contaminants (TACs)

Facts: No notable impacts related to TAC emissions during construction are anticipated to occur under the Proposed Project. Mitigation Measures F.1-1 through F.1-6 identified below would further reduce diesel exhaust emissions associated with on-site heavy equipment and haul trucks during the construction period. As detailed in Appendix M to the EIR, the maximum incremental increase in off-site individual 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 chronic hazard index would be reduced to less than 0.1. As such, potential impacts would be less than significant.

As project specific TAC impacts were deemed less than significant, cumulative TAC emission impacts during construction would not be cumulatively considerable and are therefore also concluded to be less than significant.

Finding: The City finds based on substantial evidence that project and cumulative construction related toxic air contaminant (“TAC”) impacts would be less than significant. Implementation of Mitigation Measures F.1-1 through F.1-8a, b and c would further reduce the severity of already less than significant construction related project and cumulative TAC impacts.

vii. Construction Impacts (Cumulative)

Facts: 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_x, 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_x, PM₁₀, and PM_{2.5} 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.

Finding: Although Mitigation Measures F.1-1 through F.1-8a, 8b and 8c will reduce the severity of regional and localized construction related emission impacts, they will not reduce the impacts to less than significant levels. Despite incorporation of this mitigation, impacts resulting from regional CO, NO_x and VOC and localized NO_x, PM₁₀ and PM_{2.5} emissions remain significant and unavoidable.

viii. Project and Cumulative – Regional and Localized Operational Impacts

Facts: Although the Project would incorporate Design Feature F.2-1, Mitigation Measure F.1-9 through F.1-14 and numerous other measures to reduce operational emissions (e.g., implementation of a Transportation Demand Management plan and encouraging the use of mass transit), regional operational emissions would still exceed the SCAQMD daily emission threshold for regional NO_x, VOC, PM₁₀, PM_{2.5}, and CO after implementation of feasible mitigation measures.

With respect to localized emissions from operational activities, PM₁₀ and NO_x impacts would be significant and unavoidable. The exceedance of NO_x is primarily a function of very high ambient background concentrations as reflected in the fact that the background annual NO₂ concentration represents approximately 98.7 percent of the NAAQS and the background 1-hour NO₂ concentration represents approximately 84 percent of the NAAQS. As such, the Proposed Project would have only a very minor effect on ambient concentrations. The 2007 AQMP projects that nitrogen oxide emissions in the Air Basin will decrease substantially in subsequent years, which suggests that the NO₂ background concentration will also substantially decrease over time. Given the Proposed Project's minor effect on ambient concentrations and given the AQMP 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 NO₂ concentrations into account would be 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.

Finding: Despite incorporation of the Project's extensive sustainability features and Mitigation Measure F.1-9 through F.1-14, the City finds the following project and cumulative operational air quality impacts would remain significant and unavoidable: (i) regional impacts relative to NO_x, VOC, PM₁₀, PM_{2.5} and CO, and (ii) localized impacts relative to PM₁₀ and NO_x.

ix. Concurrent Construction and Project related impacts

Facts: Portions of the Project Site would be completed and occupied while construction of the later Project components would be ongoing. Therefore, concurrent construction and operational impacts were evaluated in the DEIR. Based on a review of the Project components, it was determined that the maximum concurrent emissions could potentially occur during excavation of Event Center and completion of the New Hall. Concurrent construction and operational regional emissions of VOC, NO_x, and CO would exceed SCAQMD regional thresholds. Additionally, concurrent construction and operational localized emissions of NO_x would exceed localized thresholds. 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.

Finding: Despite incorporation of Mitigation Measures F.1-1 through F.1-8, concurrent construction and operational regional emissions of VOC, NO_x and CO as well as localized NO_x emissions would remain significant and unavoidable.

I. Air Quality – Greenhouse Gases

i. Project - Construction and Operational

Facts: 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.

Sustainability project design features would be implemented via the Sustainability Plan included as Appendix E to the Draft EIR. With implementation of the Sustainability Plan, 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 CO₂ (MTCO₂e). This represents an increase of 14,191 MTCO₂e over existing conditions and an increase of 15,799 MTCO₂e 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 MTCO₂e attributable to private automobile traffic to Spectator Events at the Event Center.

Finding: The City finds based on substantial evidence that construction and operational related greenhouse gas impacts would be less than significant.

ii. Cumulative (construction and operational impacts)

Facts: 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 Section IV.F.2, Air Quality – Climate Change, of the DEIR 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 to achieve 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.

Finding: The City finds based on substantial evidence that cumulative construction and operational greenhouse gas impacts would be less than significant and that no feasible mitigation measures exist that would substantially reduce the severity of such impacts.

m. Cultural Resources – Historic Resources

i. Project and Cumulative (construction and operational impacts)

Facts: As determined in the Historical Resources Assessment, 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. 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 demand. The West Hall also has not been demonstrated to be associated with the lives of persons important in our past. 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. 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 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.

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. Such commission would also have to conclude that despite the fact that it is not 50 years old, the property is of exceptional importance. If these determinations were to be made, demolition of the West Hall would be considered a significant adverse impact.

Finding: On the basis of the Initial Study completed in March, 2010, the Draft and Final EIRs, and a Historical Resources Assessment prepared for the Project Site in November 2011, the City has concluded that no existing buildings at the Project Site appear eligible for inclusion in the National Register, California Register, or as a local Historic-Cultural Monument ("HCM") under any criteria. However, it remains 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. Thus, although implementation of Mitigation Measure I.1-1 would reduce the severity of any potential impact, the City conservatively finds that demolition of the West Hall would cause a significant and unavoidable project related and cumulative impact.

n. Cultural Resources – Archaeological and Paleontological Resources

i. Project and Cumulative – Archeological Resources

Facts: 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. Potentially adverse impacts to archaeological resources in those areas would be avoided, however, through implementation of routine construction monitoring and reporting procedures, as set forth in Mitigation Measures I.2-1 and I.2-1a thru I.2-5.

With regard to potential cumulative impacts, 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures I.2-1 and I.2-1a through I.2-5 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to impacts to archeological resources. Thus, with implementation of these mitigation measures project and cumulative impacts associated with archeological resources would be reduced to a level of less than significant.

ii. Project and Cumulative – Paleontological Resources

Facts: The Project Site does not contain any observed geologic features and it has not been identified as having the potential to yield vertebrate paleontological resources. Yet, as with much of the region, the Project area consists of surface sediments with unknown fossil potential. The Project Site is developed with highly urbanized uses and the soils underlying the site have been disturbed; however, the Project would likely require more extensive excavation and grading than previous construction activities at

the site. With implementation of Mitigation Measure Paleo-1, potential impacts would be mitigated to a less than significant level.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measure Paleo-1 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to project and cumulative impacts to paleontological resources. Thus, with implementation of this mitigation measure project and cumulative impacts associated with paleontological resources would be reduced to a level of less than significant.

o. Land Use/Planning

i. Regulatory Consistency (Project)

Facts: 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's ("SCAQMD") Air Quality Management Plan (2007); and the Metropolitan Transportation Authority of Los Angeles County's ("Metro") Congestion Management Plan (2009).

The City of Los Angeles land use plans, policies, and codes applicable to the 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").

The 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 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 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 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.

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

The Project would also be consistent with the 2010 Bicycle Plan in that it would: allow for the integration of Downtown bikeways with the existing Downtown Street Standards; 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 in the vicinity of or on the Project Site).

The 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 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 CECSP ("Convention and Event Center Specific Plan") Zone.

The 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 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 includes a request to amend the LASED Specific Plan to remove the land use restriction with regard to the Convention Center Expansion Parcel (Development Site 1a in the LASED's Specific Plan Olympic West Subarea) upon completion of the New Hall. The purpose of the restriction was to establish a specific and limited time frame that the site would be reserved for potential Convention Center expansion purposes. The proposed New Hall obviates the need for, and achieves the objective expressed in, the use restriction. As a result, no land use impacts would occur as a result of implementing the proposed LASED Specific Plan amendment. Further, the impacts of the use of the Convention Center Expansion Parcel for other uses

permitted under the LASED Specific Plan was fully analyzed in the LASED EIR, and thus changing the timing for when those uses can occur on the parcel does not affect any of the analyses set forth in the LASED EIR.

The proposed signage would add to the event- and entertainment-oriented aspect of the Project Site and complement 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”). 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 CECSP 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 CECSP Zone, and the existing Conditional Use Permits (CUPs) for the Convention Center and STAPLES Center would be no longer needed.

Finding: The City finds based on substantial evidence that project impacts to land use (regulatory consistency) would be less than significant.

i. Regulatory Consistency (Cumulative)

Facts: As with the 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 Project would generally be consistent with applicable land use plans, policies, and regulations, the Project would not incrementally contribute to significant cumulative land use inconsistencies.

Finding: The City finds based on substantial evidence that cumulative impacts to land use (regulatory consistency) would be less than significant.

ii. Land Use Compatibility (Project)

Facts: 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 Harbor Freeway.

The Proposed Project represents infill development on land owned by the City that's designated for Public Facilities, such as the uses proposed. The 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 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 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 lofts to the east. Additionally, given the presence of numerous mid- to high-rise buildings in the immediate vicinity, including the JW Marriott, the Ritz-Carlton, and the Ritz-Carlton Residences at L.A. LIVE (referred to herein as the "Marriott/Ritz tower"), and other large-scale buildings such as STAPLES Center and various Convention Center exhibition halls, the 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 be secondary to and supportive of scheduled events, and therefore, would only be open during events. Such uses 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 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 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.

Finding: The City finds based on substantial evidence that project-specific impacts to land use compatibility would be less than significant.

iii. Land Use Compatibility (Cumulative)

Facts: There are three related projects located adjacent to the Project Site (Related Project Nos. 27, 60, and 91 located across Figueroa Street as identified in the Draft EIR) 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.

Finding: The City finds based on substantial evidence that cumulative impacts to land use compatibility would be less than significant.

iv. Urban Decay – Disinvestment in Competitive Facilities

Facts: MR&E prepared a study of the potential urban decay impacts that could be caused by the Project (the "MR&E Study"). The MR&E Study and DEIR assessed the Project's potential for displacement of competing facilities based on: (1) mass public events anticipated to use the Project's proposed 72,000 seat Event Center ("Spectator Events") and (2) events that would primarily use the upgraded Convention Center facilities developed as part of the Project including but not limited to, trade shows, consumer shows, conventions, etc. ("Public Assemblies").

Based on the characteristics of the Spectator Events and Public Assembly locations within the region, recent and ongoing investments in these facilities, and the lack of associated potential for the Project to result in displacement at these facilities, operation of the 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 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, the capacities of the Project would not fundamentally alter the market dynamics for public assembly events in Los Angeles County.

Finding: The City finds based on substantial evidence that the Project would not cause significant impacts by resulting in the closure of, or dis-investment in, competing facilities which may, in turn, result in conditions that lead to urban decay.

v. *Effects on Pico Union Community*

Facts: Since the opening of STAPLES Center in 1999, there is little evidence of widespread gentrification in the Pico-Union area. Moreover, as a result of certain initiatives arising from the STAPLES Center and Los Angeles Sports and Entertainment District Specific Plan, a number of stabilizing community benefits programs and projects have been implemented. Such beneficial programs/projects include: job training and local hiring; affordable housing; open space improvements; day care facilities and after school programs; and improvements to the Salvation Army Red Shield Center. L.A. LIVE, open since 2008, has also offered a variety of dining and entertainment facilities that have been enjoyed by nearby residents, including the new 14-screen Regal Cinema complex.

The combination of local jobs, numerous housing and open space projects, new and upgraded community facilities, and local youth programs all stimulated by the development of STAPLES Center and L.A. LIVE, have resulted in positive impacts in many areas of Pico-Union and have contributed to further stability in other Project adjacent neighborhoods. By being an economic anchor tenant for the community, STAPLES Center activities have contributed to growth in the local economy through direct employment of area residents as well as providing business opportunities for a wide variety of local enterprises. Similar local hiring initiatives and employment opportunities as well as continued and expanded community enhancement programs are anticipated to be implemented by the Proposed Project.

With respect to housing costs, an analysis prepared by MR&E entitled “Pico-Union Market Impacts” analyzed seven comparable markets. This analysis did not provide consistent evidence of a sustained increase in housing costs in communities adjacent to new NFL stadiums, either in terms of absolute increases in costs or relative position compared to state and metro area markets. The stadium-adjacent communities on average experienced a 5 percent increase in community housing values compared to housing values in their greater metro area. However, given this sample size and the diversity of factors affecting housing costs, this percentage increase is not considered conclusive, as some of the surveyed communities experienced a reduction in value, and the case studies overall are decidedly mixed in their outcome in terms of effects on housing costs. As such, it is concluded that there is insufficient evidence to support the conclusion that the development of the Event Center in the neighborhood adjacent to Pico-Union would bring about large-scale increases in housing costs that would have the effect of undermining housing affordability in the community.

In addition, the operation of STAPLES Center since its opening in 1999 further suggests that the presence of event space and public assembly facilities does not in and of itself lead to gentrification. Since the opening of STAPLES in 1999 to the present, housing prices in Pico-Union have generally varied with Los Angeles County prices, and in

general the presence of STAPLES Center has not led to a transformation in the available housing stock in the community.

Finding: The City finds that there is no substantial evidence in the administrative record to conclude that development of the Project would result in adverse impacts to the Pico-Union community.

vi. Secondary Retail Urban Decay Impacts in the Pico Union Community

Facts: Some residents in the Pico-Union community have expressed concern that new spending by visitors and the additional economic activity generated by the Proposed Project would distort the local retail market in such a manner that demand for sports apparel and related items would overwhelm community serving retail.

Pico-Union has a retail mix oriented toward serving the local community. With the exception of some notable region-serving retailers such as La Curacao, the retail outlets in Pico-Union are primarily geared toward meeting the day-to-day needs of the neighborhood's residents. At present, there are 340 retail stores reported within Pico-Union. The largest single category of retail stores are food and beverage outlets, which account for 64 outlets, or approximately 19 percent of all retail outlets in the community. Other notable categories include clothing and clothing accessory stores, as well as miscellaneous retail stores. The retail sector accounts for approximately 22 percent of all business establishments within Pico-Union. The sporting goods subsector includes 18 stores, accounting for 5.3 percent of the total mix of retail businesses within the community and 1.2 percent of the total mix of all businesses in the community. This results in a ratio of 2,503 residents per sporting goods store.

The experience of STAPLES Center is indicative of the narrow sphere of influence that a sports venue is anticipated to have on the local retail market. Over the 12 years of the arena's operation, the retail mix in Pico-Union has not been dramatically altered to meet the demands of STAPLES Center patrons. As discussed in Appendix H, since the 2000 economic census, one year after the opening of STAPLES Center, there has been a 2.39 percent increase in share of sporting goods stores that make up the total retail mix in the two ZIP Codes that overlap with Pico-Union (90005 and 90015).

The analysis of comparable NFL communities suggests that there is likely to be a nominal increase in demand for sporting goods and related memorabilia within 1 mile of the Event Center. It is likely that the 18 existing sporting goods outlets located within the Pico-Union area would reorient more of their offerings to meet the demand of patrons drawn to the area by the presence of spectator events at the Event Center. The increased demand also could support between two and four additional sporting good outlets, an increase of approximately 0.6 percent to 1.7 percent of the total mix of retail businesses in the Pico-Union area. This increase in demand for sporting goods and

related items does not represent a level of change that can be anticipated to significantly alter the community serving nature of retail outlets in Pico-Union as a whole.

Finding: The City finds that there is no substantial evidence in the administrative record to conclude that the Project would result in changes to the retail market that would directly or indirectly result in an adverse change to the environment.

p. Noise

i. Construction Noise (Project)

Facts: 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. The analysis demonstrated that 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.

As discussed in Section IV.E, Noise, of the Draft EIR, compliance with the recommended mitigation measures would reduce construction noise levels to the extent feasible. However, daytime construction noise impacts would remain significant at Receptor R1 (Ritz Carlton/Marriott Hotels at L.A. LIVE) due to the proximity of this receptor to the Event Center construction site. The temporary construction noise barrier (Mitigation Measure E-1) would effectively reduce construction noise impacts at the ground level. However, 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 Carlton/Marriott Hotel. It is forecasted that noise generated during the composite construction phase, (i.e., noise from all construction sources 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), would also be significant during the daytime construction period. In addition, nighttime construction impacts would be significant under composite construction conditions at multiple receptors located west of SR-110 freeway, limited locations south of the Project Site, and one location north of the Project Site. Although the mitigation measures would reduce these impacts, they would not be reduced to a less than significant level. These impacts are significant and unavoidable as nighttime construction cannot be avoided in order to complete the Project within the timeframe identified in the DEIR Project Objectives.

Finding: The City finds that although incorporation of Mitigation Measure E-1 through E-6, would reduce the severity of project construction related noise, impacts would remain significant and unavoidable.

ii. Construction (Cumulative)

Facts: If the related projects identified in the DEIR were to occur concurrently with the Project's construction, cumulative construction noise impacts could be significant. Specifically, 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.

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.

Finding: The City finds that although incorporation of Mitigation Measure E-1 through E-6, would reduce the severity of cumulative construction related noise, impacts would remain significant and unavoidable.

iii. Construction (Groundborne Vibration) – Project and Cumulative

Facts: 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. The estimated ground-borne vibration levels at the nearest off-site building structure (Nokia Theatre), approximately 100 feet from the nearest on-site construction equipment, would be approximately 0.0004 inch per second (PPV) (due to small bulldozer) to 0.0805 inch per second (PPV) (due to vibratory roller).

In addition to the on-site construction equipment, the construction trucks (loaded haul trucks) along the Project haul routes would generate vibration levels up to 0.076 inch per second (PPV) at the nearby building structures (25 feet from the haul trucks travel pathways). As each of the estimated vibration levels at the nearest off-site building structure is below the 0.12 inch per second (PPV) significance threshold (which represents the most stringent criteria), vibration impacts (with respect to building damage) associated with construction equipment would be less than significant. Implementation of Mitigation Measures E-5 and E-6 which restrict the use of pile drivers within 320 feet and vibrator rollers within 50 feet would further reduce impacts to a level of less than significant.

Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity to the construction site (i.e., less than 25 feet). The nearest related project is approximately 100 feet away from the Project Site. Therefore, 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 (assuming concurrent construction), 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 is low, if not improbable.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures E-5 and E-6, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to construction related groundborne vibration impacts. Thus, with implementation of these mitigation measures construction related groundborne vibration impacts would be reduced to a level of less than significant.

iv. Operational Noise (Project)

Facts: Because there are no feasible mitigation measures to reduce the crowd cheering noise to a less than significant level, noise impacts associated with crowd noise at Event Center events would be significant and unavoidable at some of the sensitive receptors, including residential uses. In addition, there are no feasible mitigation measures to reduce crowd noise within the public plazas to a less than significant level at some of the sensitive receptors, including residential uses.

Therefore, noise impacts associated with outdoor plaza operations would be significant and unavoidable.

Noise from firework display shows and noise from the parking garage would also be significant at some of the sensitive receptors and unavoidable. Furthermore, there are no feasible mitigation measures to reduce the off-site traffic, public transit, and media helicopter noise to a less than significant level.

An evaluation of composite noise levels, including all Project-related noise sources plus the existing ambient level, was conducted to assess 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.

Finding: The City finds that Project related operational noise impacts would remain significant and unavoidable and that no feasible mitigation measures exist that would substantially reduce the severity of such impacts.

v. Operational Noise (Cumulative)

Facts: 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 (e.g., heating, ventilating, and air-conditioning systems). 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, noise from the Project's on-site stationary-sources (i.e., Event Center operations including crowds, use of sound systems, parking garage operations, and use of outdoor plazas) combined with on-site stationary noise sources from Related Project Nos. 60 and 91 (located within 500 feet of the Project Site) would potentially result in significant impacts at nearby noise-sensitive receptors.

The Project and other related development in the area would also produce traffic volumes (off-site mobile sources) that would generate roadway noise. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from “existing” conditions to “future cumulative” conditions to the applicable significance criteria. Future cumulative conditions include traffic volumes from future ambient growth, and related development projects, with and without the Project.

The calculated traffic noise levels under “existing” and “future cumulative” conditions for the Sunday, Saturday, and Weekday scenarios are presented in the DEIR. Additional scenarios are presented in Appendix L, (e.g., Project with Convention Center Dark and Project events concurrent with Coliseum and Dodger Stadium events). As indicated in this table, significant cumulative noise impacts would occur at 11 analyzed roadway segments for the Sunday scenario, with a maximum increase of 9.9 dBA along 18th Street (west of Grand Avenue). For the Saturday scenario, significant cumulative noise impacts would occur at eight (8) roadway segments, with a maximum increase of up to 8.5 dBA along 11th Street (west of Grand Avenue). In addition during the Weekday scenario, significant cumulative noise impacts would occur at 12 roadway segments, with a maximum increase of 8.8 dBA along Grand Avenue (between 17th Street and Washington Avenue). Therefore, cumulative traffic from the Project and the related projects would result in significant cumulative noise impacts.

Finding: The City finds that cumulative operational noise impacts would remain significant and unavoidable and that no feasible mitigation measures exist that would substantially reduce the severity of such impacts.

q. Transportation/Traffic

i. Construction

Facts: 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.

Mitigation Measure B.1-30 requires the Project to prepare a 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 remain significant and unavoidable.

Finding: Although Mitigation Measures B.1-30 will reduce the severity of construction transportation/traffic impacts, it will not reduce the impacts to less than significant levels. Despite incorporation of this mitigation, construction transportation/traffic impacts will remain significant and unavoidable.

ii. Operational Impacts

a. Traffic Mitigation Methodology

Facts: The overall mitigation program is a comprehensive multi-modal program that includes the following categories of measures: (1) encouraging transit use, (2) trip reduction measures, (3) traffic management measures, (4) reduction in cut-through traffic in Pico-Union neighborhood, and (5) street intersection improvements (including temporary reversible lanes and physical improvements). The severity of the remaining significant and unavoidable impacts would be further reduced by implementation of the Transportation Management Plan. 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. Implementation of additional trip reduction and greater use of transit measures to be implemented as part of the SB 292 program would also further reduce the severity of the remaining significant and unavoidable impacts.

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.

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. 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.

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.

Significant and unavoidable impacts after implementation of the proposed mitigation measures would occur irregularly associated only with events at the Event Center, as opposed to occurring on a daily basis. Transportation mitigations are thus more appropriately focused on operational measures that would address the short-term and temporary nature 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 thereby undermining policies designed to increase transit use. 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.

Finding: The City finds based on substantial evidence that the transportation impact methodology is credible, reliable, and based on expert analysis that addresses the unique operational characteristics of Project traffic trip generation. Mitigations for the Project are, therefore, more appropriately focused on operational measures that address the unique short term and temporary nature of event related traffic, rather than

physical improvements which encourage increased auto use and undermine policies designed to promote transit.

b. Intersection Impacts

Facts: The transportation 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.)

The transportation analysis addressed 177 street 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 four intersections.

Impacts would not occur on a daily or regular basis and would occur irregularly associated only with major events at the Event Center. The number of impacts would also be reduced with implementation of additional trip reduction and greater use of the transit measures as well as with implementation of the Transportation Management Plan (TMP) and SB 292. Although for purposes of conservative analysis no credit was taken for such measures in determining the significance of the impacts.

Even with incorporation of Mitigation Measures B.1-1 through B.1-21B the following significant and unavoidable impacts would remain: (i) 4 intersections in the Sunday Day Pre-Event Hour (ii) 20 intersections in the Sunday Day Post-Event Hour, (iii) 28 intersections in the Saturday Day Pre-Event Hour, (iv) 42 intersections in the Saturday Day Post-Event Hour, (v) 72 intersections in the Weekday Evening Pre-Event Hour, and (vi) 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.

Finding: Although Mitigation Measures B.1-1 through B.1-21B, B.1-29 and B.1-29a will reduce the severity of project and cumulative transportation/traffic intersection impacts, it will not reduce the impacts to less than significant levels. Despite incorporation of this mitigation, as well as increased transit use encouraged by the Project and SB 292 trip reduction requirements, project and cumulative operational transportation/traffic impacts will remain significant and unavoidable.

i. Transit

Facts: 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. With the implementation of these increases by Metro, and after implementation of Mitigation Measure B.1-1, impacts on the transit system would be reduced to a less than significant impact and there would be no remaining unavoidable significant impacts. Additional Metro rail/bus service required to accommodate patron demand would be subject to MTA Board approval as part of MTA's annual operating budget.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measure B.1-1 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to transit impacts identified in the Final EIR. Thus, after incorporation of Mitigation Measure B.1-1 transit impacts would be less than significant. However, if Metro does not add the requisite number of additional rail cars to increase transit services, impacts would remain significant and unavoidable.

ii. Project Access (Vehicular)

Facts: Vehicular access for the Proposed Project would be very similar to that under existing conditions. Access to the South Hall and Venice parking garages at the Convention Center would remain as is. Access to the new L.A. Live Way Garage would be very similar to the current access to the Cherry Street Garage which it would replace. The two driveways on L.A. Live Way would be in approximately the same locations as currently provided, although additional driveways would be provided on 12th Street and Pico Boulevard. Access to the new Bond Street Garage would be in the same locations as currently provided for at the surface lot in that location and as detailed in Section IV.B.7(b) of the DEIR. According to the *City of Los Angeles CEQA Thresholds Guide*, a project would have a significant access impact if the intersection(s) nearest the primary site access are projected to operate at LOS E or LOS F during the morning or afternoon peak hour under cumulative plus project conditions. The analysis of the Future With Project Conditions shows that intersections adjacent to these driveways would operate at better than LOS E conditions. With the Proposed Project design features and measures that will be included in the Transportation Management Plan, impacts related to driveway access would be less than significant.

Emergency vehicle access would be available at all times. While certain streets may be closed at certain times before, during, or after an event, these closures would not close the street to all vehicles, as local access and emergency vehicles would continue to be allowed to use those streets. The access of such vehicles would actually be facilitated by the proposed street closures and by the use of traffic control officers at key intersections. The Transportation Management Plan will address emergency vehicle

provisions. Impacts of the Proposed Project on emergency vehicle access, is therefore, considered less than significant.

Finding: The City finds based on substantial evidence that the Project would create a less than significant impact with regard to vehicular access.

iii. Project Access (Bus Transit)

Facts: The Proposed Project would not be expected to relocate any bus stops permanently and therefore, would not have any potentially significant impacts on bus stop locations. However, there are a number of bus routes that run along streets in the immediate vicinity of the Proposed Project that could be affected by temporary street closures at certain times. Mitigation Measures discussed in Section IV.B.1.16 of the Draft EIR provide for temporary closures during the Post-Event Hour at major events at the Event Center on the following streets: Figueroa Street and Flower Street between Olympic Boulevard and Pico Boulevard; 11th and 12th Street between Figueroa Street and Hope Street; and Pico Boulevard westbound only between Flower Street and L.A. Live Way. The final decisions on bus operations would be made by Metro and incorporated into the Transportation Management Plan. This would include provisions for notifying passengers of possible diversions and temporary bus stops for diverted routes. Alternate routes exist within close proximity to streets that could be closed during Post-Event Hours, and they would be necessary only for approximately up to one hour after major events. Such alternate routes would offer the potential to minimize bus-pedestrian conflicts during those hours. Measures to accommodate temporary route diversions would be included in the Transportation Management Plan.

Finding: The City finds based on substantial evidence that the Project would create a less than significant impact with regard to bus transit access.

iv. Project Access (Rail Transit)

Facts: The existing Pico Station, between 12th Street and Pico Boulevard, has one platform, which is accessed only from the sidewalk on the east side of Flower Street. The side platform access/egress points have limited capacities because of the narrow sidewalk (only 10-feet wide) and narrow entrances to the station platform. Access to the east sidewalk is from 12th Street and from Pico Boulevard.

The light rail tracks, which would serve both the Blue Line and Exposition Line, run at-grade at 12th Street and to the south. Event attendees using the rail transit system at the Pico Station would need to cross the light rail tracks at the Pico Station to access/egress the station platform. Because of the design of the station, they would need to cross both tracks, once to get to the east sidewalk of Flower Street, and then to cross the northbound track again to access the platform. Some of the pedestrians that

park east of Flower Street would also need to cross the tracks to walk to/from the parking areas to the Project Site. This would occur at 12th Street and at Pico Boulevard.

The implementation of a pedestrian bridge(s) across Flower Street and the rail tracks was investigated and found to be infeasible as there is very limited room in the public right-of-way for the placement of a pedestrian bridge as well as the up/down stairs without severely reducing the sidewalk width and significantly impacting sidewalk pedestrian flows. Sidewalk widenings are not feasible as right-of-way is not available. Because of these physical constraints, any pedestrian bridge would have a much lower pedestrian capacity than the surface street routes, and thus would have limited benefit. Also, there would be no guarantee that pedestrians would use pedestrian bridges, as it is often more convenient for pedestrians to stay at-grade than use a pedestrian bridge and many pedestrians may simply continue to walk at-grade. It was therefore concluded that pedestrian bridge solutions were infeasible at this location.

Consequently, there could be conflicts between pedestrians, vehicles, and light rail trains at the Flower Street & 12th Street intersection, and at the Flower Street & Pico Boulevard intersection that could potentially cause significant pedestrian impacts. However, at-grade access/egress is not uncommon on the at-grade light rail system in Los Angeles County, where pedestrian access to the at-grade stations usually occurs at street intersections safely and without problems. With the Proposed Project however, the pedestrian volumes would be much higher for short periods of time before and after events. However, there are examples across the country where at-grade light rail lines operate successfully either immediately adjacent to or in close proximity to major sports facilities. For example, the Third Street Line in San Francisco runs immediately adjacent to the AT&T Park baseball field for the San Francisco Giants, and in Baltimore the light rail line runs one block east of the Camden Yards baseball field for the Baltimore Orioles.

The temporary closure of Flower Street to vehicles after events would eliminate auto-pedestrian conflicts. A mitigation measure would add a second platform to the Pico Station that would significantly increase and enhance both the person capacity of the station and pedestrian safety for access/egress to/from the station platforms. As the second platform would be designed with “end-loading” from 12th Street and Pico Boulevard (which is the standard design at other light rail stations on the system in Los Angeles County), it would significantly reduce and minimize the number of transit passengers crossing the tracks.

Pedestrian circulation issues are addressed in the mitigation program and would be further detailed in the Transportation Management Plan. The Transportation Management Plan would also include measures (developed in close cooperation with Metro) for controlling trains at the Pico Station and for controlling and directing pedestrians crossing the tracks, to enhance pedestrian safety and improve pedestrian

access to the station. These would include use of Metro and law enforcement personnel to control/direct pedestrian traffic, and to control train movements at the station and at the intersections immediately adjacent to the station (Flower Street & 12th Street, and Flower Street & Pico Boulevard). In addition, these measures would also include, at the discretion of Metro and LADOT, the temporary prohibition of pedestrians and/or vehicles crossing tracks at certain times as necessary (in which case they could for example, be redirected to 11th Street, where the light rail tracks are below grade). These measures would be detailed in the Transportation Management Plan that would be developed in coordination with Metro and LADOT.

With the proposed improvements at Pico Station to add a second platform, the proposed post-event street closures to vehicle traffic, and the provisions for pedestrian and vehicle control to be included in the Transportation Management Plan, rail transit pedestrian access impacts would be less than significant.

Finding: The City finds based on substantial evidence that the Project would not result in a significant impact to vehicular, bus/transit or rail/transit access.

v. Neighborhood Intrusion

Facts: The transportation analysis indicates a remote 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure B.1-9 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to neighborhood intrusion impacts identified in the Final EIR. Thus, with implementation of this mitigation measure impacts would be less than significant. However, if the Pico-Union community rejects Mitigation Measure B.1-9, the City conservatively finds that neighborhood intrusion impacts would remain significant and unavoidable.

vi. Freeways

Facts: The impact analysis identified that the 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 therefore focus

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

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, with Caltrans having the flexibility to re-allocate monies between the specific measures as may be necessary or appropriate in their implementation.

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.

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 Mitigation Measures B.1-25 through B.1-28 would facilitate traffic flows and operations and that could reduce impacts.

Freeway On/Off Ramps

The Proposed Project would result in significant freeway off-ramp impacts at 3 locations in the Sunday Day Pre-Event Hour, at 5 locations in the Saturday Pre-Event Hour, and at 7 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.

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.

A review of the Proposed Project's impacts on the freeway system revealed that other than Mitigation Measures B.1-22 through B.1-24, 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.

Finding: Although Mitigation Measures B.1-22 through B.1-29 and B.1-29a will reduce the severity of project and cumulative impacts to freeway mainline segments, off-ramps and on-ramps, it will not reduce the impacts to less than significant levels. Despite incorporation of this mitigation, project and cumulative freeway impacts will remain significant and unavoidable.

vii. *Congestion Management Program(Project and Cumulative)*

Facts: 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.

Finding: Although implementation of the TMP and SB 292 is expected to reduce the severity of project and cumulative impacts at nineteen CMP freeway monitoring locations, impacts would not be reduced below the threshold of significance. Accordingly, the City conservatively finds a significant and unavoidable impact at these intersections under the Congestion Management Program.

A. *Parking (Project – Construction and Operational)*

Facts In Support of Finding: 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.

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.

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 parking 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 Mitigation Measures B.2-1 through B.2-7, 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures B.2-1 through B.2-7 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to parking impacts identified in the Final EIR. Thus, after implementation of Mitigation Measures B.2-1 through B.2-7 project-related construction and operational parking impacts would be less than significant.

B. *Parking (Cumulative)*

Facts: 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, factoring in the spaces that would be eliminated from the supply as future development from related projects occurs on currently entitled surface parking lots. The analysis of Saturday day events, Sunday day events, and Weekday evening events demonstrated that 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.

Finding: The City finds based on substantial evidence that cumulative construction and operational parking impacts will be less than significant.

C. *Pedestrian Circulation and Bicycle and Pedestrian Safety (Construction)*

Facts: 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measure B.1-30 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to construction related impacts to pedestrian circulation and bicycle and pedestrian safety as identified in the Final EIR. Thus, with implementation of this mitigation measure impacts to pedestrian circulation and bicycle and pedestrian safety during construction would be less than significant.

D. *Pedestrian Circulation and Bicycle and Pedestrian Safety (Operational)*

Facts: The 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measure B.3-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to operational impacts to pedestrian circulation and bicycle and pedestrian safety as identified in the Final EIR. Thus, after implementation of Mitigation Measure B.3-1 impacts would be less than significant.

E. *Pedestrian Circulation and Bicycle and Pedestrian Safety (Cumulative)(Construction and Operational)*

Facts: Cumulative 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 to address cumulative impacts. 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures B.1-30 and B.3-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to cumulative construction and operational impacts to pedestrian circulation and bicycle and pedestrian safety as identified in the Final EIR. Thus, after implementation of Mitigation Measure B.3-1 cumulative pedestrian circulation and bicycle and pedestrian safety impacts would be less than significant.

r. Utilities/Service Systems (Water, Wastewater, Solid Waste, Electricity, and Natural Gas)

i. Water Supply and Water Infrastructure (Construction)

Facts: Proposed Project demolition and construction activities would require minimal water demand and are not anticipated to have an adverse impact on available water supplies. 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 LA 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 ensure 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.

Finding: The City finds that the Project's construction related water supply and water infrastructure impacts would be less than significant.

ii. Water Supply (operation)

Facts: 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. Buildout of the Proposed Project is projected to result in a total annual potable water demand of 89.5 million gallons or 274.72 acre-feet ("AF") per year. However, incorporation of the City's water efficiency requirements and the Applicants' specified commitments with respect to water conservation would result in water savings amounting to approximately 8.3 million gallons or 26.15 AF per year. Thus, the net increase in water demand, after accounting for water conservation

measures and existing Project Site water consumption, would be 62.5 million gallons or approximately 194 AF per year. The Proposed Project's net daily impact when accounting for water conservation measures and existing uses to be removed would be 630,277 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 742,895 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 652,700 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.

Finding: The City finds based on substantial evidence that the Project's operational water supply impacts would be less than significant.

iii. Water Supply (Cumulative)

Facts: 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.

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 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 Project and future growth through 2017 (the Proposed Project's buildout year) and beyond.

Finding: The City finds based on substantial evidence that cumulative impacts to water supply would be less than significant.

iv. *Water Infrastructure (Operation)*

Facts: Pressure fluctuations in the existing water distribution system due to the additional domestic water demand associated with the 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 Project would be generally comparable to the average pipe pressure of 53 psi in the Project vicinity. Furthermore, pipe pressures from the 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 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 5 psi, with the exception of the existing 8-inch main in Pico Boulevard, which would drop by over 30 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 112.3 percent of the pipe capacity. Therefore, the 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 43 psi, well above the Fire Department's minimum pressure requirement of 20 psi. In addition, the pipe velocity would decrease from 112.3 percent to 71 percent. Thus, after implementation of the following mitigation measure, 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure K.1-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to the Project's operational impacts to water infrastructure. Thus, with implementation of this mitigation measure the Project's operational water infrastructure impacts would be less than significant.

vi. Water Infrastructure (Cumulative)

Facts: 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 ensure facilities are adequate.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure K.1-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to cumulative operational impacts to water infrastructure. Thus, with implementation of this mitigation measure cumulative operational water infrastructure impacts would be less than significant.

vii. Wastewater (Construction Project)

Facts: 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 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. These impacts would be relatively short-term in duration, and would cease once installation is complete.

Finding: The City finds based on substantial evidence that construction impacts to the wastewater system would be less than significant.

viii. Wastewater (Project - Operational)

Facts: The Proposed Project would generate an annual wastewater flow of 72.3 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 6.8 million gallons), the Proposed Project would result in an annual net increase of 65.5 million gallons. On a daily basis, the Proposed Project would generate an increase of 632,277 gpd (0.632 million gallons per day (“mgd”)), of which the Convention Center and its ancillary uses would generate approximately 13,129 gpd (0.013 mgd). Proposed Project 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 719,158 gpd (0.719 mgd), of which the Convention Center and its ancillary uses would generate approximately 92,857 gpd (0.093 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 0.013 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 0.093 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 0.013 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.

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. Based on these forecasts and the City Bureau of Sanitation’s analysis, the Proposed Project’s increase in wastewater generation would be adequately accommodated by the HTP. Thus, operation of the Project would have a less than significant impact on wastewater treatment facilities.

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 ensures 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure IV.K-2-1 and IV.K-2-2, changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect with regard to operational wastewater impacts. Thus, with implementation of these mitigation measures the Project’s operational wastewater impacts would be less than significant.

ix. Wastewater (Cumulative)

Facts: 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.

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 an increase of 0.632 mgd in average daily flows, or 0.719 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure IV.K-2-1 and IV.K-2-2, changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect with regard to cumulative operational wastewater impacts. Thus, with implementation of these mitigation measures cumulative operational wastewater impacts would be less than significant.

x. *Solid Waste Disposal Facilities (Construction)*

Facts: 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. 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.

Finding: The City finds based on substantial evidence that the Project's construction related impact to solid waste disposal facilities would be less than significant.

xi. Solid Waste Disposal Facilities (Operation)

Facts: 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. 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. Other than waste minimization and diversion, which are project design features, no other feasible mitigation measures have been identified to address this potential impact.

Finding: The City conservatively finds that operational impacts to solid waste would be significant and unavoidable and that no feasible mitigation measures exist that would substantially reduce the severity of such impacts.

xii. Solid Waste Disposal Facilities (Construction - Cumulative)

Facts: 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.

Finding: The City finds based on substantial evidence that cumulative construction related impacts to solid waste disposal would be less than significant.

xiii. Solid Waste Disposal Facilities (Operational-Cumulative)

Facts: 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.

Finding: The City finds that cumulative operational impacts with regard to solid waste disposal will be significant and unavoidable and that no feasible mitigation measures exist that would substantially reduce the severity of such impacts.

xiv. Solid Waste Regulatory Consistency and Solid Waste Collection Routes (Construction and Operational)(Project and Cumulative)

Facts: The Project would promote source reduction and recycling, consistent with AB 939 and the City's SWIRP, Framework Element, RENEW LA Plan, Green LA Plan, and the LA Green Building Code. Therefore, the Project would not conflict with solid waste policies and objectives.

Proposed on-site development would continue to be served by existing solid waste routes both within the Project Site as well as off the Project Site. As such, proposed development within the Convention and Event Center areas would not create a need for additional solid waste collection routes to adequately handle Project-generated solid waste. Development within the proposed Convention and Event Center areas would also include the completion of a new and modified loading dock configuration that would provide easy access to on-site waste collection locations.

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.

Finding: The City finds based on substantial evidence that all project specific and cumulative impacts with regard to solid waste regulatory consistency and solid waste collection routes would be less than significant.

xv. Project Electricity Impacts (Construction)

Facts: 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.

Finding: The City finds based on substantial evidence that the Project would result in less than significant construction related electricity impacts.

xvi. Project Electricity Consumption Impacts (Operation)

Facts: 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. 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. 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.

Finding: The City finds based on substantial evidence that the Project would result in less than significant impacts with regard to operational electricity consumption impacts.

xvii. Project Electricity Demand Impacts (Operation)

Facts: 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.⁵ 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 K.4-1 through K.4-4 would be implemented, which would reduce impacts to a less than significant level.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure K.4-1 through K.4-4, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to operational electricity demand impacts. Thus, with implementation of these mitigation measures Project impacts to operational electricity demand would be reduced to a level of less than significant.

xviii. Cumulative Electricity Consumption Impacts (Operation)

Facts: 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. 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).

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure K.4-1 through K.4-4, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to cumulative operational electricity demand impacts. Thus, with implementation of these mitigation measures cumulative impacts to operational electricity demand would be reduced to a level of less than significant.

xix. Cumulative Electricity Demand Impacts (Operation)

Facts: The IRP forecasts an increase in peak demand from 5,797,000 kVA during the 2010-2011 fiscal year to 6,152,000 kVA in the 2016-2017 for a total of 355,000 kVA. 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 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 Mitigation Measures K.4-1 through K.4-4.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure K.4-1 through K.4-4, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the cumulative significant environmental effect with regard to operational electricity demand impacts. Thus, with implementation of these mitigation measures cumulative impacts to operational electricity demand would be reduced to a level of less than significant.

xx. *Natural Gas (Construction)*

Facts: Construction activities for the 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. 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.

Finding: The City finds based on substantial evidence that construction related impacts to utilities (Natural Gas) would be less than significant.

xxi. Natural Gas (Project - Operational)

Facts: Operation of the 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 with implementation of Mitigation Measure K.5-1.

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. 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure K.5-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to operational impacts to Utilities (Natural Gas). Thus, with implementation of this mitigation measure operational natural gas impacts would be reduced to a level of less than significant.

xxii. Natural Gas (Cumulative)

Facts: As population and growth forecasts are not available for the entire SCG 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 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure K.5-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant cumulative environmental effect with regard to impacts to Utilities (Natural Gas). Thus, with implementation of this mitigation measure cumulative natural gas impacts would be reduced to a level of less than significant.

s. Public Services (Police Protection, Fire Protection)

i. Police Protection (Project – Construction)

Facts: 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 ensure that adequate and safe access and parking remains available within the Project Site and surrounding area throughout the construction process. 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. 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation transportation Mitigation Measures B.1-9 and B.1-29, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to construction related impacts to police protection services. Thus, with implementation of these mitigation measures construction-related police protection service impacts would be reduced to a level of less than significant.

ii. Police Protection Crime Impacts (Project – Operational)

Facts: 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,

traditional tailgating would be expressly prohibited within any and all parking facilities under the Applicants' control.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measure J.1-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to impacts to police protection (crime). Thus, with implementation of this mitigation measure operational police protection (crime) related impacts would be reduced to a level of less than significant.

iii. Police Protection Crowd Management Impacts (Project – Operational)

Facts: The 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measure J.1-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to impacts to police protection (crowd management). Thus, with implementation of this mitigation measure operational police protection (crowd management) impacts would be reduced to a level of less than significant.

iv. Police Protection (Traffic Flow and Management)(Project and Operational)

Facts: 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 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures B.1-9, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to police protection service impacts (parking, traffic and traffic flow and management). Thus, with implementation of this mitigation measure operational police protection service impacts with respect to parking, traffic and traffic flow and management would be reduced to a level of less than significant.

v. Police Protection (Event Management and Command Operations)(Project and Operational)

Facts: 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure J.1-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to impacts to police protection (event management and command operations). Thus, with implementation of this mitigation measure operational police protection (event management and command operations) impacts would be reduced to a level of less than significant.

vi. Police Protection (Terrorist Attack Response)(Project and Operational)

Facts: 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. 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measure J.1-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to impacts to police protection (terrorist attack response). Thus, with implementation of this mitigation measure operational impacts to police protection (terrorist attack response) would be reduced to a level of less than significant.

vii. Police Protection (Natural Disasters, Special Events and Unified Emergency Response)(Project and Operational)

Facts: 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measure J.1-1, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to impacts to police protection services (natural disasters, special events and unified emergency response). Thus, with implementation of this mitigation measure operational police protection impacts (natural disasters, special events and unified emergency response) would be reduced to a level of less than significant.

viii. Police Protection (Cumulative)(Construction and Operational)

Facts: Projects with construction underway during the same time frame as the 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.

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. 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. Thus, 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measures J.1-1 and B.1-9 and B.1-29, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to cumulative construction and operational related impacts to police protection services. Thus, with implementation of these mitigation measures cumulative construction and operational police protection impacts (all areas) would be reduced to a level of less than significant.

ix. Fire Protection (Construction)

Facts: 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. With implementation of Mitigation Measure B.1-30 and Project Design Features J.2-1 through J.2-5, construction-related impacts related to fire protection services would be less than significant.

Finding: The City finds based on substantial evidence that construction-related impacts to fire protection services would be less than significant.

x. *Fire Protection (Operational)*

Facts: 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.

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.

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 project design features J.2-6 through J.2-9, impacts with regard to distances to LAFD facilities and access would be less than significant.

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.

Finding: The City finds based on substantial evidence that operational impacts to fire protection services would be less than significant.

xi. Fire Protection (Cumulative)

Facts: 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.

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 J.2-1 through J.2-9, the impact of the Proposed Project would be reduced such that it 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.

Finding: The City finds based on substantial evidence that cumulative impacts to fire protection services would be less than significant.

t. Geology and Soils

i. Project Impact (Construction and Operational)

Facts: 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 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.

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.

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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures G-1 through G-3, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to geology and soils as identified in the Final EIR. Thus, with implementation of these mitigation measures construction and operational related project impacts to geology and soils would be less than significant.

ii. Cumulative Impacts(Construction and Operational)

Facts: 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures G-1 through G-3, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant potential cumulative environmental effect with regard to geology and soils as identified in the Final EIR. Thus, with implementation of these mitigation measures cumulative geology and soils impacts would be reduced to a level of less than significant.

u. Environmental Hazards

i. Project Impacts (Prior Use of the Project Site)

Facts: It is possible that development within certain areas of the Project site 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measures L-1 through L-4 and L-12, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant potential impact of environmental hazards relative to prior use of the Project Site. Thus, with implementation of these mitigation measures Project environmental hazards impacts relative to prior use of the project site would be reduced to a level of less than significant.

ii. Project Impacts (Hazards Associated with Hazardous Sites Listing and Regulatory Agency Review)

Facts: 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures L-1 through L-3, L-5 and L-12 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant potential impact of environmental hazards relative to hazards associated with hazardous sites listing and regulatory agency review. Thus, with implementation of these mitigation measures Project environmental hazard impacts (hazardous sites listing and regulatory review) would be reduced to a level of less than significant.

iii. Project Impacts (Hazardous Materials Use, Storage, and Management)

Facts: 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures L-6 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant potential impact of environmental hazards relative to hazardous materials use, storage and management. Thus, with implementation of this mitigation measure Project environmental hazard impacts (hazardous materials use, storage and management) would be reduced to a level of less than significant.

iv. Project Impacts (Hazardous Waste) (Construction)

Facts: 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures L-1, L-2, L-7, L-11 and L-12 changes or

alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant potential construction related environmental hazard (hazardous waste) impact. Thus, with implementation of these mitigation measures construction related hazardous waste impacts would be reduced to a level of less than significant.

v. Project Impacts (Hazardous Waste) (Operation)

Facts: 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.

Finding: The City finds based on substantial evidence that operational project impacts to environmental hazards (hazardous waste generation) would be less than significant.

vi. Project Impacts (Asbestos and Lead Based Paints)(Construction)

Facts: 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.

Finding: The City finds based on substantial evidence that construction related project impacts to environmental hazards (asbestos and lead based paints) would be less than significant.

vii. Project Impacts (Asbestos and Lead Based Paints) (Operation)

Facts: 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.

Finding: The City finds based on substantial evidence that operational project impacts to environmental hazards (asbestos and lead based paints) would be less than significant.

viii. Project Impacts (Polychlorinated Biphenyls) (Construction)

Facts: 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures L-8 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant potential construction related environmental hazard (polychlorinated biphenyls) impact. Thus, with implementation of this mitigation measure construction related polychlorinated biphenyl impacts would be reduced to a level of less than significant.

ix. Project Impacts (Polychlorinated Biphenyls) (Operation)

Facts: 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.

Finding: The City finds based on substantial evidence that operational project impacts to environmental hazards (polychlorinated biphenyls) would be less than significant.

*x. Project Impacts (Aboveground and Underground Storage Tanks)-
(Construction)*

Facts: 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 environmental safety 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City further finds that with implementation of Mitigation Measures L-1 through L-3 and L-12 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant potential construction related environmental hazard (aboveground and underground storage tanks) impact. Thus, with implementation of these mitigation measures construction related AST and UST impacts would be reduced to a level of less than significant.

*xi. Project Impacts (Aboveground and Underground Storage Tanks)
(Operation)*

Facts: 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.

Finding: The City finds based on substantial evidence that operational project impacts to environmental hazards (aboveground and underground storage tanks) would be less than significant.

xii. Project Impacts (Oil and Gas) (Construction)

Facts: 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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measures L-10 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant potential construction related environmental hazard (oil and gas) impacts. Thus, with implementation of this mitigation measure construction related environmental hazard (oil and gas) impacts would be reduced to a level of less than significant.

xiii. Project Impacts (Oil and Gas) (Operation)

Facts: Given the location of the Project Site in a Methane Zone, new buildings and paved areas of the 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. Compliance with these regulations would assure that methane concentrations would be below the level that would present a risk to human health and safety.

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.

Finding: In accordance with CEQA Guideline Section 15091(a)(1), the City finds that with implementation of Mitigation Measure L-10 changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant potential operational related environmental hazard (oil and gas) impacts. Thus, with implementation of this mitigation measure operational environmental hazard impacts (oil and gas) would be reduced to a level of less than significant.

xiv. Environmental Hazard (Cumulative)

Facts: 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 safety 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.

Finding: The City finds based on substantial evidence that cumulative project and operational impacts to environmental hazards (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 less than significant.

v. Water Resources - Hydrology and Surface Water Quality

i. Hydrology (Construction)

Facts: Construction activities associated with the 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 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.

Finding: The City finds based on substantial evidence that potential construction related impacts to hydrology would be less than significant.

ii. Hydrology (Operational)

Facts: The Project would involve the development of new buildings, paved areas, and landscaping. Through the provision of additional landscaped areas, the 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 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. Given the Project would not (i) result in on- or off-site flooding during a 50-year storm event, (ii) substantially reduce or increase the amount of surface water in a water body, (iii) result in a permanent adverse change to the movement of surface water, or (iv) impact the existing storm drain system serving the Project Site, impacts to hydrology during operation of the 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 Project.

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 of 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.

Finding: The City finds based on substantial evidence that potential operational impacts to hydrology would be less than significant.

iii. Surface Water Quality (Construction)

Facts: 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.

Finding: The City finds based on substantial evidence that potential construction related impacts to surface water quality would be less than significant.

iv. Surface Water Quality (Operational)

Facts: 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. Nitrates often used in landscaping fertilizers would also be controlled through the selection of native plants and minimal use of nitrogen-based fertilizers in on-going landscape maintenance.

Finding: The City finds based on substantial evidence that potential operational related impacts to surface water quality would be less than significant.

v. Hydrology and Surface Water Quality (Cumulative)

Facts: 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.

Finding: The City finds based on substantial evidence that potential cumulative hydrology and surface water quality impacts would be less than significant.

w. Water Resources - Groundwater

i. Groundwater Level and Groundwater Quality (Construction)

Facts: Construction of the 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 Project would not have an impact on groundwater levels during construction.

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.

Compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would also 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.

Finding: The City finds based on substantial evidence that potential construction related impacts to groundwater level and groundwater quality would be less than significant.

ii. Groundwater Level and Groundwater Quality (Operational)

Facts: 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 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 operation of the Proposed Project.

Finding: The City finds based on substantial evidence that potential operational impacts to groundwater level and groundwater quality would be less than significant.

iii. Groundwater Level and Groundwater Quality (Cumulative)

Facts: 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).

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.

Although development of the related projects could involve groundwater remediation, the 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.

Finding: The City finds based on substantial evidence that potential cumulative impacts to groundwater level and groundwater quality would be less than significant.

x. Significant Irreversible Environmental Changes

Facts: Section 15126.2(c) of the State CEQA Guidelines states that the “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.” Section 15126.2(c) further states that “irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The Proposed Project would necessarily consume limited, slowly renewable, and non-renewable resources, resulting in irreversible environmental changes. This consumption would occur during construction of the Proposed Project and would continue throughout its operational lifetime. The development of the Proposed Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation and the associated impacts related to air quality.

Construction and operation of the Proposed Project would require the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Proposed Project’s building site for future generations or for other uses. However, the consumption of such resources would be on a relatively small scale and consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner.

Finding: The City finds based on substantial evidence that although irreversible environmental changes would result from the Project, such changes would be less than significant.

y. Growth Inducing Impacts/Other CEQA Considerations

Section 15126.2(d) of the State CEQA Guidelines requires a discussion of the ways in

which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 12126.2(d) of the State CEQA Guidelines states:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Facts: Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

Growth can be induced or fostered as follows:

- Direct growth associated with a project;
- Indirect growth created by either the demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.

Because the Proposed Project does not include the construction of new housing that would generate new population, it would not result in direct population growth. However, the Proposed Project is expected to result in varying types of indirect growth.

At present, the Convention Center is the largest public assembly venue in the market and it would remain so after completion of the Project. The Proposed Project improvements would not prevent the opportunity for any of the existing facilities in the market from competing with the Los Angeles Convention Center in the classes of business where they presently compete. As stated above, NFL football is not presently accommodated in the market. Although some classes of spectator events may shift from existing spectator facilities, as a whole the potential loss of this activity would not in itself lead to significant capital disinvestment. The capacities of the Proposed Project do not fundamentally alter the market dynamics for public assembly events in Los Angeles County.

Finding: The City finds based on substantial evidence that the Proposed Project would not result in the closure of, or disinvestment in, competing facilities leading to their abandonment or decay or decay of the surrounding area. Thus, potential impacts associated with urban decay would be less than significant.

Finding: The City recognizes that the environmental analysis of the Project raises several controversial environmental issues, and that a range of technical and scientific opinion exists with respect to those issues. The City acknowledges that there is differing and conflicting information and other opinions regarding the Project. Some of the differences of opinion pertain to the methodologies the EIR employed regarding social, economic and health impacts; vulnerability of the Pico Union community and other neighborhoods in the vicinity of the Project to gentrification and housing displacement; the causes of any projected or existing gentrification; whether housing prices or hiring practices would occur as a result of the project and the extent such changes might affect physical impacts; population, housing and employment projections; and the ability to make reliable forecasts regarding physical impacts that might result from socio-economic impacts. The City has, by its review of the evidence and analysis presented in the EIR and in the record, acquired a better understanding of the breadth of this technical and scientific opinion and of the full scope of the environmental issues presented by the Project. In sum, this understanding has enabled the City to make fully informed, thoroughly considered decisions after taking account of the various viewpoints on these important issues. These findings are based on full appraisal of all viewpoints expressed in the EIR and in the record, as well as other relevant information in the record of proceedings for the Project. This information includes expert reports, which were prepared to assist the City in the independent review of issues related to social, economic and health impacts. These reports included the Response to Social and Economic Impact Comments, dated July 26, 2012, prepared by MR&E; Response to Human Impact Partners Health Impact Assessment, dated July 25, 2012, prepared by MR&E; and Review of Human Impact Partners Health Impact Assessment, dated July 24, 2012, prepared by Professors William S. Comanor and Jon Riddle. The City adopts the analysis, methodology and opinions that support these findings for the reasons stated in the EIR, in staff reports presented to the

Planning Commission and the City Council, and in presentations made by the applicants.

Finding: The City acknowledges that there is substantial controversy, differences of opinion, and conflicting evidence regarding whether the Project will cause socioeconomic impacts that will lead to physical impacts. The City has reviewed extensive information presented by commentors, some of whom, in turn, cite other reports and studies and community surveys, regarding these issues. The City adopts the conclusions of the several experts, including those contained in the reports prepared by MR&E and Professors William S. Commonor and Jon Riddle, whose opinions support the conclusions stated in the EIR that the Project would not result in significant indirect physical impacts arising from socioeconomic impacts, for the reasons stated in the EIR.

These experts support the City's conclusions regarding whether social and economic issues (including but not limited to gentrification, housing, jobs and displacement) will in turn cause any significant effects on the environment. The City acknowledges the community surveys presented by commentors and numerous citations to studies and reports presented in support of conclusions opposite to those reached by the City. However, that evidence and the studies cited were reviewed by other experts, who explained how the evidence and analysis submitted by the commentors did not establish a reasonable probability either that the Project would result in significant adverse social or economic impacts or that such impacts, if they were to occur, would cause significant physical or public health impacts. (See, for example, Appendix E of the Final EIR.) The City finds these explanations reasonable. In support of this finding, the City has determined that insufficient evidence has been presented that would allow the City to reasonably quantify or project what contribution, if any, the Project would make toward gentrification and housing displacement, or assess the Project's possible contribution to it in any meaningful way. The City also finds it speculative to conclude that the Project would cause displacement for the reasons set forth in the EIR or that, any Project-caused displacement, should it occur, would cause the physical impacts the commentors claim.

F. Alternatives

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of the proposed project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be

more costly. The Draft EIR Alternatives Analysis, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the project's significant impacts.

I. Project Objectives

Section 15124(b) of the CEQA Guidelines states that the Project Description shall contain "a statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The following is a list of Project Objectives as contained in Section II, Project Description, of the Draft EIR, and is restated below:

1. Modernize and enhance the marketability of the Convention Center.
 - a. Replace the outmoded West Hall with a modern New Hall contiguous to the existing South Hall.
 - b. Enhance the marketability of the Convention Center by creating 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.
 - c. Increase the number of trade shows and conventions attracting largely out-of-town visitors.
 - d. Provide a new multi-purpose room of a size that can function as exhibit hall space, meeting rooms or a ballroom, a new amenity that the Convention Center cannot offer today.
 - e. Through joint booking with the Event Center, provide Convention Center expansion capabilities for Exhibition Events through the use of the event floor, premium suites and club spaces for exhibit and meeting use.

2. Construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses.

- a. Construct a state-of-the-art venue capable of attracting and maintaining up to two NFL teams, with a seating capacity that is competitive with venues in other major media markets and with other stadia proposals in the region.
- b. Develop an Event Center that would also be used for event floor exhibit hall space and premium meeting rooms, with direct physical connections to the Convention Center.
- c. Develop an Event Center that would accommodate a variety of other Spectator Events beyond NFL games, including, but not limited to, college football championship and bowl games, MLS and international soccer matches and championship games, music concerts or festivals, and religious gatherings.
- d. Develop an Event Center that would be expandable to host occasional major sporting events such as an NFL Super Bowl or NCAA Final Four Tournament.

3. Develop a Project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles.

- a. Promote the development of major sports, entertainment and Convention Center facilities in downtown Los Angeles and in close proximity to transportation corridors and transit stations.
- b. Create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area.
- c. Synergistically build upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level.
- d. Create a catalyst to enhance further the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another.

4. 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.

- a. Through appropriate design, location and massing, seamlessly integrate the additional exhibition space with the existing South Hall and Concourse Building to create an overall complex that is efficient, architecturally compatible, and maximizes opportunities for contiguous event and meeting space.
 - b. Design the Event Center to take advantage of Southern California's climate, and meet fans' expectations, through an open-air stadium design for NFL and other Spectator Events.
 - c. Design the Event Center to include a deployable roof to enable a broad range of uses, including exhibition use by the Convention Center.
 - d. Design the Event Center to allow for a visitor experience both within and outside the Event Center comparable to, and competitive with, other major new spectator event venues across the United States, including, but not limited to, state-of-the-art sound and lighting systems, and other features.
 - e. Implement a sustainability program as one of the key design and operational criteria for the Proposed Project.
 - f. Create additional open space assembly areas for fans and visitors that can serve as pre-event and post-event gathering places to enhance the fan and visitor experience, including a reconfigured Gilbert Lindsay Plaza with open space that can be used by the community on non-event days.
 - g. Incorporate signage into the design of the Project in a manner that is compatible with the signage program of the neighboring Los Angeles Sports and Entertainment District, is capable of attracting sponsorship revenues to assist in the private financing of the Event Center, and reinforces the site's sense of place as a major urban sports and entertainment destination venue.
5. Take maximum advantage of existing and planned transportation infrastructure and efficiently utilize existing parking resources to conserve resources, reduce environmental impacts and improve access.
- a. Locate the Project at an existing and expanding regional transit hub currently served by multiple local and regional rail and bus lines that would offer visitors and employees a viable alternative to the automobile.

- b. While encouraging transit, nonetheless locate the Project at the regional freeway hub that is well served by multiple freeway ramps to decentralize automobile travel and parking opportunities to balance demands on the regional and local system.
 - c. Conserve resources and avoid environmental impacts by taking advantage of the existing parking supply, and distribute parking consistent with arrival and departure directions to disperse Project traffic, facilitate automobile access to and from the Project site, and reduce traffic in the immediate Project Site vicinity to avoid potential pedestrian/vehicular conflicts.
 - d. Avoid the need for new infrastructure through a transportation management plan, including information systems to advise patrons of transportation options and preferred alternatives, to maximize use of existing facilities and ensure flexibility to be responsive to changing conditions.
 - e. Implement the provisions of SB 292 to reduce traffic congestion and global climate change impacts that may result from private automobile trips to the Event Center by undertaking a range of measures in the effort to achieve a vehicle trip ratio that is no more than 90 percent of the trip ratio of the next best NFL stadium.
 - f. Foster job growth in an area served by mass transit.
 - g. Create inviting and appropriately scaled pedestrian environments to facilitate the safe movement of pedestrians and to encourage transit use.
6. Construct the Proposed Project in a manner that limits disturbance to ongoing Convention Center operations, while still completing the Event Center prior to the 2016 NFL season.
7. Promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism.
- a. Finance construction of the New Hall at no risk to the City's General Fund.
 - b. Construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship.

- c. Develop entertainment and sports facilities on public lands that provide a return to the City's General Fund and/or provide civic, cultural, and sporting amenities that serve a wide range of public interests in the City and the region.
- d. Generate substantial additional revenues for the City government, stimulate economic activity in the greater Los Angeles area, and create thousands of good paying construction and permanent jobs as soon as possible.
- e. Provide economic development opportunities in Pico-Union and South Los Angeles by attracting out of town visitors to additional Exhibition Events and local and out of town fans to additional Spectator Events.

II. Alternatives Rejected as Being Infeasible

Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. The Draft EIR discussed a number of alternatives considered but rejected as infeasible during the scoping process. Each of these alternatives, and a brief explanation for the rejection of each as infeasible, is included herein:

- a. Event Center of 54,000 Seats. An event center with 54,000 seats, a further-reduced intensity alternative when compared with the Reduced Intensity Alternative considered in the Draft EIR, was rejected as being infeasible. The reduction of seats in the Event Center proposed in this alternative would reduce impacts to air quality, noise, traffic, and views proportionally, as related to the reduction in size of the event center. However, the impacts resulting from these areas would remain significant, like in the Proposed Project. In addition, an event center with 54,000 seats would be unable to meet the capacity standards for NFL stadiums nationally and would not possess the requisite flexibility to meet market demand. An event center with 54,000 seats would not be able to meet expectations for a visitor experience desired for the event center, and, without NFL support, a 54,000 seat event center would not meet the requirements for financing to enable construction and operation. An event center with 54,000 seats would fail to meet several project objectives either fully or in part, including Project Objectives 1, 2, 3, and 7. For this reason, this alternative was rejected as infeasible during the scoping process.

- b. New Hall with 375,000 s.f. of Floor Area. New Hall with 375,000 s.f. of Floor Area, a reduced-intensity alternative reducing the Proposed Project New Hall by 25%, was rejected as being infeasible. The reduction of the size of New Hall to 375,000 s.f. proposed in this alternative would reduce the size of the entire Convention Center by eight percent. This alternative would reduce the mass and scale of the New Hall, result in less overall construction, and potentially reduce Project impacts that are associated with increased square footage, such as traffic and solid waste. New Hall with 375,000 s.f. of floor area would fail to meet two key project objectives, including Project Objectives 1 and 7. For this reason, this alternative was rejected as infeasible during the scoping process.

III. Alternative Sites Rejected as Being Infeasible

Section 15126.6(f) of the CEQA Guidelines requires EIRs to identify only those alternatives necessary to permit a reasoned choice. Specifically, “the alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the project.” The Draft EIR determined that no feasible alternative locations exist, consistent with section 15126.6(f)(2) of the CEQA Guidelines, as explained in the Final EIR and as discussed below:

- a. Event Center Alternative Site: Los Angeles Memorial Coliseum. Using the Los Angeles Memorial Coliseum Site as an Event Center Alternative Site was rejected as being infeasible. The Los Angeles Memorial Coliseum Site is committed, via a lease with 47 years remaining on its term, to the University of Southern California. In addition, the Los Angeles Memorial Coliseum Site would fail to meet several project objectives either fully or in part, including Project Objectives 1, 2, 3, 4, and 5. For this reason, this alternative site was rejected as infeasible during the scoping process.
- b. Event Center Alternative Site: Rose Bowl. Using the Rose Bowl as an Event Center Alternative Site was rejected as being infeasible. The Rose Bowl Site is committed for football uses, via lease with 30 years remaining, to the University of California at Los Angeles. In addition, neighborhood opposition to the Rose Bowl for a NFL use culminated in a 2006 ballot measure where Pasadena City voters rejected the use of the Rose Bowl for a NFL team. The City of Pasadena, the Rose Bowl Operating Committee, and the University

of California at Los Angeles possess full operational control of the site. In addition, the Rose Bowl would fail to meet several project objectives either fully or in part, including Project Objectives 1, 2, 3, 4, 5, and 7. For these reasons, this alternative site was rejected as infeasible during the scoping process.

- c. Event Center Alternative Site: City of Industry. Using the City of Industry “Industry Business Center” as an Event Center Alternative Site was rejected as being infeasible. The “Industry Business Center” site is not available to the Event Center applicant as an alternative site for the Event Center. In addition, the “Industry Business Center” would fail to meet several project objectives either fully or in part, including Project Objectives 1, 2, 3, 4, 5, and 7. For this reason, this alternative site was rejected as infeasible during the scoping process.
- d. Event Center Alternative Site: Dodger Stadium. Using Dodger Stadium as an Event Center Alternative Site was rejected as being infeasible. Dodger Stadium is not available to the Event Center applicant as an alternative site for the Event Center. In addition, Dodger Stadium would fail to meet several project objectives either fully or in part, including Project Objectives 1 and 2. For this reason, this alternative site was rejected as infeasible during the scoping process.

IV. Alternatives Analyzed in the Draft EIR

Section 15126.6 of the CEQA Guidelines requires that an EIR analyze “a range of reasonable alternatives to the project...which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” The Draft EIR considered a reasonable range of alternatives to the project to provide informed decision-making in accordance with Section 15126.6 of the CEQA Guidelines. By analysis of seven specific alternatives, the EIR meets the requirements of CEQA.

Based on the potentially significant environmental impacts identified in the Draft EIR and the Final EIR and the objectives established by the City as lead agency for the Project, as well as consideration of the applicable plans and zoning designations that guide development of the project site, the Draft EIR analyzed the following seven alternatives in addition to the Proposed Project: (i) No Project—Status Quo; (ii) No Project—Buildout Per Existing Approvals; (iii) Reduced Intensity Alternative; (iv) Enclosed Stadium Alternative; (v) New Hotel and Expansion Alternative; (vi) Maximum Convention Center Expansion Alternative; and (vii) Rehabilitation of West Hall and

Limited Expansion Alternative. These alternatives are discussed below and more fully in Section V the Draft EIR, as modified by the Final EIR. The City finds that the alternatives evaluated represent a reasonable range of alternatives, and that the alternatives were properly evaluated, including a “No Project” alternative, consistent with Section 15126.6(e) of the CEQA Guidelines.

1. Alternative 1: No Project – Status Quo

a. Description of Alternative

The No Project—Status Quo Alternative assumes that the 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.

b. Impact Summary of Alternative 1

Alternative 1 would result in greater, but still less than significant, impacts to land use plans, geology and soils, surface water hydrology, surface water quality, groundwater levels, groundwater quality, and operational environmental safety related to methane when compared with the Proposed Project. Alternative 1 will result in a less than significant, and lesser impact, to construction traffic, operational traffic, parking, pedestrian safety, construction artificial light and glare, operational artificial light and glare, construction noise, operational noise, construction air quality, operational air quality, climate change, cultural resources, construction solid waste, electricity, construction environmental safety, and operational environmental safety (except for methane) when compared to the Proposed Project. Alternative 1 would result in no impact to land use compatibility, urban decay, visual quality, views, natural light, archaeological resources, police, fire, water, sewer, operational solid waste, and natural gas.

c. Finding

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.

This Alternative does not meet the objectives of the Project. It is found pursuant to Public Resources Code section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section H, Statement of Overriding Considerations, make infeasible the No Project—Status Quo Alternative described in the Draft EIR.

d. Rationale for Finding

The No Project—Status Quo Alternative would not meet the underlying purpose to “enhance the marketability of the Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District (LASED).” Nor would it meet any of the Project Objectives.

Alternative 1 would not meet the Project Objective to modernize or enhance the marketability of the Convention Center. Specifically, it would not replace the outmoded West Hall with a modern New Hall contiguous to the existing South Hall, or enhance the marketability of the Convention Center by creating 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, because Alternative 1 would not modernize the Convention Center, it would not increase the anticipated number of trade shows and conventions attracting largely out-of-town visitors or provide a new multi-purpose room. Because the Event Center would not be developed under this Alternative, it would not provide Convention Center expansion capabilities through joint booking with the Event Center.

Alternative 1 would also not meet the Project Objective related to constructing a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses. Because the Event Center would not be developed under this Alternative, it would not provide a state-of-the-art venue capable of attracting and maintaining up to two NFL teams that would be expandable to 76,250 seats to host occasional major sporting events (e.g., a NFL Super Bowl) and that could be used for event floor exhibit hall space. Nor would it accommodate a variety of other spectator events beyond NFL games.

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 would also not be realized under Alternative 1. Specifically, without an Event Center it 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. Nor would it synergistically build upon existing venues, includes STAPLES Center

and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level, or create a catalyst to enhance further the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another.

Because no new development would occur under Alternative 1, it would not meet the Project Objectives to design a Project that is compatible with existing Convention Center facilities, promotes the spectator experience at the Event Center events and is consistent with smart growth and urban design principles or take maximum advantage of existing and planned transportation infrastructure and efficiently utilize existing parking resources to conserve resources, reduce environmental impacts, and improve access.

Finally, under this Alternative no new development would occur and without modernization, the existing Convention Center would lose its current market share. Therefore, Alternative 1 would not 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. Specifically, the Alternative 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 and/or provides civic, cultural, and sporting amenities that serve a wide range of public interests in the City and region, or generate substantial additional revenues for the City government, stimulate economic activity in the greater Los Angeles area, and create thousands of good paying construction and permanent jobs as soon as possible. Nor would it provide economic development opportunities in Pico-Union and South Los Angeles by attracting out of town visitors to additional exhibition events, and local and out of town fans to additional spectator events.

Therefore, the City finds that Alternative 1 is infeasible and less desirable than the Proposed Project and rejects this Alternative for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with Alternative 1, please see Section V of the Draft EIR.

2. Alternative 2: No Project – Buildout Per Existing Approvals

a. Description of Alternative

The No Project – Buildout Per Existing Approvals Alternative consists of constructing additional Convention Center Floor Area permitted by the City's October 29, 1987,

Conditional Use Permit (CPC-1987-0595-CU), and Convention Center related uses on a portion of the Los Angeles Sports and Entertainment District (LASED) Specific Plan designated for this purpose. A total of 323,329 s.f. of floor area would be construed within two new structures under this Alternative. Including the South Hall, Kentia Hall, Concourse Building, and West Hall (which would remain under this alternative) the total Convention Center square footage under the No Project—Existing Approvals Alternative would be 1,862,000 s.f. of Floor Area. The Event Center would not be developed under this Alternative.

Impact Summary of Alternative 2

Alternative 2 would not introduce additional significant environmental impacts, and in a few cases would avoid and in others lessen the Proposed Project's beneficial effects. Alternative 2 would result in significant impacts to construction traffic, operational traffic, construction noise, operational noise, construction air quality, operational air quality, and operational solid waste, although these impacts would be lesser than those associated with the Proposed Project. Alternative 2 would result in greater, but still less than significant, impacts to land use plans, geology and soils, operational surface water hydrology, and operational environmental safety related to methane, when compared with the Proposed Project. Alternative 2 would result in similar but less than significant impacts to surface water quality, groundwater quality, and archaeological resources when compared to the Proposed Project. Alternative 2 would result in a less than significant and lesser impact to land use compatibility, urban decay, parking, pedestrian safety, visual quality, views, natural light, construction artificial light and glare, operational artificial light and glare, climate change, construction surface water hydrology, groundwater levels, historical resources, police, fire, water, sewer, construction solid waste, electricity, natural gas, construction environmental safety, and operational environmental safety (except for methane) when compared to the Proposed Project.

b. Finding

Alternative 2 would reduce the Proposed Project's land use intensity by replacing the proposed Event Center with 323,329 additional s.f. of Convention Center related uses. As many of the Proposed Project's potential environmental impacts are directly related to the types of events at the Project Site and their corresponding attendance levels, Alternative 2 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. As a result of these and other factors, Alternative 2 would avoid the Proposed Project's significant impact with regard to visual resources, 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 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.

This Alternative does not meet the objectives of the Project. It is found pursuant to Public Resources Code section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section H, Statement of Overriding Considerations, make infeasible the No Project—Buildout Per Existing Approvals Alternative described in the Draft EIR.

c. Rationale for Finding

Alternative 2 would only partly achieve the Project's underlying purpose to "enhance the marketability of the Los Angeles Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue that buildings upon the character and success of the adjacent Los Angeles Sports and Entertainment District." Although Alternative 2 would provide additional exhibition space for the Convention Center, such additional space would consist of non-contiguous floor area. Moreover, this Alternative would not replace the existing outmoded West Hall with a modern New Hall contiguous to the South Hall. It would therefore not improve the marketability of the Convention Center to the same degree as the Proposed Project. In addition, Alternative 2 would not add a major multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District.

Alternative 2 would meet the Project Objective to modernize or enhance the marketability of the Convention Center to a lesser extent than the Proposed Project. Specifically, it would not replace the outmoded West Hall with a modern New Hall contiguous to the existing South Hall, or enhance the marketability of the Convention Center by creating 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.

Alternative 2 would not increase the anticipated number of trade shows and conventions attracting largely out-of-town visitors to the same extent as the Proposed Project. In addition, this Alternative would not provide a new multi-purpose room of a size that can function as exhibit hall space, meeting rooms or a ballroom, which is a new amenity that

the Convention Center cannot provide today. Because the Event Center would not be developed under this Alternative, it would not provide Convention Center expansion capabilities through joint booking with the Event Center.

Alternative 2 would also not meet the Project Objective to construct a multi-purpose Event Center that compliments and promotes the adjacent convention and sports and entertainment uses. Because the Event Center would not be developed under this Alternative, it would not provide a state-of-the-art venue capable of attracting and maintaining up to two NFL teams that would be expandable to 76,250 seats to host occasional major sporting events (e.g., an NFL Super Bowl) and that could be used for event floor exhibit hall space. Nor would this Alternative accommodate a variety of other spectator events beyond NFL games.

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, but to a much lesser extent than the Proposed Project. Specifically, without an Event Center the Alternative would not promote development of major sports, entertainment, and convention center facilities in the Downtown Center and in close proximity to transportation corridors and transit station, or create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area. Nor would it synergistically build upon existing venues, including STAPLES Center and L. A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level, or create a catalyst to enhance further the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another.

Alternative 2 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. This Alternative would design a Project that is compatible with existing Convention Center facilities. However, it would not implement a sustainability program to the same extent as the Proposed Project because this Alternative would retain the West Hall instead of replacing it with a modern LEED Gold New Hall. In addition, this Alternative would not develop the Event Center and therefore would not promote the spectator experience at Event Center events. Unlike the Proposed Project, this Alternative would not create additional open space assembly area for fans and visitors, including a reconfigured Gilbert Lindsay Plaza.

Alternative 2 would not include the Event Center. It would therefore 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. In addition, this Alternative would not implement the provisions of SB 292, which applies only to the Event Center. Alternative 2 would

also generate far fewer jobs, and therefore would not foster job growth in an area served by mass transit to the same degree as the Proposed Project.

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 to a much lesser degree than the Proposed Project. Specifically, Alternative 2 would not replace the outmoded West Hall, or add contiguous exhibition space and a multi-purpose room, all of which are necessary to allow the Convention Center to be competitive with other venues. Without modernization, the marketability of the Convention Center would not improve and it may continue to lose its market share. Moreover, this Alternative would not develop the Event Center. Therefore, while Alternative 2 would create some additional temporary and permanent jobs during construction and operation, it would create substantially fewer new jobs 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 and/or provides civic, cultural, and sporting amenities that serve a wide range of public interests in the City and region. Without the Event Center and contiguous space added to the Convention Center, Alternative 2 would not generate substantial additional revenues for the City government. It would also not stimulate economic activity in the greater Los Angeles area to the extent of the Proposed Project. While some jobs would be created under Alternative 2, it would not create the magnitude of good paying construction and permanent jobs as the Proposed Project. In addition, because Alternative 2 would retain the outmoded West Hall and would develop only non-contiguous new exhibition space, it would not increase the anticipated number of trade shows and conventions attracting largely out-of-town visitors to the same extent as the Proposed Project. In addition, because Alternative 2 would retain the outmoded West Hall and would develop only non-contiguous new exhibition space, it would not increase the anticipated number of trade shows and conventions attracting largely out-of-town visitors to the same extent as the Proposed Project. Therefore, this Alternative would provide economic development opportunities in Pico-Union and South Los Angeles by attracting out of town visitors to additional exhibition events to a lesser degree as the Proposed Project. Because it would not develop the Event Center, Alternative 2 would not attract any local or out of town fans to additional spectator events.

Therefore, the City finds that Alternative 2, No Project—Buildout Per Existing Approval is infeasible and less desirable than the Proposed Project and rejects this Alternative for the reasons stated above.

d. Reference

For a complete discussion of impacts associated with Alternative 2, please see Section V of the Draft EIR.

3. Alternative 3: Reduced Density Alternative

a. Description of the Alternative

The Reduced Density Alternative (Alternative 3) includes the same land uses and structures as the Proposed Project. However, the overall Floor Area within the Project Site would be reduced by approximately 293,299 s.f. and the overall Rentable Area would be reduced by approximately 36,623 s.f. when compared with the Proposed Project. When accounting for existing buildings to remain, the total floor area within the Project Site would be approximately 3.0 million s.f. The height of the Event Center would be reduced from 220 feet to 200 feet, and the number of seats would be reduced from 72,000 to 61,500.

b. Impact Summary of Alternative 3

Alternative 3 would not introduce additional significant environmental impacts, and in many cases would lessen the Proposed Project's overall impacts as well as its beneficial effects. Alternative 3 would result in significant impacts to construction traffic, operational traffic, visual quality, views, construction artificial light and glare, operational artificial light and glare, construction noise, operational noise, construction air quality, operational air quality, historical resources, and operational solid waste, although these impacts are lesser than those that would result from the Proposed Project. Alternative 3 would result in less than significant impacts to land use plans, land use compatibility, geology and soils, surface water hydrology, surface water quality, groundwater levels, and groundwater quality, and these impacts would be similar to those resulting from implementation of the Proposed Project. Alternative 3 would result in less than significant impacts to urban decay, parking, pedestrian safety, natural light, climate change, archaeological resources, police, fire, water, sewer, construction solid waste, electricity, natural gas, construction environmental safety, and operational environmental safety and these impacts would be lesser than those resulting from implementation of the Proposed Project.

c. Finding

Alternative 3 would reduce the Event Center's seating by 15 percent and reduce the Floor Area of the New Hall. As many of the Proposed Project's 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. In summary, Alternative 3 would not introduce additional significant environmental impacts, and in many cases would lessen the Proposed Project's overall impacts as well as its potential beneficial effects.

This Alternative does not meet the objectives of the Project. It is found pursuant to Public Resources Code section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section H, Statement of Overriding Considerations, make infeasible Alternative 3: Reduced Density Alternative described in the Draft EIR.

d. Rationale for Finding

Alternative 3 would largely meet the underlying purpose of the Proposed Project to enhance the marketability of the Los Angeles Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent LASED. However, because of the reduced intensity proposed under this Alternative, most of the Project Objectives would be achieved to a lesser extent and a prime Project Objective related to the Event Center would likely not be achieved at all, as discussed below.

Alternative 3 would meet the Project Objective to modernize or enhance the marketability of the Convention Center to a lesser extent than the Proposed Project. Specifically, it would replace the outmoded West Hall with a modern New Hall contiguous to the existing South Hall, and enhance the marketability of the Convention Center by creating a more efficient exhibit hall contiguous to the existing South Hall. However, with less overall new square footage, it would improve the rank of the Convention Center and make it more competitive nationally and increase the anticipated number of trade shows and conventions attracting largely out-of-town visitors to a lesser extent than the Proposed Project. In addition, this Alternative would not provide a new multi-purpose room of a size that can function as exhibit hall space, meeting rooms or a ballroom, which is a new amenity that the Convention Center cannot provide today.

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. Ticket sales are an important revenue source for a team and fewer seats would mean less revenue to the team. Moreover, the Event Center would not be expandable to 76,250 seats to host occasional major sporting events (e.g., an NFL Super Bowl) under this Alternative. However, even with the reduced capacity Event Center, this Alternative would accommodate a variety of other spectator events beyond NFL games.

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 Event Center seating capacity.

Alternative 3 would meet the Project Objectives to design a Project that is compatible with existing Convention Center facilities, promote the spectator experience at Event Center events and is consistent with smart growth and urban design principles. However, it would meet these objectives to a lesser extent than the Proposed Project due to the reduced square footage of exhibition space and Event Center seating capacity. For the same reason, Alternative 3 would not meet Project Objective No. 5 to, "Take maximum advantage of existing and planned transportation infrastructure" and would generate fewer jobs and therefore would not foster job growth in an area served by mass transit to the same degree as the Proposed Project. In addition, a smaller Event Center would not meet fans' expectations to the same degree as the Proposed Project, as discussed above.

Due to reduced square footage of exhibition space and Event Center seating capacity, Alternative 3 would not 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 to the same degree as the Proposed Project. Specifically, this Alternative would provide economic development opportunities in Pico-Union and South Los Angeles by attracting out-of-town visitors to additional exhibition events to a lesser degree than the Proposed Project.

Therefore, the City finds that Alternative 3, Reduced Density Alternative, is infeasible and less desirable than the Proposed Project and rejects this Alternative for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with Alternative 3, please see Section V of the Draft EIR.

4. Alternative 4: Enclosed Stadium

a. Description of Alternative

The Enclosed Stadium Alternative is exactly the same as the Proposed Project, with the exception that the deployable roof is replaced by a permanent fixed roof that would enclose the Event Center.

b. Impact Summary of Alternative 4

Alternative 4 eliminates the operational significant artificial lighting and some operational noise impacts, but significant impacts would remain for all of the same issues as the Proposed Project (i.e., transportation, visual resources, air quality, historical resources, solid waste, and noise except as otherwise noted herein). In addition, impacts associated with demand for electricity, GHG emissions, and construction-related traffic, air quality, artificial light, noise during construction, and electricity, under Alternative 4 would increase relative to the Proposed Project. Alternative 4 would result in significant impacts to construction traffic, construction artificial light and glare, construction noise, construction air quality, and operational air quality, and these impacts would be greater than those that would result from implementation of the Proposed Project. Alternative 4 would also result in significant impacts to operational traffic, visual quality, views, historical resources, and operational solid waste, and these impacts would be similar to those that would result from implementation of the Proposed Project. Alternative 4 would result in a significant impact to operational noise, but this impact would be less than the impact resulting from the Proposed Project. Alternative 4 would result in less than significant impacts to climate change, electricity, and operational environmental safety, and these less than significant impacts would be greater than the impacts resulting from the Proposed Project. Alternative 4 would result in less than significant impacts to land use plans, land use compatibility, urban decay, parking, pedestrian safety, natural light, geology and soils, surface water hydrology, surface water quality, groundwater levels, groundwater quality, archaeological resources, police, fire, water, sewer, construction solid waste, natural gas, and construction environmental safety, similar in impact to implementation of the Proposed Project. Alternative 4 would result in less than significant impacts to operational artificial light and glare, and this impact would be less than the Proposed Project.

c. Finding

The roof design and façade for the Event Center are the only differences between Alternative 4 and the Proposed Project. The analyses conducted for this Alternative indicate that the impacts of Alternative 4 would be the same as those of the Proposed Project for all issues except artificial light, construction traffic, construction and operational regional air quality emissions, construction and operational noise, and electricity. As such, 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 operational 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.

In conclusion, Alternative 4 eliminates the operational significant artificial lighting and some operational noise impacts, but significant impacts would remain for all of the same issues as the Proposed Project (i.e., transportation, visual resources, air quality, historical resources, solid waste, and noise except as noted above). In addition, impacts associated with demand for electricity, GHG emissions, and construction-related traffic, air quality, artificial light, noise during construction, and electricity, under Alternative 4 would increase relative to the Proposed Project.

This Alternative does not meet the objectives of the Project. It is found pursuant to Public Resources Code section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section H, Statement of Overriding Considerations, make infeasible Alternative 4: Enclosed Stadium Alternative described in the Draft EIR.

d. Rationale for Finding

Alternative 4 would meet the underlying purpose of the Proposed Project to enhance the marketability of the Los Angeles Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue which builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District. Alternative 4 would also meet most of the Project Objectives, except as noted below.

Alternative 4 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. Specifically, it would not design the Event Center to include a deployable roof to enable a broad range of uses.

In terms of the national perspective, one of Southern California's defining characteristics is its weather and the outdoor lifestyle it supports. As such, an Event Center without an open roof would deprive fans of one of the most important elements that shape the Southern California experience. Moreover, the closed roof would deprive spectators of the views of the Downtown skyline that would be expected in a downtown venue. Further, a deployable roof is the preferred design for modern stadiums including Cowboy Stadium in Arlington, Texas (opened 2009); Reliant Stadium in Houston, Texas (2002); University of Phoenix Stadium in Glendale, Arizona (2006); and Lucas Oil Stadium in Indianapolis, Indiana (2008). The MetLife Stadium which opened in 2010 in New Jersey was originally planned with a retractable roof system, but was ultimately constructed as an open roof stadium due to financial constraints. Therefore, under Alternative 4 the visitor experience would not be comparable to, and competitive with, other major new spectator event venues across the United States.

As noted, construction of the Event Center under Alternative 4 would take about six months longer than under the Proposed Project. This would jeopardize the ability of this Alternative to complete the Event Center prior to the 2016 NFL Season. Therefore, this Alternative would meet this Project Objective to a lesser extent than the Proposed Project.

Therefore, the City finds that Alternative 4, Enclosed Stadium Alternative, is infeasible and less desirable than the Proposed Project and rejects this Alternative for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with Alternative 4, please see Section V of the Draft EIR.

5. Alternative 5: New Hotel and Expansion Alternative

a. Description of Alternative

The New Hotel and Expansion Alternative includes the development of a 1,000-room convention hotel at the north end of the Project Site adjacent to Chick Hearn Court in close proximity to the JW Marriott and the Ritz Carlton hotels at L.A. LIVE. It would also increase the size of the Convention Center through the development of the New Hall, as proposed under the Project, and additional convention center floor area to the north of

the New Hall. Under this Alternative, the total rentable area within the Convention Center would be increased to approximately 1.20 million s.f. The Event Center would not be developed under this Alternative and therefore would not include spectator uses. When accounting for existing buildings to remain, the total floor area under Alternative 5 would be approximately 3.0 million s.f.

b. Impact Summary of Alternative 5

Alternative 5 would not introduce significant environmental 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. Alternative 5 would result in significant impacts to visual quality, views, and historical resources, similar in impact to the Proposed Project. Alternative 5 would result in significant impacts to construction traffic, operational traffic, construction noise, operational noise, construction air quality, operational air quality, and operational solid waste, but would result in a lesser impact than the Proposed Project. Alternative 5 would result in less than significant impacts to natural light and natural gas and water, and those impacts would be greater than the Proposed Project. Alternative 5 would also result in less than significant impacts to land use plans, land use compatibility, urban decay, geology and soils, surface water hydrology, surface water quality, groundwater levels, groundwater quality, and archaeological resources, and those impacts would be similar to those resulting from the Proposed Project. Alternative 5 would result in a less than significant impact to parking, pedestrian safety, construction artificial light and glare, operational artificial light and glare, climate change, police, fire, sewer, construction solid waste, electricity, construction environmental safety, and operational environmental safety, and the resulting impacts would be less than those that would result from implementation of the Proposed Project.

c. Finding

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 also 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.

This Alternative does not meet the objectives of the Project. It is found pursuant to Public Resources Code section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section H, Statement of Overriding Considerations, make infeasible the New Hotel and Expansion Alternative described in the Draft EIR.

d. Rationale for Finding

Alternative 5 would only partially achieve the underlying purpose of the Proposed Project. Although this Alternative would enhance the marketability of the Los Angeles Convention Center through modernized facilities (i.e., in increase in rentable area and the creation of a contiguous exhibition space among the South Hall and the New Hall), it would not add a major multi-purpose sports and entertainment venue which builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District.

This Alternative would generally meet most of the Project Objectives under the category to modernize and enhance the marketability of the Convention Center. In addition, the 1,000 room hotel proposed under this Alternative would be expected to further enhance the attractiveness of the Convention Center to out-of-town visitors for trade shows and conventions. Although this Alternative would not provide Convention Center expansion capabilities for Exhibition Events through joint booking of the Event Center, the additional square footage of the Convention Center proposed under this Alternative would offset the loss of the Event Center as exhibit space.

Alternative 5 would also not meet the Project Objective to construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports entertainment uses. Because the Event Center would not be developed under this Alternative, it would not provide a state-of-the-art venue capable of attracting and maintaining up to two NFL teams that would be expandable to 76,250 seats to host occasional major sporting events (e.g., an NFL Super Bowl) and that could be used for

event floor exhibit hall space. Nor would this Alternative accommodate a variety of other spectator events beyond NFL games.

Alternative 5 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. Specifically, this Alternative would not create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area. Nor would it synergistically build upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level.

Alternative 5 would not meet the Project Objective to promote the spectator experience at Event Center events, since the Event Center would not be built. However, this Alternative would design a Project that is compatible with existing Convention Center facilities and consistent with smart growth and urban design principles to a similar extent as the Proposed Project. Unlike the Proposed Project, this Alternative would not create additional open space assembly area for fans and visitors, including a reconfigured Gilbert Lindsay Plaza.

Alternative 5 would not develop the Event Center. It would therefore 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. In addition, this Alternative would not implement the provisions of SB 292, which applies only to the Event Center.

Alternative 5 would not achieve the Project Objective to promote economic development and job creation through increased private investment, event activity, and tourism to the same degree as the Proposed Project. Alternative 5 would replace the outmoded West Hall, and add contiguous exhibition space and a multi-purpose room, all of which are necessary to allow the Convention Center to be even more competitive with other venues. However, this Alternative would not develop the Event Center. 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 and/or provides civic, cultural, and sporting amenities that serve a wide range of public interests in the City and region, or generate substantial additional revenues for the City government, stimulate economic activity in the greater Los Angeles area, and create thousands of good paying

construction and permanent jobs as soon as possible to the same extent as the Proposed Project.

Therefore, the City finds that Alternative 5, New Hotel and Expansion Alternative, is infeasible and less desirable than the Proposed Project and rejects this Alternative for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with Alternative 5, please see Section V of the Draft EIR.

6. Alternative 6: Maximum Convention Center Expansion

a. Description of Alternative

The Maximum Convention Center Alternative would not include development of the Event Center and, therefore, would not include spectator uses. Rather, the West Hall site would be developed with two levels of Convention Center uses over one level of at-grade parking and half a level of below-grade parking. The New Hall would be developed with 500,000 s.f. of floor area as proposed under the Project. These new structures would provide a total of approximately 1.22 million s.f. of net new floor area and 0.97 million s.f. of net new rentable area. The Convention Center Expansion Parcel within the LASED Specific Plan Area would be developed with 250,000 s.f. of floor area for Convention Center uses. When combined with the floor area of the existing South Hall and Concourse Building, this Alternative would provide a total of approximately 2.76 million s.f. of floor area.

b. Impact Summary of Alternative 6

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. Alternative 6 would result in significant impacts to construction traffic that would be greater than those impacts resulting from implementation of the Proposed Project. Alternative 6 would result in significant impacts to visual quality, views, and historical resources that would be similar to the impacts resulting from the Proposed Project. Alternative 6 would result in significant impacts to operational traffic, construction noise, operational noise, construction air quality, operational air quality, and operational solid waste that would be less than those of the Proposed Project but still significant. Alternative 6 would result in less than significant impacts to land use plans, urban decay, and electricity that would still be greater than the Proposed Project. Alternative 6 would result in less than significant impacts to land use compatibility, parking, natural light, geology and soils, surface water hydrology, surface water quality, groundwater levels, groundwater quality,

and archeological resources and would result in impacts similar to those resulting from the Proposed Project. Alternative 6 would result in less than significant impacts to pedestrian safety, construction artificial light and glare, operational artificial light and glare, climate change, police, fire, water, sewer, construction solid waste, natural gas, construction environmental safety, and operational environmental safety, and those impacts would be lesser than those resulting from the Proposed Project.

c. Finding

Alternative 6 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 this Alternative would not involve nighttime construction, the significant nighttime noise and artificial light 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 and 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, and in many cases would lessen the Proposed Project's overall impacts including its beneficial effects.

This Alternative does not meet the objectives of the Project. It is found pursuant to Public Resources Code section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section H, Statement of Overriding Considerations, make infeasible the Maximum Convention Center Alternative described in the Draft EIR.

d. Rationale for Finding

Alternative 6 would only partly achieve the Project's underlying purpose to "enhance the marketability of the Los Angeles Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent Los Angeles Sports and Entertainment

District.” Although Alternative 6 would provide additional exhibition space for the Convention Center, it would not add a major multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District.

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 that this Alternative create in terms of increasing 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.

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. Because the Event Center would not be developed under this Alternative, it would not provide a state-of-the-art venue capable of attracting and maintaining up to two NFL teams that would be expandable to 76,250 seats to host occasional major sporting events (e.g., an NFL Super Bowl) and that could be used for event floor exhibit hall space. Nor would this Alternative accommodate a variety of other spectator events beyond NFL games.

Alternative 6 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 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. Nor would it synergistically build upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level, ore create a catalyst to enhance further the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another.

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. This Alternative would design a Project that is compatible with existing Convention Center facilities. However, this Alternative would not develop the Event Center and therefore would not promote the spectator experience at Event Center events. Unlike the Proposed Project, this Alternative would not create additional open space assembly area for fans and visitors as this Alternative

would remove landscaping from the existing Gilbert Lindsay Plaza in order to provide necessary bus parking for the modernized Convention Center uses.

Alternative 6 would not develop the Event Center. It would therefore not take advantage of existing and planned transportation infrastructure to the extent the Proposed Project would, as the Event Center would attract many more visitors who would use existing and planned transportation infrastructure, especially public transit. In addition, this Alternative would not implement the provisions of SB 292, which applies only to 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 areas through increased private investment, event activity and tourism to a much lesser degree than the Proposed Project. Specifically, this Alternative would not develop the Event Center. 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 and/or provides civic, cultural, and sporting amenities that serve a wide range of public interests in the City and region. Without the Event Center and contiguous space added to the Convention Center, Alternative 6 would generate not substantial additional revenues for the City government, stimulate economic activity in the Greater Los Angeles area, and create thousands of good paying construction and permanent jobs as soon as possible. Because it would not develop the Event Center, Alternative 6 would not attract any local and out of town fans to additional spectator events.

Therefore, the City finds that Alternative 6: Maximum Convention Center Alternative, is infeasible and less desirable than the Proposed Project and rejects this Alternative for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with Alternative 6, please see Section V of the Draft EIR.

7. Alternative 7: Rehabilitation of West Hall and Limited Expansion Alternative

a. Description of Alternative

The Rehabilitation of West Hall and Limited Expansion Alternative would include retention of the West Hall to avoid a potential impact that could result if the West Hall was determined to be eligible for the California Register, the National Register, or as a City of Los Angeles Historical-Cultural Monument. No new convention center facilities would be constructed on the Project Site other than a pedestrian bridge to connect the West Hall to a new two-level Event Deck Hall on the Convention Center Expansion Parcel within the LASED Specific Plan Area. The Event Deck Hall would consist of 216,000 s.f. of floor area with one level of meeting rooms on top of one level for exhibit use. When combined with the existing South Hall and Concourse Building, this Alternative would result in a Convention Center comprised of 1.75 million s.f. of floor area and approximately 1.01 million s.f. of rentable area. The Event Center would not be developed under this Alternative.

b. Impact Summary of Alternative 7

Alternative 7 would not introduce additional significant environmental impacts, and in several cases would reduce or lessen the Proposed Project's significant impacts, while also lessening the Proposed Project's beneficial effects. Alternative 7 would result in significant impacts to operational traffic, construction noise, construction air quality, operational air quality, and solid waste operations, although these impacts would be lesser than those resulting from implementation of the Proposed Project. Alternative 7 would result in less than significant impacts to land use plans, geology and soils, operational surface water quality, and operational environmental safety (methane only) but these impacts would be greater than those presented by the Proposed Project. Alternative 7 would result in less than significant impacts to land use compatibility, surface water quality, groundwater quality, and archaeological resources similar to those impacts that would result from implementation of the Proposed Project. Alternative 7 would result in less than significant impacts to urban decay, construction traffic, parking, pedestrian safety, visual quality, views, natural light, construction artificial light and glare, operational artificial light and glare, operational noise, climate change, construction surface water hydrology, groundwater levels, historical resources, police, fire, water, sewer, construction solid waste, electricity, natural gas, construction environmental safety, and operational environmental safety (except with respect to methane) would be lesser than those when compared to impacts resulting from the Proposed Project.

c. Finding

Alternative 7 would reduce the Proposed Project's land use intensity by replacing the proposed Event Center with additional Convention Center related uses consisting of 216,000 s.f. of floor area. As many of the Proposed Project's potential environmental impacts are directly related to the types and sizes of events, Alternative 7 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. Specifically, 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 impact than the Proposed Project with respect to land use plans, geology, methane, 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.

Therefore, the City finds that Alternative 7: Rehabilitation of West Hall and Limited Expansion Alternative, is infeasible and less desirable than the Proposed Project and rejects this Alternative for the reasons stated above.

d. Rationale for Finding

Alternative 7 would only partly achieve the Project's underlying purpose to "enhance the marketability of the Los Angeles Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District." Although Alternative 7 would provide additional exhibition space for the Convention Center, such additional space would consist of non-contiguous floor area. Moreover, this Alternative would not replace the existing outmoded West Hall with a modern New Hall contiguous to the existing South Hall. It would therefore not improve the marketability of the Convention Center to the same degree as the Proposed Project. In addition, Alternative 7 would not add a major multi-purpose sports and entertainment

venue that builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District.

Alternative 7 would meet the Project Objective to modernize or enhance the marketability of the Convention Center to a lesser extent than the Proposed Project. Specifically, it would not replace the outmoded West Hall with a modern New Hall contiguous to the existing South Hall, or enhance the marketability of the Convention Center by creating 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, because Alternative 7 would not retain the outmoded West Hall and would develop only non-contiguous new exhibition space, it would not increase the anticipated number of trade shows and conventions attracting largely out-of-town visitors to the same extent as the Proposed Project. In addition, this Alternative would not provide a new multi-purpose room of a size that can function as exhibit hall space, meeting rooms, or a ballroom which is a new amenity that the Convention Center cannot provide today. Because the Event Center would not be developed under this Alternative, it would not provide Convention Center expansion capabilities through joint booking with the Event Center.

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. Because the Event Center would not be developed under this Alternative, it would not provide a state-of-the-art venue capable of attracting and maintaining up to two NFL teams that would be expandable to host occasional major sporting events (e.g., an NFL Super Bowl) and that could be used for event floor exhibit hall space. Nor would this Alternative accommodate a variety of other spectator events beyond NFL games.

Alternative 7 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 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. Nor would it synergistically build upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level, or create a catalyst to enhance further the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another.

Alternative 7 would not meet the Project Objectives to design a Project that is compatible with existing Convention Center facilities, promotes the spectator experience

and Event Center events, and is consistent with smart growth and urban design principles to the same extent as the Proposed Project. This Alternative would design a Project that is compatible with existing Convention Center facilities. However, it would not implement a sustainability program to the same extent as the Proposed Project because this Alternative would retain the West Hall instead of replacing it with a modern LEED Gold New Hall. In addition, this Alternative would not develop the Event Center and therefore would not promote the spectator experience at Event Center events. Unlike the Proposed Project, this Alternative would not create additional open space assembly area for fans and visitors, including a reconfigured Gilbert Lindsay Plaza.

Alternative 7 would not develop the Event Center. It would therefore 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. In addition, this Alternative would not implement the provisions of SB 292, which applies only to the Event Center. Alternative 7 would also generate far fewer jobs, and therefore would not foster job growth in an area served by mass transit to the same degree as the Proposed Project.

Alternative 7 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 to a much lesser degree than the Proposed Project. Specifically, Alternative 7 would not replace the outmoded West Hall, or add contiguous exhibition space and a multi-purpose room, all of which are necessary to allow the Convention Center to be competitive with other venues. Without modernization and expansion, the marketability of the Convention Center would not substantially improve and it is expected to continue to lose market share. Moreover, this Alternative would not develop the Event Center. Therefore, while Alternative 7 would create some additional temporary and permanent jobs during construction and operation, it would create substantially fewer new jobs than the Proposed Project. Under the Proposed Project, risk to the general fund is eliminated due to the transactions surrounding development of the Event Center and use as an NFL stadium. Without the Event Center, a private developer, including the Event Center Applicant, would not finance construction of the New Hall or rehabilitation of the West Hall at no risk to the City's fund. Given the rehabilitation and new construction costs associated with this Alternative, it is not likely that the City could undertake it without risk to the general fund.

In addition, Alternative 7 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 and/or provides civic, cultural, and sporting amenities that serve a wide range of public interest in the City and region. Without the Event Center and contiguous space added to the

Convention Center, Alternative 7 would generate not substantial additional revenues for the City Government, stimulate economic activity in the greater Los Angeles area, and create thousands of good paying construction and permanent jobs as soon as possible. In addition, because Alternative 7 would retain the outmoded West Hall and would develop only non-contiguous new exhibition space, it would not increase the anticipated number of trade shows and conventions attracting largely out-of-town visitors to the same extent as the Proposed Project. Therefore, this Alternative would provide economic development opportunities in Pico-Union and South Los Angeles by attracting out of town visitors to additional exhibition events to a lesser degree as the Proposed Project. Because it would not develop the Event Center, Alternative 7 would not attract any local and out of town fans to additional spectator events. In addition, this Alternative would not finance construction of the New Hall at no risk to the City's General Fund.

Therefore, the City finds that Alternative 7: Rehabilitation of West Hall and Limited Expansion Alternative, is infeasible and less desirable than the Proposed Project and rejects this Alternative for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with Alternative 7, please see Section V of the Draft EIR.

V. Environmentally Superior Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The State CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative from among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those alternatives analyzed in the Draft EIR, the range of alternatives includes the following: (i) No Project—Status Quo; (ii) No Project—Buildout Per Existing Approvals; (iii) Reduced Intensity Alternative; (iv) Enclosed Stadium Alternative; (v) New Hotel and Expansion Alternative; (vi) Maximum Convention Center Expansion Alternative; and (vii) Rehabilitation of West Hall and Limited Expansion Alternative. Of the alternatives analyzed in the Draft EIR, the No Project—Status Quo Alternative (Alternative 1) would be the Environmentally Superior Alternative, as it would result in less impacts relative to the Proposed Project than the other alternatives. However, as indicated herein, this Alternative would not meet the project objectives established for the Proposed Project.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that the Rehabilitation of the West Hall and Limited Convention Center Expansion Alternative (Alternative 7) is the Environmentally Superior Alternative. This Alternative would have relatively less environmental impact than the Proposed Project or any of the other project alternatives, other than the No Project Alternative. Alternative 7 is distinguished from the Proposed Project since it would have less overall development and more limited types of uses (e.g., no Event Center).

As many of the Proposed Project's potential environmental impacts are directly related to the types and sizes of events, Alternative 7 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. Specifically, Alternative 7 avoids the Proposed Project's significant impacts with regard to visual resources (both visual quality and views), artificial light and glare, and historical resources. However, similar to the Proposed Project, Alternative 7 would still result in significant 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, although to a lesser extent than the Proposed Project. With less overall development, Alternative 7 would have incrementally fewer and reduced impacts for those issues where the amount and type of development defines the impact, including impacts to traffic, visual resources, artificial light and glare, noise, historical resources, public services, utilities, air quality, and environmental safety.

In addition, Alternative 7 would only partially achieve some portions of the Project Objectives, and would not achieve any Project Objectives related to the Event Center. 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 also be significantly reduced under this Alternative.

G. Significant and Unavoidable Impacts

All of the relevant mitigation measures set forth in the Final EIR for the Project would be implemented as set forth therein and in the Mitigation Monitoring and Reporting Plan. Notwithstanding the foregoing, the Final EIR determines and the Planning Commission finds that certain impacts of the Project will have significant and unavoidable environmental effects, and therefore, these Findings conclude that certain project related impacts of the Project are significant and unavoidable impacts and that certain cumulative impacts of the Project, which take into account the related projects listed in the Final EIR, are also cumulatively considerable and have significant and unavoidable impacts. The Final EIR determined and the City hereby finds that the following significant and unavoidable impacts:

- Transportation (construction, intersections, freeway segments, freeway on-and off-ramps, and Congestion Management Program freeway monitoring locations);
- Air Quality (construction, operational and concurrent construction and operational emissions);
- Aesthetics/Visual Resources (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);
- Cultural/Historic Resources (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;
- Artificial Light and Glare;
- Noise; and
- Utilities/Solid Waste.

The City hereby finds that all feasible mitigation measures to substantially reduce or avoid the Project's significant impacts and significant cumulative impacts have been incorporated into the Project. Despite these measures, Project impacts and cumulative impacts as set forth above will remain significant and unavoidable.

H. Statement of Overriding Considerations

The Final EIR has identified certain unavoidable significant project and cumulative impacts of the Project. The City concludes, as described above, that the Project will have certain project and cumulative significant impacts on the environment.

Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decisions of the public agency allows the occurrence of significant impacts identified in the Final EIR that are not substantially lessened or avoided, the lead agency must state in writing the reasons to support its action based on the Final EIR and/or other information in the record. Section 15093 (b) of the CEQA Guidelines requires that the decision maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant

adverse environmental effects identified in the Final EIR cannot be substantially lessened or avoided. These findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Final EIR, the source references in the Final EIR, and other documents and material that constitute the record of proceedings.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts will result from implementation of the Project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible alternatives to the Project, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Project against the significant and unavoidable impacts of the Project and its cumulative impacts, the City hereby finds that the each of the Project's benefits, as listed below, outweighs and overrides the significant unavoidable impacts of the Project.

Summarized below are the benefits, goals and objectives of the Project. These provide the rationale for approval of the Project. Any one of the overriding considerations of economic, social, aesthetic and environmental benefits individually would be sufficient to outweigh the significant unavoidable project and cumulative impacts of the Project and justify the approval, adoption or issuance of all of the required permits, approvals and other entitlements for the Project and the certification of the completed Final EIR. Despite the significant unavoidable impacts of the Project as described above, the City certifies the Final EIR and approves the Project entitlement approvals based on the following contributions of the Project to the community:

- The direct on and off-site economic impact associated with construction of the Project is expected to generate over \$3.3 billion in output supporting 19,359 full time equivalent (FTE) positions with earnings of over \$960 million over the course of the construction period.
- Annual operation of the Project is expected to generate over \$183 million in total output throughout the Los Angeles economy supporting 3,546 full time equivalent (FTE) positions with earnings over \$77 million per year.
- The Project would generate \$27.3 million in annual revenues to the City's general fund from on and off-site operations.
- The Project would serve as a catalyst for economic growth in downtown Los Angeles and synergistically build upon existing venues including STAPLES Center and L.A. Live.
- The New Hall, Event Center and new parking structures will be financed solely from private funding sources, at no risk to the City's General Fund.

- The Project promotes smart growth and sound urban planning principles by developing a major sports, entertainment and Convention Center venue in close proximity to transportation corridors and transit stations.
- The Project would modernize and enhance the marketability of the Convention Center by: (i) replacing the outmoded West Hall with a modern New Hall contiguous to the existing South Hall, (ii) creating a more efficient exhibit hall, (iii) increasing the number of trade shows and conventions attracting out of town visitors, (iv) providing Convention Center expansion capabilities for certain events through the use of the event floor, premium suites and club spaces for exhibit and meeting use.
- Completion of the Project and modernization of the Convention Center will propel Los Angeles from 15th to 5th in the nation for convention center size.
- An upgraded convention center will result in an estimated 80 annual booked event days in downtown Los Angeles, significantly benefiting the local economy.
- The Project will provide a state of the art Event Center capable of attracting and maintaining up to two NFL teams. In addition, the Event Center will enable the City to attract major national and international sporting events, such the Super Bowl, Pro Bowl, NCAA Final Four, Rodeos, Motor Cross, MLS and international soccer matches, other collegiate championships, potentially the Olympic Games, as well as music concerts, festivals and religious gatherings.
- The Project would incorporate sustainability as one of its key design and operational criteria. 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.
- As part of the effort to pursue LEED Certification, the Event Center would incorporate the AEG 1EARTH environmental program already implemented at STAPLES Center and across L.A. Live for the purpose of reducing greenhouse gas emissions.
- The Project will include substantial open space assembly areas for fans and visitors that can be utilized for pre-event and post-event gatherings.
- The Gilbert Lindsay Plaza will be reconfigured as part of the Project design to provide additional open space available to the community on non-event days.

- The Event Center will incorporate an open air stadium design with a deployable roof to take advantage of Southern California's temperate climate.
- The Project would provide economic development opportunities in Pico-Union and South Los Angeles by attracting out of town visitors to additional exhibition events and local and out of town fans to additional spectator events.
- The Project will provide an extensive community benefits program in collaboration with a coalition of community-based organizations, as specified in Exhibit D to the Development Agreement proposed for the Project:
 - Local hiring and job training, including \$500,000 in seed funding to a non-profit organization to staff and operate a first source referral system.
 - A living wage program with the goal of maintaining 100% of the jobs in the Project as living wage jobs.
 - A commitment of \$500,000 in funding towards a neighborhood protection and land use analysis plan to be implemented in the vicinity of the Project covering the following communities: Pico Union, South Park and South Los Angeles.
 - Preparation of a plan and a commitment of \$500,000 for the implementation of streetscape improvements (such as street trees, sidewalk scoring, street furniture and street lighting) covering the portal or connection points between the South Park and Pico Union communities.
 - Small business development program that includes the following hiring goals: (1) 25% Small Business Enterprise (SBE) participation for construction and operation of the Project, (2) 20% participation for Minority Business Enterprise (MBE), (3) 5% participation for Women Business Enterprises (WBE) and 3% participation for Disabled Veteran Business Enterprises (DVBE).
 - A commitment of \$200,000 to a non-profit organization that supports the development and growth of Emerging Business Enterprises (EBE) in the vicinity of the Project, including the Pico-Union, South Park and South Los Angeles communities.

- A commitment of \$1,300,000 for the creation or improvement of green space and parks and recreation facilities, including but not limited to land acquisition, park design and construction, soccer field development and the development of community gardens within a five mile radius of the Project.
- Establishment of a job shadowing program designed to introduce youth who live within a five mile radius of the Project to careers in the Sports, Entertainment and Hospitality industries.
- A commitment of \$1,000,000 towards a college scholarship program for students who reside within a five mile radius of the Project.
- A commitment of \$50,000 in seed funding to support a summer youth employment program for students living within a five mile radius of the Project.
- Preparation of an outreach program for the (i) promotion of existing college internship opportunities to area colleges and universities within a five mile radius of the Project and (ii) development of a paid college internship program for interns from the same communities.

I. Mitigation Monitoring and Reporting Program

J. The Mitigation Monitoring and Reporting Program (“MMRP”) includes all of the mitigation measures identified in the Final EIR and adopted by the City in connection with the approval of the Project and has been designed to ensure compliance with such measures during implementation of the Project. In accordance with CEQA, the MMRP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code §21081.6, the City hereby adopts the MMRP and finds that the impacts of the Project have been mitigated to the extent feasible by the mitigation measures identified in the MMRP, incorporated by reference and located in the administrative file, and finds that the Project meets the mitigation monitoring program requirement of Section 21081.6 of the Public Resources Code. The City reserves the right to make amendments and/or substitutions of mitigation measures if the City determines that the amended or substituted mitigation measure will mitigate the identified potential environmental impacts to at least the same degree as the original mitigation measure, and where the amendment or substitution would not result in a new significant impact on the environment which cannot be mitigated. **Consideration of Record; Independent Judgment**

In approving the Project, the City decision-makers have reviewed and considered the

Draft EIR and appendices, the Final EIR and appendices, and all other pertinent evidence in the record of proceedings.

The Applicant's consultants prepared the screen check versions of the Draft EIR, Final EIR and technical studies. All such materials and all other materials related to the EIR were extensively reviewed and, where appropriate, modified by the Planning Department or other City representatives. As such, the City finds that the Draft EIR, Final EIR, technical studies, and all other related materials reflect the independent judgment and analysis of the Lead Agency.

K. Substantial Evidence

The City finds and declares that substantial evidence for each and every finding made herein is contained in the Draft EIR, Final EIR, technical studies, and other CEQA related materials, the administrative record, staff reports, information provided by the Applicant, each and all of which are incorporated herein by this reference. Moreover, the City finds that where more than one reason exists for any finding, each reason independently supports such finding, and that any reason in support of a given finding individually constitutes a sufficient basis for that finding.

L. Relationship of Findings to EIR

These Findings are based on the most current information available. Accordingly, to the extent there are any apparent conflicts or inconsistencies between the Draft EIR and the Final EIR, on the one hand, and these Findings, on the other, these Findings shall control and the Draft EIR and Final EIR or both, as the case may be, are hereby amended as set forth in these Findings.

M. Project Conditions of Approval

Each of the Project features and mitigation measures referenced in these Findings shall be conditions of Project approval to be monitored and enforced by the City pursuant to the building permit process and the Mitigation Monitoring and Reporting Program. To the extent feasible, each of the other findings and conditions of approval made by or adopted by the City in connection with the Project are also incorporated herein by this reference.

N. Custodian of Documents

The custodian of the documents or other material which constitutes the record of proceedings upon which the City's decision is based is the City of Los Angeles, Planning Department, located at 200 North Spring Street, Room 750, Los Angeles, California 90012.

O. Recirculation Not Required

The Final EIR documents changes to the Draft EIR. The Final EIR provides additional analysis that was not included in the Draft EIR. Having reviewed the information contained in the Draft EIR and the Final EIR and in the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant information in the record of proceedings, in the Final EIR and finds that neither recirculation of the Draft EIR, nor preparation of a supplemental or subsequent EIR is required. Specifically, the City finds that:

- The Responses To Comments contained in the Final EIR fully considered and responded to comments claiming that the Project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that Project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.
- The City has thoroughly reviewed the public comments received regarding the Project and the Final EIR as it relates to the Project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required with respect to the Project.

PUBLIC HEARING AND COMMUNICATIONS

Public Hearing

No public hearing for the requested entitlements was held prior to the writing of the staff report. The City Planning Commission will conduct the public hearing for the requested entitlements at its September 13, 2012 meeting.

No letters or petitions have been received regarding the subject entitlements as of the writing of the staff report.

A public hearing on the Draft Environmental Impact Report, as required by Senate Bill 292, was held on May 16, 2012 at the Los Angeles Convention Center.

No letters, comments or petitions have been received regarding the impacts of the subject entitlements on the environment as of the writing of the staff report.

Description of Exhibits

Exhibit 1 – Vicinity Map, Radius Map, Specific Plan Map

Exhibit 2 – Proposed Amendment to the LASED Specific Plan

Exhibit 3 – Proposed Amendment to the LASED Development Agreement

Exhibit 4 – Environmental Review (Final Environmental Impact Report ENV-2011-0585-EIR, SCH No. 2011031049, not included in this packet but a separate Attachment contained in the Environmental Case File and sent to City Planning Commission under a previous cover)

Exhibit 5 – Statement of Overriding Considerations