
I. SUMMARY

A. INTRODUCTION

In accordance with Sections 15088, 15089, and 15132 of the State Guidelines for the Implementation of the California Environmental Quality Act (“CEQA Guidelines”), the City of Los Angeles Planning Department, as Lead Agency, has prepared the Final Environmental Impact Report (“Final EIR”) for the Los Angeles Sports and Entertainment District Project (“Project”).

This Final EIR comprises the second and final part of the Environmental Impact Report (EIR) for the Project. The Los Angeles Sports and Entertainment District Draft EIR, previously circulated for public review and comment, comprises the first part, and is available for review at the Department of City Planning, Environmental Review Section, 221 North Figueroa Street, Room 1500, Los Angeles, CA 90012.

This Final EIR consists of the following elements:

- Section I: A comprehensive summary of the Final EIR for the Project including a brief description of the Project; a summary of each of the environmental impacts analyzed; all recommended mitigation measures, and the alternatives evaluated.
- Section II: Corrections and Additions to the Draft EIR, including all Technical Appendices to the Draft EIR, in order to correct certain inaccuracies and to provide additional analysis where necessary.
- Section III: Mitigation Monitoring and Reporting Program
- Section IV: Responses to written comments received during the public review period. Also includes a summary matrix that lists the name and address of every person, organization, or public agency that commented on the Draft EIR and identifies in summary each of the topics addressed by such person, organization or public agency.

B. PROPOSED PROJECT

This Final EIR examines the potential environmental impacts of constructing and operating the proposed Los Angeles Sports and Entertainment District (also referred to in this document as the

“Project”), a multi-use development, the conceptual plan of which includes: a major convention hotel with a capacity of 1,200 rooms; a second 600-room hotel; up to 1,115,000 gross square feet (GSF) of retail/entertainment/restaurant uses, including a 7,000-seat live theater; up to 870,000 GSF of residential uses (800 dwelling units); up to 300,000 GSF of office space, including medical offices and a sports medicine center; a health/sports club of up to 125,000 GSF; an open-air plaza to feature year-round venues; and, combined support parking of up to 5,305 spaces located throughout the Project site.¹

The Project would be located in downtown Los Angeles, on a set of sites located adjacent to STAPLES Center and the Los Angeles Convention and Exhibition Center. Generally, the development areas that make up the site are located east and west of Figueroa Street, at Olympic Boulevard on the north and almost to Pico Boulevard on the south. The Project would create an entertainment district that complements STAPLES Center and the Los Angeles Convention and Exhibition Center by providing compatible and synergistic uses including convention hotel rooms, retail/entertainment/restaurant/office and residential uses. An urban design that emphasizes the street frontage and pedestrians would create strong pedestrian linkages to downtown and the surrounding community. Parking, vehicular and pedestrian circulation is comprehensively planned to distribute vehicles over multiple approaches to the parking facilities, including shared use parking facilities. Additional project design features would support safe, comfortable and convenient pedestrian flow throughout the Project site and encourage the use of public transit.

C. AUTHORIZATION AND FOCUS

This EIR has been prepared at the direction and under the supervision of the City of Los Angeles Planning Department (Planning Department) in accordance with the California Environmental Quality Act (CEQA)² and the Guidelines for Implementation of CEQA (CEQA Guidelines)³, as amended. As discussed below, the Planning Department is the Lead Agency pursuant to CEQA.

¹ *The Project includes a regulatory mechanism (i.e., equivalency program) that would provide flexibility in the proposed land uses that will be developed at the Project site in order to respond to the future needs of the southern California economy. The equivalency program defines a framework within which land uses can be exchanged for certain other land uses so long as no additional environmental impacts would occur. For example, there may be increases in the square footage of certain land uses (i.e., entertainment) in exchange for decreases in the square footage of other land uses (i.e., restaurant). However, at no time would the total of on-site development exceed the proposed four million square feet of development. Refer to Section II.C.d., Project Characteristics, of the Draft EIR for additional discussion regarding the proposed equivalency program. Also refer to Item II.a in Section II of this Final EIR for revisions to the equivalency program.*

² *Public Resources Code Section 21000 et seq.*

³ *Administrative Code, Title 14, Chapter 3, Section 15000 et seq.*

The purpose of this EIR is to inform decision-makers, as well as the general public, of the potential environmental effects of the proposed Project. The EIR, by itself, does not determine whether the Project will be approved. In accordance with Section 15121 of the CEQA Guidelines, its purpose is to identify all potentially significant effects of the Project on the physical environment, to determine the extent to which those effects could be reduced or avoided, and to identify and evaluate feasible alternatives to the Project.

In accordance with Section 15130 of the CEQA Guidelines, the EIR includes an examination of the effects of cumulative development in the downtown Los Angeles area. Cumulative development is analyzed for the year 2008 which includes new development expected to be present when the Project build-out occurs. The EIR also evaluates the effects of five alternatives to the proposed Project (including the No Project Alternative, three on-site alternatives, and one off-site alternative) and identifies the Environmentally Superior Alternative, as required by Section 15126(d) of the CEQA Guidelines.

D. LEAD AGENCY

In accordance with Section 15367 of the CEQA Guidelines, the Lead Agency is defined as "the public agency which has the principal responsibility for carrying out or approving the project." The City of Los Angeles Planning Department is acting as Lead Agency and is responsible for certifying the EIR and adopting any mitigation measures needed to address any identified significant environmental impacts. The Community Redevelopment Agency (CRA) is a Responsible Agency under CEQA Guidelines Sections 15096 and 15381 and, as such, will certify that it has reviewed and considered the information in the EIR and made environmental findings as appropriate when decisions and/or approvals are made by the CRA with respect to the Project.

E. NOTICE OF PREPARATION

In compliance with CEQA Section 21080.4, a Notice of Preparation (NOP) was prepared by the Planning Department and was received by the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on September 14, 2000. The 30-day response period for the NOP ended on October 14, 2000. The NOP identified specific areas where the proposed Project could have adverse environmental effects and indicated that an EIR would need to be prepared to document these effects

F. CIRCULATION OF DRAFT EIR

The Draft EIR, dated January 2001, constitutes the first part of the EIR. The Draft EIR was comprised of the Draft EIR and the Technical Appendices (Volumes I to III). The Technical Appendices included the Notice of Preparation Comments and Responses, a Mitigation Monitoring and Reporting Program, and various technical studies, which support the analysis contained in the Draft EIR.

The Draft EIR and Technical Appendices were distributed to State, City, and other public agencies, as well community organizations, homeowners associations, and other interested parties. Copies of the Draft EIR were made available for review at the Central Library, Exposition Park Library, and Little Tokyo Library. The Draft EIR was also made available for review at the City of Los Angeles Department of City Planning (221 North Figueroa Street, Room 1500, Los Angeles). In addition, the Summary and some sections of the Draft EIR were provided in Spanish.

The Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and circulated for public review on January 11, 2001. The 45-day public comment period required by CEQA Guidelines Sections 15087 and 15105 concluded on February 26, 2001. Although not required by the CEQA Guidelines, the Lead Agency accepted and considered all comments received after the closure of the comment period.

G. AREAS OF CONTROVERSY

Potential areas of controversy and issues to be resolved by the Lead Agency include those areas where a significant unavoidable impact has been projected. For the Project, the areas of unavoidable significant impact include short-term noise and air quality impacts associated with construction activities, peak hour traffic impacts, regional air quality impacts primarily associated with an increase in average daily traffic volumes, visual quality, shade/shadow, light and glare, and parks. Issues raised during the NOP comment period generally regarded traffic and noise impacts as they may affect neighborhood quality.

H. ALTERNATIVES

The EIR describes a range of reasonable alternatives to the project, and evaluates the environmental impacts associated with each alternative, as required by Section 15126.6 of the CEQA Guidelines. The analysis of alternatives focuses on the alternatives capable of reducing or eliminating the significant, unavoidable adverse impacts of the Project. Specifically, this EIR analyzes the following five alternatives: Alternative A, No Project; Alternative B, Reduced Density

Alternative; Alternative C, Design Alternative; Alternative D, Land Use Alternative; Alternative E, Alternative Site. The five identified alternatives, as well as the identified environmentally superior alternative, are summarized below.

Alternative A, the No Project Alternative assumes that no project is approved and the existing 40,000 square foot warehouse/mechanical facility remains within the Project area. Thus, under this alternative, the physical conditions of the Project site would remain as they exist today. The No Project Alternative would have better or much better impacts compared to the Project with regard to land use (off-site uses), visual quality, light and glare, shade/shadow, drainage and surface water quality, air quality, traffic, pedestrian safety, noise, public services, utilities, geologic and seismic hazards, and historic resources. The Alternative would have greater impacts with regard to land use (land use policies), shade/shadow, visual quality, population, housing, and employment, and hazardous materials. The No Project Alternative would not achieve the Project's or the City's objectives.

Alternative B, the Reduced Density Alternative includes the types of uses as set forth with the proposed Project, but reduces the amount of development, which would occur at the Project site. On an overall basis, the amount of development is reduced by 30 percent, to a total of approximately 2.8 million square feet of development. The Reduced Density Alternative would have better impacts than the Project with regard to land use (off-site uses), visual quality, light and glare, shade/shadow, surface water quality, air quality, traffic, pedestrian safety, noise, public services, utilities, and geologic and seismic hazards. The Alternative would have worse impacts with regard to land use (land use policies) and employment. The Reduced Density Alternative would achieve the Project's and City's objectives, but to a reduced degree.

Alternative C, the Design Alternative, includes the same amount of development as the proposed Project; however changes to the design of the Project have been incorporated into this alternative to reflect a project which is oriented more towards Figueroa Street (i.e., convention hotel and central plaza), and includes reductions in building height and signage within current regulations in order to address the principal environmental effects of the Project from a physical design perspective. The Alternative Design would have a worse impact than the Project with regard to visual quality (visual access) and light and glare by orienting Project buildings more along a north-south axis, thus increasing the potential for reflective glare in morning and afternoon hours. The Alternative Design would have worse impacts with regard to pedestrian safety and noise. The Alternative Design would have equivalent impacts with regard to shade and shadow effects on surrounding sensitive land uses, except that it would increase the expected summer afternoon shading of the rear patio/pool of the Hotel Figueroa. This Alternative would have better impacts to visual quality (signage). The Alternative Design would achieve some, but not all of the Project's and the City's objectives.

Alternative D, the Land Use Alternative, calls for a substantial reorientation of the Project from one that seeks to create a sports and entertainment district to one that is predominately residential in character. Alternative D consists of 2,400 residential units, as well as support retail development (i.e., supermarket, dry cleaners, etc.) in addition to a 1,400-room convention hotel. The Land Use Alternative would have better impacts compared to the Project with regard to land use (off-site uses), light and glare, shade/shadow, noise, public services (fire and police), and utilities. The Alternative would have worse impacts with regard to land use (land use policies), pedestrian safety, and public services (parks and schools). The Alternative Land Use would achieve some, but not all, of the Project's and the City's objectives.

Alternative E, the Alternative Site Alternative, proposes to locate the Project at a different site as a means of understanding the environmental effects of the Project in a different geographical context. The alternative site selected for analysis is the Cornfields Site, also located in the City of Los Angeles, northeast of Chinatown. The Cornfields Alternative would result in better impacts compared to the Project with regard to shade/shadow, pedestrian safety, and noise (construction). The Alternative would have worse impacts with regard to land use, visual quality, light and glare, drainage, air quality (operational), traffic, noise (operational), utilities (infrastructure), and historic resources. This Alternative would require the extension of new drainage, sewer, and water infrastructure to serve a previously underserved area. The Cornfields Alternative would not achieve many of the Project's or the City's objectives.

Environmentally Superior Alternative: Of the Alternatives analyzed in the Final EIR, the No Project Alternative (Alternative A) is considered the overall environmentally superior alternative, as it would reduce nearly all of the significant impacts occurring under the Project (i.e., regional construction air emissions, regional operational air emissions, construction noise, and traffic) to less than significant levels. Thus, no significant impacts would occur under this Alternative. However, this Alternative would not meet any of the programmatic, physical, economic, or operational objectives established for the Project, would not include many of the beneficial effects associated with the proposed Project, nor would it fulfill the objectives of the City of Los Angeles' existing plans for the Project area. 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 Reduced Density Alternative (Alternative B) would be environmentally superior. Although the Reduced Density Alternative would generally reduce the significant impacts occurring under the Project, it would not reduce such impacts to less than significant levels. Under the Reduced Density Alternative, other environmental impacts would be either generally reduced or substantially equivalent to those associated with the proposed Project and would remain less than significant. Additionally, the Reduced Density Alternative would achieve many, but not all, of the programmatic, physical, economic, and operational objectives established for the proposed Project.

I. SUMMARY OF ENVIRONMENTAL IMPACTS

LAND USE

Impacts: This analysis discusses the Project's consistency with the provisions and requirements of the various policy plans and regulations which govern planning and development in the portion of downtown Los Angeles nearest to the Project. The relocation of portions of the existing surface parking for STAPLES Center may temporarily disrupt existing activities and scheduled events at STAPLES Center and the Convention Center during construction. These impacts would be reduced by the construction of a parking structure to serve existing STAPLES Center parking. The Project would also reserve a "holding area" for future Convention Center expansion. Therefore, the Project is compatible with the plans to accommodate the proposed Convention Center expansion. Overall, the Project would combine with existing adjacent land uses to create a well-designed, modern, efficient, and balanced urban environment; including a full range of day and nighttime activities and uses that are desired and encouraged in order to achieve the long term realization of development strategies for this area of downtown. Therefore, the Project would be compatible with the majority of surrounding land uses.

Mitigation and Adverse Effects: The Project would not result in any significant environmental impacts upon known land use plans or surrounding land uses, and therefore no mitigation measures are required.

AESTHETICS (VISUAL QUALITIES)

Impacts: Construction activity typically involves disturbance of existing natural and man-made features and development of structures that are temporarily devoid of external treatments designed to promote a pleasant visual appearance. The proposed temporary covered walkway along 11th Street, along with other temporary construction barriers, could potentially serve as targets for graffiti and other unattractive visual features, if not properly monitored, and a significant visual impact at an important gateway to STAPLES Center and the Convention Center would result from project construction.

Unifying design elements would be employed for consistency among STAPLES Center, the Convention Center and the Project further defining the area as a special downtown sports and entertainment district. The height and bulk of the Project would be compatible with the height and bulk of buildings allowed under existing zoning and *CBD Redevelopment Plan* and *Downtown Strategic Plan* standards for proposed development. The Project would be consistent with planned development characteristics expected of the area and would provide pedestrian-oriented transitions between the Project and existing adjacent land uses. Design of the Project would not result in buildings that are visually incompatible with the Variety Arts Center. Therefore, the Project would

not introduce elements that would substantially detract from the existing visual character or primary visual resources of the area and would not remove or demolish elements that contribute positively to the visual character of an area. No significant impacts to visual resources would occur. The project would not remove a valued visual feature, or largely obstruct a valued existing view; no significant impact on views from these buildings is expected. Proposed development is consistent with applicable *General Plan Framework* policies regarding the Downtown Center associated visual amenities and pedestrian accommodations. The Project Design Guidelines would be consistent with recommendations for private and public signage standards expressed in the *South Park Development Strategies and Design Guidelines*.

Mitigation Measures: During construction the following mitigation measure would be implemented:

1. The Applicant shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials (such as graffiti or posters) would be posted on temporary construction barriers or temporary pedestrian walkways and that any such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.
2. In the Project design, the Project Applicant shall substitute vegetated surfaces for hard surfaces, which shall include 15 percent of the at-grade plaza and courtyards and 5 percent of elevated surfaces. In addition, the Project streetscape plan shall provide for additional landscape areas. The Project Applicant shall explore elimination of blacktop and the use of new coatings and integral colorants for asphalt to achieve light colored surfaces, to the extent feasible for Project development.

Although no significant impacts have been identified for visual quality during operations, urban design standards, defined in the Project's Specific Plan Design Guidelines (See Section II.C., Project Characteristics), have been incorporated into the proposed Project to ensure an appropriate aesthetic appearance. Project development plans will include specific siting of structures and facilities, structural design, signage design and landscaping measures. In addition, implementation of the design guidelines in the Project's Specific Plan would ensure consistency with the *General Plan Framework*, *Downtown Strategic Plan*, *CBD Redevelopment Plan*, and the *South Park Development Strategies and Design Guidelines*.

Adverse Effects: The Project would obstruct views of STAPLES Center and the Convention Center from vantage points north of the Project site. Although the Project would be consistent with height and zoning requirements and with the overall large-scale development pattern of STAPLES Center and Convention Center area, the Project would result in a significant impact to visual access. Project signage would be consistent with the applicable plans and regulations, would complement STAPLES Center and Convention Center and would contribute to a sense of place

reflecting the unique identity of the area and the creation of a major public outdoor “gathering place.” However, as the Project would introduce substantial signage to the visual environment, impacts to visual quality due to signage are significant.

AESTHETICS (LIGHT AND GLARE)

Impacts: Any Project construction activities involving nighttime activities would require lighting of work areas. This lighting would be necessarily focused downward or shielded, oriented toward Project property, and away from adjacent sensitive residential receptors. Furthermore, construction hours within the project areas would be restricted in accordance with municipal code requirements. Therefore, no significant lighting impacts are anticipated during project construction. Construction heavy equipment and building materials would not generate glare that would cause a hazard or clear visual nuisance. In addition, construction activity would be screened from view by temporary barriers. No significant glare impacts are anticipated during project construction.

The Project would substantially increase ambient light levels on the project site and in the vicinity. City permit review would insure that proposed lighting would not pose hazards to motorists. Nighttime illumination, particularly special-event related lighting, associated with the convention hotel, entertainment facilities and the Plaza could be visible from the neighboring motels, apartment buildings, and Holiday Inn and Figueroa Hotel, although this additional nighttime illumination would replace existing ambient nighttime illumination associated with existing parking lots. Project structures would also block some of the presently visible lighting associated with STAPLES Center and the Convention Center. In addition, Project lighting design dictates that Project lighting would be shielded to minimize lighting impacts upon adjacent sensitive uses and roadways. However, although Project illumination would be consistent with applicable regulations and guidelines, the increase in illumination from the proposed Project would result in a significant impact to adjacent sensitive receptors. The Project would not generate glare, caused by light reflected off expanses of undifferentiated expanses of glass or polished surfaces, that would cause a hazard or clear visual nuisance by serving as a distraction or interference to vision or concentration.

Mitigation Measures: Project development plans will include detailed specifications regarding light fixture types and locations, as well as glare-reducing or screening elements. In addition to the following mitigation measures, urban design standards will be incorporated into the proposed Project’s Specific Plan to ensure an appropriate Project illumination.

1. The Applicant shall prepare a Lighting Plan in coordination with the Department of City Planning to establish lighting standards and guidelines.
2. To the extent feasible and consistent with the functions and uses of the Project, the following mitigation measures shall be addressed in the design of the Project’s facilities:

- a. Pedestrian-level lighting shall be used adjacent to Olympic Boulevard and Figueroa, 11th, 12th, and Flower Streets.
- b. Floodlights shall be located so as to minimize impacts onto sensitive receptors.
- c. The Applicant shall coordinate with the Bureau of Street Lighting as to whether the streetlights shall be refurbished and/or reinstalled to preserve the character of the community, in addition to providing adequate lighting to motorists and pedestrians.
- d. All new lighting shall be designed to minimize glare and to prevent light impacts upon adjacent sensitive receptors.
- e. The use of highly reflective building materials for the exterior walls of the Project structures shall be minimized.
- f. Use high performance glass with high shading coefficient and low reflectivity, such as Heat Mirror or Low E type glass.
- g. Architectural and/or landscape screening elements shall be incorporated into project design so as to minimize glare impacts on adjacent sensitive receptors.
- h. Parking facilities exits shall be located and designed so as to minimize glare impacts from vehicle headlights on adjacent sensitive receptors.

Adverse Effects: Even with implementation of the mitigation measures listed above, light sources associated with the Project, including building and signage lighting, would contribute to increased ambient nighttime illumination levels that would spill over onto and illuminate adjacent sensitive receptors, producing significant impacts that could not be mitigated. Impacts related to glare would be less than significant.

AESTHETICS (SHADE/SHADOW)

Impacts: The Project would result in significant shading impacts to five off-site shadow-sensitive uses during the winter, including two multi-family residential structures (adjacent to Francisco Street) shaded by the Olympic East Properties; two multi-family residential structures (adjacent to Georgia Street) shaded by Olympic North Properties; and the Gilbert Lindsay Plaza shaded by the Figueroa South Properties.

Mitigation Measures: The following mitigation measure is required to reduce significant shade-shadow impacts:

1. To reduce shading from the Project structures on the Olympic East, Olympic North and Figueroa South Properties, design elements, including roof form, setback, building height and massing, shall be implemented (to the extent feasible and consistent with the functions and uses of the Project) to avoid shading currently unshaded off-site shadow-sensitive uses for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.

Adverse Effects: The Project would result in significant shading impacts to five off-site shadow-sensitive uses during the winter. No off-site shadow-sensitive uses would be impacted during the summer. These impacts would be reduced with implementation of the Project design guidelines and the recommended mitigation measure. However, it may not be feasible to reduce all shading impacts to less than significant and still be consistent with the functions and uses of the Project. In this case, a significant shading impact would remain.

POPULATION, HOUSING AND EMPLOYMENT

Impacts: It is estimated that approximately 4,296 construction workers would be employed during the construction of the Project, although these employees do not typically relocate closer to a construction site and, therefore, impacts to housing and population related to construction workers would be less than significant.

The Project's 800 new residential units and its estimated population increase of 2,272 new residents would be well within growth parameters established by SCAG for the Central City Community Plan Area. The Project is anticipated to add 5,343 jobs to the Central City Community Plan Area, a ratio of 2.35 jobs added for every resident added. This ratio is below historical levels for the area, and supports the trend of reducing the jobs-to-residents ratio.

Mitigation Measures and Adverse Effects: The Project would not result in any significant environmental impacts upon housing, population and employment and therefore no mitigation measures are required.

DRAINAGE AND SURFACE WATER QUALITY

Impacts: Construction of the proposed Project will not result in a significant change to existing hydrologic conditions. The existing downstream storm drain system, as designed by BOE, is flowing at or above capacity. Adding additional storm drain capacity is not recommended because while it may improve the flooding situation locally, it would transfer the flooding to other downstream locations. No increase in runoff over existing conditions would occur.

During construction, compliance with the County's NPDES permit and all relevant storm water quality management programs of federal, State, County and City agencies would reduce any potential surface water quality impacts on receiving waters to less than significant levels. Implementation of BMPs in compliance with the SUSMP would reduce Project impacts during operation to below a level of significance.

Mitigation Measures: Although the proposed Project is not expected to result in significant impacts with respect to drainage, the following measures shall further ensure that neither the Project site nor surrounding properties are subject to increased flood hazard:

1. Prior to construction activities on any development area, the Applicant shall prepare a master erosion control plan for that developed area, which includes detailed flood control plans, for the City of Los Angeles Department of Public Works, Bureau of Engineering. The plans shall include hydrology/hydraulic calculations and drainage improvement plans, showing quantitatively how projected storm water runoff would not exceed existing design conditions. Such plans shall be reviewed and approved by the City prior to the issuance of building permits.

In addition, the following mitigation measure is recommended to ensure that the Project would not result in significant impacts to surface water quality:

2. The Applicant shall construct catch basins, roof drains, surface parking drains connecting directly to the existing storm drain system, and any other drainage improvements, as may be required by the Bureau of Engineering.

Adverse Effects: With adherence to all applicable regulations and implementation of the measures outlined above, Project impacts on drainage and surface water quality would be less than significant.

AIR QUALITY

Impacts: Construction-related daily emissions would exceed SCAQMD significance thresholds for NO_x, CO, ROC, and PM₁₀. Construction-related quarterly emissions would exceed SCAQMD significance thresholds for NO_x, CO, and ROC. Thus, emissions of these pollutants would result in a significant short-term regional air quality impact. Local air quality impacts relative to PM₁₀ concentrations would be less than significant. Regional emissions resulting from the proposed Project are expected to exceed the SCAQMD thresholds for CO, NO_x, PM₁₀, and ROC. Sensitive receptors in the area would not be significantly affected by CO emissions generated by Project-related traffic, and localized air quality impacts related to mobile source emissions would therefore be less than significant. The Project would be consistent with applicable SCAQMD and SCAG policies.

Mitigation Measures: The following mitigation measures set forth a program of air pollution control strategies designed to reduce the Project's air quality impacts.

1. The Applicant shall secure any necessary permits from the SCAQMD.
2. Non-toxic soil stabilizers shall be applied according to manufacturers' specifications or vegetation shall be planted on all inactive construction areas (i.e., previously graded areas inactive for 10 days or more and not scheduled for additional construction activities within 12 months) to the extent feasible.
3. Exposed pits (i.e., gravel, soil, dirt) with 5 percent or greater silt content shall be watered twice daily, enclosed, covered or treated with non-toxic soil stabilizers according to manufacturers' specifications.
4. All other active sites shall be watered at least twice daily.
5. All grading activities shall cease during second stage smog alerts and periods of high winds (i.e., greater than 25 mph) if soil is being transported to off-site locations and cannot be controlled by watering.
6. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer).
7. A construction relations officer shall be appointed by the Applicant to act as a community liaison concerning onsite construction activity, including resolution of issues related to fugitive dust generation.
8. Diesel fueled onsite generators shall not be used during construction of the proposed Project.
9. All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite, or shall be paved.
10. Streets shall be swept if visible soil material has been carried onto adjacent public paved roads.
11. Construction equipment shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

12. Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce offsite transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.
13. Traffic speeds on all unpaved roads shall not exceed 15 mph.
14. The Applicant shall use low emission vehicles to the extent technologically and economically feasible. This may include vehicles using alternative fuels, low sulfur diesel, diesel with particulate traps, methanol, or electricity.
15. The Applicant shall implement the use of low emission technology to the extent technologically and economically feasible.
16. The Applicant shall comply with applicable Proposition 65 notice requirements in the event that construction activities utilize toxic materials, or cause toxic materials to be released into the air, including if toxics are identified in the fugitive dust.
17. In order to reduce the long-term mobile source emissions associated with the proposed Project, the Applicant shall continue to implement transportation systems management and demand management measures and comply with SCAQMD Rule 2202, which applies to all employers who employ 250 or more persons on a full or part-time basis at a single worksite. This rule, which aims to reduce volatile organic compounds (VOCs), NO_x, and CO, provides employers a menu of options that they can choose from to reduce emissions related to employee commutes.
18. The Applicant shall provide alternative refueling stations within the Project at a ratio of one per 1,000 parking spaces distributed throughout the Project as the parking is developed.

Adverse Effects: With implementation of the mitigation measures described above, Project construction would continue to generate NO_x, CO, ROC, and PM₁₀ emissions that exceed SCAQMD regional significance thresholds for construction activities. Therefore, construction of the proposed Project would have a significant and unavoidable impact on regional air quality. This impact, however, would be short-term in nature. Local air quality impacts associated with construction emissions would remain less than significant. During the operational phase, the proposed Project would result in regional emissions that exceed SCAQMD significance thresholds for CO, NO_x, PM₁₀, and ROC. The mitigation measures identified above would reduce these air quality impacts to the degree technically feasible, but emissions would remain above SCAQMD significance thresholds. Therefore, operation of the proposed Project would have a significant and unavoidable impact on regional air quality. No significant impacts to local air quality would result from Project operations.

TRANSPORTATION/CIRCULATION (TRAFFIC)

Impacts: The realignment of 12th Street between Figueroa and Flower Streets may require the partial or full closure of 12th Street, which could cause a temporary significant impact during construction. The Project would result in a significant traffic impact at 16 intersections during the weekday P.M. peak hour and 10 intersections during the Saturday evening peak hour. Potential residential street impacts could occur on 11th Street east of Burlington Avenue, and on 12th Street east of Burlington Avenue and between Valencia and Albany Streets, although the actual occurrence of such impacts is considered unlikely due to the fact that the arterial streets provide the most direct and convenient access to the Project site and experience with STAPLES Center has shown no significant traffic intrusion into the neighborhood. The Project would cause significant impacts at two *CMP* freeway-monitoring locations, even though these freeway segments would operate at LOS F without the Project.

Mitigation Measures:

1. Prior to construction, the Applicant shall, in consultation and cooperation with the South Park Event Coordinating Committee, develop and implement a Construction Management Plan for construction of the Project. The goals of the Construction Management Plan shall be to minimize conflicts with STAPLES Center and Convention Center operations and conflicts and delays in construction of the Project.

The Construction Management Plan shall provide for the coordination of construction staging areas and traffic controls, in order to assist in the orderly flow of pedestrian and vehicular traffic in the Project area, and to/from STAPLES Center and the Convention Center events; and of labor, materials and construction vehicles to the construction site, including the staging of delivery trucks on public streets surrounding the Project site. The Construction Management Plan shall also address measures to ensure adequate access to STAPLES Center and to the Convention Center, if temporary lane closures on adjacent roadways are required.

Prior to full implementation of mitigation measures in this section, the Construction Management Plan should consider the use of temporary operational techniques (e.g., coning, temporary/changeable signs, etc.), as appropriate to the circulation needs of particular events.

2. The Applicant shall be responsible for any relocation and/or modification of the existing Highway Advisory Radio system for the STAPLES Center, if required as a result of the construction of the Project.

In order to address significant traffic impacts the feasibility of physical improvements was investigated. Specific street mitigation measures are proposed at the following intersections.

3. Blaine Street/11th Street/SR-110 Southbound On-Ramp
4. Cherry Street & Pico Boulevard
5. Georgia Street & Olympic Boulevard
6. Francisco Street & Olympic Boulevard
7. Figueroa Street & Olympic Boulevard
8. Grand Avenue & 11th Street
9. SR-110 Northbound Off-Ramp/9th Street

The following mitigation measures are recommended to ensure that the residential neighborhood to the west of the Harbor Freeway is protected from significant traffic and parking impacts:

10. The Applicant shall fund up to \$100,000 for studies, evaluations, and implementation of a Neighborhood Traffic Management Plan, if necessary. Such actions would be carried out under the direction of the LADOT, with the participation of the Applicant. The Applicant would post a bond for the \$100,000 and monies would be released as a plan or individual measures are agreed upon and implemented. After a period of three years from the opening of the Project, the bond would be terminated and/or any unused monies returned to the Applicant. This program would include both traffic management measures, as well as the implementation of any residential permit parking district programs requested by the neighborhoods and approved by LADOT.

In addition to the measures identified above that would directly mitigate and/or avoid significant impacts, the following general mitigation measures shall be implemented, which would help traffic flow in the area and lessen the magnitude of unmitigated impacts:

11. The Applicant shall enhance connections and linkages to transit, particularly including physical linkages to the Metro Blue Line Station at Flower Street/Pico Boulevard, as well as directional signage to bus and rail lines, and the provision of landscaped bus stops with passenger amenities, such as benches and shaded areas.
12. The Applicant shall install six new bus shelters throughout the project area, at locations to be agreed between the Applicant, LADOT, and LACMTA. These will be City standard bus shelters at a minimum, although the Applicant may modify the design to fit in with the overall urban design/streetscape of the Project with the approval of the City.

13. The Applicant shall provide up to two transit information kiosks on-site (one on the Olympic properties and one on the Figueroa properties) for the purpose of providing information about the available transit in the area, and of dispensing tickets/passes, if feasible.
14. The Applicant shall install 30-foot wide crosswalks at Figueroa Street/Olympic Boulevard, Figueroa Street/Pico Boulevard, 12th Street/Flower Street, and Pico Boulevard/Flower Street, where and as feasible.
15. The Applicant shall initiate and maintain a transportation demand management program that will actively promote the use of transit and rideshare, including providing project employees and visitors with transit and rideshare information.
16. The Applicant shall provide off-site parking for employees (to the north, east and south of the Project) along with shuttle bus service from parking locations to the Project site.
17. The Applicant shall provide fixed signage on access/egress corridors to the project to help direct inbound traffic to parking facilities, and outbound traffic to arterials and freeway ramps, up to a total of \$25,000.
18. The Applicant shall participate in providing up to three additional changeable message signs (CMS), if necessary, on the surface street system in the Project area, that will be linked into the existing Traffic Operations Center (TOC), that will help direct traffic and ensure smooth traffic flows during Convention Center and STAPLES Center events and during closures of 11th Street.
19. The Applicant shall participate with Caltrans to provide one additional changeable message sign (CMS) on the freeway mainline system, if Caltrans determines it to be necessary or desirable.
20. The Applicant shall coordinate with Caltrans and LADOT to develop fixed and changeable signage programs to direct traffic to utilize the various different freeway off-ramps in the Project area, where necessary.
21. The Applicant shall participate in the existing South Park Event Parking & Circulation Management Plan, and the ongoing traffic management activities coordinated by the South Park Event Coordinating Committee.
22. The Applicant shall implement a minimum 2-foot or 4-foot dedication and 3-foot or 5-foot widening along the Project frontage, as necessary, to bring Olympic Boulevard up to Class II Major Highway standards, except where greater dedication and widening are needed for traffic mitigation.

23. The Applicant shall implement a minimum 2-foot dedication and 2-foot widening along the Project's Georgia Street frontage, north of Olympic Boulevard, as necessary, to bring Georgia Street up to Collector Street standards.
24. The Applicant shall implement a minimum 2-foot dedication and 2-foot widening along the Project's Francisco Street frontage north of Olympic Boulevard, as necessary, to bring Francisco Street up to Collector Street standards.

In order to facilitate the closure of 11th Street between Georgia Street and Figueroa Street, on a regular basis outside the morning and evening peak periods, the Applicant shall implement the following improvements:

25. Develop a Traffic Control Plan, requiring LADOT approval, prior to completion and public use of the plaza to the north of 11th Street. Among the potential measures that could be included in the plan are the following (subject to the approval of LADOT):
 - Implement temporary traffic barriers and pop-up bollards on 11th Street west of Figueroa Street and east of Georgia Street to prevent traffic entering 11th Street between Georgia and Figueroa during closure periods.
 - Add electronic signs to signal poles and signal mast arms at the intersections of 11th Street/Figueroa Street and 11th Street/Georgia Street, to indicate “No Entry,” “Turn Left,” and “Turn Right” during street closures.
 - Add changeable message signs at locations to be determined by LADOT, advising motorists of alternate routes to 11th Street during street closures. Such signs would be located in the immediate vicinity of the block of 11th Street to be closed, at the following intersections: 11th Street and Figueroa Street; Olympic Boulevard and Figueroa Street; Olympic Boulevard and Georgia Street; and 11th Street and Georgia Street.
 - Add similar signs on the street approaches to the block of 11th Street to be closed to give motorists advance warning and information of alternate routes, such as at the following locations: 11th Street, east of Flower Street; 11th Street, east of Olive Street; and Cherry Street, south of 12th Street.
 - If necessary, provide additional temporary measures such as coning temporary traffic lanes, at the following locations: Olympic Boulevard and Figueroa Street; Olympic Boulevard and Georgia Street; 11th Street and Georgia Street; and 11th Street and Figueroa Street.

Adverse Effects: The temporary full closure of 12th Street during street and utility realignment would cause a significant, unavoidable traffic impact. Significant impacts would remain at 16 locations in the weekday P.M. peak hour, although only one location would operate at an unacceptable level of service (i.e., LOS E). The remaining 15 locations would continue to

operate at satisfactory conditions, with eight locations operating at LOS C and seven locations operating at LOS D. During the Saturday evening peak hour, the impact analysis identified significant traffic impacts at 10 locations. The physical mitigation measures identified would eliminate five of these significant impacts and would reduce the impact at two additional locations. Significant impacts would remain at five locations, which would all operate at satisfactory conditions (four locations at LOS C and one location at LOS D). No physical capacity improvements have been identified to directly mitigate identified impacts on the two CMP freeway analysis locations, which are considered to be feasible within the confines of a Project-specific analysis.

TRANSPORTATION/CIRCULATION (PARKING)

Impacts: The overall Project parking supply of 6,260 spaces, including on-site and off-site spaces, would meet the overall *Zoning Code* requirement of 6,257 spaces. For a peak day, the total peak parking demand of 8,138 spaces on a Saturday would exceed the total Project parking supply of 6,260 spaces, a shortfall of 1,878 spaces. The on-site visitor need of 7,363 spaces would exceed the on-site supply of 5,310 spaces, a shortfall of 2,053 spaces. This excess demand would be met through off-site parking in the adjacent areas to the north and to the east, and through the existing abundance of off-site parking supply in both public and private lots. This parking demand would most likely be met in leased or public spaces to the north and east of the Project site. Since the peak parking demand occurs at night, the office spaces to the north of the Project site are prime candidates for shared parking opportunities. The Project would, therefore, conform to the requirements of the *Zoning Code* and parking impacts would be less than significant.

Mitigation Measures:

- a. Construction**
 1. The Applicant shall develop a Construction Management Plan, which shall provide for the coordination of construction areas and the replacement of STAPLES Center parking prior to commencing construction. During Project utility relocation, existing street parking shall be retained wherever possible.
 2. As part of the Construction Management Plan, measures to minimize parking impacts to STAPLES Center and other land uses in the area shall be developed (for example, the provision of permanent or temporary replacement parking). Delays in construction of the Project shall be avoided to the fullest possible extent.

b. Operation

3. The Applicant shall provide employee parking off-site to the northeast or south of the Project site in leased and/or owned spaces. The employees would be transported to the Project site by a shuttle bus system similar to that currently used for STAPLES Center employees. The off-site employee parking program would accommodate approximately 550 daytime employee spaces and 775 nighttime employee spaces.
4. The Project shall participate in the South Park Event Coordinating Committee, to coordinate parking management issues.

Adverse Effects: After the incorporation of recommended mitigation measures, no adverse effects to parking would occur.

TRANSPORTATION/CIRCULATION (PEDESTRIAN SAFETY)

Impacts: Construction of the Project could have the potential to impact pedestrian movement in the immediate vicinity of the construction sites. Project-related construction could require temporary lane closures on surrounding streets, particularly during utility relocation activity, although no complete closure of any major streets is anticipated. These temporary lane closures could temporarily reroute pedestrian access to STAPLES Center and the Convention Center from the parking facilities, constituting a temporary, but significant, impact to pedestrian circulation. During peak day conditions with a sold-out event at STAPLES Center (or a major consumer show at the Los Angeles Convention and Exhibition Center) and substantial off-site parking occurring for Project visitors, all segments of the sidewalk system would operate at acceptable levels of service and impacts would be less than significant.

Mitigation Measures:

1. The Applicant shall develop a Construction Management Plan, which shall provide for the coordination of construction areas and safe pedestrian movement throughout the Project area such that adequate and safe pedestrian access is maintained to STAPLES Center, the Convention Center and surrounding land uses during construction.
2. The Applicant shall coordinate with the Los Angeles Unified School District to provide crossing guards along identified pedestrian routes to the Tenth Street Elementary School in the vicinity of the construction site during construction activities.

3. Haul routes shall be established which minimize construction vehicle traffic passing by Tenth Street Elementary School.
4. Construction vehicles shall be prohibited from staging in front of either Los Angelitos Children's Center or Tenth Street Elementary School.
5. The Los Angeles Unified School District's Transportation Branch shall be provided with a construction schedule and shall be notified of the commencement of project construction. During construction, the Los Angeles Unified School District shall also be notified of any planned lane closures in the vicinity of the project.

Adverse Effects: With the application of the above mitigation measures, impacts relative to pedestrian safety during construction would be less than significant.

HAZARDOUS MATERIALS

Impacts: Additional excavation and ground clearing on any of the potential properties of concern may have the potential to disturb soil and/or groundwater contaminants, which could pose potential health risks and thus a significant impact to construction workers and employees, residents and visitors adjacent to the Project site. The demolition of the two remaining structures in the Figueroa Central area with asbestos containing materials or lead-based paint would have the potential to release these substances into the atmosphere if these substances are not properly stabilized or removed prior to demolition activity, which could result in a significant impact.

Operation of the Project and ancillary facilities would involve the use of small quantities of such potentially hazardous materials as solvents, detergents, and petroleum products. All potentially hazardous materials would be stored, handled, and disposed of in accordance with all applicable federal, state, and local regulations. Consequently, the Project operation would not be expected to pose any significant risks related to the accidental release of hazardous materials. Operational impacts would be less than significant.

Mitigation Measures: The following mitigation measures shall be employed during construction of the proposed Project:

1. Further investigation by a registered environmental professional of the potential soil and/or groundwater contamination on 1240 South Figueroa Street (APN 5138-025-004), 844 West Olympic Boulevard (APN 5138-009-002), and 931 West Olympic Boulevard (APN 5138-005-008) shall be conducted in accordance with the RWQCB, where applicable. Any required remedial action recommended by the registered environmental professional and approved by the RWQCB for any

contamination discovered during these investigations shall be fully implemented and documented.

2. Coordination of ongoing remediation activities with proposed Project construction shall be performed to ensure that soil cleanup is not stopped or impeded.
3. Removal of any asbestos-containing materials found in the only two onsite structures (Figueroa Central Properties) shall be conducted in accordance with the requirements of South Coast Air Quality Management District Rule 1403. Specific requirements of Rule 1403 include:
 - a. Implementation of a thorough survey of the affected facility prior to issuance of permits for any demolition or renovation activity, including inspection, identification, and quantification of all friable and certain non-friable asbestos-containing materials.
 - b. Surveys which include collection and analyses of representative asbestos building material samples, and quantification of these materials for asbestos abatement purposes prior to or during demolition.
 - c. Notification of the SCAQMD of the intent to demolish or renovate any facility at least ten days prior to commencing with the activity.
 - d. Removal of all asbestos-containing materials prior to any demolition or renovation activity that would break up, dislodge, or similarly disturb the material.
 - e. Use of prescribed procedures when removing asbestos-containing materials.
 - f. Placement of all collected asbestos-containing materials in leak-tight containers or wrapping.
 - g. Transportation and disposal of asbestos-containing materials as required by applicable regulations.
4. Lead-based paint assessments of the only two remaining structures on the Project Site (Figueroa Central Properties) shall be conducted prior to issuance of permits for any demolition activity involving a particular structure. These assessments will include use of x-ray fluorescent technology to identify buildings with lead-based paint. Lead-based paint found in any buildings shall be removed and disposed of as a hazardous waste in accordance with all applicable regulations.
5. In the event that previously undiscovered contaminated soil or hazardous materials are encountered at the Project site during construction, identification and remediation procedures shall be developed in accordance with applicable federal, State and City regulations which would ensure that the potential for the risk of upset would be below a level of significance.

Adverse Effects: After the incorporation of mitigation measures, no significant impacts from hazardous materials would occur.

NOISE

Impacts: During the heaviest periods of construction activity, the construction noise could potentially be as high as 89 dBA during short instances. At the Project construction site, noise would range from 74 to 85 dBA. The construction noise would range from 68 to 79 dBA at the apartment hotel located south of Pico Boulevard and West of Flower Street. During periods of less intensive activity, the construction noise would be lower. Construction on portions of the Olympic and Figueroa Properties would have the potential to exceed 75 dBA within 500 feet of the existing residential areas. Impacts to residential receptors (i.e., apartment building located north of Olympic Boulevard and east of Flower Street) associated with construction on the Olympic and Figueroa Properties would be significant. During operation, sensitive land uses located along portions of 9th Street (James Wood Boulevard), 11th Street, Figueroa Street, Flower Street, Olympic Boulevard, and Pico Boulevard would experience future traffic noise levels that exceed the City's CNEL guideline of 70 dBA.

Mitigation Measures:

The following mitigation measures are recommended for proposed development on the Project site.

a. Construction

Because noise associated with on-site construction activity would have the potential to exceed the level normally allowed under the City Noise Ordinance, the following mitigation measures are recommended to minimize construction-related noise impacts:

1. On-site construction activity that generates noise in excess of 75 dBA at a distance of 50 feet shall be limited to between 7:00 A.M. and 9:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturdays, unless the City extends such hours.
2. The Los Angeles Unified School District shall be provided with a construction schedule.
3. All construction equipment shall be in proper operating condition and fitted with standard factory silencing features.
4. Sound blankets shall be used on all construction equipment for which use of sound blankets is technically feasible.

5. If noise levels from construction activity are found to exceed 75 dBA at the property line of an adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor.
6. All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.
7. The Applicant shall notify residents within 800 feet of the Project construction site and in addition will post a notice in a local newspaper as part of the Construction Management Plan notifying residents of construction activity.

b. Operation

The following mitigation measures are recommended to address significant traffic noise impacts occurring during the event and during the post-event hour and from the bus staging area.

8. Entrances and exits from parking lots in the Olympic and Figueroa Properties parking areas shall be located to minimize impact on residential, motel, or hotel units.
9. As part of the *South Park Area Parking and Circulation Management Plan (PCMP)*, an operational traffic plan shall be implemented which minimizes the amount of Project generated traffic passing by sensitive receptors by providing traffic control personnel to direct departing vehicles along corridors that will have the least impact on sensitive receptors in the area.
10. All events in the Central Plaza that would involve the use of public address systems shall be required to obtain a permit from the City for operating amplified sound and speech equipment.

Adverse Effects: With the recommended mitigation measures, noise associated with construction activity would be reduced to the degree technically feasible. Nevertheless, impacts are likely to occur on the sensitive receptors located nearest to the Project site. Apartments located north, east, and south of the Project Site would occasionally experience high construction noise levels. This construction-related noise would constitute a significant unavoidable adverse impact of the Project.

Noise increases on Francisco Street north of Olympic Boulevard would be significant because of the increased vehicle traffic associated with the Project. Because of the source of the impact (i.e., moving vehicles), the only available measure to mitigate the impact would be to route

traffic onto Olympic Boulevard away from Francisco Street. No other feasible mitigation measures are available to reduce this impact to less than significant. This impact is also expected to occur during weekend operations. This would be a significant and unavoidable adverse impact.

PUBLIC SERVICES (FIRE)

Impacts: Construction of the proposed Project may result in temporary lane closures. However, due to the temporary and limited nature of the closures along roadways and the wide selection of alternate routes to and through the Project site, emergency access and response times would not be significantly affected. Implementation of the proposed Project would increase the need for LAFD fire protection and emergency medical services at the Project site. However, the Project site is within the required response distance of the nearest fire station and no significant impacts to LAFD staff and equipment capabilities are anticipated. Water service for fire fighting purposes would continue to be provided by the City of Los Angeles Department of Water and Power (DWP). In order to determine if the existing water system is adequate to meet fire flow demand, the Water Operations Division of DWP will conduct a flow study prior to issuance of any building permits.

Mitigation Measures: The following mitigation measures for fire protection and emergency medical service shall be employed during the construction and operation of the proposed Project:

1. The Applicant shall ensure that during construction, LAFD access will remain clear and unobstructed.
2. Proposed roadway modifications shall be reviewed by the LAFD to assure adequate access to the Project site and adjacent uses.
3. The DWP shall conduct a flow test prior to the issuance of certificates of occupancy to determine whether the existing water system meets fire flow requirements imposed by the Fire Department for the Project. The Applicant shall undertake and complete those required improvements identified by the DWP as a result of findings of the flow test.
4. The proposed Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the *Fire Protection and Fire Prevention Plan Element*, as well as the *Safety Element*, both of which are elements of the General Plan of the City of Los Angeles.
5. The Applicant shall submit definitive plans and specifications to the LAFD and requirements for necessary permits shall be satisfied prior to commencement of any portion of the proposed Project.

6. The Project shall provide access for LAFD apparatus and personnel to and into all structures shall be required. At least two different ingress/egress roads for each area, which will accommodate major fire apparatus and provide for major evacuation during emergency situations, shall be required. Additional vehicular access may be required by the LAFD where buildings exceed 28 feet in height.
7. The Applicant shall submit plans that show proposed access road(s) and turning area(s) for LAFD approval.
8. Project development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.
9. Project design shall use standard cut-corners on all street corners to permit easy turning access for LAFD vehicles.
10. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of an LAFD aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
11. Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No fire lane or dead ending street shall be greater than 700 feet in length or secondary access shall be required.
12. All access roads, including fire lanes, shall be maintained in an unobstructed manner, and removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area, in accordance with Section 57.09.05 of the *Los Angeles Municipal Code*.
13. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance, or exit of individual units.
14. To accommodate an LAFD apparatus, if necessary, the minimum outside radius of paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway.
15. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.
16. No building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

17. Adequate off-site public and on-site private fire hydrants may be required. Their number and location are to be determined after the LAFD's review of the Project's plot plan. The maximum distance between fire hydrants on roads and fire lanes in a regional commercial area is 300 feet.
18. The Applicant shall coordinate with the South Park Event Coordinating Committee to address issues relating to vehicle and pedestrian flows during major events and to identify measures for ensuring LAFD access to the Project site, parking lots, and the immediate vicinity during the pre-event and post-event periods.

Adverse Effects: After the incorporation of mitigation measures, no adverse effects to fire and emergency medical services, response times or fire flow would occur.

PUBLIC SERVICES (POLICE)

Impacts: Event-related population increases would generate demand for additional security officers during events at the Project site and at STAPLES Center, especially for crowd and traffic control. The extent of additional protection needed would vary in accordance with the type of event and expected number of spectators. Reporting Districts for portions of the Project site currently have a higher than average crime rate (in comparison with the average for all 52 Reporting Districts in the Central Area) for breaking and entering into automobiles and theft. The Project would generate off-site parking during peak-usage, which could increase these kinds of crimes and place an increased demand on police protection services. During events at the STAPLES Center and the Los Angeles Convention and Exhibition Center, and during the post-event period, traffic could result in considerable congestion at many area streets and intersections in the vicinity of the project site, which could potentially cause significant delays in LAPD emergency response times for responses within or through the project site, thereby creating delays for other occupants and residents in the area.

Mitigation Measures: The following mitigation measures would be employed to provide adequate on-site security and minimize on-site demand for police protection service during the construction and operation of the proposed Project:

1. The Applicant shall ensure that during construction, LAPD access will remain clear and unobstructed.
2. Proposed roadway modifications shall be reviewed by the LAPD to assure adequate access to the proposed Project and adjacent uses.
3. The Applicant shall provide security features on the construction site(s), such as guards, fencing, and locked entrances.

4. The Applicant shall submit plot plans for all proposed development to the Los Angeles Police Department's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented to the extent feasible.
5. The Applicant shall file building plans with the LAPD Central Area Commanding Officer. Plans shall include access routes, floor plans, and any additional information that might facilitate prompt and efficient police response.
6. Alarms and/or locked gates shall be installed on doorways providing public access to commercial facilities.
7. Landscaping shall not be planted in a way that could provide cover for persons tampering with doors or windows of commercial facilities, or for persons lying in wait for pedestrians or parking garage users.
8. Additional lighting shall be installed where appropriate, including on the Project site and in parking garages, as determined in consultation with the LAPD.
9. Safety features shall be incorporated into project design to assure pedestrian safety, assist in controlling pedestrian traffic flows, and avoid pedestrian/vehicular conflicts on-site. Safety measures may include provision of security and traffic control personnel; approved street closures for special events or peak pedestrian activity; clearly designated, well-lighted pedestrian walkways on-site; special street and pedestrian-level lighting; physical barriers (e.g., low walls, landscaping), particularly around the perimeter of the parking garages, to direct pedestrians to specific exit locations that correspond to designated crosswalk locations on adjacent streets; guide signs for Project site-bound pedestrians approaching the site from the Pico Blue Line Metro station; and provision of an on-site bus passenger drop-off facility.
10. The Applicant shall develop and implement a new or modified Security Plan to minimize the potential for on-site crime and the need for LAPD services. The plan would outline the security services and features to be implemented, as determined in consultation with the LAPD. The following shall be included in the plan:
 - a. Provision of an on-site security force that would monitor and patrol the Project site. During operational hours, security officers shall perform pedestrian, vehicular, and/or bicycle patrols.
 - b. Implementation of a video camera surveillance system and/or a closed-circuit television system;
 - c. Additional security features shall be incorporated into the design of proposed parking facilities, including "spotters" for parking areas, and ensuring the

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- availability of sufficient parking either on- or off-site for all building employees and anticipated patrons and visitors;
- d. Security lighting incorporating good illumination and minimum dead space in the design of entryways, seating areas, lobbies, elevators, service areas, and parking areas to eliminate areas of concealment. Security lighting shall incorporate full cutoff fixtures which minimize glare from the light source and provide light downward and inward to structures to maximize visibility;
 - e. Provision of lockable doors at appropriate Project entryways, offices, retail stores, and restaurants;
 - f. Installation of alarms at appropriate Project entryways and ancillary commercial structures;
 - g. The City shall approve of all businesses desiring to sell or allow consumption of alcoholic beverages through specific plan regulation or issuance of one or more Conditional Use Permits;
 - h. Accessibility for emergency service personnel and vehicles into each structure, and provision to the Central Area Commanding Officer of detailed diagram(s) of the Project site, including access routes, unit numbers, and any information that would facilitate police response.
 - i. In addition, security procedures regarding initial response, investigation, detainment of crime suspects, LAPD notification, crowd and traffic control, and general public assistance shall be outlined in the Security Plan. The plan would be subject to review by the LAPD, and any provisions pertaining to access would be subject to approval by the City of Los Angeles Department of Transportation.
11. The Applicant shall develop and implement an Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by the LAPD, and any provisions pertaining to access would be subject to approval by the City of Los Angeles Department of Transportation.
12. The Applicant shall coordinate with the South Park Event Coordinating Committee to address issues relating to vehicle and pedestrian flows during major events and to identify measures for ensuring LAPD access to the Project site, parking lots, and the immediate vicinity during the pre-event and post-event periods.
13. The Applicant shall complete an annual assessment of off-site Project related crime, in coordination with the LAPD, subject to the approval of the City Planning Department, and in response develop and implement additional security measures.

Adverse Effects: After the incorporation of mitigation measures, no adverse effects to police protection services or response times would occur.

PUBLIC SERVICES (SCHOOLS)

Impacts: The development of 800 new residential uses would result in the increased demand for school facilities by generating an estimated total of 302 new students. This total would be made up of 134 elementary, 76 middle, and 92 high school students. The Project does not contain any school construction, so there is no impact on the supply of school facilities available to students generated by the Project development. This student generation would exceed the forecasted future available capacities of the local schools.

Mitigation Measures: Any significant impacts on the demand for schools within LAUSD attributable to residential construction are considered mitigated by the Applicant's payment of development fees to LAUSD prior to issuance of building permits. Development fees payable to LAUSD are calculated by applying the maximum construction fees specified by the State Allocation Board, \$2.05 per square foot of residential construction and \$0.33 per square foot of commercial construction. State law (SB 50) states that the maximum fee amounts allowed by the bill are "deemed to provide full and complete school facilities mitigation" for purposes of CEQA.

Adverse Effects: After the incorporation of the recommended mitigation measure, no adverse effects to schools or school facilities would occur.

PUBLIC SERVICES (PARKS AND RECREATION)

Impacts: Implementation of the proposed Project is not anticipated to result in construction-related impacts to parks and recreational facilities because construction workers are highly transient in their work locations and would not likely utilize off-site facilities in proximity to a job site. The development of 800 new dwelling units within the proposed Project would add an estimated 2,272 residents to the South Park Area, resulting in the increased use of existing neighborhood, community and regional parks in the Central City Community Plan Area, where parkland deficiencies have been identified. Therefore, the proposed Project would result in a potentially significant impact to the delivery of parks and recreation services.

Mitigation Measures: In order to mitigate the proposed Project's impacts on the Central City area's existing and future deficiency of parkland and open space, the following mitigation measures are recommended:

1. The Project shall incorporate project design features such as plazas, terraces and paseos that encourage access to a variety of open space uses for residents and visitors to the Project site.

2. The Applicant shall pay required fees to the City of Los Angeles Recreation and Parks Department for the purpose of providing future parks and open space in the Central City area.

Adverse Effects: The Project would satisfy the open space requirements of the City's Municipal Code for multi-family housing. However, the Project would not meet the Department of Recreation Parks and planning standard of four acres per 1,000 residents. Therefore, the Project would have a significant impact on parks and recreational facilities.

UTILITIES (WATER)

Impacts: The Project is estimated to have a buildout water demand of approximately 1,660,000 gallons per day. The Project's increases in water demand with respect to existing and anticipated supplies would not be significant. The local water infrastructure would be adequate to provide for the increase in domestic water demand.

Mitigation Measures: The proposed Project shall comply with all applicable sections of the City of Los Angeles Water Conservation Ordinances (Ordinance Nos. 163,532; 164,093; 165,004; 166,080; and subsequent amendments). Specifically, no hose washing of roadways, paved parking areas, plaza areas, or walkways shall be allowed. Low flow toilets and plumbing fixtures that prevent water loss shall be installed, decorative fountains shall use recycled water, water leaks shall be repaired in a timely manner, and drinking water shall be served only upon request. In adherence to the City's Landscape Ordinance No. 170,978, plants selected for landscaping shall comply with xeriscape (drought-resistant, low maintenance) requirements. Finally, the Project shall comply with any additional mandatory City-imposed water use restrictions required as a result of drought conditions.

Although development of the Project is not expected to produce significant impacts to water supply services, the following measures will ensure that water resources will be conserved to the extent feasible:

1. The Project and occupants shall adhere to all applicable DWP rules and regulations. The DWP shall be consulted regarding feasible water conservation features, including xeriscape practices (e.g., use of drought-tolerant landscaping and drip irrigation systems), which can be incorporated into the design of the project. All necessary infrastructure improvements shall be constructed to meet the requirements of the DWP.
2. Automatic sprinkler systems shall be set to irrigate landscaping during morning or evening hours to reduce water losses from evaporation. Sprinklers shall be reset to

water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

3. The DWP shall conduct a flow test prior to the issuance of building permits to determine whether the existing water system meets fire flow requirements imposed by the Fire Department for the Project. The Applicant shall undertake and complete those required improvements identified by the DWP as a result of findings of the flow test.
4. The Applicant shall obtain a DWP Letter of Service prior to issuance of building permits.

Adverse Effects: With adherence to all applicable regulations and implementation of the measures outlined above, the Project impacts to domestic water service, fire flows, and the water infrastructure system would be less than significant.

UTILITIES (SEWER)

Impacts: The existing sewer infrastructure surrounding the Project site would be adequate to provide for the Project. The proposed Project is estimated to have a buildout sewage generation estimated at 1,383,450 gallons per day, which represents a substantial increase over existing conditions but would not impact the existing sewer system.

Mitigation Measures: The Project is not expected to produce significant impacts to sewer service; however, compliance with City and State codes, ordinances, and permit requirements will ensure that wastewater generation will be reduced to the maximum extent feasible. Specifically, the Project shall comply with the following:

1. The Applicant shall comply with procedural requirements of City ordinances regulating connections to the City sewer system (e.g., Ordinance No. 166,060).
2. All necessary infrastructure improvements shall be constructed to meet the requirements of the Department of Public Works.
3. The Applicant shall comply with all provisions of Ordinance No. 162,532, which reduces water consumption levels, thereby restricting wastewater flows. Water saving devices to be installed shall include low flow toilets and plumbing fixtures that prevent water loss.
4. The Applicant shall develop and implement a construction management plan for any temporary lane closures that may be necessary (including temporary coning, signing, road striping, signalization, etc.), to assist in the orderly flow of vehicular and

pedestrian traffic in the project area, and to ensure the maintenance of adequate access to STAPLES Center and the Convention Center.

Adverse Effects: With adherence to all applicable regulations and implementation of the measures outlined above, the Project impacts to sanitary sewer service and the sewage infrastructure system would be less than significant.

UTILITIES (SOLID WASTE)

Impacts: Operation of the Project is estimated to generate approximately 31,170 pounds of solid waste per day. The Project would implement source reduction, recycling, and diversion measures, which would serve to reduce the amount of waste disposed of at area landfills. The most likely destinations for solid waste generated by the proposed Project would be the Sunshine Canyon Landfill and the Chiquita Canyon Landfill. The Project would not result in significant impacts to the remaining disposal capacity of these facilities or their anticipated closure dates.

Mitigation Measures: The Project shall comply with all applicable City, County, and State requirements regulating solid waste disposal, including the California Solid Waste Reuse and Recycling Access Act of 1991 (AB 939), which requires that adequate waste storage facilities be provided for the collection and storage of recyclable and green waste materials. The Project is not expected to produce significant impacts to landfill capacity. Waste management practices shall be implemented during both construction and operation in order to reduce the quantity of solid waste generated. The following measures have been established to achieve waste reduction goals:

1. Prior to the issuance of building permits, a Recycling and Resource Recovery Plan shall be prepared to coordinate resource conservation and recycling for the Project. Prior to implementing this plan, it shall be reviewed and approved by the City of Los Angeles Department of Public Works, Solid Resources Citywide Recycling Division. The plan shall include the following:
 - a. A recycling program shall be designed to reduce the amount of solid waste going to landfills, in line with the City's goals and continued efforts towards a Citywide 50 percent waste reduction rate over 1990 waste diversion levels.
 - b. Measures for maximizing the recycling of demolition and construction debris, including a proposed layout for source separation of materials and recycling bins at the Project site and utilization of prospective contractor(s) specializing in demolition and construction waste management shall be implemented, to the extent feasible.
 - c. Recycling bins and chutes shall be provided at appropriate locations to promote the recycling of paper, metal, glass, and other recyclable materials.

- d. An education/outreach program for all Project employees shall be instituted to reduce the output of solid waste through recycling and reduction of waste at the source.
- e. Promote recycling to patrons.
2. Trash compaction facilities shall be provided in all occupied structures, where deemed feasible.
3. Yard waste management techniques shall be incorporated into the maintenance of the Project, including use of drought tolerant plants and mulching or composting of regular landscape maintenance waste where appropriate.

Adverse Effects: No significant adverse effects with respect to solid waste would result from development of the proposed Project.

GEOLOGIC AND SEISMIC HAZARDS

Impacts: No significant impacts to geology and soils are anticipated during construction of the proposed project. The Elysian Park-Wilshire Thrust Zone is potentially located below the entire Central City Subregion. As ground shaking has the potential to affect all structures within the City of Los Angeles, this hazard would pose a potentially significant, but mitigable, impact associated with the Project site. Although not well-defined, the portion of the Project site located north of Pico Boulevard and east of South Figueroa Street (Figueroa South/Figueroa Central development areas) is located within what was the major oil drilling area for this former oil field and this area would be considered a potential hazard for subsidence.

Mitigation Measures: The proposed Project must comply with all applicable City of Los Angeles Building Code regulations with regard to seismic safety requirements and shall be approved by the City Department of Building and Safety prior to the issuance of building permits. Geotechnical investigations shall be performed by a registered geotechnical engineer. In addition, the following mitigation measures have been established for potential seismic and subsidence hazards potentially impacting future development on the Project site:

1. A State-certified geologist shall review all excavations for evidence indicative of faulting, or seismically-induced ground deformation. If during grading, an active fault is determined to extend through the area, appropriate building setbacks from the fault line shall be established.
2. An assessment of the potential for subsidence at the Project site shall be conducted as part of the geotechnical evaluation.

3. To assist in response to a seismic event, an emergency response and building-specific evacuation plan for Project structures shall be developed in coordination with the Los Angeles Fire Department prior to the Certificate of Occupancy being granted by the City of Los Angeles. Such information shall be disseminated to employees to reduce the potential for human injury.
4. To assist in response to a seismic event, an emergency response and building-specific evacuation diagram for Project structures shall be posted in each on-site building. Such signage shall be posted in appropriate locations to reduce the potential for injury to visitors and employees.

Adverse Effects: The proposed Project would potentially expose both employees and visitors to on-site seismic hazards. However, the proposed Project would be designed so that there would be no increased threat of exposing people, property, or infrastructure to geotechnical or seismic hazards. In addition, the Project is not subject to any greater seismic risk than any other site within the Central City subregion of the City of Los Angeles. Therefore, with implementation of the recommended mitigation measures, any potential geologic or seismic impacts would be reduced to less than significant levels.

ARCHITECTURAL/HISTORIC RESOURCES

Impacts: The proposed Project would not result in any adverse effects to historic resources. There are no historic resources located on the Project site. Those properties adjacent to the Project site, evaluated as 5S3 (i.e., 1037, 1100 and 1140 South Flower Street) are not eligible for federal, State, or local designation. In addition, they are not considered historic resources under CEQA. Therefore, the impact of the project on properties identified as 5S3 would be considered less than significant. In addition, the proposed Project would not result in significant impacts to the Petroleum Building or Hotel Figueroa. The proposed Project would not impact the Variety Arts Center, adjacent to the Project site, as Project structures will be set back from the Variety Arts Center, thus minimizing any impact upon this historic five-story building. In addition, the front façade of the Variety Arts Center will not be blocked by the Project development or operation.

Mitigation Measures: No significant impacts upon historical resources have been identified, however, the following mitigation measure would apply to protect against destruction of paleontological resources that may be encountered during construction:

1. If unknown paleontological, archaeological and/or cultural materials are discovered during any grading or construction activity, work will stop in the immediate area. Upon such discoveries the contractor shall immediately notify the client and the City of Los Angeles. A paleontologist and/or archaeologist shall be consulted to determine the discovery's significance and, if necessary, formulate a mitigation plan,

including avoidance alternatives, to mitigate impacts. Work can only resume in that area with the approval of the City of Los Angeles and paleontologist and/or archaeologist.

2. New construction adjacent to the Variety Arts Center shall respect its historic character through conformance with the Secretary of the Interior's Standards for Treatment of Historic Properties.

Adverse Effects: No significant impacts to historical resources would occur.