FINDINGS

1. **General Plan Land Use Designation.** The subject property is located within the area covered by the South Los Angeles Community Plan Revision, which was adopted by the City Council on March 22, 2000. The South Los Angeles Community Plan designates the approximately 15-acre project site containing the existing Los Angeles Memorial Sports Arena (project site) and nearly all of Exposition Park, including the area subject to the Coliseum District Specific Plan as Open Space (OS) with corresponding zones of OS and A1, and identifies Exposition Park as a "major opportunity site." The OS designation permits parks, community centers and public serving facilities under the ownership or operation of a public agency. In addition, a portion of the project site fronting Figueroa Street is identified by the General Plan Framework for the South Los Angeles Community Plan area as a Regional Center, which is a designated focal point of regional commerce, identity and activity identified for commercial uses, major entertainment and cultural facilities and supporting services. The City Council has initiated a Specific Plan Amendment of the Coliseum District Specific Plan (Specific Plan) and a new Sign Supplemental Use District (Sign District) where findings would be required to demonstrate that the Coliseum District Specific Plan Amendment and Soccer Stadium project are consistent with the Land Use designation for the South Los Angeles Community Plan.

2. **General Plan Text.** The South Los Angeles Community Plan identifies Exposition Park as a "major opportunity site" and designates the project site and all of Exposition Park as Open Space (OS). In identifying Exposition Park as a "major opportunity site" the South Los Angeles Community Plan provides the following guiding principles in the development of Exposition Park and the facilities it holds:

   - The need for community empowerment regarding future development.
   - The opportunity for a variety of jobs and job training for community residents.
   - Development reflective of community needs.
   - The need for appropriate development plans to prevent incongruent, incremental development.

   The Specific Plan Amendment and Supplemental Use Sign District for the Soccer Stadium project are consistent with the guiding principles in the development of Exposition Park and the facilities it holds.

   <u>The need for community empowerment regarding future development.</u>

   The Soccer Stadium project would be an in-fill development allowing for redevelopment of the underutilized Los Angeles Memorial Sports Arena (Sports Arena) site by modernizing and diversifying the existing uses at the project Site, while remaining consistent with the existing and proposed scale of development in the surrounding area. The Soccer Stadium project's ancillary uses would provide additional amenities to support both stadium operations and the surrounding community, including restaurant and retail uses, which would create new permanent jobs and add additional accessible amenities for community residents. In addition, the ancillary uses would enable the creation of a state-of-the-art sports and entertainment complex that would be a catalyst for revitalizing the southern end of the Figueroa sports and entertainment corridor in South Los Angeles, thereby empowering the surrounding community and reinforcing Exposition Park as an important cultural, sports, entertainment and activity hub for area residents and the community at large.

The opportunity for a variety of jobs and job training for community residents.

The Specific Plan Amendment and Sign District presents a major economic opportunity to create a variety of jobs, job training, and stimulate investment in the South Los Angeles community. The Soccer Stadium project is estimated to cost upwards of $250 million and construction is estimated to result in approximately $274 million in economic output. The project will not utilize any public funds. Operation of the Soccer Stadium project is estimated to generate approximately $129 million in annual economic output. The project would maintain and enhance the economic vitality of the area by creating approximately 1,228 job temporary job opportunities associated with the construction of the project and approximately 1,840 permanent jobs opportunities during operation of the project. Many employment openings created with the development of the soccer stadium are anticipated to be filled by community residents, and the project Applicant has publicly committed to the Coliseum Commission that it will achieve 40 percent local hire during project construction and operations.

Development reflective of community needs.

The Soccer Stadium project would replace the existing Sports Arena, which has become underutilized, with a professional soccer stadium intended to be the home of a MLS team and the location of a variety of other major and special events. The Soccer Stadium project also would include the addition of a major conference facility, World Football museum, team store, and retail, restaurant and office uses. The Soccer Stadium project would provide this area of South Los Angeles with an identity necessary to attract new patrons, customers, businesses and visitors, along with generating an active environment that will reinvigorate the surrounding community. In addition, the Soccer Stadium project would provide approximately 143,000 square feet of new public open space on the Sports Arena site, including wider sidewalks and plazas that will diversify and increase the amount of accessible open space for the community in Exposition Park. In particular, the plaza at the northwest corner of the project Site (Northwest Plaza) would provide a new public gathering space for pre-game events and other game-day activities and would serve as an active public space on non-event days (e.g., for small concerts, red carpet events, and community events such as food festivals or art fairs). Therefore, the Specific Plan Amendment and Sign District would allow the development of a diverse array of entertainment, restaurant, business and other public uses that will help address the community's and the region's needs.

The need for appropriate development plans to prevent incongruent, incremental development.

The Specific Plan Amendment and Sign District contain regulations would maintain the prevailing scale, neighborhood character, and land uses within Exposition Park and its surrounding neighborhoods and districts. The Specific Plan Amendment and Sign District would allow the development of the Soccer Stadium project and would not replace or otherwise alter the land uses, museums, cultural and entertainment venues in Exposition Park, or other neighboring commercial and residential uses. The Specific Plan Amendment and Sign District would allow for the continued revitalization of Exposition Park.

Open Space

The South Los Angeles Community Plan text explains that Open Space should function in one or more of the following ways:

1. Recreational and educational opportunities.
2. Scenic, cultural, and historic values.

3. Public health and safety.
4. Preservation and creation of community identity.
5. Rights-of-way for utilities and transportation facilities.
6. Preservation of natural resources or ecologically important areas.
7. Preservation of physical resources.

With the Specific Plan Amendment and Sign District, the Soccer Stadium project would be consistent with the South Los Angeles Community Plan Open Space functions. The Soccer Stadium project's World Football museum would provide for educational opportunities and cultural values consistent with the existing cultural facilities in Exposition Park including the California Science Center, the Los Angeles County Museum of Natural History, the California African-American Museum, and the Wallis Annenberg Building for Science Learning and Innovation. In addition, the Soccer Stadium project would preserve and create community identity by replacing the existing Sports Arena, which has become underutilized, with a professional soccer stadium and entertainment complex while adding approximately 143,000 square feet of improved public open space that would consist of pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas, potentially including water features, public art, and seating areas.

The South Los Angeles Community Plan text also includes the following relevant land use objective and policies related to Open Space:

Objective 5-1: To preserve existing open space resources and where possible develop new open space.

> Policy 5-1.1: Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.
>
> Policy 5-1.2: Require development in major opportunity sites to provide public open space.

The Soccer Stadium project would add approximately 143,000 square feet of improved public open space that would consist of pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas, potentially including water features, public art, and seating areas. These open space areas would contribute to passive and visual open space within Exposition Park, which is a designated major opportunity site. Pedestrian plazas would include a main plaza at the northwest corner of project Site (Northwest Plaza) and a large pedestrian gathering area along Figueroa Street. The Soccer Stadium project would add available open space and substantially increase the project site's accessibility to the public as compared to the existing Sports Arena, which is surrounded by fencing.

Commercial

Within the Land Use Chapter of the Framework Element of the General Plan, the Specific Plan area, Sign District, and project Site are located adjacent to and partially within a designated Regional Center that generally corresponds with Figueroa Street. A Regional Center is defined as:

> *...a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. Generally different types of Regional Centers will fall within the range of floor area ratios from 1.5:1 to 6.0:1. Some will only be commercially oriented; others will contain a mix of residential and commercial uses. Generally, Regional Centers*

are characterized by 6- to 20-stories (or higher). Regional Centers are usually major transportation hubs.

The Land Use Chapter also indicates that Martin Luther King, Jr. Boulevard adjacent to the Specific Plan area is designated as a Mixed Use Boulevard. Mixed Use Boulevards are described as connections between the City's neighborhood districts and community, regional, and Downtown centers. Mixed-use development is encouraged along these boulevards, with the scale, density and height of development compatible with the surrounding areas.

Because the Specific Plan area, Sign District, and project Site are located adjacent to and partially within a Regional Center and adjacent to a Mixed Use Boulevard, the following objectives from the South Los Angeles Community related to Commercial uses are also relevant:

Objective 2-1: To conserve and strengthen viable commercial development.

The Soccer Stadium project would add an approximately 9,000-square-foot conference facility, a World Football museum, team store, and a mix of retail and restaurant uses to the existing commercial uses in the Exposition Park area. These ancillary uses would be available to support Soccer Stadium uses and would be open to the public on nonevent days. These uses would provide neighborhood residents and visitors a diversity of commercial options. As the Soccer Stadium project is expected to attract Major League Soccer (MLS) patrons and new visitors to Exposition Park, the Soccer Stadium project would generate new customers for businesses in the area.

Objective 2-5: To enhance the appearance of commercial districts.

The Soccer Stadium project would include improvements immediately adjacent to the new stadium and across from the Figueroa-adjacent commercial district. Such improvements would include the provision of a 40- to 70-foot set-back along Figueroa Street. This area would be developed as a broad, landscaped sidewalk to provide sufficient space for patrons to circulate and queue on event days and provide an inviting and safe pedestrian environment on non-event days.

The Soccer Stadium project would include a Northwest Plaza to provide a welcoming pedestrian environment with a mix of hardscape and landscaped areas, and may include water features, public art, and seating areas. Sound, lighting, and video components also would be incorporated into the design of the plaza, adding to its aesthetic appeal. As the primary gathering plaza for game days and special events, the Northwest Plaza would be a landscaped and visually appealing public hub from which site visitors could patronize on- and off-site businesses.

Objective 2-3: To attract uses which strengthen the economic base and expand market opportunities for existing and new businesses.
Objective 2-6: To maintain and increase the commercial employment base for community residents whenever possible.

The Soccer Stadium project presents a major economic opportunity to create jobs and stimulate investment in in the South Los Angeles community. The Soccer Stadium project is estimated to cost upwards of $250 million and construction is estimated to result in approximately $274 million in economic output. Operation of the Soccer Stadium project is estimated to generate approximately $129 million in annual economic output. Development of the project would enhance the economic vitality of the area by creating approximately 1,228 job temporary job opportunities associated with the construction of the project and approximately 1,840 permanent jobs opportunities during operation of the project.

In addition to the approximately 22,000 seat professional soccer stadium (Soccer Stadium), the Soccer Stadium project also would include a World Football museum, conference, retail, and restaurant uses that would directly benefit Exposition Park and the surrounding community. The Soccer Stadium project could attract new patrons to the City and the South Los Angeles area for MLS matches and other community events providing new employment opportunities for local residents and increasing revenues for area businesses. The Soccer Stadium project would bring more visitors to Exposition Park, and anchor the southern end of the sports and entertainment venues located on Figueroa, which extend to LA Live and Dodger Stadium to the north. The project would create thousands of construction and permanent jobs, bring critical investment to Exposition Park, and develop long-needed community serving facilities like restaurants and meeting spaces.

Framework Element.

The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including South Los Angeles, the Specific Plan area, and concomitant Sign District. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide polices regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services.

The Specific Plan area is currently developed with the Coliseum, the Sports Arena, and surface parking lots. Redevelopment of the Sports Arena site would be the replacement of an existing and outdated sports and entertainment venue. By enabling the redevelopment of the underutilized Sports Arena site, the Specific Plan Amendment and Sign District would be consistent with the character of land uses in the area and would further several goals and policies of the Framework Element.

Land Use Chapter. The Land Use Chapter of the Framework Element provides primary objectives to support the viability of the City's residential neighborhoods, commercial and industrial districts, and encourage sustainable growth in appropriate locations. The Land Use Chapter establishes land use categories which are broadly described by ranges of intensity/density, heights, and lists of typical uses. The designated land use categories are Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. The Specific Plan area is located adjacent to and partially within a designated Regional Center that generally corresponds with Figueroa Street. The Land Use Chapter also designates Martin Luther King, Jr. Boulevard along the southern edge of the Specific Plan area as a Mixed Use Boulevard.
Additionally, the Framework Element designates the eastern edge of the Specific Plan area as being located within a Pedestrian-Oriented District that generally corresponds with Figueroa Street.

The Specific Plan Amendment and Sign District, which would facilitate the development of the Soccer Stadium project, would meet specific objectives and policies contained in the Land Use Chapter of the Framework Element of the Los Angeles General Plan as follows:

Objective 3.1 - Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

The Specific Plan area including the project Site is located within Exposition Park, which is home to several cultural, entertainment, and sporting facilities.

The Soccer Stadium project would replace the existing Sports Arena, which has become underutilized, with a professional soccer stadium intended to be the home of a MLS team and a variety of other major and special events. The Soccer Stadium project also would include a major conference facility, World Football museum, team store, and retail, restaurant and office uses; and the Northwest Plaza which would provide a new public gathering space for pre-game events and other game-day activities and would serve as an active public space on non-event days. The Specific Plan Amendment and Sign District would allow the development of the Soccer Stadium project adding a diverse array of entertainment, restaurant, business and other public uses to the already diverse existing set of uses within the Specific Plan area and Exposition Park.

Objective 3.2 - Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.

> Policy 3.2.4 - Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.

The ancillary facilities would include a conference facility that could be used by the University of Southern California, other Exposition Park entities, and area businesses and organizations, along with a World Football museum, team store, and a mix of retail and restaurant uses. These uses would complement the existing facilities in Exposition Park by providing additional amenities, eating establishments and activities within close walking distance of other Exposition Park museums and facilities, thereby reducing vehicle trips and vehicle miles traveled for park visitors and nearby residents and businesses.

The Soccer Stadium project also would include improvements designed to activate pedestrian areas immediately adjacent to the Soccer Stadium project, such as a landscaped sidewalks and pedestrian improvements to allow sufficient space for patrons to circulate and queue on event days and provide an inviting and safe pedestrian environment on non-event days. The Soccer Stadium project is comparable in scale to the existing Sports Arena and it would occupy the same general area within the southeast corner of the Specific Plan area in Exposition Park. The Soccer Stadium project operations would be accommodated within the existing network of streets, pedestrian areas, parking areas and other existing Exposition Park amenities. Furthermore, owing to its co-location with an established network of pedestrian and public transit options, the Soccer Stadium project would facilitate the use of modes of transportation other than private vehicles to and from the Specific Plan area and Soccer Stadium project. The Soccer Stadium project would be located in an area with convenient pedestrian access to several stops on the Expo Light Rail Line, including the Expo Park/USC Station (0.35 mile from the project Site) and the Expo/Vermont Station (0.7 mile from the project Site), as well as the 37th Street/USC Silver Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.37 mile from the project Site). All of these transit facilities are operated by the Los Angeles County Metropolitan Transportation Authority (Metro). The Specific Plan area is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Specific Plan area. The Soccer Stadium project's proximity to numerous public transit options supports the location of a major sports and entertainment destination in this location, which will reduce vehicle miles traveled and vehicle trips, along with associated air pollution.

The Specific Plan Amendment amends sections of the Specific Plan to allow the development of the Soccer Stadium project. It will not replace or otherwise alter the land uses, museums, cultural and entertainment venues in Exposition Park, or other neighboring commercial and residential uses, all of which together will continue to contribute to a diverse Exposition Park-area community.

Objective 3.4 - Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.

> Policy 3.4.1 - Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range.

Objective 3.10 - Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.

The Specific Plan area and concomitant Sign District are located at the center of a diverse array of neighborhood commercial, residential, and open space uses within and surrounding Exposition Park. The Specific Plan Amendment and Sign District would allow the development of the Soccer Stadium project, enhancing the character of Figueroa Street (a major boulevard within a Regional Center) along with nearby commercial districts. The Soccer Stadium project would include an approximately 9,000-square-foot conference facility, a World Football museum, team store and a mix of retail and restaurant uses. These ancillary uses would be available to support Soccer Stadium uses and would be open to the public on non-event days to serve as a catalyst for additional revitalization of the Exposition Park area and to complement and enhance the existing venues and destinations within and surrounding the park. These uses also would enhance competition with and among existing commercial, retail and restaurant uses across Figueroa Street from the project Site, which would improve the commercial character of the neighborhood for residents and visitors alike who demand a diversity of commercial options. As the Soccer Stadium project is expected to attract Major League Soccer (MLS) patrons and new visitors to Exposition Park, the Soccer Stadium project would generate new customers for businesses in the area. The various pedestrian and site improvements associated with the Soccer Stadium project, as well as its location within walking distance to two stops on the Expo Light Rail Line, along with many bus lines, would contribute to the viability and accessibility of existing and proposed commercial uses enhancing the convenience and desirability of businesses concentrated near the project Site and Specific Plan area.

The Soccer Stadium project is estimated to cost upwards of $250 million and construction is estimated to result in approximately $274 million in economic output. Operation of the Soccer Stadium project is estimated to generate approximately $129 million in annual economic output. Development of the Soccer Stadium project implemented through the Specific Plan Amendment and Sign District would maintain and enhance the economic vitality of the area by creating approximately 1,228 job temporary job opportunities associated with the construction of the project and approximately 1,840 permanent jobs opportunities during operation of the project.

Whereas declining attendance and fewer events at the Sports Arena have left the existing site underutilized, the Soccer Stadium project could attract new patrons to the City and the South Los Angeles area for MLS matches and other community events providing new employment opportunities for local residents and increasing revenues for area businesses. The Soccer Stadium project would bring more visitors to Exposition Park, and anchor the southern end of the sports and entertainment venues located on Figueroa Street, which extend to LA Live and Dodger Stadium to the north. The Soccer

Stadium project would be a transformative development for South Los Angeles with a broad range of uses, and would create thousands of construction and permanent jobs, bring critical investment to Exposition Park, and develop long-needed accessible community serving facilities like restaurants and meeting spaces that will reinforce the existing Regional Center along Figueroa.

Objective 3.16 - Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.

The Soccer Stadium project would accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity. The Soccer Stadium project would include landscaped sidewalks and pedestrian improvements to allow sufficient space for patrons to circulate and queue on event days and provide an inviting and safe pedestrian environment on non-event days. The Soccer Stadium project is comparable in scale to the existing Sports Arena and it would occupy the same general area within the southeast corner of the Specific Plan area in Exposition Park. The Soccer Stadium project operations would be accommodated within the existing network of streets, pedestrian areas, parking areas and other existing Exposition Park amenities. Furthermore, owing to its co-location with an established network of pedestrian and public transit options, the Soccer Stadium project would facilitate the use of modes of transportation other than private vehicles to and from the Specific Plan area and Soccer Stadium project.

The Soccer Stadium project would be located in an area with convenient pedestrian access to several stops on the Expo Light Rail Line, including the Expo Park/USC Station (0.35 mile from the project Site) and the Expo/Vermont Station (0.7 mile from the project Site), as well as the 37th Street/USC Silver Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.37 mile from the project Site). All of these transit facilities are operated by the Los Angeles County Metropolitan Transportation Authority (Metro). The Specific Plan area is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Specific Plan area.

Mobility Element.

The Mobility Element of the General Plan would not be affected by the recommended action herein, because the Specific Plan Amendment and Soccer Stadium project would not include reconfiguration of any existing roadways within the Specific Plan area, Exposition Park or the surrounding area. Construction of the Soccer Stadium project would be coordinated with the City's My Figueroa street improvement project, through which the City would ensure compliance with the Mobility Element of the General Plan. Any dedications and/or improvements of the abutting streets, if required, would be subject to the recommendations of the Bureau of Engineering and the Department of Transportation, which may further assure compliance with this Element of the General Plan and with the City's updated Street Standard Plans/S-470-1.

Sewerage Facilities Element.

Sewerage Facilities within the General Plan would be affected by the recommended action. Sewer service for the Soccer Stadium project would be provided utilizing new or existing sewer connections to the existing sewer main that generally runs along the east side of South Coliseum Drive within the project Site. Except for these sewer connection pipes, no upgrades to the existing sewer mainlines are anticipated. Requirements for construction of sewer facilities to serve the subject project and complete the City sewer system for the health and safety of City inhabitants will assure compliance with the goals of this General Plan Element.

Street Lights.

Any City required installation or upgrading of street lights necessary to complete the City street improvement system so as to increase night safety along the streets which adjoin the subject property.

3. Charter Findings - City Charter Sections 556 and 558 (Specific Plan Amendment).

The Specific Plan Amendment complies with Sections 556 and 558 of the City Charter in that the Specific Plan with the adoption of the Specific Plan Amendment promotes an intensity and pattern of development that would be consistent with the area's General Plan Framework designation and would encourage transit use; reduce automobile dependency; encourage the development of regionally-serving and diverse commercial uses; and enhance the pedestrian environment. The Specific Plan Amendment would permit the development of an approximately 22,000 seat professional soccer stadium and approximately 119,000 gross square feet (approximately 105,900 square feet of floor area) of ancillary facilities. The Specific Plan Amendment furthers many of the City's land use policies by promoting economic development, encouraging high-activity uses, and otherwise supporting a diverse set of new public and commercial uses. The following is a summary of the amendments made to the Coliseum District Specific Plan:

- Section 1: Specifies the boundaries of the Specific Plan; Adds a section discussing the five Zones of the Specific Plan.
- Section 2: Updates the intent of the Specific Plan by including the redevelopment of the Sports Arena site.
- Section 3: Updates the sign ordinance within the Specific Plan and its relationship to the Los Angeles Municipal Code.
- Section 4: Updates definitions to reflect the soccer stadium project.
- Section 5: Updates the parties that can utilize the Specific Plan and subjects activities related to both the Coliseum and soccer stadium to the Specific Plan.
- Section 6: Adds a Project Permit Compliance process.
- Section 7: Updates the uses permitted within the Specific Plan area.
- Section 8: Adds design regulations for the soccer stadium.
- Section 9: Adds additional alcohol consumption regulations. More specifically, allows for on-site consumption of alcohol for bars, cafes, outdoor eating areas, event areas within the Soccer Stadium zone, and in other ancillary areas, as well as designated areas within the South Parking Lot Zone. Also adds the application process, identifies permanent and temporary establishments, and the approval and appeal process.
- Section 10: Adds parking requirements for vehicles and bicycles. Also adds parking regulations for ancillary uses, location of parking and bicycle parking regulations.

The Soccer Stadium project facilitated by the Specific Plan Amendment would be compatible with the surrounding community. The Soccer Stadium project would be an in-fill development allowing for redevelopment of the underutilized Sports Arena site by modernizing and diversifying the existing uses at the project Site, while remaining consistent with the existing and proposed scale of development in the surrounding area. It also would accommodate the growing population and investment in the South Los Angeles community.

The Specific Plan Amendment would permit the Soccer Stadium project helping to reinforce Exposition Park's role as a major regional center in Southern California. As discussed, it would replace the Sports Arena with a modern, world-class sports complex, and would provide enhanced landscape and pedestrian improvements The Soccer Stadium project's ancillary uses would provide additional amenities to support stadium operations, including year-round restaurant and retail uses, which would create new permanent jobs and enable the creation of a state-of-the-art sports and entertainment complex that would be able to compete with similar, modern facilities reinforcing Exposition Park as an important commercial hub for area residents and the community at large.

The Soccer Stadium project would be designed to be capable of achieving at least LEED Silver certification or equivalent green building standards.

The Specific Plan Amendment also promotes transit-oriented development. The Specific Plan area including the project Site is located approximately two miles southwest of downtown, within Exposition Park. The Specific Plan area provides convenient pedestrian access to several stops on the Expo Light Rail Line, and is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Specific Plan area.

Consistent with Sections 556 and 558 of the City Charter, the Specific Plan Amendment would help promote the general welfare and good zoning practices by supporting many of the land use planning goals, objectives, policies and programs specified in the South Los Angeles City Community Plan, including locating jobs near housing, creating density near transit, promoting sustainable building, providing landscaping and public open spaces, and providing retail and entertainment venues.

SPECIFIC PLAN AMENDMENT FINDINGS

4. The Specific Plan Amendment Would Be in Conformance with the Purposes, Intent and Provisions of the City of Los Angeles General Plan.

Los Angeles City Charter Sections 556 and 558 and 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 General Plan. The Specific Plan Amendment 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 South Los Angeles Community Plan, General Plan Framework, General Plan Mobility Element, and General Plan Air Quality Element, as discussed below.

5. The Specific Plan Amendment Would Be in Conformance with the South Los Angeles Community Plan.

The Specific Plan Amendment would be consistent with the identification of Exposition Park as a "major opportunity site," the designation of the project site and all of Exposition Park as Open Space (OS), and the following objectives and policies of the South Los Angeles Community Plan:

Major Opportunity Site

In identifying Exposition Park as a "major opportunity site" the South Los Angeles Community Plan provides for the following guiding principles in the development of Exposition Park and the facilities it holds:

- The need for community empowerment regarding future development.
- The opportunity for a variety of jobs and job training for community residents.
- Development reflective of community needs.
- The need for appropriate development plans to prevent incongruent, incremental development.

The Soccer Stadium project facilitated by the Specific Plan Amendment would contribute to community empowerment in South Los Angeles, in particular within the surrounding community of Exposition Park. The Soccer Stadium project would be an in-fill development allowing for redevelopment of the underutilized Sports Arena site by modernizing and diversifying the existing uses at the project site, while remaining consistent with the existing and proposed scale of development in the surrounding area. The Soccer Stadium project would replace the Sports Arena with a modern, world-class sports complex, and would provide enhanced landscape and pedestrian improvements as compared to existing conditions.

The Soccer Stadium project's ancillary uses would provide additional amenities to support both stadium operations and the surrounding community, including year-round restaurant and retail uses, which would create new permanent jobs and add additional accessible amenities for community residents. In addition, the ancillary uses would enable the creation of a state-of-the-art sports and entertainment complex that would be a catalyst for revitalizing the southern end of the Figueroa sports and entertainment corridor in South Los Angeles, thereby empowering the surrounding community and reinforcing Exposition Park as an important cultural, sports, entertainment and activity hub for area residents and the community at large.

The Soccer Stadium project, which would be expressly allowed with the Specific Plan Amendment, presents a major economic opportunity to create a variety of jobs, job training, and stimulate investment in the South Los Angeles community. Development of the Soccer Stadium project implemented through the Specific Plan Amendment would maintain and enhance the economic vitality of the area by creating approximately 1,228 job temporary job opportunities associated with the construction of the project and approximately 1,840 permanent jobs opportunities during operation of the project. The Project Applicant has publicly committed to the Coliseum Commission that it will achieve 40 percent local hire during project construction and operations.

The Soccer Stadium project is reflective of community needs because it would increase the diversity of uses within Exposition Park, thereby increasing the available resources to support the City's and neighborhood's existing and future residents, businesses and visitors. In addition to the new soccer stadium, the a major conference facility, World Football museum, team store, and retail, restaurant and office uses would contribute to the vitality of the underutilized site.

The Soccer Stadium project would provide approximately 143,000 square feet of new public open space on the Sports Arena site, including wider sidewalks and plazas that will diversify and increase the amount of accessible open space for the community in Exposition Park.

The Specific Plan Amendment would provide appropriate development regulations to prevent incongruent, incremental development. The Specific Plan Amendment contains regulations that would maintain the prevailing scale, neighborhood character, and land uses within Exposition Park and its surrounding neighborhoods and districts. The Specific Plan Amendment would expressly allow the development of the Soccer Stadium project and would not replace or otherwise alter the land uses, museums, cultural and entertainment venues in Exposition Park, or

other neighboring commercial and residential uses. The Specific Plan Amendment would allow for the continued revitalization of Exposition Park, a recognized community and regional center, with a state-of-the art professional soccer stadium venue.

Open Space

The South Los Angeles Community Plan text also includes the following relevant land use objective and policies related to Open Space:

Objective 5-1: To preserve existing open space resources and where possible develop new open space.

Policy 5-1.1: Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.

Policy 5-1.2: Require development in major opportunity sites to provide public open space.

The Specific Plan Amendment would preserve existing open space and allow for the development of new public spaces complimentary to the existing mixture of open space, cultural and recreational uses in Exposition Park. In particular, the Soccer Stadium project would add approximately 143,000 square feet of improved public open space that would consist of pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas, potentially including water features, public art, and seating areas.

These open space areas would contribute to passive and visual open space within Exposition Park, which is a designated major opportunity site. Pedestrian plazas would include a main plaza at the northwest corner of project site (Northwest Plaza) and a large pedestrian gathering area along Figueroa Street.

Commercial

Within the Land Use Chapter of the Framework Element of the General Plan, the Specific Plan area and project site are located adjacent to and partially within a designated Regional Center that generally corresponds with Figueroa Street. A Regional Center is defined as:

> *...a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. Generally different types of Regional Centers will fall within the range of floor area ratios from 1.5:1 to 6.0:1. Some will only be commercially oriented; others will contain a mix of residential and commercial uses. Generally, Regional Centers are characterized by 6- to 20-stories (or higher). Regional Centers are usually major transportation hubs.*

The Land Use Chapter also indicates that Martin Luther King, Jr. Boulevard adjacent to the Specific Plan area is designated as a Mixed Use Boulevard. Mixed Use Boulevards are described as connections between the City's neighborhood districts and community, regional, and Downtown centers. Mixed-use development is encouraged along these boulevards, with the scale, density and height of development compatible with the surrounding areas.

Because the Specific Plan area and project site are located adjacent to and partially within a Regional Center and adjacent to a Mixed Use Boulevard, the following objectives from the South Los Angeles Community related to Commercial uses are also relevant:

Objective 2-1 - To conserve and strengthen viable commercial development.

> Policy 2-1.1 - New commercial uses shall be located in existing, established commercial areas or existing shopping centers.
>
> Policy 2-1.3 - Commercial areas should be consolidated and deepened to stimulate existing businesses, create opportunities for new development and off-street parking, expand the variety of goods and services, and improve shopping convenience as well as offer local employment.
>
> Policy 2-1.5 - Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.

The Specific Plan area and concomitant Sign District are located at the center of a diverse array of neighborhood commercial, residential, and open space uses within and surrounding Exposition Park. The Specific Plan Amendment and Sign District would allow the development of the Soccer Stadium project enhancing the character of the nearby commercial districts. The Soccer Stadium project would include an approximately 9,000-square-foot conference facility, a World Football museum, team store and a mix of retail and restaurant uses. These ancillary uses would be available to support stadium uses and would be open to the public on non-event days to serve as a catalyst for additional revitalization of the Exposition Park area and to complement and enhance the existing venues and destinations within and surrounding Exposition Park. These uses also would enhance competition with and among existing commercial, retail and restaurant uses across Figueroa Street from the project site, which would improve the commercial character of the neighborhood for residents and visitors alike who demand a diversity of commercial options. As the Soccer Stadium project is expected to attract Major League Soccer (MLS) patrons and new visitors to Exposition Park, it would generate new customers for businesses in the area. The various pedestrian and site improvements associated with the Soccer Stadium project, as well as its location within walking distance of the Expo Light Rail Line and many bus lines, would contribute to the viability and accessibility of existing and proposed commercial uses enhancing the convenience and desirability of businesses concentrated near the project site and Specific Plan area.

Objective 2-5 - To enhance the appearance of commercial districts.

> Policy 2-5.1 - Improve the appearance and landscaping of commercial properties.
>
> Policy 2-5.2 - Preserve community character, scale and architectural diversity.

The Soccer Stadium project would incorporate a number of aesthetic and landscaping improvements that would have the effect of improving the commercial appeal of the Specific Plan area, the Soccer Stadium project's commercial and restaurant uses, and the surrounding commercial areas. Most significantly, the Soccer Stadium project would include improvements immediately adjacent to the new stadium and across from the Figueroa-adjacent commercial district. Such improvements would include the provision of a 40- to 70-foot set-back along Figueroa Street. This area would be developed as a broad, landscaped sidewalk to provide sufficient space for patrons to circulate and queue on event days and provide an inviting and safe pedestrian environment on nonevent days that would facilitate public patronage at nearby commercial establishments.

The Soccer Stadium project would include a Northwest Plaza to provide a welcoming pedestrian environment with a mix of hardscape and landscaped areas, and may include water features, public art, and seating areas. Sound, lighting, and video components also would be incorporated into the design of the plaza, adding to its aesthetic appeal. As the primary gathering plaza for game days and special events, the Northwest Plaza would be a landscaped and visually appealing public hub from which site visitors could patronize on- and off-site commercial uses.

Moreover, none of the proposed improvements or alterations would adversely impact the community character or existing scale and architectural diversity of the Specific Plan area. Exposition Park has long accommodated a diversity of open space, recreational and commercial uses. The Soccer Stadium project's addition of certain commercial ancillary uses such as a team store, retail, and restaurant uses would serve to enhance the existing diversity of uses in Exposition Park.

The Soccer Stadium project would preserve architectural diversity with the development of the first open-air stadium in Los Angeles since Dodger Stadium opened in 1962. The roof canopy skin would moderate the perceived height of the stadium because it would be permeable to light and would not be perceived as solid. In addition, the Soccer Stadium project would modulate building heights to locate shorter buildings closer to the Coliseum. Further, the base of the stadium at street level would draw on material influences from the Coliseum and Swim Complex, incorporating similar materials and color palates, such as the Travertine and the concrete used extensively on those venues. As a result, the stadium design would create a unique visual identity for the Soccer Stadium project while maintaining visual compatibility with surrounding uses, including the Coliseum.

Objective 2-3 - To attract uses which strengthen the economic base and expand market opportunities for existing and new businesses.

Objective 2-6 -To maintain and increase the commercial employment base for community residents whenever possible.

The Soccer Stadium project is estimated to cost upwards of $250 million and project construction is estimated to result in approximately $274 million in economic output. Operation of the Soccer Stadium project is estimated to generate approximately $129 million in annual economic output. Development of the Soccer Stadium project implemented through the Specific Plan Amendment and Sign District would maintain and enhance the economic vitality of the area by creating approximately 1,228 job temporary job opportunities associated with the construction of the project and approximately 1,840 permanent jobs opportunities during operation of the project.

The Soccer Stadium project would include a World Football museum, conference, retail and restaurant uses that would directly benefit Exposition Park and the surrounding community. These uses would be open on non-event days, thereby activating the project site and Exposition Park seven days a week, and providing long-term, permanent jobs above what would be required for stadium operations alone. Whereas declining attendance and fewer events at the Sports Arena have left the existing site underutilized, the Soccer Stadium project could attract new patrons to the City and the South Los Angeles area for Major League Soccer matches and other community events providing new employment opportunities for local residents and increasing revenues for area businesses. The Soccer Stadium project would bring more visitors to Exposition Park, and anchor the southern end of the sports and entertainment venues located on Figueroa Street, which extend to LA Live and Dodger Stadium to the north. The Soccer Stadium project would be a transformative development and would create thousands of construction and permanent jobs, bring critical investment to Exposition Park, and develop long-needed community serving facilities like restaurants and meeting spaces.

Police Protection

Objective 9-1 - To provide adequate police facilities and personnel to correspond with population and service demands.

Policy 9-1.3 - Encourage private developments to contribute to providing protection services to the residents of the community.

Although the construction of a professional soccer stadium has the potential to place high demands upon police protection services during operation, the Soccer Stadium project would replace an existing sports and entertainment venue (the Sports Arena) that has an existing police demand, and would also include additional security and design features that would reduce the demand for police service. For example, the Soccer Stadium project would include time-controlled interior and exterior public area lighting limited to that necessary for safety and security and would include low level security lighting around the project site perimeter and throughout the site to mark walkways, parking areas, restroom facilities, and entrances. In addition, private security staff will be employed for special events in a manner that is consistent with the current Coliseum and Sports Arena operations.

The Soccer Stadium project would be subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City in order to address police protection service demands adequately. The Soccer Stadium project's Final Environmental Impact Report (EIR) and Addendum contain a mitigation measure requiring the project Applicant to develop and implement a Security Plan in consultation with the LAPD outlining the security services and features to be provided in conjunction with the Soccer Stadium project. Additionally, the sales and service of alcohol would be subject to the operational conditions in the Specific Plan including the requirement for security personnel trained in consultation with the LAPD and ABC regulations. The Soccer Stadium project would contribute to community protection services and coordinate with the LAPD to reduce the Soccer Stadium project's impact on police services while fully protecting the surrounding community.

Public Transportation and Land Use Transportation Policy

Objective 12-2 - To increase the work trips and non-work trips made on public transit.

> Policy 12-2.2 - Support the expansion of Community based transit service improvement.

Objective 13-1 - To reflect the objectives and guiding principles of the City Council adopted Land Use-Transportation policy.

> Policy 13-1.1 - Encourage growth, as appropriate, around transit stations when these become operational.

Objective 13-2 - To increase the work and non-work trips made on public transit.

> Policy 13-2.1 - Encourage the provision safe, attractive and clearly identifiable transit stops with user friendly design amenities.

The Specific Plan area is well-integrated with substantial existing infrastructure and provides convenient pedestrian access to public transportation including the Expo Park/USC Station, Jefferson/USC Station, and Expo/Vermont Station stops of the Expo Light Rail Line, as well as seven nearby Metro and LADOT bus lines within a quarter mile of the Specific Plan area. These transit lines allow access to the Specific

Plan area, Coliseum, and project site from a wide range of areas. The Metro Expo Line serving the Specific Plan area via the Expo Park/USC (0.35 miles) and Expo/Vermont (0.7 miles) Metro Expo Line Stations, provides light rail connection currently running from Downtown to Culver City, and will be operating in the near future west to Santa Monica. The Specific Plan area and project site are also serviced by the Metro Silver Line via the 37th Street/USC Station (0.37 miles), a north/south bus rapid transit (BRT) line running in the Harbor Transitway in the median of the Harbor Freeway from the Harbor Gateway Transit Center to downtown Los Angeles. A total of seven local and express Metro bus lines operate in the vicinity of the Specific Plan area and Exposition Park making the project site and Specific Plan area accessible from many locales in the greater Los Angeles area. Moreover, the Specific Plan area is serviced by several LADOT and OCTA transit lines, as well as the Torrance Transit Line 4. All of the aforementioned transit lines and stations are already operational in the vicinity of the Specific Plan area and the project site, so redevelopment of the project site with a new professional soccer stadium would encourage growth around existing transit stations and support the expansion of Community-based transit services consistent with the policies of the South Los Angeles Community Plan.

Non-Motorized Transportation

Objective 16-1 - To promote an adequate system of safe bikeways for commuter, school and recreational use.

Objective 16-3 - To provide for pedestrian and Bikeway access to transit stations.

> Policy 16-3.1 - Assure that all development in the area surrounding transit stations make adequate provision for pedestrian and bicycle access and to share proportionally in the cost of such access.
>
> Policy 16-3.2 - Designate generalized locations for pedestrian and bike accesses in areas around transit stations.

The Specific Plan area and project site are located within blocks of numerous citywide designated bicycle routes.

- Vermont Avenue provides a bike route along the western edge of the Specific Plan area from Coliseum Drive to Jefferson Boulevard;
- Hoover Street provides a bike route at the southern edge of the Specific Plan area from Martin Luther King, Jr. Boulevard to 98th Street;
- Figueroa Street provides a bike route along the northeastern portion of Exposition Park from the California Science Center to 11th Street;
- Broadway provides a bike route east of the Specific Plan area from 92nd to 16th Street;
- Exposition Boulevard provides a bike lane northwest of the Specific Plan area from Vermont Avenue to Jefferson Blvd; and
- 39th Street provides a bike route to the west of the Specific Plan area from Vermont Avenue to Buckingham Road.

The Specific Plan Amendment and Soccer Stadium project would not disrupt any of these currently existing bike routes from which the Specific Plan area and project site can be accessed. The Specific Plan area's accessibility by bicycle also will benefit from being adjacent to the City's MyFigueroa Streetscape project ("My Fig"), a street redesign of Figueroa Street extending from 7th Street in downtown Los Angeles to its intersection with Martin Luther King, Jr. Boulevard. The My Fig plan will

improve signalized intersections and signage, install high-visibility crosswalks and transit platforms, and install separated paths for bicycles.

In addition, the Soccer Stadium project has been designed specifically to promote and encourage the use of bicycles by meeting Code requirements for bicycle parking. At least 107 permanent bicycle parking spaces will be installed on the project site for use on both event and non-event days. This represents the largest available supply of bicycle parking for the public in Exposition Park. On event days, the Soccer Stadium project would provide at least 333 bicycle parking spaces through a bicycle valet service, which could add capacity over time as bicycle parking demands increase. In total, the soccer stadium would provide more bicycle parking than other recently approved sports stadiums in California.

Furthermore, the Specific Plan area and the bicycle facilities that service it will be integrated with the greater area surrounding the Specific Plan area, which is characterized by a mature network of pedestrian facilities. The Specific Plan area and project site will remain bounded by a system of wide sidewalks along Martin Luther King, Jr. Boulevard (11 feet), Figueroa Avenue (18 feet), Exposition Park Drive (20 feet), and Hoover Street (13 feet). The Specific Plan Amendment and Soccer Stadium project would not upset pedestrian facilities already existing in and surrounding the Specific Plan area and project site.

The pedestrian and bicycle linkages to be maintained within and surrounding the Specific Plan area and project site also connect into the robust public transit system servicing the Specific Plan area. Transit lines and stops in the vicinity of the Specific Plan area include the Expo Park/USC Station, Jefferson/USC Station, and Expo/Vermont Station stops of the Expo Light Rail Line, as well as seven nearby Metro and LADOT bus lines within a quarter mile of the Specific Plan area and the project site. These transit lines allow access to the Specific Plan area and the project site from a wide range of areas. For example, the Metro Expo Line serving the Specific Plan area and the project site via by the Expo Park/USC (0.35 miles) and the Expo/Vermont (0.7 miles) Metro Expo Line Stations, provides light rail connection currently running from Downtown to Culver City, and will be operating in the near future west to Santa Monica. The Soccer Stadium project therefore would contribute to and expand upon an already comprehensive pedestrian and bicycle network connecting the project site with the rest of the City through available transit.

Parking

Objective 17-1 - To provide parking in appropriate locations in accord with Citywide standards and community needs.

> Policy 17-1.1 - Consolidate parking, where appropriate, to eliminate the number of ingress and egress points onto arterials.

Parking for the Specific Plan area and the Soccer Stadium project would be provided by the existing parking supply available in Exposition Park. Exposition Park provides approximately 5,961 parking spaces in multiple parking lots (5,662 spaces) and on drives (299 spaces) within Exposition Park (not including the proposed VIP parking lot on the project site, which would provide an additional, approximately 250 parking spaces). These existing parking spaces are shared and coordinated among the Coliseum, the Sports Arena, the California Science Center, the Los Angeles County Natural History Museum, the California African American Museum, and the public through the Office of Exposition Park Management. Per the terms of the Non-Disturbance Agreement between the California Science Center and the University of Southern California, 600 parking spaces may be reserved for the California Science

Center in the Science Center Structure and 375 spaces may be reserved for the Natural History Museum in Lot 3 when major events occur in the Coliseum or the Sports Arena, leaving between 4,986 and 5,961 spaces available for events in the Exposition Park parking supply. The Soccer Stadium project's event-day parking demand of approximately 4,578 spaces would therefore be fully satisfied by the existing parking supply in Exposition Park. The Soccer Stadium project would not remove any of the existing parking supply provided within the Exposition Park, nor would it change the terms of the Non-Disturbance Agreement between the California Science Center and the University of Southern California. Therefore, the Specific Plan Amendment and Soccer Stadium project would maintain consolidated parking within the Exposition Park area and utilize existing ingress and egress points into the Park.

6. The Specific Plan Amendment Would Be in Conformance with the 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 Specific Plan Amendment would be consistent with the goals, objectives and policies of the General Plan Framework.

Land Use Chapter.

Within the Land Use Chapter of the Framework Element, the following goals, objectives and policies relevant to the South Los Angeles area are applicable to the amended Specific Plan with the Specific Plan Amendment:

Objective 3.1 - Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

The Specific Plan area including the project site is located within Exposition Park, which is home to several cultural, entertainment, and sporting facilities. Such facilities include the Coliseum, the Los Angeles Swim Stadium, the California Science Center and its related IMAX Theater, the Rose Garden, the Los Angeles County Museum of Natural History, the Expo Center, the California African-American Museum, the Wallis Annenberg Building for Science Learning and Innovation, and the Dr. Theodore T. Alexander Jr. Science Center School (a Los Angeles Unified School District school).

The Soccer Stadium project would increase the diversity of uses within Exposition Park, thereby enhancing the available resources to support the City's and surrounding neighborhood's existing and future residents, businesses and visitors. Specifically, the soccer stadium would replace the existing Sports Arena, which has become underutilized, with a state of the art professional soccer stadium intended to host a Major League Soccer team and a variety of other major and special events. The Soccer Stadium project would also add a diversity of uses to Exposition Park, including a conference facility, museum, team store, and retail, restaurant and office uses. The plaza at the northwest corner of the project site (Northwest Plaza) would provide a new public gathering space for pre-game events and other game-day activities and would serve as an active public space on non-event days (e.g., for small concerts, red carpet events, and community events such as food festivals or art fairs). The Specific Plan Amendment and Sign District would allow the development of the Soccer Stadium project adding a diverse array of

entertainment, restaurant, business and other public uses to the already diverse existing set of uses within Exposition Park.

Objective 3.2 - Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.

Policy 3.2.4 - Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.

The Specific Plan area and concomitant Sign District are mostly located within the OS1XL (Open Space Zone, Extra Limited Height District 1), as is the majority of Exposition Park. The western portion of the Specific Plan area and concomitant Sign District is located within the RD1.5-1 zone with a small area in the southwestern corner of the area located in the C2 and [Q]C2 zones. Exposition Park is home to several cultural, entertainment, and sporting facilities and associated surface parking and landscaped areas. Such facilities include the Coliseum, the Los Angeles Swim Stadium, the California Science Center and its related IMAX Theater, the Rose Garden, the Los Angeles County Museum of Natural History, the Expo Center, the California African-American Museum, the Wallis Annenberg Building for Science Learning and Innovation, and the Dr. Theodore T. Alexander Jr. Science Center School (a Los Angeles Unified School District school).

The Specific Plan area is located in a developed area of the City, which is supported by existing urban infrastructure. Figueroa Street along the eastern boundary of the Specific Plan area is designated an Avenue I, which is generally developed along its east side with surface parking, a USC school related use, multi-family residential uses, fast food restaurants, and a retail center. Along the southern boundary is Martin Luther King, Jr. Boulevard, also an Avenue I, which is generally developed with commercial and multifamily residential uses, surface parking, and retail shops along its south side. The University of Southern California (USC), a private university, is located directly north of Exposition Park, across Exposition Boulevard, another Avenue I. To the west of Exposition Park is Vermont Avenue, also an Avenue I, which is generally developed with commercial office and retail uses along its west side. Land use designations for these areas surrounding Exposition Park are predominately designated as “Community Commercial” and “High-Medium,” “Medium,” or “Low Medium II” residential. The Harbor Freeway (Interstate 110) is located immediately to the east of these properties and is designated Public Facility.

The Specific Plan Amendment contains regulations that would maintain the prevailing scale, neighborhood character, and land uses within Exposition Park and its surrounding neighborhoods and districts. The Soccer Stadium project would locate an approximately 22,000-seat soccer stadium and approximately 105,900 square feet of ancillary amenities within a 15-acre site in the eastern portion of the Specific Plan area. The ancillary facilities would include a conference facility that could be used by the University of Southern California, other Exposition Park entities, and area businesses and organizations, along with a World Football museum, team store, and a mix of retail and restaurant uses. These uses would complement the existing facilities in Exposition Park by providing additional amenities, eating establishments and activities within close walking distance of other Exposition Park museums and facilities, thereby reducing vehicle trips and vehicle miles traveled for park visitors and nearby residents and businesses

The Soccer Stadium project also would include improvements designed to activate pedestrian areas immediately adjacent to the soccer stadium, such as a landscaped sidewalks and pedestrian

improvements to allow sufficient space for patrons to circulate and queue on event days and provide an inviting and safe pedestrian environment on non-event days. The proposed stadium design is comparable in scale to the existing Sports Arena and it would likewise occupy the same general area within the southeast corner of Exposition Park and Specific Plan area project operations will be accommodated within the existing network of streets, pedestrian areas, parking areas and other existing Exposition Park amenities. Further, owing to its co-location with an established network of pedestrian and public transit options, the project would facilitate the use of modes of transportation other than private vehicles to and from the project site. The Soccer Stadium project would be located in an area with convenient pedestrian access to several stops on the Expo Light Rail Line, including the Expo Park/USC Station (0.35 mile from the project site) and the Expo/Vermont Station (0.7 mile from the project site), as well as the 37th Street/USC Silver Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.37 mile from the project site). All of these transit facilities are operated by the Los Angeles County Metropolitan Transportation Authority (Metro). The Specific Plan area is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Specific Plan area. The Soccer Stadium project's proximity to numerous public transit options supports the location of a major sports and entertainment destination in this location, which will reduce vehicle miles traveled and vehicle trips, along with associated air pollution.

The Specific Plan Amendment would expressly allow the development of the Soccer Stadium project, and will not replace or otherwise alter the land uses, museums, cultural and entertainment venues within Exposition Park, or other neighboring commercial and residential uses, all of which together will continue to contribute to a diverse Exposition Park-area community.

Objective 3.4 - Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.

> Policy 3.4.1 - Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range.

Objective 3.10 - Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.

The Specific Plan area and concomitant Sign District are located at the center of a diverse array of neighborhood commercial, residential, and open space uses within and surrounding Exposition Park. The Specific Plan Amendment and Sign District would allow the development of the Soccer Stadium project enhancing the character of Figueroa Street (a major boulevard within a Regional Center) along with nearby commercial districts. The Soccer Stadium project would include an approximately 9,000-square-foot conference facility, a World Football museum, team store and a mix of retail and restaurant uses. These ancillary uses would be available to support stadium uses and would be open to the public on non-event days to serve as a catalyst for additional revitalization of the Exposition Park area and to complement and enhance the existing venues and destinations within and surrounding the park. These uses also would enhance competition with and among existing commercial, retail and restaurant uses

across Figueroa Street from the project site, which would improve the commercial character of the neighborhood for residents and visitors alike who demand a diversity of commercial options. As the Soccer Stadium project is expected to attract Major League Soccer (MLS) patrons and new visitors to Exposition Park, the Soccer Stadium project would generate new customers for businesses in the area. The various pedestrian and site improvements associated with the Soccer Stadium project, as well as its location within close walking distance to two stops on the Expo Light Rail Line, along with many bus lines, would contribute to the viability and accessibility of existing and proposed commercial uses enhancing the convenience and desirability of businesses concentrated near the project site and Specific Plan area.

The Soccer Stadium project is estimated to cost upwards of $250 million and construction is estimated to result in approximately $274 million in economic output. Operation of the Soccer Stadium project is estimated to generate approximately $129 million in annual economic output. Development of the Soccer Stadium project implemented through the Specific Plan Amendment and Sign District would maintain and enhance the economic vitality of the area by creating approximately 1,228 job temporary job opportunities associated with the construction of the project and approximately 1,840 permanent jobs opportunities during operation of the project.

In addition to the approximately 22,000 seat professional soccer stadium (Soccer Stadium), the Soccer Stadium project also would include a World Football museum, conference, retail, and restaurant uses that would directly benefit Exposition Park and the surrounding community. Whereas declining attendance and fewer events at the Sports Arena have left the existing site underutilized, the Soccer Stadium project could attract new patrons to the City and the South Los Angeles area for MLS matches and other community events providing new employment opportunities for local residents and increasing revenues for area businesses. The Soccer Stadium project would bring more visitors to Exposition Park, and anchor the southern end of the sports and entertainment venues located on Figueroa Street, which extend to LA Live and Dodger Stadium to the north. The Soccer Stadium project would be a transformative development for South Los Angeles with a broad range of uses, and would create thousands of construction and permanent jobs, bring critical investment to Exposition Park, and develop long-needed accessible community serving facilities like restaurants and meeting spaces that will reinforce the existing Regional Center along Figueroa.

Objective 3.16 - Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.

The Soccer Stadium project would accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity. The Soccer Stadium project would include landscaped sidewalks and pedestrian improvements to allow sufficient space for patrons to circulate and queue on event days and provide an inviting and safe pedestrian environment on non-event days. The Soccer Stadium project is comparable in scale to the existing Sports Arena and it would occupy the same general area within the southeast corner of the Specific Plan area in Exposition Park. The Soccer Stadium project operations would be accommodated within the existing network of streets, pedestrian areas, parking areas and other existing Exposition Park amenities. Furthermore, owing to its co-location with an established network of pedestrian and public transit options, the Soccer Stadium project would facilitate the use of modes of transportation other than private vehicles to and from the Specific Plan area and Soccer Stadium project.

The Soccer Stadium project would be located in an area with convenient pedestrian access to several stops on the Expo Light Rail Line, including the Expo Park/USC Station (0.35 mile from the project site) and the Expo/Vermont Station (0.7 mile from the project site), as well as the 37th Street/USC Silver

Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.37 mile from the project site). All of these transit facilities are operated by the Los Angeles County Metropolitan Transportation Authority (Metro). The Specific Plan area is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Specific Plan area.

Urban Form and Neighborhood Design Chapter.

Within the Urban Form and Neighborhood Design Chapter of the Framework Element, the following policies will be applicable to the Specific Plan and Sign District:

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.

> 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 (see Chapter 3: Land Use). Additionally, develop these areas so that they are compatible with surrounding neighborhoods, as defined generally by the following building characteristics.

The Specific Plan area including the project site is located in Exposition Park, which is home to several cultural, entertainment, and sporting facilities and has long served as a community and regional center. As discussed in the Exposition Park Master Plan and the Soccer Stadium project's Final EIR, the California Sixth District Agricultural Association, the County and City of Los Angeles mutually designed Exposition Park to transition the location from an agricultural fairground to a flourishing cultural center. Today Exposition Park has realized that vision and functions as a center for the surrounding neighborhoods, community and region, as the park now is home to the Coliseum, the Los Angeles Swim Stadium, the California Science Center and its related IMAX Theater, the Rose Garden, the Los Angeles County Museum of Natural History, the Expo Center, the California African-American Museum, the Wallis Annenberg Building for Science Learning and Innovation, and the Dr. Theodore T. Alexander Jr. Science Center School (a Los Angeles Unified School District school).

The Specific Plan area and project site are served by a robust public transit system. Transit lines and stops in the vicinity of the Specific Plan area and project site include the Expo Park/USC Station, Jefferson/USC Station, and Expo/Vermont Station stops of the Expo Light Rail Line, as well as seven nearby Metro and LADOT bus lines within a quarter mile of the project site. These transit lines allow access to the Specific Plan area and project site from a wide range of areas. For example, the Metro Expo Line serving the Specific Plan area and project site via the Expo Park/USC (0.35 miles) and the Expo/Vermont (0.7 miles) Metro Expo Line Stations, provides light rail connection currently running from Downtown to Culver City, and will be operating in the near future west to Santa Monica. The Specific Plan area is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Specific Plan area. The Specific Plan area and Soccer Stadium project would provide convenient pedestrian access to this substantial existing infrastructure.

The Specific Plan Amendment that would permit the new soccer stadium serves the objective of the City's Urban Form and Neighborhood Design plan to co-locate new development in community centers that encourage the use of transit. The Soccer Stadium project would add another landmark feature to the already expansive list of public entertainment, recreation and cultural facilities that make Exposition Park a regional center for the City. Moreover, the ancillary restaurant, commercial, and business uses that

would operate day and night both during and outside of events that would be part of the Soccer Stadium project would further develop the Specific Plan area into a commercial and neighborhood center.

Policy 5.8.4 - Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.

The Sign District Ordinance would implement a signage program for the Specific Plan area including the project site. The Specific Plan currently regulates signage associated with the Coliseum and surrounding areas, and those regulations have been incorporated into the Sign District consistent with existing City policies concerning signage. The signage program for the Soccer Stadium project would present an additional, integrated strong visual element that would influence the aesthetics of the project site and the Specific Plan area. The types and extent of permitted signage would emphasize and support the event- and entertainment-oriented aspect of the Soccer Stadium project, and complement the existing and approved signage for the Coliseum currently allowed by the signage regulations in the current Specific Plan. The signage program in the Sign District is intended to support both the Coliseum and new soccer stadium operations and revitalize the Specific Plan area as a major sports and entertainment venue, consistent with its historic use. Accordingly, signage is central to the goal of establishing a unique visual identity for the Specific Plan area, the Coliseum, and the Soccer Stadium project. The Sign District would not change or alter the type or number of signs allowed in the Coliseum or areas around the Coliseum. The Sign District would allow additional signs specifically intended to support and promote the Soccer Stadium project. A number of the sign elements on the exterior of the soccer stadium would be light-emitting diode (LED) capable of showing changing digital content, which have been architecturally integrated into the stadium design. In particular, a video wall (digital sign) on the north façade of the World Football museum would be an architectural element, along with digital signs on the stadium canopy along Figueroa Street. Additionally, although the interior of the stadium would not be regulated by the Sign District Ordinance because interior signs are intended for viewing by patrons inside the stadium, two LED video boards would be located within the northeast and southwest corners of the stadium bowl, respectively, which would be designed to integrate with a series of video ribbon boards on the fascia of the various seating bowls. In addition, the Director of Planning would review an interior sign plan to confirm that interior signs are consistent with how those signs are defined in the Sign District Ordinance, and that they do not conflict with other applicable provisions in the Ordinance. The Sign District includes specific limitations on the types, amounts, locations, sizes, operating hours, and illumination of permitted signs on and around the exterior of the soccer stadium consistent with the character of a professional sports and entertainment venue. From the outside of the soccer stadium, entry gates would be clearly identifiable and would prominently feature signage integrated into the stadium's architecture, and the design of the street level facades would relate to a human scale. Further, the soccer stadium signage program integrates with the aesthetic character of the Coliseum, soccer stadium, and Exposition Park in the areas on which they are located, and are positioned in a manner that is compatible both architecturally and relative to other signs within the Sign District. Accordingly, the Sign District ordinance would satisfy the City's goal that new signage should integrate with the architectural and visual character of buildings in an aesthetically attractive manner.

Objective 5.9 - Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.

> Policy 5.9.1 - Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.

Most of the Soccer Stadium project's ancillary uses would be centered on a main entry plaza at the northwest corner of the project site that would connect to the stadium's main concourse and serve as a primary public entry to the stadium. The Northwest Plaza would provide a gathering space for pre-game events and other game-day activities and would serve as an active public space on non-event days. Pedestrian-scale wayfinding signage would allow pedestrian flow through the plaza area. The Northwest Plaza would be designed to provide a welcoming pedestrian environment with a mix of hardscape and landscaped areas, and may include water features, public art, and seating areas. Sound, lighting, and signage also would be incorporated into the design of the plaza. As the primary gathering plaza for game days and special events, the Northwest Plaza would be designed with landscaping and other fixtures providing natural barriers and visual cues, and the comprehensive lighting in the area would simplify surveillance. In addition, the Soccer Stadium project would provide a 40- to 70-foot set-back along Figueroa Street. This area would be developed as a broad, landscaped sidewalk to provide sufficient space for patrons to circulate and queue on event days and provide an inviting and safe pedestrian environment on non-event days that would facilitate public patronage of the Soccer Stadium project's establishments and nearby commercial establishments. This would further benefit the built environment by providing additional outdoor open space along Figueroa Street, and facilitating increased natural surveillance and good visual connections along the project's activated, primary street frontage.

Open Space and Conservation Chapter.

Within the Open Space and Conservation Chapter of the Framework Element, the following policies are applicable to the Specific Plan area:

Objective 6.4 - Ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.

> Policy 6.4.2 - Encourage increases in parks and other open space lands where deficiencies exist, such as South East and South Central Los Angeles and neighborhoods developed prior to the adoption of the State Quimby Act in 1965 (As amended in 1972).
>
> Policy 6.4.4 - Consider open space as an integral ingredient of neighborhood character, especially in targeted growth areas, in order that open space resources contribute positively to the City's neighborhoods and urban centers as highly desirable places to live.
>
> Policy 6.4.8 – Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.
>
> Policy 6.4.10 – Provide for the joint use of open space with existing and future public facilities, where feasible.

The Specific Plan area and the Sign District are mostly located within the OS-1XL (Open Space, Extra Limited Height District 1), as is the majority of Exposition Park. The western portion of the Specific Plan area and the Sign District is located within the RD1.5-1 zone with a small area in the southwestern corner of the area located in the C2 and [Q]C2 zones. Exposition Park is home to several cultural, entertainment, sporting facilities and associated landscaped areas. Such facilities include the Coliseum, the Los Angeles Swim Stadium, the California Science Center and its related IMAX Theater, the Rose Garden, the Los Angeles County Museum of Natural History, the Expo Center, the California African-American Museum, the Wallis Annenberg Building for Science Learning and Innovation, and the Dr. Theodore T. Alexander Jr. Science Center School (a Los Angeles Unified School District school). All of

Exposition Park, including the Specific Plan area and soccer stadium site, is located within the City's South Los Angeles Community Plan Area, an area of South Central Los Angeles targeted for revitalization.

The Specific Plan Amendment would allow for the development of new public spaces complimentary to the existing mixture of open space, cultural and recreational uses in Exposition Park. In particular, the Soccer Stadium project would add approximately 143,000 square feet of improved public open space that would consist of pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas, potentially including water features, public art, and seating areas. Pedestrian plazas would include a main plaza at the northwest corner of project site (Northwest Plaza) and a large pedestrian gathering area along Figueroa Street, including a new 40- to 70-foot set-back sidewalk area. In addition to supporting soccer stadium events (i.e., games and concerts), the Soccer Stadium project's ancillary uses (conference, restaurant, retail and museum uses) would be open to the public on non-event days to serve as additional catalyst for revitalizing Exposition Park and to complement and enhance the existing venues and destinations within the park. The Specific Plan Amendment permitting the Soccer Stadium project would increase available open space in Exposition Park as compared to existing conditions with the ageing Sports Arena, thereby contributing new open space and community gathering resources to the community and surrounding neighborhoods, and providing increased open space to facilitate joint use of all of the open space areas in Exposition Park by existing public facilities, including existing Exposition Park museums. Further, the Specific Plan Amendment would not disrupt existing park space and other public spaces described above and currently accessible in Exposition Park. For these reasons, the Specific Plan Amendment would allow for enhanced and diverse public and open space features that would contribute to continuing Exposition Park's reputation as a neighborhood and cultural center.

Economic Development Chapter.

The following policies in the Economic Development Chapter of the Framework Element would be applicable to the amended Specific Plan:

Objective 7.2 - Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.

> Policy 7.2.2 - Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.
>
> Policy 7.2.3 - Encourage new commercial development in proximity to rail and bus transit corridors and stations.

The Specific Plan Amendment also promotes transit-oriented development by locating a major sports and entertainment venue in close proximity to public transit, thereby preventing commercial development from encroaching on existing neighborhoods and sustaining economic growth in South Los Angeles. The Specific Plan area including the project site is located approximately two miles southwest of downtown, within Exposition Park, a developed urban site where substantial existing infrastructure is in place. The Specific Plan area provides convenient pedestrian access to several stops on the Expo Light Rail Line, including the Expo Park/USC Station (0.35 mile from the project site) and the Expo/Vermont Station (0.7 mile from the project site), as well as the 37th Street/USC Silver Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.37 mile from the project site). All of these transit facilities

are operated by the Los Angeles County Metropolitan Transportation Authority (Metro). The Specific Plan area is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Specific Plan area.

Further, the Specific Plan Amendment would allow for the continued revitalization of Exposition Park, a recognized community and regional center, with a state-of-the art professional soccer stadium venue that would host approximately 15-20 professional soccer games annually as well as various non-soccer events including concerts and conferences. The Soccer Stadium project also would add new commercial and retail offerings including approximately 11,900 sf of restaurant space and approximately 27,750 sf of retail and team store space. The Soccer Stadium project is expected to generate new visitors to existing surrounding commercial establishments as well. Given the site's proximity to public transit and its adjacency to Figueroa Street, in an area along Figueroa designated as Regional Center, Martin Luther King, Jr. Boulevard, a designated Mixed-Use Boulevard, the Specific Plan Amendment would support policies 7.2.2 and 7.2.3, which together promote new private development in compatible areas with rail and bus transit corridors.

Objective 7.3 - Maintain and enhance existing businesses in the City.

> Policy 7.3.2 - Retain existing neighborhood commercial activities within walking distance of residential areas.

The Specific Plan Amendment would enhance commercial activity within the Specific Plan area without displacing nearby existing neighborhood commercial activities. Because the Soccer Stadium project would attract new visitors to Exposition Park and enhance pedestrian connectivity within and surrounding Exposition Park, it is anticipated that the Soccer Stadium project would help to improve patronage at nearby and related neighborhood commercial uses including Exposition Park's museums and IMAX Theater. Therefore, the Specific Plan Amendment would be consistent with policy 7.3.2, which encourages the retention of existing neighborhood-serving commercial activities.

> Policy 7.10.2 - Support efforts to provide all residents with reasonable access to transit infrastructure, employment, and educational and job training opportunities

The Specific Plan Amendment would allow for replacement of the underutilized Sports Arena with a state-of-the art professional soccer stadium and ancillary facilities, the construction of which would result in an approximately $274 million in economic output and operation of which would generate approximately $129 million in annual economic output. The Soccer Stadium project permitted by the amended Specific Plan would enhance the economic vitality of the region by providing approximately 1,228 job temporary job opportunities associated with the construction of the soccer stadium and approximately 1,840 permanent jobs opportunities during project operations. Many employment openings created with the development of the Soccer Stadium project are anticipated to be filled by area residents, and the project Applicant has publicly committed to the Coliseum Commission that it will achieve 40 percent local hire during project construction and operations. In addition, the Soccer Stadium project's museum component will provide increased educational opportunities about the sport of soccer throughout the world, which is not currently covered by existing museums in Los Angeles. Furthermore, as described at length above, the Specific Plan area including the project site is in close proximity to existing transit infrastructure including the Expo Light Rail Line and many local and regional bus lines. Therefore, the Specific Plan Amendment and Soccer Stadium project support policy 7.10.2 to provide residents with reasonable access to transit infrastructure, employment, and educational and job training opportunities.

7. The Specific Plan Amendment Would Be in Conformance with the Mobility Element of the General Plan.

The Specific Plan Amendment would be consistent with the following objectives and policies of the Mobility Element of the General Plan:

> Policy 4.13 – Balance on-street and off-street parking supply with other transportation and land use objectives.

Parking for the Specific Plan area and the Soccer Stadium project would be provided by the existing parking supply available in Exposition Park. Exposition Park provides approximately 5,961 off-street parking spaces in multiple parking lots and on streets within Exposition Park (not including the proposed VIP parking lot on the project site, which would provide an additional, approximately 250 spaces). These existing parking spaces are currently shared and coordinated among the Coliseum, the Sports Arena, the California Science Center, the Los Angeles County Natural History Museum, the California African American Museum, and the public through the Office of Exposition Park Management. Per the terms of the Non-Disturbance Agreement between the California Science Center and the University of Southern California, 600 parking spaces may be reserved for the California Science Center in the Science Center Structure and 375 spaces must be reserved for the Natural History Museum in Lot 3 when major events occur in the Coliseum or the Sports Arena, leaving between 4,986 and 5,961 spaces available for events in the Exposition Park parking supply. The Soccer Stadium project's event-day parking demand of approximately 4,578 spaces would therefore be fully satisfied by the existing parking supply in Exposition Park. The requirements in the amended Specific Plan and the Soccer Stadium project would not remove any of the existing parking supply provided within the Exposition Park, nor would the Specific Plan Amendment or Soccer Stadium project change the terms of the Non-Disturbance Agreement between the California Science Center and the University of Southern California. Therefore, the amended Specific Plan and Soccer Stadium project would promote the use of shared parking within the Exposition Park area.

> Policy 2.3 – Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.
>
> Policy 3.7 – Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.
>
> Policy 5.2 – Support ways to reduce vehicle miles traveled (VMT) per capita.

The Specific Plan Amendment and Soccer Stadium project would promote several policies within the General Plan that prioritize projects compatible with pedestrian uses. The project site would be integrated with the surrounding Specific Plan area, which is characterized by a mature network of pedestrian facilities. The Specific Plan area will remain bounded by a system of wide sidewalks along Martin Luther King, Jr. Boulevard (11 feet), Figueroa Avenue (18 feet), Exposition Park Drive (20 feet), and Hoover Street (13 feet). Furthermore, the project site would connect with the intricate pedestrian network system within Exposition Park that provides easy walking access between the project site and the Coliseum, the California Science Center, the California African American Museum, and the Los Angeles County Natural History Museum, and the shared parking facilities that serve these attractions. Sidewalks buffer all local roads within Exposition Park and pedestrian pathways are present throughout the park. Multiple pedestrian routes run

through Exposition Park between the Specific Plan area and the Expo Park/USC Expo Line Station, connecting and passing adjacent to the California Science Center and Rose Garden. The Specific Plan Amendment and Soccer Stadium project would not upset these extensive pedestrian facilities already existing in and surrounding the project site and the Specific Plan area.

The Soccer Stadium project also incorporates elements designed to enhance and activate pedestrian areas above existing levels. For example, the Soccer Stadium project would include improvements immediately adjacent to the project site, including a 40- to 70-foot set-back along the eastern boundary of the Specific Plan area fronting Figueroa Street. This area would be developed as a broad, landscaped sidewalk to provide sufficient space for patrons to circulate and queue on event days and provide an inviting and safe pedestrian environment on non-event days. Additionally, an approximately 25-foot-wide sidewalk would be provided along the south edge of Christmas Tree Lane abutting the northern boundary of the project site, serving as a pedestrian-friendly pathway from Figueroa Street to the interior of Exposition Park and the Soccer Stadium project's Northwest Plaza. The Northwest Plaza would be designed to provide a welcoming pedestrian environment with a mix of hardscape and landscaped areas, and may include water features, public art, and seating areas. The Soccer Stadium project incorporates many new elements that would enhance and encourage pedestrian use in accordance with applicable General Plan policies, thereby providing additional access to nearby transit facilities and cultural and sports destinations within Exposition Park, which will serve to reduce vehicle miles traveled.

Policy 2.6 – Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.

The Specific Plan area and project site are located within blocks of numerous designated bicycle routes, allowing for future visitors and patrons to access games, events and the ancillary restaurants, retail, and other commercial uses in the Soccer Stadium project by bicycle. Bicycle routes in the area include:

- Vermont Avenue provides a bike route along the western edge of the Specific Plan area from Coliseum Drive to Jefferson Boulevard;
- Hoover Street provides a bike route at the southern edge of the Specific Plan area from Martin Luther King, Jr. Boulevard to 98th Street;
- Figueroa Street provides a bike route along the northeastern portion of Exposition Park from the California Science Center to 11th Street;
- Broadway provides a bike route east of the Specific Plan area from 92nd to 16th Street;
- Exposition Boulevard provides a bike lane northwest of the Specific Plan area from Vermont Avenue to Jefferson Blvd; and
- 39th Street provides a bike route to the west of the Specific Plan area from Vermont Avenue to Buckingham Road.

The Specific Plan Amendment and Soccer Stadium project would not disrupt any of these currently existing bike routes from which the Specific Plan area and project site may be accessed. The Specific Plan area's accessibility by bicycle also will benefit from its co-location with the City's MyFigueroa Streetscape project ("My Fig"), a street redesign of Figueroa Street extending from 7th Street in downtown Los Angeles to its intersection with Martin Luther King, Jr. Boulevard. The My Fig plan will improve signalized intersections and signage, install high-visibility crosswalks and transit platforms, and install separated paths for bicycles.

In addition, the Soccer Stadium project has been designed specifically to promote and encourage the use of bicycles. At least 107 permanent bicycle parking spaces will be installed on the project

site for use on both event and non-event days. This represents the largest available supply of bicycle parking for the public in Exposition Park. In addition, on event days the Soccer Stadium project would provide at least 333 bicycle parking spaces through a bicycle valet service, which could add capacity over time as bicycle parking demands increase. In total, the Soccer Stadium project will provide more bicycle parking than other recently approved professional sports stadiums in California, which will further support the use of bicycles as an alternative mode of transportation to access the project site and Exposition Park.

8. The Specific Plan Amendment Would Be in Conformance with the Air Quality Element of the General Plan.

Policy 2.2.3 of the Air Quality Element states the following:

> Policy 2.2.3 - Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.

The Specific Plan area and project site are served by a robust public transit system. Transit lines and stops in the vicinity of the Specific Plan area and project site include the Expo Park/USC Station, Jefferson/USC Station, and Expo/Vermont Station stops of the Expo Light Rail Line, as well as seven nearby Metro and LADOT bus lines within a quarter mile of the project site. These transit lines allow access to the Specific Plan area and project site from a wide range of areas. For example, the Metro Expo Line serving the Specific Plan area and project site via the Expo Park/USC (0.35 miles) and the Expo/Vermont (0.7 miles) Metro Expo Line Stations, provides light rail connection currently running from Downtown to Culver City, and will be operating in the near future west to Santa Monica. The Soccer Stadium project would contribute to and expand upon an already comprehensive pedestrian network allowing access to the Specific Plan area and project site from these transit facilities. The readily available alternative modes of transportation are expected to reduce the number of patrons that elect to arrive by private vehicle for games and events at the project site.

Furthermore, traffic assessments prepared in connection with the Soccer Stadium project's Final EIR and Addendum have determined that locating a Major League Soccer stadium and ancillary uses at the current Sports Arena site would not generate significant new traffic impacts. Specifically, the Final EIR and Addendum determined that a new professional soccer stadium would host events with attendance levels comparable to the historic operations of the Sports Arena, and that operations of the Soccer Stadium project's ancillary uses would not result in significant traffic impacts. Since the Final EIR for the soccer stadium was certified in 2011, before the completion of the Expo Light Rail Line, it conservatively did not account for reductions in traffic that would occur as a result of Expo Line operations and increased transit ridership from patrons attending stadium events. For these reasons, the Soccer Stadium project can be expected to minimize reliance on single-occupancy vehicles compared to the conservative analysis contained in the Final EIR.

> Policy 4.2.3 – Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

The project site would be integrated with the surrounding Specific Plan area, which is characterized by a mature network of pedestrian facilities. The Specific Plan area will remain bounded by a system of wide sidewalks along Martin Luther King, Jr. Boulevard (11 feet), Figueroa Avenue (18 feet), Exposition Park Drive (20 feet), and Hoover Street (13 feet).

Furthermore, the project site would connect with the extensive pedestrian network system within Exposition Park that provides easy walking access between the project site and the Coliseum, the California Science Center, the California African American Museum, and the Los Angeles County Natural History Museum, and the shared parking facilities that serve these attractions. Multiple pedestrian routes run through Exposition Park between the Specific Plan area and the Expo Park/USC Expo Line Station, connecting and passing through the California Science Center and Rose Garden. The Specific Plan area and project site are located within blocks of numerous citywide designated bicycle routes and in close proximity to several stops on the Expo Light Rail Line, including the Expo Park/USC Station (0.35 mile from the project site) and the Expo/Vermont Station (0.7 mile from the project site), as well as the 37th Street/USC Silver Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.37 mile from the project site). Further, the Soccer Stadium project would equip 20 percent of the parking supply in a reconfigured VIP parking lot on the project site for electric vehicle charging stations. For 5 percent of the parking spaces in the VIP Parking lot, the Soccer Stadium project would install the electric vehicle charging stations prior to the commencement of operations, with two plugs in each station. Therefore, the Specific Plan Amendment allowing development of the Soccer Stadium project would be consistent with the Air Quality Element policy encouraging development compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

Objective 5.1 – It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.

The Soccer Stadium project would incorporate sustainability as a key aspect of its design and operations criteria. The Soccer Stadium project would be designed to be capable of achieving at least LEED Silver certification or equivalent green building standards. The new soccer stadium would comply with the required measures of the current Los Angeles Green Building Code and would implement additional efficiency measures to achieve a reduction in energy consumption that is greater than 25 percent relative to the ASHRAE 90.1-2007 standard, but no less than minimum compliance with the 2013 California energy efficiency standards (Title 24, Part 6). Energy efficiency would be achieved through building design and through the incorporation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems, lighting, and appliances. Therefore, the Soccer Stadium project permitted with the amendments to the Specific Plan would meet the City's objective to increase energy efficiency in private developments.

9. The Specific Plan Amendment Would Conform to Public Necessity, Convenience, General Welfare of the City of Los Angeles.

The Specific Plan Amendment would serve the public necessity, convenience and general welfare of the City of Los Angeles by permitting use of the amended Specific Plan as a tool to more comprehensively control development of the project site and Specific Plan area. The amended Specific Plan would promote the fundamental concepts of the Community Plan for this area of South Los Angeles, such as economic development, job creation, enhanced use of existing public infrastructure, shared facilities, mix of uses, and pedestrian orientation. As demonstrated above, the Specific Plan Amendment would provide for development that would address the needs of both the adjacent and regional community as well as visitors who come to Exposition Park for recreational, cultural and commercial purposes; revitalize open spaces; maximize benefits to South Los Angeles businesses by supporting the development and linkage of public infrastructure investments; and encourage new commercial, restaurant, retail and entertainment development in proximity to rail and bus transit corridors and stations reducing

vehicle trips and vehicle miles traveled in the City. Therefore, the Specific Plan Amendment would serve the public necessity, convenience and general welfare of the City of Los Angeles.

10. The Specific Plan Amendment Would Conform to Good Zoning Practice.

The existing Sports Arena site is part of an approximately 15-acre site presently zoned OS-1XL (Open Space Zone, Extra Limited Height District 1), as is the majority of Exposition Park. In addition to the site's OS Zone, the project site is also located within the boundaries of the Specific Plan area. The current Specific Plan provides additional land use regulations applicable to the existing Sports Arena site as well as the adjacent site of the Coliseum and immediately surrounding ancillary parking areas. The amended Specific Plan would improve and clarify the land use planning for the Specific Plan area.

Allowable uses in the OS Zone include park and recreation facilities and athletic fields. The Specific Plan specifically permits a variety of additional uses in the Specific Plan area, including the operation of sports, entertainment and public gathering facilities, the sale of concessions and alcoholic beverages for consumption on site, the sale of merchandise and other retail uses, offices, restaurants, bars, cafes and outdoor eating areas, and museums and parking facilities. Although the Specific Plan area encompasses the project site, many of the purposes, definitions, permitted uses, design regulations, on site alcohol regulations, and signage provisions currently stated in the Specific Plan either contemplate development at the adjacent Coliseum property, or do not clearly establish specific parameters for redevelopment of the Sports Arena site. Accordingly, the Specific Plan Amendment would make necessary clarifications to allow the redevelopment of the Sports Arena site with the Soccer Stadium project. The Specific Plan Amendment would clarify that the list of uses currently allowed at the Coliseum also would be allowed in the new Soccer Stadium Zone (Project site) for the Soccer Stadium project. The Specific Plan Amendment is necessary to expressly allow development standards for the Soccer Stadium project (e.g., seating capacity, Floor Area, height, signage, parking and uses), and to clarify that, notwithstanding provisions in the LAMC, the use, height and density regulations for the project site in the Specific Plan area are established by the Specific Plan. The Specific Plan Amendment would serve good zoning practice by resolving ambiguities and areas of uncertainty present in the current Specific Plan.

The Specific Plan Amendment would resolve issues concerning the Specific Plan's internal boundaries. The Specific Plan Amendment would revise the Specific Plan's internal Zone boundaries, including the current Periphery Zone containing the Sports Arena, to become the approximately 15-acre Soccer Stadium Zone (Project site) for the Soccer Stadium project. The slight modifications to the internal Zone boundaries within the Specific Plan area would align the northern and eastern Soccer Stadium Zone boundaries for the project site for the Soccer Stadium project with the southern and western edges of the South Coliseum Drive and Figueroa Street rights-of-way, respectively. Further, the boundaries of the internal Zones within the Specific Plan area do not accurately reflect the actual boundaries of the Coliseum property and the project site. Updated internal boundaries are necessary to appropriately distinguish between the Coliseum property (Primary Stadium Zone) and the project site (Soccer Stadium Zone), along with immediately surrounding areas and parking lots that serve the Specific Plan area and Exposition Park.

In light of the City's current policy that comprehensive signage programs should be authorized only through a Sign District rather than through a Specific Plan, the Specific Plan Amendment would provide that the Specific Plan would cease regulating the signs for the Coliseum and other

areas within the Specific Plan area when the proposed Sign District Ordinance becomes effective. The sign regulations for the Coliseum and Specific Plan areas other than the Periphery Zone containing the Sports Arena would effectively be transferred to the new Sign District regulations. In addition to transferring the current sign regulation for a majority of the Specific Plan area, the Sign District also contains new signage regulations for the Soccer Stadium Zone to support the Soccer Stadium project as discussed in the Sign District findings.

The Soccer Stadium project would be a unique sport and entertainment venue use similar to the Coliseum and Sports Arena. The amended Specific Plan would be an effective planning tool for the Specific Plan area because it would guide development of the Specific Plan area as a whole, including the project site, ensuring orderly development with appropriate parameters, intensity, and design standards for the Specific Plan area. For the above reasons, the Specific Plan Amendment would clarify and create a plan for the orderly, logical and functionally integrated development of the Specific Plan area consistent with adjacent uses and conforming to good zoning practice.

SIGN DISTRICT FINDINGS

Pursuant to LAMC Sections 13.11 and 12.32 S, a Sign District setting forth sign regulations, procedures, guidelines and standards for the Specific Plan area, the project site, and the Soccer Stadium project.

11. The Sign District Would Be in Conformance with the Purposes, Intent and Provisions of the City of Los Angeles General Plan.

Los Angeles City Charter Section 556 and 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 General Plan. The Coliseum and Soccer Stadium Sign District (Sign District) 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 South Los Angeles Community Plan, General Plan Framework and General Plan Mobility Element, as discussed below.

12. The Sign District Would Be in Conformance with the South Los Angeles Community Plan.

The Community Plan is the official guide to future development within South Los Angeles. It is intended to promote an arrangement of land uses, streets and services that will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live and work in the Community Plan area. The Community Plan is also intended to guide development in order to create a healthful and pleasant environment. The Sign District would be consistent with the identification of Exposition Park as a "major opportunity site," the designation of the project site and all of Exposition Park as Open Space (OS), and objectives and policies of the South Los Angeles Community Plan.

In identifying Exposition Park as a "major opportunity site" the South Los Angeles Community Plan provides for the following guiding principles in the development of Exposition Park and the facilities it holds:

- The need for community empowerment regarding future development.
- The opportunity for a variety of jobs and job training for community residents.
- Development reflective of community needs.

- The need for appropriate development plans to prevent incongruent, incremental development.

In addition, the South Los Angeles Community Plan text explains that Open Space should function in one or more of the following ways:

1. Recreational and educational opportunities.
2. Scenic, cultural, and historic values.
3. Public health and safety.
4. Preservation and creation of community identity.
5. Rights-of-way for utilities and transportation facilities.
6. Preservation of natural resources or ecologically important areas.
7. Preservation of physical resources.

Signage rules and regulations pertaining to the project site are currently set forth in the existing Coliseum District Specific Plan, approved under the South Los Angeles Community Plan, and include signage for sports and entertainment uses. Transferring the signage regulations for the Specific Plan area to the Sign District is consistent with current City policies regarding the regulation of signage. The Sign District includes existing signage authorized in the Specific Plan, which includes some signage for the project site, the Coliseum, and surrounding areas. The Sign District would also include modifications to the signage for the Soccer Stadium project. Transferring the signage rights from the Coliseum District Specific Plan and the modifications to the signage for the Soccer Stadium project is consistent with the "major opportunity site" and Open Space functions of the South Los Angeles Community Plan.

The signage program in the Sign District is intended to support the Coliseum and Soccer Stadium project and revitalize the Specific Plan area as a major sports and entertainment venue, consistent with its historic use as a major sports and event center and destination for the entire region. A vibrant, energetic and active environment that would be created under the Sign District's signage program is a critical component to the success of modern sports and entertainment districts, such as Staples Center and LA Live. This type of environment not only attracts patrons of the sports venue, but also attracts patrons and visitors to nearby businesses and public plazas, and promotes additional economic and pedestrian activity in the surrounding area. Further, the limitations on types of signage and operational and lighting restrictions contained in the Sign District ensure that signage in the district will be developed in a cohesive manner and that signage will be designed and operated to avoid impacts on the surrounding community. As a result, the Sign District would support development that empowers the community, provides opportunities for a jobs and job training for community residents, is reflective of community needs, and is designed appropriately to prevent incongruent, incremental development. In addition, the Sign District would promote cultural values and preserve and create community identity. The signage permitted by the Sign District would be consistent with the character of a sports and entertainment venue (i.e., a well-lit and active environment with substantial pedestrian activity including nighttime activity), which is consistent with the area's historic use as a major sports and events destination. The Sign District would contribute to revitalizing the underutilized Sports Arena site by promoting a vibrant and successful sports and entertainment district that would draw patrons and visitors not only to the Coliseum, and the Soccer Stadium project including its ancillary commercial, retail and restaurant uses, but also to surrounding existing and future businesses adjacent to the Specific Plan area. A successful sports and entertainment district would strengthen the economic base and expand market opportunities for existing and new businesses in the neighborhood. Further, revenues from advertising and sponsorship signage permitted by the Sign District are necessary to finance the

Soccer Stadium project, which represents a $250 million private investment on state-owned land in South Los Angeles. By enabling this development, the signage program allowed by the Sign District would help produce other direct economic benefits from the Soccer Stadium project including the generation of approximately $274 million in economic output of construction, $129 million in annual economic output of project operation, 1,228 temporary jobs and 1,840 permanent jobs, and approximately $83 million in annual tax revenues to the City.

New digital signage approvals are necessary to support the significant investment in developing and operating a new professional soccer stadium in South Los Angeles, and will help create and promote a vibrant and active environment around the stadium. New digital signage, including freeway visible signage, absent additional conditions requiring funding to support aesthetic improvements and contribute to the reduction of visual blight in the surrounding area, has the potential to alter and affect the visual environment in adjacent areas of South Los Angeles. The City has reviewed the analysis of signage impacts in the Addendum to the Final EIR for the Soccer Stadium project, and finds that the introduction of new signage to the area would have less than significant impacts under CEQA in the areas of aesthetics and lighting, cultural resources, and land use. While the Soccer Stadium project's signage program would not result in a significant impact under CEQA, the City also recognizes that the introduction of new signage in an area that already experiences visually blighted conditions has the potential to result in some social impacts that are not covered by CEQA or the Los Angeles CEQA Thresholds Guide. Specifically, the introduction of new light sources from signage, the duration of that new lighting and the exposure to new sources of advertising messaging can affect a community that is already experiencing conditions of visual blight unless efforts are made to remedy those existing conditions and improve the surrounding visual environment. While these types of effects are not considered significant effects on the physical environment under CEQA, the City recognizes that for policy reasons it is important to dedicate funds to removing existing visual blight from communities where new signage, and in particular digital and freeway-visible signage, is approved in such areas. Such efforts are necessary to offset the potential negative social impacts of approving new signage adjacent to areas that already contain visual blight in order to avoid such impacts.

The City recognizes that effects from the Project's signage will occur particularly in the area immediately adjacent to the stadium from Martin Luther King, Jr. Boulevard on the north, Slauson Avenue on the south, Normandie Avenue on the west and Central Avenue on the east. This area is currently affected by visual blight, including but not limited to, a lack of streetscape improvements, damaged sidewalks, under-maintained or absent street landscaping, lack of street trees, insufficient trash and bulky item collection, need for pedestrian-oriented lighting for purposes of increased pedestrian safety, bus shelters and associated furniture for transit riders, and graffiti removal. In addition, commercial corridors in this area along Martin Luther King, Jr. Boulevard and Figueroa Street have insufficient City resources to support beautification and improvement programs that would improve the streetscape with funding to address issues such as wayfinding, trash clean-up and vandalism. Further, much of the available park space in this area is in need of hardscape and landscape improvements, or contains outdated or damaged facilities, all of which could be improved with funding to benefit the aesthetics of the open space locations and the surrounding community that are currently visually impacted by the existing conditions.

In order to offset the addition of new digital signage into this area from the Soccer Stadium project, substantial additional efforts should be made by the Applicant to provide funding to improve the existing visual environment. Specifically, improvements to support the reduction and removal of existing visual blight in this community of South Los Angeles are appropriate to offset

the effects to the visual environment of adding new digital signage and related ambient lighting to the area. Improvements should be focused on remedying the existing visual impacts experienced in this community, including visual improvements to the streetscape, commercial corridors and neighborhoods, and parks and open space uses that are located within the affected area. Though the City Planning Commission required $3 million in funding under Section 6.F of the Sign District Ordinance, the Council finds that the Applicant should be required to spend or cause to be spent $4 million in funds toward the efforts described above to improve the visual environment, as detailed in proposed replacement Section 6.F for the Sign District Ordinance. This amount is based on the fact that the Council is approving additional signage for the stadium and extending the hours of signage operations.

In particular, the Soccer Stadium's freeway-visible signs will generate substantial additional revenues for the Applicant, but will also affect the visual environment on the I-110 Freeway (and its off-ramps) and in the surrounding community that currently experiences visually blighted conditions. The $4 million amount equates to approximately $325 per square foot of digital signage that is expected to be visible from the I-110 Freeway or its off-ramps, which totals approximately 12,288 square feet. This amount will be sufficient for significant investments addressing existing visual blight and make improvements to aesthetic conditions in the area of South Los Angeles affected by these new signs.

Commercial

Within the Land Use Chapter of the Framework Element of the General Plan, the Sign District and project site are located adjacent to and partially within a designated Regional Center that generally corresponds with Figueroa Street. A Regional Center is defined as:

...a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. Generally different types of Regional Centers will fall within the range of floor area ratios from 1.5:1 to 6.0:1. Some will only be commercially oriented; others will contain a mix of residential and commercial uses. Generally, Regional Centers are characterized by 6- to 20-stories (or higher). Regional Centers are usually major transportation hubs.

The Land Use Chapter also indicates that Martin Luther King, Jr. Boulevard adjacent to the Specific Plan area and Sign District is designated as a Mixed Use Boulevard. Mixed Use Boulevards are described as connections between the City's neighborhood districts and community, regional, and Downtown centers. Mixed-use development is encouraged along these boulevards, with the scale, density and height of development compatible with the surrounding areas.

Because the Sign District and project site are located adjacent to and partially within a Regional Center and adjacent to a Mixed Use Boulevard the following objectives from the South Los Angeles Community related to Commercial are also relevant:

Objective 2-1: To conserve and strengthen viable commercial development.

Policy 2-1.1: New commercial uses shall be located in existing, established commercial areas or existing shopping centers.

Policy 2-1.3: Commercial areas should be consolidated and deepened to stimulate existing businesses, create opportunities for new development and off-street parking, expand the variety of goods and services, and improve shopping convenience as well as offer local employment.

Policy 2-1.5: Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.

Objective 2-3: To attract uses which strengthen the economic base and expand market opportunities for existing and new businesses.

The Sign District would be consistent with the City's objective to strengthen viable commercial development and policies related thereto. The Sign District and project site are located at the edge of an existing Regional Center along Figueroa Street, which encourages the development of a diversity of uses, including major entertainment and cultural facilities. The types and extent of permitted signage allowed by the Sign District would emphasize the event and entertainment-oriented aspect of the underlying Coliseum District Specific Plan (Specific Plan) area, including a mixture of stadium and sponsor identification signs, temporary event signs, electronic digital displays, changeable message light-emitting diode (LED) boards, static signs, and retail and tenant identification signs, including both on-site and off-site signs. The signage permitted by the Sign District would be consistent with the character of a sports and entertainment venue (i.e., a well-lit and active environment with substantial pedestrian activity including nighttime activity), which is consistent with the area's historic use as a major sports and events destination (including decades of events at the adjacent Coliseum) and is therefore compatible with existing use and development. By authorizing a variety of large scale and fully integrated signage within the Sign District and its concomitant Specific Plan area including the project site, the Sign District would contribute to a vibrant and successful sports and entertainment district that would draw patrons and visitors not only to the Coliseum and the Soccer Stadium project, including its ancillary commercial, retail and restaurant uses, but also to surrounding existing and future businesses adjacent to the Specific Plan area. A successful sports and entertainment district would strengthen the economic base and expand market opportunities for existing and new businesses in the neighborhood. Revenues from advertising and sponsorship signage permitted by the Sign District would help to finance the Soccer Stadium project. The signage program allowed by the Sign District would help produce other direct economic benefits from the Soccer Stadium project including the generation of approximately $274 million in economic output of construction, $129 million in annual economic output of project operation, 1,228 temporary jobs and 1,840 permanent jobs, and approximately $83 million in annual tax revenues to the City.

New digital signage approvals are necessary to support the significant investment in developing and operating a new professional soccer stadium in South Los Angeles, and will help create and promote a vibrant and active environment around the stadium. New digital signage, including freeway visible signage, absent additional conditions requiring funding to support aesthetic improvements and contribute to the reduction of visual blight in the surrounding area, has the potential to alter and affect the visual environment in adjacent areas of South Los Angeles. The City has reviewed the analysis of signage impacts in the Addendum to the Final EIR for the Soccer Stadium project, and finds that the introduction of new signage to the area would have less than significant impacts under CEQA in the areas of aesthetics and lighting, cultural resources, and land use. While the Soccer Stadium project's signage program would not result in a significant impact under CEQA, the City also recognizes that the introduction of new signage in an area that already experiences visually blighted conditions has the potential to result in some social impacts that are not covered by CEQA or the Los Angeles CEQA Thresholds Guide.

Specifically, the introduction of new light sources from signage, the duration of that new lighting and the exposure to new sources of advertising messaging can affect a community that is already experiencing conditions of visual blight unless efforts are made to remedy those existing conditions and improve the surrounding visual environment. While these types of effects are not considered significant effects on the physical environment under CEQA, the City recognizes that for policy reasons it is important to dedicate funds to removing existing visual blight from communities where new signage, and in particular digital and freeway-visible signage, is approved in such areas. Such efforts are necessary to offset the potential negative social impacts of approving new signage adjacent to areas that already contain visual blight in order to avoid such impacts.

The City recognizes that the effects from the Project's signage will occur particularly in the area immediately adjacent to the stadium from Martin Luther King, Jr. Boulevard on the north, Slauson Avenue on the south, Normandie Avenue on the west and Central Avenue on the east. This area is currently affected by visual blight, including but not limited to a lack of streetscape improvements, damaged sidewalks, under-maintained or absent street landscaping, lack of street trees and an absence of street furniture. In addition, commercial corridors in this area along Martin Luther King, Jr. Boulevard and Figueroa Street have insufficient City resources to support beautification and improvement programs that would improve the streetscape with funding to address issues such as wayfinding, trash clean-up and vandalism. Further, much of the available park space in this area is in need of hardscape and landscape improvements, or contains outdated or damaged facilities, all of which could be improved with funding to benefit the aesthetics of the open space locations and the surrounding community that are currently visually impacted by the existing conditions.

In order to offset the addition of new digital signage into this area from the Soccer Stadium project, substantial additional efforts should be made by the Applicant to provide funding to improve the existing visual environment. Specifically, improvements to support the reduction and removal of existing visual blight in this community of South Los Angeles are appropriate to offset the effects to the visual environment of adding new digital signage to the area. Improvements should be focused on remedying the existing visual impacts experienced in this community, including visual improvements to the streetscape, commercial corridors and neighborhoods, and parks and open space uses that are located within the affected area. Though the City Planning Commission required $3 million in funding under Section 6.F of the Sign District Ordinance, the Council finds that the Applicant should be required to spend or cause to be spent $4 million in funds toward the efforts described above to improve the visual environment, as detailed in proposed replacement Section 6.F for the Sign District Ordinance. This amount is based on the fact that the Council is approving additional signage for the stadium and extending the hours of signage operations.

In particular, the Soccer Stadium's freeway-visible signs will generate substantial additional revenues from the Applicant, but will also affect the visual environment on the I-110 Freeway (and its off-ramps) and in the surrounding community that currently experiences visually blighted conditions. The $4 million amount equates to approximately $325 per square foot of digital signage that is expected to be visible from the I-110 Freeway or its off-ramps, which totals approximately 12,288 square feet. This amount will be sufficient for significant investments to address existing visual blight and make improvements to aesthetic conditions in the area of South Los Angeles affected by these new signs. The City therefore recognizes that if the Soccer Stadium's freeway-visible signs were to be obstructed by future intervening development, the justification for Section 6.F would no longer be supported. Accordingly, to ensure the justification for this condition is maintained, the City shall preserve appropriate view corridors of the Soccer Stadium's freeway visible signage from the I-110 Freeway and its off-ramps.

Objective 2-5: To enhance the appearance of commercial districts.

The Sign District would authorize the existing signage program for the Specific Plan area, along with additional signage for the Soccer Stadium project. The signage program for the Soccer Stadium project would present a strong visual element that would influence the aesthetics of the project site and the Specific Plan area. The types and extent of permitted signage would emphasize and support the sport-, event- and entertainment-oriented aspect of the Soccer Stadium project and complement the existing and approved signage for the Coliseum currently authorized by the signage regulations in the existing Specific Plan. The signage program in the Sign District is intended to support the Coliseum and Soccer Stadium project and revitalize the Specific Plan area as a major sports and entertainment venue, consistent with its historic use.

Accordingly, dynamic signage is central to the goal of establishing a unique visual identity for the Specific Plan area, the Coliseum, and the Soccer Stadium project. The Sign District would not change or alter the type or number of signs allowed for the Coliseum or areas around the Coliseum. The Sign District would allow additional signs specifically intended to support and promote the Soccer Stadium project. The Sign District includes limitations on the types, amounts, locations, sizes, operating hours, and illumination of permitted signs on and around the exterior of the Soccer Stadium project consistent with the character of a professional sports and entertainment venue (i.e., a well-lit and active pedestrian environment with substantial pedestrian activity throughout the day and evening). The Sign District would support the Community Plan goal to enhance the appearance of commercial districts by providing vibrant, clear, attractive signage enhancing the Specific Plan area while complementing and protecting the character of the surrounding areas by limiting visual clutter. The signage program authorized by the Sign District complements the aesthetic character of the Coliseum, Soccer Stadium project, and Exposition Park and would be positioned in an attractive manner that is compatible both architecturally and relative to other signs within the Sign District. Further, the unified and consistent signage program allowed by the Sign District would contribute in a positive way to the Specific Plan area and Exposition Park's visual environment in a manner that would reinforce the Sign District's sense of place as a major urban sports and entertainment venue, cultural and visitor destination, and a visually engaging pedestrian experience.

Non-Motorized Transportation

Objective 16-2: To promote Pedestrian Oriented areas and pedestrian routes for commuter, school, recreational use, economic revitalization, and access to transit facilities.

The Sign District would support the South Los Angeles Community Plan by creating a visually inviting pedestrian-oriented area around the Soccer Stadium project and Coliseum as the southern anchors of the City's My Figueroa street improvement project area. Smaller-scale, directional pedestrian and vehicular signage would be placed throughout the Sign District as necessary to facilitate access and safety for the benefit of both pedestrians and bicyclists, including way-finding signage for pedestrian routes to access transit facilities such as nearby Expo Light Rail Line stations. By facilitating a more vibrant and active environment around the Soccer Stadium project both during the daytime and evening hours, the Sign District would promote further pedestrian activity in the vicinity of Exposition Park and along Figueroa Street and Martin Luther King, Jr. Boulevard, and economic revitalization in the surrounding area of South Los Angeles.

13. The Sign District Would Be in Conformance with the General Plan Framework.

Within the Land Use Chapter of the Framework Element, the following goals, objectives and policies relevant to the Specific Plan area are applicable to the Sign District:

Policy 5.8.4 - Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.

The signage program for the Soccer Stadium project that would be permitted pursuant to the Sign District Ordinance would present a strong visual element that would influence the aesthetics of the project site and the Specific Plan area. The Specific Plan currently regulates signage associated with the Coliseum and surrounding areas, and those regulations have been incorporated into the Sign District consistent with existing City policies concerning signage. The types and extent of permitted signage would emphasize and support the event- and entertainment-oriented aspect of the Soccer Stadium project and complement the existing and approved signage for the Coliseum currently allowed by the signage regulations in the current Specific Plan. The signage program in the Sign District is intended to support both the Coliseum and Soccer Stadium project and revitalize the Specific Plan area as a major sports and entertainment venue, consistent with its historic use. Accordingly, signage is central to the goal of establishing a unique visual identity for the Specific Plan area, the Coliseum, and the Soccer Stadium project. The Sign District would not change or alter the type or number of signs allowed in the Coliseum or areas around the Coliseum. The Sign District would allow additional signs specifically intended to support and promote the Soccer Stadium project. A number of the sign elements on the exterior of the Soccer Stadium would be light-emitting diode (LED) capable of showing changing digital content, which have been architecturally integrated into the stadium design. In particular, a video wall (digital sign) on the north façade of the World Football Museum would be a design feature integrated into the architectural design of the building, along with digital signs on the stadium canopy along Figueroa Street. Signs on the inside of the Soccer Stadium would not be regulated by the Sign District, but would be fully integrated with the architecture of the Stadium. In addition, the Director of Planning would review an interior sign plan to confirm that interior signs are consistent with how those signs are defined in the Sign District Ordinance, and that they do not conflict with other applicable provisions in the Ordinance. The Sign District includes specific limitations on the types, amounts, locations, sizes, operating hours, and illumination of permitted signs on and around the exterior of the Soccer Stadium project in a visually attractive manner consistent with other professional sports and entertainment venues. From the outside of the Soccer Stadium, entry gates would be clearly identifiable and would prominently feature signage integrated into the stadium's architecture with the street level facades designed to a human scale. Accordingly, the Sign District would comply with the policy that new signage be integrated with the architectural character of the Soccer Stadium project that conveys a visually attractive aesthetic.

Objective 5.8 - Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.

Objective 5.9 - Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.

The project site's frontage on Figueroa Street is located in a designated Regional Center, as well as a Pedestrian-Oriented District, which generally corresponds with Figueroa Street. As discussed above, the Sign District's smaller-scale, directional pedestrian and vehicular signage

would be placed throughout the Sign District as necessary to facilitate access and safety for the benefit of both pedestrians and bicyclists. Furthermore, within the Sign District, the Soccer Stadium and South Parking Lot Zones would be divided into Vertical Sign Levels with the purpose of addressing different sign viewing distances, including pedestrian views from street level, pedestrian views from a distance, and from vehicles. The Sign District supports the pedestrian-oriented nature of the Specific Plan area and contemplates that signage throughout the Sign District would improve personal safety of visitors by facilitating a more vibrant and active environment around the Soccer Stadium project both during the daytime and evening hours that encourages additional pedestrian activity and eyes on the street.

14. The Sign District Would Be in Conformance with the Mobility Element of the General Plan.

The Sign District would be consistent with applicable objectives and policies of the Mobility Element, including the following:

> Policy 4.14 – Provide widespread, user-friendly information about mobility options and local destinations, delivered through a variety of channels including traditional signage and digital platforms.

The signage program would include directional pedestrian and vehicular signage placed throughout the Sign District. Signage provided in conjunction with the pedestrian and bicycle network within the Sign District would be further integrated with the area surrounding the Specific Plan area, which is characterized by a mature network of pedestrian and bicycle facilities, and thereby enhance pedestrian connectivity on a larger scale. This would include way-finding signage for pedestrian routes to access transit facilities, such as nearby Expo Light Rail Line stations, which would further promote mobility options both within the Sign District and Exposition Park.

15. The Sign District Would Conform to Public Necessity, Convenience and General Welfare of the City of Los Angeles.

The Sign District would help further revitalize Exposition Park and the surrounding area in South Los Angeles with a professional soccer stadium that would attract patrons to soccer games and other events resulting in the generation of approximately $274 million in economic output and 1,228 temporary jobs during project construction, $129 million in annual economic output and 1,840 permanent jobs during project operations, and approximately $83 million in annual tax revenues to the City. In order to revitalize the project site, the development must reflect a high design standard. Permitting unique context-oriented and innovative signage through the Sign District would help support the private investment necessary to redevelop the project site to provide the projected economic output and jobs for City residents. The Sign District would incorporate a wide variety of signage types, some of which would utilize state-of-the-art technologies to create a wide variety of signage throughout the Soccer Stadium Zone and the Sign District in general.

New digital signage approvals are necessary to support the significant investment in developing and operating a new professional soccer stadium in South Los Angeles, and will help create and promote a vibrant and active environment around the stadium. New digital signage, including freeway visible signage, absent additional conditions requiring funding to support aesthetic improvements and contribute to the reduction of visual blight in the surrounding area, has the potential to alter and affect the visual environment in adjacent areas of South Los Angeles. The

City has reviewed the analysis of signage impacts in the Addendum to the Final EIR for the Soccer Stadium project, and finds that the introduction of new signage to the area would have less than significant impacts under CEQA in the areas of aesthetics and lighting, cultural resources, and land use. While the Soccer Stadium project's signage program would not result in a significant impact under CEQA, the City also recognizes that the introduction of new signage in an area that already experiences visually blighted conditions has the potential to result in some social impacts that are not covered by CEQA or the Los Angeles CEQA Thresholds Guide. Specifically, the introduction of new light sources from signage, the duration of that new lighting and the exposure to new sources of advertising messaging can affect a community that is already experiencing conditions of visual blight unless efforts are made to remedy those existing conditions and improve the surrounding visual environment. While these types of effects are not considered significant effects on the physical environment under CEQA, the City recognizes that for policy reasons it is important to dedicate funds to removing existing visual blight from communities where new signage, and in particular digital and freeway-visible signage, is approved in such areas. Such efforts are necessary to offset the potential negative social impacts of approving new signage adjacent to areas that already contain visual blight in order to avoid such impacts.

The City recognizes that the effects from the Project's signage will occur particularly in the area immediately adjacent to the stadium from Martin Luther King, Jr. Boulevard on the north, Slauson Avenue on the south, Normandie Avenue on the west and Central Avenue on the east. This area is currently affected by visual blight, including but not limited to a lack of streetscape improvements, damaged sidewalks, under-maintained or absent street landscaping, lack of street trees and an absence of street furniture. In addition, commercial corridors in this area along Martin Luther King, Jr. Boulevard and Figueroa Street have insufficient City resources to support beautification and improvement programs that would improve the streetscape with funding to address issues such as wayfinding, trash clean-up and vandalism. Further, much of the available park space in this area is in need of hardscape and landscape improvements, or contains outdated or damaged facilities, all of which could be improved with funding to benefit the aesthetics of the open space locations and the surrounding community that are currently visually impacted by the existing conditions.

In order to offset the addition of new digital signage into this area from the Soccer Stadium project, substantial additional efforts should be made by the Applicant to provide funding to improve the existing visual environment. Specifically, improvements to support the reduction and removal of existing visual blight in this community of South Los Angeles are appropriate to offset the effects to the visual environment of adding new digital signage to the area. Improvements should be focused on remedying the existing visual impacts experienced in this community, including visual improvements to the streetscape, commercial corridors and neighborhoods, and parks and open space uses that are located within the affected area. Though the City Planning Commission required $3 million in funding under Section 6.F of the Sign District Ordinance, the Council finds that the Applicant should be required to spend or cause to be spent $4 million in funds toward the efforts described above to improve the visual environment, as detailed in proposed replacement Section 6.F for the Sign District Ordinance. This amount is based on the fact that the Council is approving additional signage for the stadium and extending the hours of signage operations.

In particular, the Soccer Stadium's freeway-visible signs will generate substantial additional revenues from the Applicant, but will also affect the visual environment on the I-110 Freeway (and its off-ramps) and in the surrounding community that currently experiences visually blighted conditions. The $4 million amount equates to approximately $325 per square foot of digital

signage that is expected to be visible from the I-110 Freeway or its off-ramps, which totals approximately 12,288 square feet. This amount will be sufficient for significant investments to address existing visual blight and make improvements to aesthetic conditions in the area of South Los Angeles affected by these new signs. The City therefore recognizes that if the Soccer Stadium's freeway-visible signs were to be obstructed by future intervening development, the justification for Section 6.F would no longer be supported. Accordingly, to ensure the justification for this condition is maintained, the City shall preserve appropriate view corridors of the Soccer Stadium's freeway visible signage from the I-110 Freeway and its off-ramps.

The Sign District would build on the Specific Plan area's identity as a sports- and entertainment oriented destination. The Sign District would help visually integrate the signage for the Soccer Stadium project with existing and approved signage for the Coliseum to create a cohesive and unique visitor experience within Exposition Park. The Sign District would enhance the pedestrian-oriented character of the streets surrounding the Sign District by allowing and encouraging a variety of signage, including pedestrian-oriented street-level and wayfinding signs, throughout the District. By increasing flexibility for signage to attract visitors to events and to highlight sponsorships and local sports teams, the Sign District would help create a lively atmosphere complementing the existing uses in the area. By facilitating a more vibrant and active environment around the Soccer Stadium project both during the daytime and evening hours, the Sign District would promote further pedestrian activity in the vicinity of Exposition Park and along Figueroa Street and Martin Luther King, Jr. Boulevard, and economic revitalization in the surrounding area of South Los Angeles. As such, the Sign District would conform to the public necessity, convenience, and general welfare.

16. The Sign District Would Conform to Good Zoning Practice.

The Sign District would reflect good zoning practice in that it would be consistent with and enhance the unique character of the Specific Plan area, and the project site, as a vibrant sports and entertainment complex that would be a major regional destination along with the adjacent Coliseum. Exposition Park has historically served as a regional destination for sporting and other entertainment events, and declining aesthetic and usefulness of the ageing Sports Arena have resulted in lower attendance and fewer events that have left the existing site underutilized. The addition of a signage program to the Soccer Stadium project is consistent with the aesthetic of a modern, world-class sports complex for a professional sports franchise and would provide the Specific Plan area with a unique identity necessary to attract patrons and visitors, along with generating an energetic and active environment. The Sign District would also advance the purposes of the Citywide sign ordinance in that its regulations are designed to protect neighborhood aesthetics and traffic safety.

The Specific Plan area encompasses approximately 85 acres within Exposition Park, the largest public park in the South Los Angeles Community Plan area, and is the existing site of the Sports Arena and the Coliseum. As discussed above, declining use of the Sports Arena has left the Sports Arena site underutilized, but the project site has been envisioned for redevelopment with a professional soccer stadium and ancillary facilities as the home field of a Major League Soccer expansion franchise. The Soccer Stadium project would include a museum, conference, office, retail and restaurant uses that would directly benefit the surrounding South Los Angeles community and Exposition Park. The Soccer Stadium project authorized by the amended Specific Plan would require a unique and comprehensive signage program to help support the significant private investment a redevelopment project of this scope costs.

Even though the Specific Plan as amended in 2009 authorized the development of signage associated with the Coliseum and surrounding areas in Exposition Park, it did not contemplate redevelopment of the Sports Arena site and therefore included limited signage for that portion of the Specific Plan area. It is the City's current policy that unique, comprehensive signage programs should be approved through a sign district rather than being authorized through a specific plan. The Sign District therefore incorporates existing and approved signage for the Coliseum and surrounding areas allowed by the Specific Plan, as well as new signage for the Soccer Stadium project in furtherance of the Specific Plan and to further activate Exposition Park as a major sports, entertainment, and cultural destination.

Consistent with the Specific Plan area's current and historic use as a major sports and entertainment complex, the types and extent of signage permitted would emphasize the event- and entertainment-oriented aspect of the Soccer Stadium project and complement the existing and approved signage for the Coliseum envisioned for this portion of Exposition Park. The signage program is intended to support both the Soccer Stadium project's and the Coliseum's operations and help further revitalize the Specific Plan area as a major sports and entertainment venue, consistent with its historic use. Accordingly, a dynamic signage program is central to the goal of establishing a unique, visually exciting and attractive identity for the Specific Plan area and Sign District consistent with the character of a sports and entertainment venue (i.e., a well-lit and active environment with substantial daytime and nighttime pedestrian activity).

The signage program authorized by the Sign District would present an attractive visual element that would positively influence the aesthetics of the Sign District and Specific Plan area. The Sign District would unify and integrate the signage with the aesthetic character of the Coliseum, Soccer Stadium project, and Exposition Park. A comprehensive signage program would contribute in a positive way to the Sign District, Specific Plan area, and Exposition Park's visual environment, in a manner that complements the architectural styles of the Coliseum and Soccer Stadium project and reinforces the Specific Plan area and Sign District's sense of place as a major urban sports and entertainment destination venue, cultural and visitor destination with a pedestrian experience.

By limiting maximum sign area, requiring minimum distance between signs, setting maximum level of sign illuminance, requiring controlled refresh rates for digital signs, and limiting brightness after sunset and before sunrise, the regulations in the Sign District would also minimize potential traffic hazards and protect public safety by ensuring residential and vehicular viewers are shielded and that driver distraction would be minimized such that there are no significant impacts to safety. The following design and specification constraints for illuminated signage would be implemented as part of the Supplemental Use Sign District (Section 8.I) to minimize light emissions from illuminated signs:

- The intensity of each sign display shall be controlled with a photocell with an adjustable set-point that measures available daylight. This set-point shall be used to control the intensity of the sign output to either the daytime or nighttime brightness standards set forth below.

- The brightness of any Sign that includes neon, neon-like, or LED elements shall be fully dimmable and controlled by a timer, which shall be maintained in good working order.

- All illuminated Signs shall be designed, located, and/or screed so as to minimize light travel onto the exterior walls of residential units and the public right-of-way.

- All light emitting diodes used within any illuminated Sign shall have a maximum horizontal beam spread of 165 degrees. The maximum or peak light output of any Sign shall be at or below horizontal.

- Illuminance from Signs shall not exceed 0.6 footcandles above ambient.
- All illuminated signs shall have a brightness after sunset and before sunrise of no greater than 600 candelas per square meter.
- All Digital Display Signs shall transition smoothly at a consistent rate from the daytime brightness to the permitted nighttime brightness levels, beginning 45 minutes prior to sunset and concluding 45 minutes after sunset
- All illuminated signs shall comply with CALGreen (Part 11 of Title 24, California Code of Regulations)
- Sign brightness and illuminance shall be measured for each Sign individually at an angle that is within 6 degrees of perpendicular to the Sign Face, and from a distance as defined by the following formula:

  Measurement Distance (in feet) = $\sqrt{DisplayArea\ x\ 100}$
  where Display Area is the area of the sign display in square feet.

  The illumination standards for the Illuminated Signs in the Soccer Stadium Zone and South Parking Lot Zone reflect the urban, well-lit context of the Figueroa Street corridor, the proposed Major League Soccer stadium use and the sports and entertainment district that will be created in and around the southern edge of Exposition Park by this catalytic development, while ensuring that lighting impacts to sensitive uses, including residential properties, will remain less than significant. Illumination standards for the Coliseum and Soccer Stadium Sign District that limit illuminance to 0.6 foot candles above ambient and brightness after sunset and before sunrise to no greater than 600 candelas per square meter are appropriate for this site and represent a lower and more restrictive standard than exists in the Los Angeles Municipal Code (see LAMC section 14.4.4.E), which currently limits light intensity to 3.0 foot candles above ambient at the property line of the nearest residential property. The illumination standards for this Sign District are also more restrictive than other adopted Downtown sign districts, including the Sports and Entertainment District, the Convention and Event Center Sign District, and the Figueroa and Seventh Street Sign District. In addition to the restrictions in the Sign District, the Project's Mitigation Monitoring Program, prepared as part of the Project's CEQA analysis, includes Project Design Features to ensure that lighting impacts to sensitive uses, including residential properties, will remain less than significant. To ensure compliance with the illumination standards, the testing of the Illuminated Signs in the Soccer Stadium Zone and South Parking Lot Zone shall be conducted for each Sign individually at a measurement location determined by the Sign size. This measuring location and procedure will provide a consistent and verifiable method of measuring Sign compliance.

  Additionally, Signs that are both visible from and located within 660 feet from the edge of the right-of-way of interstate highways or primary highways would be subject to the Outdoor Advertising Act, Cal. Business & Professions Code Section 5200, et seq., as applicable or later amended. The Outdoor Advertising Act exempts from certain requirements Signs that are associated with an arena capable of providing a venue for professional sports on a permanent basis that have a capacity of 15,000 or more seats, such as the Coliseum and Soccer Stadium project, and that meet the following standards:

- The Signs must be used to advertise products, goods, or services sold by persons on the Premises of an Arena, such as the Coliseum or Soccer Stadium project, on a regular basis, or to advertise any products, goods, or services marketed or promoted on the Premises of an Arena subject to one or more Sponsorship Marketing Plan(s).
- If located on the Premises of an Arena, the Signs must be authorized by an ordinance adopted by the City, such as the proposed Sign District, that establishes regulations that include, at a minimum, all of the following:

    - The number of Signs and total Sign Area allowed.
    - The Maximum Individual Sign Area.
    - The Minimum Sign separation.
    - Illumination restrictions and regulations.
    - Illuminated Sign hours of operation

- If located off the Premises of an Arena, the Signs must be authorized by, an ordinance adopted by the City, such as the proposed Sign District, bear the name or logo of the arena, and be visible when approaching offramps from the interstate, primary, or state highways used to access the Premises of an Arena.

The Sign District contains each of the standards described above consistent with the criteria set forth in the Outdoor Advertising Act.

The Sign District provides an exception to the Citywide ban on offsite signs and other provisions of the Citywide sign regulations as is typical for other sign districts within the City and the extent of which is appropriate for the use of the Specific Plan area and Sign District for large-scale sporting and entertainment activities. The ban and other provisions will continue to directly advance the purposes of aesthetics and traffic safety despite this exception. Any aesthetic or traffic safety harm resulting from allowing signs that will otherwise be prohibited or restricted by the citywide sign regulations are outweighed by the improvement to aesthetics resulting from the development of an engaging and vibrant sports and entertainment district including the Coliseum and Soccer Stadium project, which would be supported by the Sign District.

The Soccer Stadium project and Sign District would reinforce the pedestrian-oriented character of the streets within and immediately surrounding the Coliseum, Soccer Stadium project, Sign District, and Specific Plan area. Through signage that complements and provides ground direction through open plazas, streetscape and sidewalk improvements and pedestrian-scaled elements on buildings and signage, the Soccer Stadium project and Sign District are intended to vastly improve the urban environment in the Specific Plan area including the project site by facilitating activity on the street, encouraging pedestrian, bicycle, and public transit travel and promoting the walkability and accessibility of and around the Specific Plan area. Soccer Stadium project elements, including street improvements and pedestrian-oriented signage, will create strong connections to the surrounding Exposition Park area, particularly to nearby transit stops and stations for the Expo Light Rail Line that will support the Specific Plan area as a unique sports, entertainment and tourist destination for South Los Angeles.

Further, any aesthetic or traffic safety harm from allowing signs that would otherwise be prohibited or restricted by the citywide ban on offsite signs or other provisions of the Citywide sign regulation, is outweighed by the elimination of blight. The development of the Soccer Stadium project would serve as a catalyst for the removal of blight and renewed interest and investment in the South Los Angeles area as a sports, entertainment, and cultural destination. Urban

redevelopment in this area of South Los Angeles, such as the Soccer Stadium project, is necessary to ensure the continued vitality of the Coliseum, Specific Plan area and Exposition Park. Accordingly, although no aesthetic or traffic safety harm is anticipated from the Sign District, any such harm would be outweighed by the elimination of blight and the investment in redevelopment of the Specific Plan area including the project site.

Finally, to the extent off-site and other signs are to be permitted in the City, the Sign District would help restrict and channel such signs in a manner that minimizes their traffic safety impacts. Furthermore, even though such signs would be allowed in the limited area of the Sign District, the Citywide ban on off-site signs and other sign regulations to which this Sign District would create an exception will continue in effect with respect to the vast majority of the City. Therefore, by narrowly tailoring the types and operational restrictions on signs that would be permitted in the Sign District in connection with the development of a regional sports and entertainment venue, the Sign District would conform to good zoning practice.

17. The Sign District Would Conform to LAMC Requirements for Establishing Sign Districts.

The enabling language for the establishment of sign districts contained in LAMC Section 13.11 B requires that the following findings be made:

a. Each "SN" Sign District shall include only properties in the C or M Zones, except that R5 Zone properties may be included in a "SN" Sign District provided that the R5 zoned lot is located within an area designated on an adopted community plan as a "Regional Center," "Regional Commercial," or "High Intensity Commercial," or within a redevelopment project area.

The Specific Plan Amendment would permit the establishment of a sign district encompassing the Specific Plan area to include properties in the OS Zone, notwithstanding the restrictions set forth in LAMC Section 13.11.B. A sign district that would only be allowed in the OS Zone within the Specific Plan area would be consistent with the intent of the LAMC for the same reasons a sign district is appropriate in the C, M and R5 zones in other Regional Center and redevelopment project areas. Comparable to the C, M and R5 zones, the OS Zone within the Specific Plan area is a developed, urban area of the City within the Exposition / University Park Redevelopment project area and adjacent to and partially within a designated Regional Center under the Framework element of the General Plan that generally corresponds with Figueroa Street. The Sign District and Specific Plan area are intended as a regional center for sports and entertainment venues, along with ancillary commercial uses. The Sign District would allow signage consistent with the signage at other sports and entertainment venues within the City such as L.A. LIVE, the Figueroa and Olympic Sign District, the Figueroa and Seventh Street Sign District, and the Convention and Event Center Sign District approved in connection with the Farmers' Field stadium project. Even though the Specific Plan as amended in 2009 authorized the development of signage associated with the Coliseum and surrounding areas in Exposition Park within the Specific Plan area, it included limited signage for the project site. It is the City's current policy that unique comprehensive signage programs should be approved through a sign district rather than being authorized through a specific plan. Accordingly, the establishment of a sign district in the OS Zone only for those areas within the Specific Plan would be appropriate as contemplated under

the LAMC, as the Sign District meets the intent of the LAMC to allow sign districts in areas intended to be regional destinations.

b. No "SN" Sign District shall contain less than one block or three acres in area, whichever is the smaller.

The Sign District would encompass approximately 85 acres and would not contain less than one block or three acres in area.

c. The total acreage in the district shall include contiguous parcels of land which may only be separated by public streets, ways or alleys, or other physical features, or as set forth in the rules approved by the Director of Planning.

The portion of the Sign District within Exposition Park includes contiguous parcels of land. In addition, the Specific Plan Amendment would permit the inclusion of up to four non-contiguous parcels within the Specific Plan area and Sign District. This allowance is consistent with the California Outdoor Advertising Act (Cal. Business & Professions Code Section 5200, et seq.), which allows professional sports arenas with a capacity of 15,000 or more seats to provide up to two off-premises advertising displays bearing the name or logo of the arena that are visible when approaching offramps from the interstate, primary or state highways used to access the premises of the arena. Accordingly, the Outdoor Advertising Act allows the development of two such signs for the Coliseum, and two such signs for the Soccer Stadium project. Further, due to the unique sports and entertainment character of the Specific Plan area and the existing signage program regulations in the Specific Plan that recognize the Coliseum's existing off-premises sign along the 110 (Harbor) Freeway, the establishment of a Sign District to include up to four non-contiguous properties is appropriate. The Specific Plan Amendment provides that "Notwithstanding LAMC Section 13.11 B, a Supplemental Use "SN" Sign District may be established in the OS Zone encompassing the Specific Plan area and may include up to four non-contiguous parcels located in any zone, including the parcel located easterly of the 110 (Harbor) Freeway containing the Existing Major Site Sign, and additional non-contiguous parcels that may contain new Stadium Freeway Signs as may be allowed by the Outdoor Advertising Act, Cal. Business & Professions Code Section 5272."

As described above, the Sign District includes the property containing the Coliseum's existing off-premises sign east of the 110 (Harbor) Freeway, which is permitted under the existing Specific Plan. This sign is separated from the majority of the Sign District by the 110 Freeway, 39th Street, one block of commercial properties and Figueroa Street. Although the locations of up to three additional off-premises signs (two for the Soccer Stadium project and one for the Coliseum) have not been identified, the Sign District recognizes that properties on non-contiguous of the specific plan area for these additional signs could be added to the Sign District in the future, following City review and approval.

The Sign District including the physically noncontiguous parcels is desirable to allow for a unified and unique signage program that is consistent with State law, and that will promote and support the success of the Coliseum, Soccer Stadium project, and Specific Plan area. Adoption of a Sign District including the non contiguous parcels also would be consistent with signage programs for other major sports and entertainment venues.

d. Precise boundaries are required at the time of application for or initiation of an individual district.

The precise boundaries of the Sign District are concomitant with the boundaries of the Specific Plan including the Major Site Sign on the east side of the 110 Freeway.

SUPPLEMENTAL OUTDOOR ADVERTISING ACT FINDING

18. The Sign District Is in Conformance with Provisions of the California Outdoor Advertising Act

The California Outdoor Advertising Act (Business and Professions Code 5200 et seq.) regulates the placement of outdoor advertising displays within 660 feet of a freeway right-of-way visible from California highways. The California Department of Transportation is the agency responsible for the enforcement of the Outdoor Advertising Act.

All signs within 660 feet of the freeway right-of-way and visible from the freeway allowed by the Sign District would be subject to the Outdoor Advertising Act, where applicable, and all such signs would be required to be subject to a Sponsorship Marketing Plan, as defined by the Act prior to seeking approval from the California Department of Transportation. The Soccer Stadium project would provide an athletic venue for a Major League Soccer team as a home field on a permanent basis. The Soccer Stadium project would have a maximum seating capacity of approximately 22,000, and sponsorship advertising displays with respect to the Soccer Stadium would be located both on the premises of the Soccer Stadium and off the premises as provided under the Sign District.

All signs in connection with the Sign District would fully comport with provisions of the Outdoor Advertising Act addressing signage in connection with arenas (Business and Professions Code Section 5272(c)(1).) Specifically, the Sign District identifies the maximum number of signs and total signage area allowed, maximum individual signage area, minimum sign separation, illumination restrictions and regulations, including signage refresh rate, scrolling, and brightness, and illuminated sign hours of operation. Therefore, the Sign District would be consistent with the state regulations set forth in the Outdoor Advertising Act.

FINDINGS OF FACT (CEQA)

Serving as Lead Agency, the Los Angeles Memorial Coliseum Commission (Coliseum Commission) determined that an Environmental Impact Report (EIR) should be prepared for the Los Angeles Memorial Sports Arena Redevelopment Project in accordance with the requirements of the California Environmental Quality Act ("CEQA") (Pub Resources Code §21000 et seq.; 14 Cal. Code Regs. §15000 et seq.). In compliance with CEQA Section 21080.4 and Section 15082 of the State CEQA Guidelines, the Coliseum Commission circulated a Notice of Preparation (NOP) to state, regional, and local agencies, and member of the general public for a 30-day review period starting on April 19, 2010 and ending on May 19, 2010. The NOP was subsequently re-circulated for a period running from May 27, 2010 to June 30, 2010, to announce a public scoping meeting would be held to solicit comments from the general public and responsible agencies with regard to the scope of the EIR.

The public scoping meeting was held on June 16, 2010 at the Los Angeles Memorial Coliseum Commission's Board Room at 3939 S. Figueroa Street, in Los Angeles, California. Written comment letters responding to the NOPs were submitted to the Coliseum Commission by public agencies and

interested organizations. Commenting public agencies included the South Coast Air Quality Management District (SCAQMD), the City of Los Angeles Fire Department (LAFD), the California Public Utilities Commission, and the Southern California Association of Governments (SCAG). Also, written comments were received from the Los Angeles Conservancy. Seven attendees of the public scoping meeting filled out a sign-in sheet and were afforded an opportunity to share oral comments. Appendix A to the EIR contains copies of each NOP, the scoping meeting attendance sign-in sheet, and all written comments submitted to the Coliseum Commission in response to the NOPs.

The EIR analyzed the demolition of the Sports Arena and the development of two potential options on the Project Site: (1) a multiple-use space that would serve as a public venue for civic gatherings, celebratory and entertainment events, (e.g. festivals, carnivals, rallies, concerts) and other similar uses (Multi-Use Project); or (2) a Major League Soccer (MLS) Stadium with a permanent seating capacity of approximately 22,000 seats and associated amenities such as restrooms, concessions, press facilities, spectator viewing areas, luxury suites and club seating, and locker and dressing facilities (Original Stadium Project). As required by CEQA, the Draft EIR was prepared and circulated during a 45-day public review period that began on November 15, 2010 and ended on December 30, 2010. Pursuant to Section 15088 of the CEQA Guidelines, the Coliseum Commission, as lead agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section III of the Final EIR.

The Coliseum Commission published the Final EIR on January 21, 2011. The Final EIR is intended to serve as an information document for public agency decision-makers and the general public regarding the objectives and components of the proposed project. The Final EIR addresses the environmental effects associated with implementation of each project Option, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR during the public review period. Copies of the Draft EIR, Final EIR, and EIR Appendices were made available for public review on the Coliseum Commission's website and at its administrative offices during normal business hours at the Sports Arena ticket office. On February 2, 2011, the Los Angeles Memorial Coliseum Commission, acting as lead agency, certified the Final EIR (Certified EIR) prepared for the Los Angeles Memorial Sports Arena Redevelopment Project (State Clearinghouse No. 2010041059).

After the Certified EIR was approved by the Coliseum Commission, the Coliseum Commission leased the Sports Arena and the Project Site to the University of Southern California (USC) with permitted uses including those approved under the Certified EIR. USC has now agreed with the Los Angeles Football Club (LAFC or Applicant), which has acquired an MLS expansion franchise, to cooperate with LAFC's efforts to seek approval of certain modifications to the Original Stadium Project in order to develop the proposed LAFC Stadium on the Project Site (Modified Project). The Modified Project would consist of the Original Stadium Project (reconfigured on the Project Site) together with the addition of up to approximately 105,900 square feet of ancillary facility floor area (up to approximately 119,000 gross square feet), including the following uses and floor areas: up to approximately 30,250 square feet of office and conference facility space, including no more than 21,250 square feet of office space; an approximately 36,000-square-foot "World Football" museum; up to approximately 27,750 square feet of team store or other retail space; and up to approximately 11,900 square feet of restaurant uses. The Modified Project also includes signage and lighting programs to support stadium operations.

In accordance CEQA Guidelines Section 15164, an addendum was released on September 4, 2015 (Modified Project Addendum) to analyze the Modified Project's proposed modifications to the Original Stadium Project and to determine whether implementation of the Modified Project would result in any

new significant environmental impacts that were not identified in the Certified EIR, or whether the previously identified significant impacts would be substantially more severe under the Modified Project.

On September 17, 2015, the Coliseum Commission, acting as lead agency under CEQA, considered the Modified Project, the Certified EIR and the Modified Project Addendum at a public meeting. The Coliseum Commission found that the minor changes resulting from the Modified Project do not meet the standards for a Subsequent or Supplemental EIR pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162. In addition, the Coliseum Commission approved the Modified Project and adopted: (1) the Modified Project Addendum; (2) CEQA findings pursuant to Public Resources Code Section 21081 and CEQA Guidelines Section 15091; (3) a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093; and (4) a Mitigation Monitoring Program.

The City of Los Angeles (City) is considering the Modified Project, the Certified EIR and the Modified Project Addendum as a responsible agency pursuant to CEQA Guidelines Section 15096. The City consulted directly with the Coliseum Commission and its CEQA consultants in the preparation of the Certified EIR and the Modified Project Addendum to ensure that the documents comply with CEQA, and believes the documents are adequate for use by the City as a responsible agency.

The Modified Project Addendum demonstrates that the Modified Project would not result in any new significant impacts compared to those evaluated and disclosed in the Certified EIR for the Original Stadium Project, nor would it substantially increase the severity of previously identified significant impacts. In addition, the Modified Project Addendum demonstrates that there are no substantial changes to the circumstances under which the Original Stadium Project analyzed in the Certified EIR would have been undertaken, and no new information of substantial importance which was not known and could not have been known when the Certified EIR was certified has been identified. Therefore the City finds that the minor changes resulting from the Modified Project do not meet the standards for a Subsequent or Supplemental EIR pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162.

The City has also considered the Coliseum Commission's CEQA findings, Statement of Overriding Considerations and Mitigation Monitoring Program. The City concurs with the findings and conclusions made by the Coliseum Commission in those documents based on substantial evidence in the whole record for the Modified Project. The City therefore makes the following findings required by CEQA Guidelines Section 15096 for responsible agencies.

I. FINDINGS REQUIRED TO BE MADE BY RESPONSIBLE AGENCY UNDER CEQA

Section 21081 of the California Public Resources Code and Sections 15091 and 15096 of the CEQA Guidelines require a responsible 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. The possible findings are:

- "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." (State CEQA Guidelines, § 15091, subd. (a)(1))
- "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." (State CEQA Guidelines, § 15091, subd. (a)(2))

- "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." (State CEQA Guidelines, § 15091, subd. (a)(3))

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Certified EIR, including any modifications to the Certified EIR's analysis disclosed in the Modified Project Addendum, for the project as fully set forth in those documents. Although Sections 15096 and 15091 of the CEQA Guidelines do not require findings to address environmental impacts that an EIR identifies as merely "potentially significant," these findings would nevertheless fully account for all such effects identified in the Certified EIR for the purpose of better understanding the full environmental scope of the project. For each of the significant impacts associated with the project, either before or after mitigation, the following sections are provided:

a) Description of Significant Effects - A specific description of the environmental effects identified in the EIR, including a judgment regarding the significance of the impact.
b) Mitigation Measures - Identified mitigation measures or actions that are required as part of the project (numbering of the mitigation measures corresponds to the Mitigation Monitoring Program, which is included as Appendix A of the Modified Project Addendum).
c) Finding - One or more of three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091.
d) Rationale for Finding - A summary of the reasons for the finding(s).
e) Reference - A notation on the specific section in the Draft and Final EIR, and the Modified Project Addendum, which includes the evidence and discussion of the identified impact.

II. ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT

A. Agricultural and Forestry Resources

Significant impacts to agricultural resources could occur if a project were to convert designated farmland to non-agricultural use, conflict with existing zoning for agricultural use or a Williamson Act contract, or otherwise result in the conversation of farmland. As analyzed under the Original Stadium Project EIR, the Project Site is leased from the Sixth District Agricultural Association of the State of California and is currently developed with the Los Angeles Memorial Sports Arena. The Project Site is zoned Open Space, IS-1XL zone. No agricultural zoning is present in the surrounding area, and no nearby lands are enrolled under the Williamson Act and no conflict exists with agricultural zoning of Williamson Act contracts. There have been no agricultural uses on the Project Site since before 1958, when construction of the Sports Arena began. The Original Stadium Project would not involve any changes to the use of the Project Site, and the Sports Arena would continue hosting the same general types of sporting, entertainment and civic events as it currently does. Therefore, the Certified EIR concluded that no impacts to agricultural resources would occur under the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR).

As explained in the Modified Project Addendum, the Project Site is currently developed with the Sports Arena and is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program. There are no existing or mapped agricultural resources within the Project Site and such uses are not proposed as part of the Modified Project. No agricultural zoning is present in the surrounding area, and no nearby lands are enrolled under the Williamson Act.

Thus, the Modified Project would not result in the conversion of designated farmland. In addition, the Modified Project would not conflict with agricultural zoning or a Williamson Act contract.

Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), no impacts to agricultural resources would occur under the Modified Project. No mitigation measures are required. Therefore, the Modified Project would not result in any new significant impacts with respect to agricultural resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR (refer to Section IV.B Comparative Analysis of Modified Project Impacts, Agriculture and Forestry Resources, of the Modified Project Addendum).

Significant impacts to forestry resources could occur if a project were to result in the loss or conversion of forest land, or conflict with existing zoning for forest land or timberland. Potential impacts to forestry resources were not assessed in detail in the Certified EIR for the Original Stadium Project (Appendix G of the CEQA Guidelines was amended to include forestry resources effective March 2010). As analyzed in the Modified Project Addendum, the Project Site is located in an urbanized area and does not include any forest land or timberland. Additionally, the Project Site is not zoned for forest land, and is not used as forest land. Therefore, development of either the Original Stadium Project or the Modified Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. Accordingly, no impacts to forestry resources would occur and no mitigation measures are required. Therefore, the Modified Project would not result in any new significant impacts with respect to forestry resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR (refer to Section IV.B Comparative Analysis of Modified Project Impacts, Agriculture and Forestry Resources, of the Modified Project Addendum).

B. Mineral Resources

Significant impacts to mineral resources could occur if a project were to result in the loss of availability of a mineral resource or a mineral resource recovery site. The Certified EIR determined that no impacts to mineral resources would occur under the Original Stadium Project. While a portion of Exposition Park has been designated by the Los Angeles City Planning Department as an area containing significant mineral deposits, that portion of the park is not occupied by the Project Site. As the Original Stadium Project is not located on the designated land, and would not alter existing uses, no impacts to these identified mineral resources will occur. Additionally, the Certified EIR determined that the Project Site is not in an area of potential petroleum resources. Therefore, the Certified EIR concluded that no impacts to mineral resources would occur under the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR).

As explained in the Modified Project Addendum, the eastern portion of the Project Site is located within a Mineral Resource Zone (MRZ) designated by the State Geologist. This area, designated as MRZ-2, corresponds with the current and ancestral Los Angeles River basin, which yields the potential for sand and gravel extraction but has been largely redeveloped with existing land uses. Notwithstanding its location within an MRZ, no mineral extraction operations currently occur on the Project Site or within the Project vicinity. Additionally, the Project Site does not overlie any oil fields or contain any oil wells.

The stadium proposed to be developed under the Modified Project would be constructed within a portion of the footprint area currently occupied by the Sports Arena, although the subterranean excavation would need to be reconfigured to accommodate the proposed stadium foundation, resulting in a slightly larger footprint. In addition, surface grading would be required to install the building pads for the proposed ancillary uses. However, no mineral extraction operations have occurred or currently occur within the Project Site, or are proposed under the Modified Project. In addition, such operations would not be consistent with the existing and planned use of the Project Site within Exposition Park, which is a regional destination for sports, entertainment, cultural, social, and civic events in the urban core of Los Angeles. Thus, the Modified Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site (refer to Section IV.K Comparative Analysis of Modified Project Impacts, Mineral Resources, of the Modified Project Addendum).

Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), no impacts with respect to mineral resources would occur under the Modified Project. No mitigation measures are required. Accordingly, the Modified Project would not result in any new significant impacts with respect to mineral resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR (refer to Section IV.K Comparative Analysis of Modified Project Impacts, Mineral Resources, of the Modified Project Addendum).

III. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT PRIOR TO MITIGATION

A. Aesthetics/Visual Resources

1.

2. Visual Character and Views (Construction and Operation)

As set forth in the L.A. CEQA Thresholds Guide and within the Certified EIR, visual character and views impacts are based on a number of factors that are used to determine whether a project would substantially alter, degrade, or eliminate the existing visual character of an area. As set forth on pages IV.A-21–IV.A-22 of the Certified EIR, these factors include the existing valued aesthetic features that would be removed; open space to be developed; integration of new structures with open spaces; contrast of project features with the area's aesthetic image; the potential for new structures to detract from the existing image of the area; the project's contribution to the area's aesthetic value; and consistency of the project with applicable design guidelines and/or regulations.

Construction-related visual character and views impacts were not assessed in detail in the Certified EIR. Similar to the Original Stadium Project, during construction activities for the Modified Project, the visual appearance of portions of the Project Site would be altered due to the removal of the existing Sports Arena building and redevelopment of the Project Site with a new stadium building, and the Modified Project's proposed ancillary uses and outdoor open space areas. Related construction activities including site preparation and grading and the staging of construction equipment and materials (i.e., bulldozers, portable toilets, and offices) would also alter the visual character of the Project Site. However, in accordance with Project Design Feature A-1, the perimeter of the Project Site would be screened, which would limit views of construction activities from off-site areas. Given the temporary nature of construction activities and the use of screening to limit views of construction activities, short-term construction activities would not substantially and adversely alter or degrade the existing visual character of the Project Site. As such, construction of the Modified Project would not result in any new significant impacts with

respect to construction-related visual character and view impacts. Construction-related impacts to views and visual character would be less than significant, and no mitigation measures are required (refer to Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics, of the Modified Project Addendum).

The Certified EIR for the Original Stadium Project concluded that impacts with respect to visual character and views during operation of the Original Stadium Project would be less than significant (refer to Section IV.A, Aesthetics, of the Certified EIR). The thresholds on which this analysis was based are stated on pages IV.A 21–IV.A-22 of the Certified EIR. As discussed in the Certified EIR, the Original Stadium Project would result in a notable change to the existing character of the Project Site, as the Sports Arena building would be demolished and replaced with a modern, open-roof stadium complex. The new soccer stadium proposed under the Original Stadium Project, while architecturally different than the existing Sports Arena, would have occupied approximately the same general height, mass, and orientation as the Sports Arena. In addition, architecturally, the Certified EIR stated that the Original Stadium Project would be designed to complement the existing public use structures within Exposition Park and would generally improve the visual character in the project area. Perimeter landscaping and pedestrian plaza areas of the Original Stadium Project would be improved around the stadium fronting Figueroa Street. In addition, the Certified EIR determined that views from residential and commercial uses in the outlying vicinity would not be adversely affected since the Original Stadium Project would occupy the same general field of view as the existing Sports Arena building. With regard to signage, the Certified EIR concluded that while a detailed signage program was not developed at the time of preparation of the EIR, signage would be implemented in accordance with all of the applicable codes of the LAMC, the design guidelines of the South Los Angeles Community Plan, as it pertains to signage, and the rules and regulations set forth in the Specific Plan. Accordingly, the Certified EIR determined that under the Original Stadium Project, visual character and view impacts, including impacts related to the addition of signage to the Project Site, would be less than significant.

As described in Section III, Project Description and Section IV, Comparative Analysis of Modified Project Impacts, of the Modified Project Addendum, the physical development envelope under the Modified Project would not vary substantially from the Original Stadium Project. Specifically, as with the Original Stadium Project, the Modified Project includes an approximately 22,000-seat soccer stadium and associated uses, which would replace the existing Sports Arena within Exposition Park. Proposed modifications to the Original Stadium Project include the addition of up to approximately 105,900 square feet of ancillary amenity floor area (Ancillary uses), and refinements to the design of the stadium and open space areas. As compared the Original Stadium Project, the Modified Project would provide enhanced pedestrian improvements and open space areas, including approximately 143,000 square feet of improved public open space around the Project Site that would include pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas and could potentially include water features, public art, and seating areas.

As discussed in Section III, Project Description, on page 4, and Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics, of the Modified Project Addendum, the proposed Supplemental Use Sign District (SUD) for the Modified Project would authorize a new signage program in the proposed Signage Project Site. Total signage allowed in the Signage Project Site as part of the SUD for the Modified Project, excluding aerial view signs, information signs, temporary signs, and interior signs, would be approximately 44,500 square feet, including up to approximately 19,200 square feet of digital signage. Individual signs could vary from

approximately 40 to 3,800 square feet in size, depending on the sign zone, sign type, and location. The types and extent of permitted signage would emphasize the event and entertainment-oriented aspect of the Project Site. Specifically, signage types could include identification signs, temporary event signs, electronic digital displays, changeable message LED boards, static signs, identification signs and retail/tenant identification signs, with both on-site and off-site signage allowed.

Based on the physical description of the Modified Project provided in Section III, Project Description and Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics, of the Modified Project Addendum, potential visual character and views impacts, including impacts related to signage, would continue to be less than significant under the Modified Project (refer to Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics. of the Modified Project Addendum). The Project Site is located within an urbanized area and specifically within the 145-acre Exposition Park, a major community resource and destination within the City that includes the Coliseum, several museums, educational facilities, recreational amenities and open space areas, including existing signage and approved additional signage pursuant to the Coliseum District Specific Plan. Exposition Park, including the Sports Arena and the Coliseum, has been a renowned destination for major sporting and entertainment activities for decades. The Modified Project would therefore continue the primary existing use on the Project Site by providing an iconic sports and entertainment destination. Further, the Modified Project would replace an aging, underutilized indoor stadium with a new, open-air stadium characterized by contemporary, streamlined architecture. As shown in the visual renderings provided in Figure 4 through Figure 6 on pages 16 through 18 of the Modified Project Addendum, the stadium would be designed to create an iconic venue for LAFC and the City of Los Angeles, and would consist of materials and color palates that draw influence from adjacent structures within Exposition Park, including the Coliseum. While the height and massing of the new structures would be taller than the existing Sports Arena, the proposed height of the new structures would be modulated with building heights that would range from approximately 75 feet above grade (for the ancillary uses in the Northwest Plaza, closest to the Coliseum) to approximately 105 feet above grade (for the proposed stadium roof structure located within the southeast portion of the site furthest from the Coliseum). The proposed building heights would be visually compatible with and within the context of the adjacent Coliseum, which reaches a height of approximately 75 feet above grade at the Coliseum Bowl and a height of 124 feet at the top of the peristyle. The Modified Project was specifically designed to respect the height of the Coliseum, so that its maximum height occurs at the edge furthest from the Coliseum (southeast corner), transitioning down to its lowest height of approximately 75 feet at the edge closest to the Coliseum.

In addition, the openings within the façade of the Modified Project's stadium and its translucent roof canopy would create additional architectural articulation and view opportunities (as discussed below), thereby contributing to the area's aesthetic value. Furthermore, the new structures would be integrated with approximately 143,000 square feet of improved public open space around the Project Site, which would include a new Northwest Plaza that would also be integrated with the Coliseum and adjacent areas within Exposition Park, as well as an expansive setback along Figueroa Street that would include enhanced landscape and streetscape to activate the western portion of the Project Site and create an inviting pedestrian space. Further, under the Modified Project, the street pattern, sidewalks, rows of trees, and central green space of North and South Coliseum Drives and Christmas Tree Lane would remain intact. In addition, trees and landscaping along the Modified Project's north and northwestern edges would provide screening when viewed from the Coliseum that would reduce the perception of the Modified Project's height and mass. In addition, the proposed reconfiguration and re-landscaping of the VIP parking lot

would enhance the aesthetic character of the southern portion of the Project Site as compared to existing conditions. Thus, the visual appearance of the Modified Project would be appropriate in the context of existing development on and immediately surrounding the Project Site and the Modified Project would not degrade the general visual character of the Project Site.

The proposed signage program would represent an important component of the Modified Project and a strong visual element that would influence the aesthetics of the Project Site. The Modified Project's signage program would allow a variety of sign types with requirements based on specific locations. The types and extent of permitted signage would emphasize the event- and entertainment-oriented aspect of the Project Site and complement the existing and approved signage environment in Exposition Park. The signage program is intended to support stadium operations and revitalize the Project Site as a major sports and entertainment venue, consistent with its historic use. 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. As discussed in Section III, Project Description, on page 4, and Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics, of the Modified Project Addendum, the proposed SUD would place limitations on the types, amounts, locations, sizes, operating hours, and illumination of permitted signs. By design, Modified Project signage would be consistent with the character of a sports and entertainment venue (i.e., a well-lit and active environment with substantial pedestrian activity including nighttime activity), such as that which already exists on site and within the surrounding area, including at the adjacent Coliseum. In addition, proposed signage would not result in significant light and glare impacts. Thus, proposed signage would not result in significant impacts associated with visual character when compared with the existing and contemplated visual character of the area as set forth in existing planning policies such as the Coliseum District Specific Plan. Overall, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.A, Aesthetics, of the Certified EIR), the Modified Project would result in less than significant impacts associated with visual character, and no mitigation measures are required (refer to Section IV, Comparative Analysis of Modified Project Impacts, of the Modified Project Addendum).

With regard to views, as stated in the Certified EIR, due to the developed nature of the Project Site vicinity, existing views from the ground level are limited by existing structures and ornamental landscaping. Views of aesthetic resources in the Project Site vicinity include views of the Coliseum and landscaped open space areas within Exposition Park, as well as intermittent distant views of the downtown skyline. The stadium under the Modified Project would be located in the same general location of the existing Sports Arena. While the building height and massing would increase as compared to the existing Sports Arena and the Original Stadium Project, the building height would be modulated to locate shorter building heights closer to the Coliseum. However, there are very limited views of the Coliseum across the Project Site from the public right-of-way along Figueroa Street due to the presence of the Sports Arena and existing trees and landscaping. Accordingly, while the Modified Project would be taller than the Original Stadium Project, it would not result in the blockage of existing unobstructed views of the Coliseum. Further, the Modified Project has been sited so as to not block views of the Coliseum when entering Exposition Park from Figueroa Street (i.e., along Christmas Tree Lane), which is the most important public view corridor in the vicinity in terms of conveying the aesthetic and historic importance of the Coliseum (refer to Section IV.E, Cultural Resources, on page 61 of the Modified Project Addendum). With regard to views of the downtown skyline, as is the case under existing conditions, and as would have been the case under the Original Stadium Project, such views would continue to be available on an intermittent basis. As compared to the Original Stadium Project, the openings in the Modified Project stadium's northeast and northwest corners would

provide enhanced viewing opportunities of the downtown skyline, that are by design intended to provide dramatic and prominent views of this visual resource. With regard to landscaped open space areas within Exposition Park, as was the case under the Original Stadium Project, the accessibility of such views would vary depending on the vantage point of the viewer. However, in general, the Modified Project would provide enhanced connections to adjacent open space areas through the Northwest Plaza and associated pedestrian walkways, providing more opportunities to access and view open space areas within Exposition Park. Thus, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.A, Aesthetics, of the Certified EIR), potential impacts associated with views under the Modified Project would be less than significant (refer to Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics, of the Modified Project Addendum). No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect visual character and views, including impacts related to signage, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

3. Light and Glare (Construction)

Impacts with respect to light and glare would be significant if the project would result in a new substantial source of light or glare, which would adversely affect day or nighttime views in the area. Potential impacts associated with construction-related lighting and glare were not assessed in detail in the Certified EIR. The Modified Project would implement Mitigation Measure CR G-2 of the Certified EIR, which restricts exterior construction and demolition activities to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday. Thus, construction lighting would be limited to very short durations during the winter season and would be temporary. Further, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, in accordance with Project Design Feature A-1, the perimeter of the Project Site would be screened and would limit views of construction activities. Therefore, uses which are not adjacent to the Project Site would not be anticipated to be substantially affected by construction light or daytime glare. Thus, through implementation of the identified mitigation measure and Project Design Feature, and with adherence to existing LAMC regulations, light and glare impacts associated with proposed construction under the Modified Project would be less than significant. As such, construction of the Modified Project would not result in any new significant impacts with respect to construction-related lighting. No additional mitigation measures are required.

4. Shading

As set forth in the L.A. CEQA Thresholds Guide, a project would have a significant shading impact if off-site shadow-sensitive uses would be shaded by project-related development for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November). Potential impacts associated with shading were not assessed in detail in the Certified EIR. The proposed structures under the Modified Project would range in height from approximately 75 feet within the northwestern portion of the Project Site to a maximum of approximately 105 feet above street level, with rooftop structures extending to approximately 115 feet. The closest off-site shadow-sensitive uses to the Specific Plan area are residential uses located across Figueroa Street to the east followed by residential uses to the of south of Martin Luther King, Jr. Boulevard. Based on

the proposed building heights, the maximum shadows that would be generated by the proposed structures would extend approximately 345 feet in a northern orientation during the winter. Given the location of the shadow-sensitive uses to the east and south of the site, as well as the presence of intervening roadways (i.e., Figueroa Street and Martin Luther King Jr., Boulevard) and surface parking areas, the Modified Project would not shade off-site shadow-sensitive uses for more than three hours during any time of the year. As such, the Modified Project's potential shading impacts would be less than significant and no mitigation measures are required (refer to Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics, of the Modified Project Addendum).

5. Cumulative

Impacts to aesthetics resources have the potential to be cumulatively considerable if a project's development in conjunction with related project development were to substantially block existing views of visual resources or negatively alter the visual character of the area.

Development of the Original Stadium Project, in conjunction with related projects in the general vicinity identified in the Certified EIR, Table IV.K-1—Related Projects List, could cumulatively contribute to alterations in visual character, viewshed and lighting in and around the Exposition Park area. The Original Stadium Project would alter the aesthetic character of the Project Site, as the Sports Arena would be demolished and redeveloped with an MLS Stadium. When analyzed under the Certified EIR, there were no other related development projects identified within Exposition Park or the immediate viewshed that would cumulatively add to the change in character. Moreover, the Original Stadium Project was determined to be consistent with the stated objectives of the Exposition Park Master Plan with respect to landscaping and signage. It was further determined under the Certified EIR that the cumulative effects of the project would therefore be experienced as gradual and independent modifications in an effort to improve the aesthetics in the general project vicinity. Because the Original Stadium Project would serve to improve the aesthetic quality of the project area, cumulative impacts on aesthetic resources were determined to be less than significant.

As analyzed under the Modified Project Addendum, Section Q "Cumulative Impacts," views of visual resources would not be significantly impacted by the Modified Project. In addition, new buildings constructed as part of the Modified Project would be compatible with existing buildings within the Project Site vicinity. The two nearest related projects are located in the northeastern portion of Exposition Park at the California African American Museum and the California Science Center. Due to the distance between these sites and the Project Site, as well as intervening landscape, the extent to which these related projects may be visible within viewsheds of the Project Site is anticipated to be minimal. Furthermore, as expansions of the existing museums, these related projects would be designed to be compatible with the existing California African American Museum and the California Science Center structures. No other related projects are immediately adjacent to or within the Modified Project's primary viewsheds. Accordingly, none of the related projects when viewed with the Modified Project would have the potential to adversely affect views or the visual character of the area. Further, through the environmental review and/or plan check processes, related projects would be reviewed on a case-by-case basis by the City and/or Coliseum Commission to ensure that they comply with applicable LAMC requirements regarding building heights, setbacks, massing, and lighting. Thus, consistent with the Certified EIR analysis, cumulative impacts associated with aesthetics would be less than significant.

B. Air Quality

1. Localized Emissions (Construction)

The Certified EIR for the Original Stadium Project concluded that air quality impacts from construction of the Original Stadium Project would be less than significant for localized emissions (refer to Section IV.B, Air Quality, of the Certified EIR). The thresholds on which this analysis was based are stated on pages IV.B-21–IV.B-24 of the Certified EIR. As stated in the Certified EIR, the Original Stadium Project would generate pollutant emissions from the following construction-related activities and sources: demolition and site clearing, grading and site preparation; building construction, including the application of architectural coatings; paving and asphalting; construction workers traveling to and from the Project Site; delivery and hauling of construction supplies and debris to and from the Project Site; and, the fuel combustion generated by on site construction equipment.

As described in Section III, Project Description, on page 4 of the Modified Project Addendum, the Modified Project would have a slightly longer construction period (by 0.5 month) and a total import/export of up to 30,000 cubic yards (cy) of soil compared to the Original Stadium Project's estimated import of approximately 125,000 cy of soil. Therefore, construction haul trips are anticipated to be less under the Modified Project. However, as a result of the modifications proposed under the Modified Project, potential construction-related emissions associated with the Modified Project were quantified to determine whether the changes in the proposed development program would have the potential to increase the severity of previously identified significant impacts or result in new, previously unidentified significant impacts related to construction air emissions.

With respect to localized emissions, the Certified EIR determined that on site emissions generated by the Original Stadium Project during the different phases of construction would not exceed the established SCAQMD localized thresholds for NOX (in the form of nitrogen dioxide (NO2)), carbon monoxide (CO), particulate matter less than 10 microns in size (PM10), and particulate matter less than 2.5 microns in size (PM2.5). Therefore, the Certified EIR concluded that impacts related to localized air emissions during construction would be less than significant under the Original Stadium Project.

With respect to quantifying mass emissions for localized analysis, only emissions that occur on site are considered. Consistent with the SCAQMD Localized Significance Threshold (LST) methodology guidelines, emissions related to off-site delivery/haul truck activity and employee trips are not considered in the evaluation of localized impacts. As shown in Table 6 on page 52 of the Modified Project Addendum, localized construction emissions from the Modified Project would increase in comparison to levels analyzed in the Certified EIR for the Original Stadium Project. However, as with the Original Stadium Project, localized emissions of all criteria pollutants (CO, NOX, PM10, and PM2.5) would remain below their respective SCAQMD LST significance thresholds. As such, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.B, Air Quality, of the Certified EIR), impacts with respect to localized air quality during construction would be less than significant under the Modified Project (refer to Section IV.C, Comparative Analysis of Modified Project Impacts, Air Quality, of the Modified Project Addendum). No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to localized air quality emissions during construction, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Operation

The Certified EIR for the Original Stadium Project concluded that air quality impacts from operation of the Original Stadium Project would be less than significant (refer to Section IV.B, Air Quality, of the Certified EIR). The thresholds on which this analysis was based are stated on pages IV.B-21–IV.B-24 of the Certified EIR. As stated in the Certified EIR, operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Site after completion of the Original Stadium Project. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices and the operation of landscape maintenance equipment. Mobile source emissions would be generated by the motor vehicles traveling to and from the Project Site. Similar to the Original Stadium Project, air pollutant emissions associated with occupancy and operation of the Modified Project would be generated by the consumption of both electricity and natural gas on site (stationary) and the operation of vehicles traveling to and from the Project Site (mobile). Therefore, each of these types of emissions is addressed below.

The Certified EIR (refer to Section IV.B, Air Quality, of the Certified EIR) concluded that no new significant air quality impacts would result from stationary sources (i.e., electricity or natural gas consumption) as the Original Stadium Project would replace an existing venue that is over 50 years old with a state-of-the-art venue that would include numerous sustainability and design features that would result in significantly increased energy efficiencies at the Project Site. Like the Original Stadium Project, the Modified Project includes a 22,000-seat MLS stadium (reconfigured on the Project Site) and the addition of up to approximately 105,900 square feet of ancillary facility floor area (up to approximately 119,000 gross square feet). While the ancillary uses would result in some additional electricity and natural gas consumption beyond levels analyzed in the Certified EIR on event days, any such increase would largely be offset by the Modified Project's compliance with applicable provisions of the 2013 CalGreen Code in accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC, as amended pursuant to City of Los Angeles Ordinance No. 182,849). Specifically, the 2013 CalGreen Code is anticipated to be 30 percent more efficient than the 2008 Title 24 requirements for nonresidential construction that were applicable to the Original Stadium Project. In addition, as shown in Table 7 on page 54 of the Modified Project Addendum, pollutant emissions related to energy sources would be considered a minor source of emissions resulting in less than 1 pound per day for all pollutants. Furthermore, like the Original Stadium Project, the proposed stadium under the Modified Project would be an outdoor venue, which would significantly reduce the amount of stationary source emissions associated with heating and air conditioning compared to the existing Sports Arena. Therefore, like the Original Stadium Project, and consistent with the conclusions in the Certified EIR, event-day stationary source emissions under the Modified Project would be expected to be reduced compared to existing conditions, and would result in less than significant impacts (refer to Section IV.C Comparative Analysis of Modified Project Impacts, Air Quality, of the Modified Project Addendum).

With respect to mobile source emissions, the Certified EIR concluded that no new significant air quality impacts would result from a game or event hosted at the proposed stadium as compared to operation of the existing Sports Arena since the maximum capacity of the stadium would be within historic attendance levels at the Sports Arena (refer to Section IV.B, Air Quality, of the

Certified EIR). Further, since the Coliseum and the Sports Arena currently hold events with up to 93,000 persons in attendance combined, the Certified EIR also concluded that no new air quality impacts would result from concurrent events in the Coliseum and Original Stadium Project with combined attendees of up to 93,000 persons, and included a mitigation measure (Mitigation Measure MM J-1) to ensure that events in the two venues are scheduled in such a manner as to not exceed this limit. Mitigation Measure J-1 would continue to be implemented under the Modified Project, and has been incorporated into the Modified Project's MMP (see Appendix A of the Modified Project Addendum). Like the Original Stadium Project analyzed in the Certified EIR, the Modified Project proposes a 22,000-seat professional soccer stadium. Pursuant to Project Design Feature O-4 in Section IV.O, Traffic/Transportation/ Parking, on page 169 of the Modified Project Addendum, the ancillary uses proposed as part of the Modified Project would be open only to ticket-holding game/event patrons during a period of time before, during and after the game/event, with no material increase in event-related traffic expected. Therefore, because air quality impacts are assessed based on peak daily conditions, the Certified EIR's conclusions with respect to air quality impacts from event day daily trips would not change under the Modified Project, and potential impacts on event days in the Modified Project would remain less than significant (refer to Section IV.C, Comparative Analysis of Modified Project Impacts, Air Quality, of the Modified Project Addendum). Additionally, the Certified EIR did not account for the trip reduction associated with the Expo Light Rail stations in proximity to the Project Site, as the Expo Light Rail Line was not in operation at the time the EIR was certified. The Expo Park/USC Station is located approximately 0.35 mile from the Project Site and the Expo/Vermont Station is located approximately 0.7 mile from the Project Site. Given the proximity of these stations, it is anticipated that a substantial number of attendees at the Modified Project would use the light rail on event days, further reducing the less-than-significant event day air quality impacts identified in the Certified EIR.

Because the Modified Project's proposed ancillary uses would be open to the public on non-event days, the Modified Project Addendum addressed and quantitatively evaluated potential air quality impacts related to operation of the ancillary uses on non-event days. SCAQMD's CalEEMod was used to calculate regional mobile source emissions, on-road fugitive dust, and emissions from architectural coatings, landscape equipment, and energy use (see Appendix D of the Modified Project Addendum for CalEEMod calculations). As shown in Table 7 on page 54 of the Modified Project Addendum, regional emissions resulting from operation of the ancillary uses are not expected to exceed any of the SCAQMD's daily regional operational thresholds. Therefore, air quality impacts from Modified Project operational emissions on non-event days would be less than significant (refer to Section IV.C, Comparative Analysis of Modified Project Impacts, Air Quality, of the Modified Project Addendum). No mitigation measures are required.

As discussed in the Certified EIR, the Original Stadium Project would also be subject to the SCAQMD's Air Quality Management Plan (AQMP). A project is considered consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that form the basis of the AQMP. The Certified EIR determined that the Original Stadium Project would be consistent with the 2007 AQMP in effect at the time the Certified EIR was prepared because it would be consistent with applicable population, housing, and employment projections. The AQMP was updated in 2012 subsequent to the preparation of the Certified EIR. The 2012 AQMP adopted by the SCAQMD incorporates the Southern California Association of Governments' (SCAG) 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS) socioeconomic forecast projections of regional population and employment growth. As discussed under Subsection IV.M, Population, Housing and Employment, on page 134 of the Modified Project Addendum, employment impacts with respect to the stadium portion

of the Modified Project would not change compared to levels analyzed in the Certified EIR. The 282 additional on-site employees that could result from the Modified Project's ancillary uses would represent approximately 0.9 percent of the anticipated employment growth in the subregion through 2018. Therefore, additional employees generated by the Modified Project would fall within SCAG's employment projections for the Subregion. Furthermore, the Modified Project would not result in new significant impacts or substantially increase the severity of any significant impacts previously identified in the Certified EIR with respect to air quality. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.B, Air Quality, of the Certified EIR), impacts with respect to AQMP consistency would be less than significant under the Modified Project (refer to Section IV.C, Comparative Analysis of Modified Project Impacts, Air Quality, of the Modified Project Addendum). No mitigation measures are required.

With regard to traffic-related localized air quality impacts, which were not analyzed in detail in the Certified EIR, as described further in Subsection IV.O, Traffic/Transportation/Parking, on page 149 of the Modified Project Addendum, the Modified Project would not increase peak-hour trips compared to the Original Stadium Project during event days, which would have the highest peak hour trips compared to non-event days. Therefore, traffic-related localized air quality impacts would be similar to those of the Original Stadium Project (i.e., less than significant). In addition, ambient CO concentrations within the Air Basin have decreased subsequent to completion of the Certified EIR. The CO background concentration at the closest monitoring station to the Project Site (Downtown Central Los Angeles County) shows that the 1-hour CO concentration has decreased from 2.4 parts per million (ppm) in 2011 to 2.0 ppm in 2013. As a result, the potential for the Modified Project to result in CO "hotspots" has decreased as compared to the Original Stadium Project. However, as discussed above, even in the absence of the reduction in CO background concentration the Modified Project would not increase peak-hour trips compared to the Original Stadium Project. Therefore, the Modified Project's potential impacts with respect to CO "hotspots" would be less than significant and no mitigation measures are required (refer to Section IV.C, Comparative Analysis of Modified Project Impacts, Air Quality, of the Modified Project Addendum).

The Certified EIR determined that potential air toxic impacts would be less than significant under the Original Stadium Project since the Original Stadium Project would not include any land uses involving the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. The conclusion would not change under the Modified Project. Furthermore, the Modified Project would not locate sensitive receptors within siting distances identified by SCAQMD and California Air Resources Board (CARB) guidelines. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.B, Air Quality, of the Certified EIR), impacts with respect to toxic air contaminants would be less than significant under the Modified Project (refer to Section IV.C, Comparative Analysis of Modified Project Impacts, Air Quality, of the Modified Project Addendum). No mitigation measures are required.

Potential odor impacts were not analyzed in detail in the Certified EIR. The Modified Project would not include any uses identified by the SCAQMD as being associated with substantial odors (e.g., agricultural uses, wastewater treatment plants, food processing plants, etc.). The Modified Project does include restaurant uses which have the potential to emit odors through cooking and charbroilers. However, the Modified Project would minimize the release of odors from restaurant uses with odor reducing equipment as required by SCAQMD Rule 1138. Garbage collection areas for the Modified Project would be covered and situated away from the property line and sensitive uses where feasible. Good housekeeping practices would be sufficient to prevent

objectionable odors related to trash facilities. Pursuant to Project Design Feature P-3 in Section IV.P, Utilities and Service Systems—Solid Waste, on page 189 of the Modified Project Addendum, the Modified Project would also include a front-of-house composting program to reduce the amount of solid waste that would be disposed of at area landfills. The composting area would incorporate appropriate odor management practices to reduce odor emissions at adjacent receptors. Examples of such practices include nutrient balance, temperature, moisture content, and aeration control. Based on the distance to the nearest sensitive receptors and the odor control measures that would be employed, the proposed composting facilities would not result in significant odor impacts. Therefore, potential odor impacts under the Modified Project would be less than significant and no mitigation measures are required (refer to Section IV.C, Comparative Analysis of Modified Project Impacts, Air Quality, of the Modified Project Addendum).

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to operational air quality, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

3. Cumulative

As stated in the Certified EIR, according to SCAQMD methodology for assessing cumulative operational impact, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the region is in non-attainment under an applicable federal or State ambient air quality standard. The Certified EIR determined that operational air quality impacts would be less than significant at the project level and that cumulative air quality impacts would also be less than significant (refer to Section IV.K, Cumulative Impacts, of the Certified EIR) . As discussed in the Modified Project Addendum, operational air quality impacts under the Modified Project would also be less than significant at the project level. Therefore, consistent with the Certified EIR analysis for the Original Stadium Project, cumulative impacts would be less than significant under the Modified Project (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

C. Biological Resources (Construction, Operation, Cumulative)

Significant impacts to biological resources could occur if a project were to conflict with a habitat conservation plan or local ordinance protecting biological resources, or result in adverse effects on endangered and/or threatened species, riparian habitat, wetlands, other sensitive natural communities, or wildlife movement.

The Certified EIR for the Original Stadium Project concluded that no impacts to biological resources would occur under the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR). The Project Site is a developed property located within a highly urbanized area. The Project Site and adjacent areas are predominantly developed with structures or urban open space areas that do not provide native or natural habitats (e.g., open space areas within Exposition Park). As stated in the Certified EIR, the Project Site does not contain any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the United States Fish and Wildlife Service. In addition, there are no known locally designated natural communities on the Project Site or in the Project vicinity. Due to the highly urbanized

surroundings, there are no federally protected wetlands, riparian habitats, wildlife corridors, or native wildlife nursery sites in the Project vicinity. Thus, as is the case with the Original Stadium Project, the Modified Project would not affect these types of resources. Furthermore, like the Original Stadium Project, the Modified Project would not conflict with the provisions of an adopted habitat conservation plan, natural conservation community plan, or other approved local, regional, or State habitat conservation plan, because there are no known locally-designated natural communities on the Project Site. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), no impacts with respect to sensitive species, sensitive habitats, wildlife movement corridors, or habitat conservation plans would occur under the Modified Project (refer to Section IV.D, Comparative Analysis of Modified Project Impacts, Biological Resources, of the Modified Project Addendum). No mitigation measures are required.

The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These native tree species are defined as protected by the City of Los Angeles. Native trees that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree..." and requires that all regulated protected trees that are removed be replaced on at least a two-to-one basis with trees that are of a protected variety. The City also requires that a report be prepared by a tree expert discussing the subject tree(s), their preservation, effects of the proposed construction, and mitigation measures pursuant to the removal or replacement thereof.

The Project Site includes a number of ornamental trees within the site interior and along Exposition Park Drive (Christmas Tree Lane) and South Coliseum Drive (Hoover Street), both of which are private roadways. In addition, ten on site street trees are located within the City right-of-way along South Figueroa Street. A total of 205 trees are located within the Project Site and along the previously described private roadways within Exposition Park. The interior trees include ten Coast live oaks (Quercus agrifolia) and seven California sycamores (Platanus racemosa). Based on a review of historic aerial photographs of the Project Site, the Tree Report—Interior Property Trees, Los Angeles Memorial Sports Arena Redevelopment Project prepared for the Modified Project by Carlberg Associates (August 2015) (included in Appendix E of the Modified Project Addendum) determined that the Coast live oaks and California sycamores on the Project Site were planted as part of a tree planting program, and as such, are not considered protected under the City of Los Angeles Protected Tree Ordinance. The Modified Project would remove approximately 177 of the 205 interior trees, including 10 of the Coast live oaks and six of the California sycamores. Because the on-site Coast live oaks and California sycamores were planted as part of a tree planting program, the proposed tree removals would not conflict with the City of Los Angeles Protected Tree Ordinance.

With regard to street trees, according to the Tree Report—City of Los Angeles Rights-of-Way Trees, Los Angeles Memorial Sports Arena Redevelopment Project (Street Tree Report) prepared for the Modified Project by Carlberg Associates (August 2015) (included in Appendix F of the Modified Project Addendum, the ten existing street trees along the Project Site's South Figueroa Street frontage are Mexican fan palms (Washingtonia robusta). Demolition, site grading, and construction activities under the Modified Project would not affect the ten identified street trees, and the street tress would be retained in the Modified Project design.

Based on the analysis above, impacts with respect to potential conflicts with local policies or ordinances protecting biological resources, including the City of Los Angeles Protected Tree Ordinance and City of Los Angeles Street Tree Division requirements, would be less than significant under the Modified Project (refer to Section IV.D, Comparative Analysis of Modified Project Impacts, Biological Resources, of the Modified Project Addendum). No mitigation measures are required.

Although unlikely, trees on the Project Site that are proposed for removal could potentially provide nesting sites for migratory birds. Construction activities under the Modified Project would be required to comply with the Migratory Bird Treaty Act and the California Department of Fish and Game Code. Specifically, in accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–August 15), to the extent feasible. If vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 200-foot buffer radius (500 feet for raptors) would be established until the fledglings have left the nest. Through compliance with this existing regulatory requirement, potential impacts to nesting raptors would be less than significant under the Modified Project (refer to Section IV.D, Comparative Analysis of Modified Project Impacts, Biological Resources, of the Modified Project Addendum). No mitigation measures are required.

Further, as discussed in the Modified Project Addendum, the Project Site vicinity is highly urbanized and no special status species, wetlands, or habitats supporting such resources are located in the Project Site vicinity. Therefore, it is not anticipated any of the related projects in the Project Site vicinity would significantly impact biological resources. Related projects would also be required to comply with both the City of Los Angeles' Protected Tree Ordinance, as well as the provisions of the Street Tree Ordinance and the Migratory Bird Treaty Act. Thus, cumulative impacts related to biological resources would be less than significant (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to biological resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

D. Cultural Resources—Archaeological and Paleontological Resources (Construction, Operation, Cumulative)

Significant impacts to archaeological resources could occur if a project were to cause a substantial adverse change in the significance of an archaeological resource. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. Significant impacts to paleontological resources could occur if a project were to directly or indirectly destroy a unique paleontological resource. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of prehistoric species are extinct.

Potential impacts to archaeological and paleontological resources were not assessed in detail in the Certified EIR. The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to disturbance and excavation in the past, including through the development of the Sports Arena in the late 1950s and subsequent site improvements. Any archaeological and/or paleontological resources that may have existed near the surface of the Project Site are likely to have been disturbed and/or previously removed. The existing Sports Arena is currently constructed within a large excavated depression that extends approximately 25 feet below grade level. The stadium proposed to be developed under the Modified Project would be constructed within a portion of the footprint area currently occupied by the Sports Arena, although the subterranean depression would need to be reconfigured to accommodate the proposed stadium foundation, resulting in a slightly larger footprint. Following demolition of the Sports Arena, grading and excavation would also be required to install the building pads for the proposed ancillary uses. As such, while unlikely, the potential exists for previously undiscovered archeological and/or paleontological resources to be encountered during construction of the Modified Project.

As would have been the case with construction of the Original Stadium Project analyzed in the Certified EIR, if an archaeological resource is discovered during Modified Project construction activities, work in the area would cease and deposits would be treated in accordance with applicable federal, State, and local guidelines, including those set forth in California Public Resources Code (PRC) Section 21083.2. Any discovery of human remains would be treated in accordance with Section 5097.98 of the PRC and Section 7050.5 of the Health and Safety Code. Therefore, through compliance with existing regulations, impacts with respect to archaeological resources would be less than significant under the Modified Project (refer to Section IV.E, Comparative Analysis of Modified Project Impacts, Cultural Resources, of the Modified Project Addendum). No mitigation measures are required.

If a paleontological resource is discovered during construction of the Modified Project, Project Design Feature E-1 would be implemented to reflect best management practices to ensure that potential impacts would be less than significant. Project Design Feature E-1 has been incorporated into the Modified Project's MMP included as Appendix A to the Modified Project Addendum. With the implementation of Project Design Feature E-1, impacts with respect to paleontological resources would be less than significant under the Modified Project (refer to Section IV.E, Comparative Analysis of Modified Project Impacts, Cultural Resources, of the Modified Project Addendum).

Further, as analyzed in the Modified Project Addendum, the Project Site vicinity is located within an urbanized area that has been substantially disrupted over time. In the event that archaeological and/or paleontological resources are uncovered, each related project would be required to comply with regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering of archeological and paleontological resources. Thus, the Modified Project would not contribute to any cumulative impacts associated with archaeological or paleontological resources (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to archaeological and paleontological resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

E. Cultural Resources—Historic Resources (Cumulative)

With regard to historic resources, as analyzed under the Modified Project Addendum, like the Original Stadium Project, the Modified Project would result in significant and unavoidable project-related impacts to historic resources due to the demolition of the existing Sports Arena. Impacts on the adjacent Coliseum would be less than significant because the Modified Project has been designed in a manner so as not to interfere with the historical integrity of the Coliseum. Impacts to historic resources are generally site-specific, and related to the proximity of a given project to an identified historic resource. As previously discussed, the two nearest related projects are located in the northeastern portion of Exposition Park at the California African American Museum and the California Science Center. Due to the distance between these sites and the Project Site, as well as intervening landscape, the extent to which these related projects may be visible within viewsheds of the Project Site, as well as viewsheds of the Project Site and the Coliseum, is anticipated to be minimal. Furthermore, as expansions of the existing museums, these related projects would be designed to be compatible with the existing California African American Museum and the California Science Center structures, as well as the Coliseum and other identified historic resources within Exposition Park. Additionally, these related projects do not involve historic resources that are significant within the same historic context as the Sports Arena. Therefore, consistent with the Certified EIR analysis for the Original Stadium Project, cumulative impacts to historic resources would be less than significant (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

F. Geology and Soils (Construction, Operation, Cumulative)

Significant impacts related to geology and soils could occur if a project were to cause or accelerate geologic hazards, including erosion, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury, or if a project were to adversely affect a distinct and prominent geologic or topographic feature. Potential impacts to geology and soils were not assessed in detail in the Certified EIR. A Preliminary Geotechnical Engineering Report (Geotechnical Report) was prepared for the Modified Project by Langan Engineering and Environmental Services, dated August 28, 2015, which is included in Appendix H of the Modified Project Addendum. The Geotechnical Report provides an assessment of the geotechnical and geological aspects of the Project Site, including existing site conditions, and provides preliminary geotechnical, seismic, and foundation recommendations for the Modified Project. The Geotechnical Report is based on reviews of regional geologic hazard and seismicity maps, subsurface information, and previous geotechnical investigations performed in the Project Site area (including readily available geotechnical investigation reports) obtained from the City of Los Angeles Department of Building and Safety (LADBS), as well as a subsurface field investigation conducted on site in June 2015. The field investigation consisted of drilling two borings on the Project Site to depths of 101.5 and 101 feet below existing grade (elevation 78.5 and 79), respectively. The locations of the borings are shown in Figure 13 of the Geotechnical Report included in Appendix H of the Modified Project Addendum.

The Project Site is located within the Los Angeles Basin of the Peninsular Ranges Geomorphic Province of Southern California. The Los Angeles Basin's structural history includes extension and strike-slip faulting, followed by oblique contraction via thrusting and strike-slip faulting. No known active faults have been identified on the Project Site. The closest known active faults capable of producing ground shaking at the Project Site are the Puente Hills Blind Thrust Fault, located approximately 0.3 mile southwest of the Project Site, the Newport-Inglewood Fault,

located approximately 2.7 miles west of the Project Site, the Elysian Park (Upper) Blind Thrust Fault, located approximately 2.9 miles northeast of the Project Site, and the Santa Monica Fault, located approximately 3.9 miles northwest of the Project Site. Due to the Project Site's proximity to several nearby active faults, moderate to strong ground shaking could occur from an earthquake on any nearby fault(s), as is typical throughout Southern California. The Modified Project would comply with the current seismic design provisions of the 2013 California Building Code to minimize seismic impacts. The 2013 California Building Code incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program (NEHRP) to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Modified Project would be required to adhere to the seismic safety requirements contained in the Los Angeles Building Code (LAMC, Chapter IX, Article 1). The Los Angeles Building Code incorporates by reference the California Building Code, with City amendments for additional requirements. The LADBS is responsible for implementing the provisions of the Los Angeles Building Code. The Modified Project would also be required to comply with the site plan review and permitting requirements of the LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to LADBS review and approval, pursuant to Project Design Feature F-1. The final, site-specific geotechnical report would incorporate the recommendations presented in the Geotechnical Report into the final design of the Modified Project. These recommendations are outlined in Project Design Feature F-1. Through compliance with regulatory requirements and the site-specific geotechnical recommendations outlined in Project Design Feature F-1, the Modified Project would not cause or accelerate geologic hazards related to strong seismic ground shaking, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Impacts related to seismic ground shaking would be less than significant, and no mitigation measures are required (refer to Section IV.F, Comparative Analysis of Modified Project Impacts, Geology and Soils, of the Modified Project Addendum).

The Project Site is not within a mapped Alquist-Priolo Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act. Geologic review does not indicate the presence of active surface faulting within or directly adjacent to the Project Site. As such, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Impacts with respect to fault rupture would be less than significant, and no mitigation measures are required (refer to Section IV.F, Comparative Analysis of Modified Project Impacts, Geology and Soils, of the Modified Project Addendum).

According to the California Geologic Survey, the Project Site is not within a mapped liquefaction potential investigation zone. As such, the potential for liquefaction to occur at the Project Site is considered low. Therefore, impacts related to liquefaction and seismically-induced ground deformations would be less than significant (refer to Section IV.F, Comparative Analysis of Modified Project Impacts, Geology and Soils, of the Modified Project Addendum). Additionally, with adherence to the recommended parameters for shallow foundations outlined in the Geotechnical Report, which are outlined in Project Design Feature F 1 and would be incorporated into the final, site-specific geotechnical report prepared for the Modified Project subject to LADBS review and approval, impacts related to settlement and cyclic densification of unsaturated sands and gravels due to earthquake ground motions would also be less than significant (refer to Section IV.F, Comparative Analysis of Modified Project Impacts, Geology and Soils, of the Modified Project Addendum). Therefore, no mitigation measures are required.

Based on the California Geologic Survey and the City of Los Angeles' Safety Element, the Project Site is not within a mapped Earthquake-Induced Landslide Hazard Zone or a mapped landslide area according to the landslide inventory and hillside area map. As discussed below, the Project Site and the immediately surrounding area are generally flat in nature, and there are no unique geologic or topographic features located on the Project Site, such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. Therefore, impacts related to landslides and landform alteration would be less than significant, and no mitigation measures are required (refer to Section IV.F, Comparative Analysis of Modified Project Impacts, Geology and Soils, of the Modified Project Addendum).

The Project Site consists predominantly of previously developed, impervious surface area. As evaluated in Section IV.I, Hydrology and Water Quality, on page 95 of the Modified Project Addendum, Modified Project-related 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. As part of these requirements, the Modified Project would adhere to Best Management Practices (BMPs) prescribed as part of a Storm Water Pollution Prevention Plan (SWPPP) pursuant the National Pollutant Discharge Elimination System (NPDES). Through compliance with applicable regulatory requirements that include the implementation of BMPs, impacts related to erosion and sedimentation would be less than significant, and no mitigation measures are required (refer to Section IV.F, Comparative Analysis of Modified Project Impacts, Geology and Soils, of the Modified Project Addendum).

The Project Site is generally flat at about elevation (el) 180 feet, with the exception of the sunken court and seating within the Sports Arena structure. The proposed stadium would be constructed within a portion of the excavation and footprint area currently occupied by the Sports Arena, which currently extends to a depth of approximately 25 feet below grade level (approximately el 155). The excavation areas following removal of the Sports Arena not occupied by the proposed stadium footprint would be backfilled to existing grade. Based on the information provided in the Geotechnical Report, the excavation required for the proposed development would not extend deeper than the current below-grade areas of the Sports Arena. Historical groundwater was reported to be 45 to 55 feet below the ground surface within the Project Site area, which is well below the lowest proposed grade development involved under the Modified Project. Furthermore, groundwater was not encountered within the maximum 101.5-foot depth (el 78.5) explored in the deepest boring drilled for the Geotechnical Report. Additionally, based on the 2015 Phase I ESA performed for the Project Site, which is discussed in Section IV.H, Hazards and Hazardous Materials, on page 91 of the Modified Project Addendum, groundwater was measured in a monitoring well located approximately one mile northwest of the Project Site at approximately 162 feet below ground surface (el 41.5). Therefore, it is not expected that groundwater would be encountered during Modified Project construction. Nonetheless, the potential exists for shallower, perched water to be encountered at the Project Site depending on seasonal rainfall. Thus, while not anticipated, temporary construction dewatering may be required. Should it be required, construction dewatering would be performed using conventional gravity routing and collection in sump pits, with pumping performed as needed to dispose of any water accumulated in these areas, as outlined in Project Design Feature F-1. Additionally, construction dewatering would be subject to NPDES permit requirements. Through compliance with existing regulations and the project-specific design measures outlined in Project Design Feature F-1, which would be incorporated into the Modified Project's final geotechnical report subject to LADBS review and approval, impacts related to groundwater would be less than significant, and no mitigation measures are required (refer to Section IV.F, Comparative Analysis of Modified Project Impacts, Geology and Soils, of the Modified Project Addendum).

According to the Geotechnical Report, the Project Site is underlain by engineered fill and alluvial soils. The fill stratum generally extended to depths ranging from approximately 7 to 10 feet (el 173 to 170) within the borings explored; however, based on a review of previous compaction reports, fill depths are anticipated to be as deep as 25 feet below existing grade (approximately el 155). The fill is subsequently underlain by alluvial deposits, which are generally comprised of medium dense to dense sands and silty sands with variable amounts of clay, gravel, and cobbles. Medium dense to dense sand and silty sands with various amounts of gravel and cobbles extend to depths up to approximately 25 feet below the existing Sports Arena basement level (approximately el 131.5), and subsequently underlain by sand and silty sand layers with interbedded layers of silt and clay. Expansion and corrosion testing indicated that the soils are non-expansive and non-corrosive The Geotechnical Report concluded that the integrity of the soils underlying the Project Site is such that the Modified Project could be adequately supported provided that the Modified Project complies with the site plan review and permitting requirements of the LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to LADBS review and approval, pursuant to Project Design Feature F-1. The final, site-specific geotechnical report would incorporate the recommendations presented in the Geotechnical Report into the final design of the Modified Project, as outlined in Project Design Feature F-1. No soil or geologic conditions were encountered that would pose a substantial safety risk during Modified Project construction or operation. Through compliance with applicable regulatory requirements and site-specific geotechnical recommendations that would be incorporated into the final plans, impacts related to soil stability would be less than significant, and no mitigation measures are required (refer to Section IV.F, Comparative Analysis of Modified Project Impacts, Geology and Soils, of the Modified Project Addendum).

The Project Site is not within a Methane Zone or Methane Buffer Zone identified by the City. Therefore, no further analysis of issues related to methane are required (refer to Section IV.F, Comparative Analysis of Modified Project Impacts, Geology and Soils, of the Modified Project Addendum).

Furthermore, as analyzed under the Modified Project Addendum, due to their site-specific nature, geology impacts are typically assessed on a project-by-project basis for a particular localized area. Cumulative development has the potential to expose a greater number of people to seismic hazards, depending on the geologic conditions in a given area. As discussed, the Project Site is generally flat in nature, does not contain known active faults, and is not within a mapped liquefaction potential investigation zone, mapped landslide area, or Methane Zone. It is therefore expected that related projects in the immediate vicinity of the Project Site would have similar geologic conditions, such that cumulative development would not have the potential to impose substantial safety risks to people, structures or infrastructure. However, as with the Modified Project, related projects would be subject to local, State, and federal regulations and standards for seismic safety to ensure potential impacts would be avoided. Thus, cumulative impacts related to geology and soils would be less than significant (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Based on the analysis above, the Modified Project would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. The Modified Project would not constitute a geologic hazard to other properties by causing or accelerating instability from erosion, or accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on site. Finally, the Modified Project would

not destroy, permanently cover, or materially and adversely modify any distinct or prominent geologic or topographic features. Therefore, based on the analysis above and through the implementation of the Project Design Feature F-1, impacts related to geology and soils would be less than significant, and no mitigation measures are required (refer to Section IV.F, Comparative Analysis of Modified Project Impacts, Geology and Soils, of the Modified Project Addendum). Accordingly, the Modified Project would not result in any new significant environmental impacts to geology and soils, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

G. Greenhouse Gas Emissions (Construction, Operation, Cumulative)

The Certified EIR for the Original Stadium Project concluded that impacts with respect to GHG emissions would be less than significant under the Original Stadium Project (refer to Section IV.C, Greenhouse Gas Emissions, of the Certified EIR). The thresholds on which this analysis was based are stated on pages IV.C-10–IV.C-11 of the Certified EIR. The Certified EIR's conclusion was based on the following:

- GHGs emitted during construction of the Original Stadium Project would represent a nominal percent of the State's total GHG emissions in 2008;
- The proposed stadium would be an outdoor venue which would significantly reduce the amount of stationary source GHG emissions associated with heating and air conditioning (as compared to an indoor stadium such as the Los Angeles Memorial Sports Arena that currently exists on the Project Site);
- The Original Stadium Project would replace an existing venue that is over 50 years old with a state-of-the art venue that would result in significantly increased energy efficiencies at the Project Site; and
- The Original Stadium Project would not result in an increase in peak (i.e., event day) vehicle trips as compared to existing conditions under operation of the Sports Arena.

These characteristics also are true for the Modified Project. However, the Modified Project includes up to approximately 105,900 square feet of ancillary facility floor area (up to approximately 119,000 gross square feet) that were not part of the Original Stadium Project. Additionally, while peak day attendance under the Modified Project is expected to be within peak historic attendance levels at the Sports Arena, based on preliminary programming data provided by LAFC, annual attendance in the Modified Project's stadium could increase compared to existing conditions. These annual attendance estimates are relevant for determining the Modified Project's GHG impacts as they relate to mobile source emissions and vehicle miles traveled (VMT). Accordingly, additional analysis was conducted in connection with the Modified Project Addendum to determine whether the Modified Project would result in new significant impacts with respect to GHG emissions that were not previously identified in the Certified EIR.

Since the certification of the Certified EIR in 2011, numerous regulatory changes have occurred that are pertinent to the study of greenhouse gas (GHG) impacts under CEQA, a summary of which is included in Appendix J of the Modified Project Addendum. Project-level significance thresholds for GHG emissions have not yet been adopted by the California Air Resources Board (CARB), the South Coast Air Quality Management District (SCAQMD), or the City of Los Angeles. Rather, assessing the significance of a project's contribution to cumulative global climate change involves developing an inventory of project GHG emissions and considering project consistency with applicable emission reduction strategies and goals, such as those set forth by Assembly Bill

(AB) 32. As analyzed under the Modified Project Addendum, a project that generates GHG emissions, either directly or indirectly, would have a significant impact if:

- The project's reduction in emissions does not constitute an equivalent or larger break from "business-as-usual" (BAU) than has been determined by CARB to be necessary to meet the state AB 32 goals (i.e., 16 percent, as discussed below); or
- The project conflicts with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Furthermore, as discussed in the Modified Project Addendum, per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions." Therefore, as explained in the Modified Project Addendum, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a plan, program, or regulation that will reduce GHG emissions.

Consistent with CEQA Guidelines Section 15064(h)(3), the Modified Project Addendum also provides a qualitative estimate of the Modified Project's compliance with plans, programs, and regulations that reduce a project's GHG emissions either directly or indirectly, including: the California Green Building Standards Code; the Southern California Associations of Governments' (SCAG) 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS); the City of Los Angeles Green Building Code (2013); and Green LA, An Action Plan to Lead the Nation in Fighting Global Warming. In addition, the Modified Project Addendum provides a qualitative assessment of the Modified Project's compliance with the California Cap-and-Trade Program and applicable executive orders related to climate change.

Given these significance thresholds, as analyzed under the Modified Project Addendum, the Modified Project would not result in significant impacts to Greenhouse Gas Emissions for the reasons discussed below.

a. Consistency with AB 32 ("Business as Usual" (BAU) Analysis)

As analyzed under the Modified Project Addendum, GHG emissions associated with the three scenarios described at Section IV.G.a on page 76 of the Modified Project Addendum, (i.e., Baseline, "business-as-usual" BAU, and Modified Project as Proposed) were calculated using CalEEMod, the model recommended by the SCAQMD for calculating emissions from land use projects. Model results are provided in Appendix I of the Modified Project Addendum. As summarized and shown in Table 9 on page 80 of the Modified Project Addendum, the Modified Project would result in an increase in annual GHG emissions in comparison to operation of the existing Sports Arena due to the increase in annual attendance at the Modified Project's stadium, as well as the daily operation of the proposed ancillary uses. However, with implementation of the Project Design Features described below, as well as

current State mandates, the Modified Project would result in an annual total of approximately 12,496 metric tons of carbon dioxide equivalent (CO2e), representing an approximate 25 percent reduction from the BAU scenario. Thus, the Modified Project would result in a net decrease in GHG emissions that represents a substantial break from BAU (i.e., greater than 16 percent). Additionally, the Modified Project's features and GHG reduction measures described below make it consistent with AB 32. Therefore, impacts with respect to AB 32 consistency and the Modified Project's break from BAU would be less than significant (refer to Section IV.G, Comparative Analysis of Modified Project Impacts, Greenhouse Gas Emissions, of the Modified Project Addendum). No mitigation measures are required.

b. Consistency with Plans, Programs, and Regulations for Reducing GHG Emissions

The Modified Project would incorporate sustainability as part of its key design and would serve to reduce GHG emissions in comparison to BAU. In so doing, the Modified Project would comply with Title 24 of the California Code of Regulations, including Part 6 (Energy Efficiency Standards for Residential and Nonresidential Buildings) and Part 11 (California Green Building Standards Code, commonly referred to as the CALGreen Code), as well as the City of Los Angeles Green Building Code (2013), which incorporates the CALGreen Code into Chapter IX of the Los Angeles Municipal Code (LAMC). The 2013 CALGreen Code (applicable to the Modified Project) is anticipated to be 30 percent more efficient than the 2008 Title 24 (applicable to the Original Stadium Project and BAU) for nonresidential construction. In accordance with Project Design Feature G-2, energy efficiency would be achieved through building design and through the incorporation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems, lighting, and appliances.

In accordance with Project Design Feature G-1, the Modified Project would also be designed to be capable of achieving at least Silver certification under the U.S. Green Building Council's LEED-BD+C or LEED-ND Rating System (v.3), or equivalent green building standards. Achieving LEED Silver would reduce energy consumption associated with lighting by a minimum of 20 percent in comparison to BAU. As discussed in Section IV.P, Utilities and Service Systems, on page 171, of the Modified Project Addendum, the Modified Project would also implement numerous water conservation measures in accordance with LADWP requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, drought-tolerant landscaping). (See Project Design Feature P-1 and EIR Mitigation Measure MM I.2-1 in Section IV.P.b, Utilities and Service Systems—Water, on page 176 of the Modified Project Addendum) Furthermore, as described in Section IV.P.c, Utilities and Service Systems—Solid Waste, of the Modified Project Addendum, Mitigation Measure MM I.4 2 from the Certified EIR (as revised) states that the Applicant shall demonstrate through annual compliance reports submitted to the City of Los Angeles Department of Public Works, Bureau of Sanitation, an annual operational diversion rate of at least 40 percent. Additionally, pursuant to Mitigation Measure MM I.4-2 from the Certified EIR (as revised), the Modified Project would divert a minimum of 75 percent of construction related solid waste and demolition debris from area landfills. Additionally, Modified Project construction materials would utilize post-consumer recycled content pursuant to Project Design Feature P-2. Pursuant to Project Design Feature P-3, during operation, the Modified Project would implement a composting program and would utilize bio-based materials. Each of these features would help to further reduce GHG emissions by reducing the amount of energy that would have otherwise been consumed to extract and process virgin source materials. The Modified Project also includes numerous energy reduction features as set forth in Section IV.P.d, Utilities and Service Systems—Energy, on page 195 of the

Modified Project Addendum. (See Project Design Features P-4 and P-5 and EIR Mitigation Measures MM I.3-1 through MM I.3-19) Such features include the use of energy efficient appliances, building materials, and heating and cooling systems.

As discussed in Section IV.J, Land Use and Planning, on page 101 of the Modified Project Addendum, SCAG's 2012–2035 RTP/SCS, adopted in April 2012, presents a long-term transportation vision through the year 2035 for its six county region. The mission of the 2012–2035 RTP/SCS is to provide "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians." The 2012–2035 RTP/SCS emphasizes sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. In so doing, the 2012–2035 RTP/SCS provides goals and policies that are inherently related to the reduction of GHG emissions.

The 2012–2035 RTP/SCS establishes High-Quality Transit Areas, which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas. The Project Site is located within a High-Quality Transit Area as designated by the 2012–2035 RTP/SCS. Furthermore, the Modified Project is designed with a mix of land uses (e.g., stadium, retail, office, and restaurants) that would capture internal vehicular trips at the Project Site, thereby reducing VMT. The Project Site is also located on a previously developed urban site where substantial existing infrastructure is in place. In accordance with Project Design Feature G 3, the Modified Project would include numerous features to reduce vehicular traffic, including preferential parking for alternative-fueled vehicles and carpools, encouraging the use of mass transit, and encouraging pedestrian and bicycling as viable means of accessing the Project Site by employees and visitors. Specifically, with regard to preferential parking for alternative-fueled vehicles, ten percent of the parking spaces provided in the Modified Project's VIP parking lot on the Project Site would be constructed to accommodate the future placement of facilities for the recharging of electric vehicles pursuant to Project Design Feature G-3. These measures would reduce vehicle miles traveled and usage of petroleum based fuels. The Project Site location provides convenient pedestrian access to several stops on the Exposition Line Light Rail Line, including the Expo Park/USC Station (0.35 mile from the Project Site) and the Expo/Vermont Station (0.7 mile from the Project Site), as well as the 37th Street/USC Silver Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.37 mile from the Project Site). The Project Site is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Project Site. The availability and accessibility of public transit in the Project area is evidenced by the Project Site's location within a designated High-Quality Transit Area. By focusing new development within a designated High-Quality Transit Area, the Modified Project would be consistent with regional growth strategies promoted in the 2012–2035 RTP/SCS, which represent widely recognized "smart growth" planning strategies that promote higher density, infill development with access to public transit in an effort to reduce urban sprawl and its associated environmental effects. Overall, and as discussed further in Section IV.J, Land Use and Planning, on page 101 of the Modified Project Addendum, the Modified Project would be consistent with the 2012–2035 RTP/SCS, which is a relevant regional plan adopted for the purpose of reducing GHG emissions (refer to Section IV.G, Comparative Analysis of Modified Project Impacts, Greenhouse Gas Emissions, of the Modified Project Addendum).

(1) California's Cap-and-Trade Program

The Climate Change Scoping Plan identifies a cap-and-trade program as one of the strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020 and ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap will be able to trade permits to emit GHGs within the overall limit.

Under the approved Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. The Cap-and-Trade Program provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in the First Update:

> The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced.

In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate:

> The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the "capped sectors." Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price

> incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap. [...]
>
> [T]he Cap-and-Trade Regulation provides assurance that California's 2020 limit will be met because the regulation sets a firm limit on 85 percent of California's GHG emissions.

In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory architecture adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures. As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage would be capped in the aggregate and steadily reduced by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015.

The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle-miles traveled (VMT) would be capped in the aggregate and steadily reduced by the Cap-and-Trade Program.

As demonstrated above, GHG emissions attributable to electricity use and VMT, as well as stationary source GHG emissions, would be reduced by the Cap-and-Trade Program. As such, these GHG emissions are reduced by an existing regulatory scheme designed to address the cumulative problem of climate change. Accordingly, the Modified Project's GHG emissions in these categories, which are reduced by the Cap-and-Trade Program, would not be considered cumulatively considerable per the guidance provided in CEQA Guidelines Section 15064(h)(3) (refer to Section IV.G, Comparative Analysis of Modified Project Impacts, Greenhouse Gas Emissions, of the Modified Project Addendum).

(2) Executive Orders S-3-05 and B-30-15

At the state level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S 3-05's goal to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). As analyzed above, the Modified Project

is consistent with AB 32. Therefore, the Modified Project does not conflict with this component of Executive Order S-3-05. The Executive Orders also establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. These goals have not been codified. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its Climate Change Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 target are too far in the future to define in detail." In the First Update, however, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately." Due to the technological shifts required and the unknown parameters of the regulatory framework in 2030 and 2050, quantitatively analyzing the Modified Project's impacts further relative to the 2030 and 2050 goals is speculative for purposes of CEQA. Moreover, CARB has not calculated and released the BAU emissions projections for 2030 or 2050, which are necessary data points for quantitatively analyzing a CEQA project's consistency with these targets.

Although the Modified Project's emissions levels in 2030 and 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the proposed Modified Project's emissions level to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Modified Project's emissions total at build-out presented in Table 9 on page 80 of the Modified Project Addendum, represents the maximum emissions inventory for the Modified Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Modified Project emissions once fully constructed and operational, the Modified Project is considered to be consistent with the Executive Orders.

The Climate Change Scoping Plan recognizes that AB 32 establishes an emissions reduction trajectory that will allow California to achieve the more stringent 2050 target: "These [greenhouse gas emission reduction] measures also put the state on a path to meet the long-term 2050 goal of reducing California's greenhouse gas emissions to 80 percent below 1990 levels. This trajectory is consistent with the reductions that are needed globally to stabilize the climate." Also, CARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by CARB would serve to reduce the proposed Modified Project's post-2020 emissions level to the extent applicable by law. These emission reduction strategies include the following:

- **Energy Sector**: Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the proposed Modified Project's emissions levels. Additionally, further additions to California's renewable resource portfolio would favorably influence the proposed Modified Project's emissions levels.

- **Transportation Sector**: Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the proposed Modified Project's emissions levels.
- **Water Sector**: The proposed Modified Project's emissions levels will be reduced as a result of further desired enhancements to water conservation technologies.
- **Waste Management Sector**: Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the proposed Modified Project's emissions levels.

The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. Although the Cap-and-Trade Program would remain in effect in post-2020, it is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions. However, CARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The "recommended action" in the First Update for the Cap-and-Trade Program is: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target." The "expected completion date" for this recommended action is 2017.

In addition to CARB's First Update, in January 2015, during his inaugural address, Governor Jerry Brown expressed a commitment to achieve "three ambitious goals" that he would like to see accomplished by 2030 to reduce the State's GHG emissions: (1) increasing the State's Renewable Portfolio Standard from 33 percent in 2020 to 50 percent in 2030; (2) cutting the petroleum use in cars and trucks in half; and (3) doubling the efficiency of existing buildings and making heating fuels cleaner. These expressions of Executive Branch policy may be manifested in adopted legislative or regulatory action through the state agencies and departments responsible for achieving the State's environmental policy objectives, particularly those relating to global climate change.

Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. Even though these studies do not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target.

Given the proportional contribution of mobile source-related GHG emissions to the State's inventory, recent studies also show that relatively new trends, such as the increasing importance of web-based shopping, the emergence of different driving patterns by the "millennial" generation and the increasing effect of Web-based applications on transportation choices, are beginning to substantially influence transportation choices and the energy used by transportation modes. These factors have changed the direction of transportation trends in recent years, and will require the creation of new models to effectively analyze future transportation patterns and the corresponding effect on GHG emissions. Therefore, the Modified Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets (refer to Section

IV.G, Comparative Analysis of Modified Project Impacts, Greenhouse Gas Emissions, of the Modified Project Addendum).

(3) Conclusion

Given the Modified Project's consistency with State, regional, and local GHG emission reduction goals and objectives, the Modified Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, as was the case with the Original Stadium Project. Furthermore, the Modified Project would comply with plans, programs, and regulations that reduce GHG emissions. Indeed, many Modified Project-related emissions would be capped in the aggregate and steadily reduced by the Cap-and-Trade Program, such as energy, mobile, and construction emissions. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, impacts with respect to GHG emissions under the Modified Project would be less than significant and not cumulatively considerable (refer to Section IV.G, Comparative Analysis of Modified Project Impacts, Greenhouse Gas Emissions, of the Modified Project Addendum). No mitigation measures are required.

The Modified Project would not result in significant greenhouse gas emissions. Further, the analysis of greenhouse gas emissions is cumulative in nature. Thus, the Modified Project would not result in significant cumulatively considerable impacts associated with greenhouse gas emissions, consistent with the Certified EIR analysis for the Original Project (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum). Cumulative impacts would be less than significant.

H. Land Use and Planning—Land Use Compatibility (Operation and Cumulative)

The Certified EIR for the Original Stadium Project concluded that impacts related to land use compatibility during operation would be less than significant under the Original Stadium Project (refer to Section IV.F, Land Use, of the Certified EIR). The thresholds on which this analysis was based are stated on page IV.F-13 of the Certified EIR. The analysis in the Certified EIR concluded that demolition of the Sports Arena and construction of the Original Stadium Project would maintain the existing, general-purpose use of the Project Site as a venue for sporting and entertainment events, cultural events, and civic events. The Certified EIR further states that the Project Site would continue to function as an integral part of the Exposition Park Master Plan as a public entertainment and civic space.

Consistent with the Original Stadium Project, the proposed stadium under the Modified Project would have a maximum seating capacity of approximately 22,000 attendees and would host MLS games, USC field events, open-air entertainment events such as concerts and civic gatherings, and exhibition soccer games. The general use of the stadium would not change with the design modifications proposed under the Modified Project. The Modified Project would also provide additional ancillary uses to the proposed stadium analyzed in the Certified EIR, including conference facility and office space, a museum, and retail and restaurant uses. These types of land uses are consistent and compatible with other land uses within and around Exposition Park. For example, land uses within Exposition Park include museums and athletic facilities with associated office/administration, conference, retail, and restaurant spaces. Retail and restaurant uses are also located adjacent to the Project Site on the east side of Figueroa Street. Additional conference facility, office, retail, and restaurant uses are located within and adjacent to the USC

main campus north of Exposition Park. Furthermore, similar to the Original Stadium Project, the Modified Project would not adversely alter the neighborhood or community through ongoing disruption, division, or isolation since the Project Site has historically been developed as a major sports, entertainment, and cultural venue since the late 1950s, a function that would be continued and expanded upon under the Modified Project. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.F, Land Use and Planning, of the Certified EIR), impacts with respect to land use compatibility during operation would be less than significant under the Modified Project (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum). No mitigation measures are required.

Further, as analyzed under the Modified Project Addendum, no related projects that could cause land use incompatibility are known to be located within Exposition Park or in the immediate vicinity of the Project Site. Thus, consistent with the Certified EIR analysis for the Original Stadium Project, cumulative land use impacts relating to land use compatibility would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to land use compatibility, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

I. Noise (Cumulative)

Short-term cumulative construction-noise impacts in the immediate vicinity of the Project Site could occur if related projects in close proximity to the Project Site are under construction during the same time period as the Modified Project. As described below, impacts with respect to construction noise would continue be significant and unavoidable under the Modified Project, consistent with the Certified EIR's analysis of the Original Stadium Project. However, based on the distance between the related projects and the Project Site and the presence of existing intervening structures, construction noise from the related projects would not be anticipated to combine with that of the Modified Project to a measureable extent. Furthermore, related projects would be required to comply with LAMC requirements related to construction noise, including limitations on hours when construction and demolition activities are allowed to occur, and would be required to mitigate construction noise to the extent feasible pursuant to CEQA. Therefore, consistent with the Certified EIR analysis for the Modified Project, cumulative construction noise impacts would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

As discussed below, impacts with respect to operational stadium event noise (i.e., related to concerts, crowd noise including yelling and cheering, a public address system, amplified music, and announcements) would be significant and unavoidable under the Modified Project, consistent with the Certified EIR's analysis of the Original Stadium Project. The two nearest related projects are located in the northeastern portion of Exposition Park at the California African American Museum and the California Science Center. These projects involve interior expansions of the existing museum facilities, and are not anticipated to result in large, outdoor events that would occur simultaneously with events at the Project Site. Based on the distance between the related projects the Project Site and the presence of existing intervening structures, noise from outdoor crowds would not be anticipated to combine to result in significant cumulative impacts. Furthermore, the Applicant would coordinate with the California African American Museum and

the California Science Center regarding the scheduling of events to minimize noise, traffic, and parking impacts to the extent feasible. Additionally, as described in the Modified Project Addendum, under existing conditions the Coliseum currently hosts outdoor events with approximately 93,000 attendees. Pursuant to Mitigation Measure J-1 in the Certified EIR, the Coliseum Commission is required to schedule events at the Coliseum and Sports Arena in such a manner that the event attendance size at the two venues combined does not exceed 93,000 people. Accordingly, noise from operations of the Modified Project in combination with noise from events at the Coliseum is not anticipated to result in a substantial increase above existing conditions. Further, the analysis of operational noise impacts in Section IV.L, Noise, on page 119 of the Modified Project Addendum, which concluded that operational noise impacts associated with traffic would be less than significant, considers future traffic levels and is therefore cumulative by nature. Therefore, consistent with the Certified EIR analysis for the Modified Project, cumulative operational noise impacts would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Accordingly, consistent with the conclusion in the Certified EIR for the Original Stadium Project (refer to IV.G, Noise, of the Certified EIR), the Modified Project would not result in any new significant impacts with respect to cumulative noise, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

J. Population, Housing and Employment (Construction, Operation, Cumulative)

Significant impacts with respect to population, housing, and employment could occur if a project were to displace existing housing or residents, or induce substantial population growth (either directly or indirectly). The Certified EIR for the Original Stadium Project concluded that impacts with respect to population, housing, and employment would be less than significant under the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR). As stated in the Certified EIR, there are no residential uses on the Project Site, and the Original Stadium Project did not propose residential uses. Therefore, the Original Stadium Project would not have displaced existing housing or provided additional housing capacity. Similarly, the Modified Project would neither displace residential uses, nor provide additional housing capacity. Rather, the Modified Project involves the development of the Original Stadium Project with certain modifications that include additional ancillary uses that are all commercial land uses that would complement the proposed stadium.

As described in the Certified EIR, construction of the Original Stadium Project would result in an increase in employment opportunities and related demand for housing. However, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, due to the temporary nature of construction employment opportunities, the Certified EIR stated that it is unlikely that construction workers would relocate their households as a consequence of construction employment associated with the Original Stadium Project; therefore, no new permanent residents would be generated as result of the construction of the Original Stadium Project. This conclusion would not change under the Modified Project. While the Modified Project proposes the construction of up to approximately 105,900 square feet of floor area for the ancillary uses in addition to the proposed stadium, the amount of additional construction work involved would not require substantial numbers of additional construction workers. In total, approximately 1,200 construction workers are projected for construction of the Modified Project. In May 2015, there were approximately

119,600 workers employed in the construction industry in Los Angeles County. Therefore, the Modified Project's projected construction workforce could be accommodated by the existing regional supply of construction workers.

With respect to employees generated during operation, the Certified EIR concluded that implementation of the Original Stadium Project would not result in a substantial change in employment levels at the Project Site because the Original Stadium Project would redevelop the Project Site with the same general use (i.e., sports stadium) that currently exists on site. Therefore, the Certified EIR concluded that any additional employment opportunities created by the Original Stadium Project would not result in a significant indirect impact on housing supply or demand in the Project area. As is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of 22,000 seats. Therefore, employment impacts with respect to the stadium operations of the Modified Project would not change. However, additional employees beyond those anticipated in the Certified EIR may result from operation of the ancillary uses proposed as part of the Modified Project. Specifically, as shown in Table 14 on page 136 of the Modified Project Addendum, conservatively assuming that all employees associated with the ancillary uses would be new to the Project Site and the Project vicinity, the Modified Project's 105,900 square feet of ancillary uses would generate as many as 282 employees on site, based on employee generation rates for non-residential land uses promulgated by the Los Angeles Unified School District (LAUSD).

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. SCAG's 2012–2035 RTP/SCS provides population, housing, and employment projections for cities under its jurisdiction through 2035. The growth projections in the 2012–2035 RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG's planning area. The Project Site is located in SCAG's City of Los Angeles Subregion. According to the 2012–2035 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2015 is approximately 1,809,341 employees. In 2018, the projected build-out year of the Modified Project, the City of Los Angeles Subregion is anticipated to have approximately 1,840,552 employees. Thus, the 282 estimated on site employees for the Modified Project's ancillary uses would constitute approximately 0.9 percent of the employment growth forecasted for the Subregion between 2015 and 2018. In July 2015, the unadjusted unemployment rate for the County of Los Angeles was 7.5 percent. The California seasonally adjusted unemployment rate was 6.2 percent in July 2015, 6.3 percent in June 2015, and 7.4 percent in July 2014. Thus, the additional part-time and full-time jobs created by the Modified Project would be considered a beneficial economic impact for the region, and the, additional employees generated by the Modified Project would fall within SCAG's employment projections for the Subregion. Furthermore, the estimated number of new employees would not be anticipated to induce substantial indirect population or housing growth in the Project area, as it is anticipated that the majority of Modified Project employees would come from the existing local labor pool and would not relocate as a result of working at the Project Site. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), impacts with respect to population, housing, and employment would be less than significant under the Modified Project (refer to Section IV.M Comparative

Analysis of Modified Project Impacts, Population, Housing, and Employment, of the Modified Project Addendum).

Further, with respect to cumulative impacts, no residential population or housing units would be introduced by the Modified Project and the Project Site is located in an urbanized area with infrastructure that is already in place. Thus, the Modified Project would not induce substantial population growth or displace substantial numbers of people, and the Modified Project's impacts to population and housing would not be cumulatively considerable. In addition, while related projects would cumulatively increase population in the area, such increases are expected to be within City and SCAG growth forecasts. Thus, cumulative impacts associated with population and housing would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Accordingly, the Modified Project would not result in any new significant impacts with respect to population, housing, and employment, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

K. Public Services

1. Fire Protection (Construction and Cumulative)

Significant impacts to fire protection services could occur if construction of a project were to require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Potential impacts to fire protection services during construction were not assessed in detail in the Certified EIR. Construction activities have the potential to result in accidental on site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, Modified Project construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on site during Modified Project construction. Furthermore, construction of the Modified Project would occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with applicable regulatory requirements would effectively reduce the potential for construction activities under the Modified Project to expose people to the risk of fire or explosion related to hazardous materials. With the implementation of these regulatory requirements, the Modified Project's potential impacts with respect to fire services during construction would be less than significant (refer to Section IV.N Comparative Analysis of Modified Project Impacts, Public Services, of the Modified Project Addendum). No mitigation measures are required.

With respect to cumulative impacts on fire protection services, development of the Modified Project in conjunction with related projects would cumulatively increase the demand for fire services. However, all three fire stations serving the Project Site area are achieving response times that are less than the Citywide average, and therefore can accommodate additional demand. Over time, 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 apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through

the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes) to which the Modified Project and related projects would contribute. Moreover, all of the related project's plans would be reviewed by the LAFD in order to ensure adequate fire flow capabilities and adequate emergency access. Compliance with LAFD requirements and LAMC requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be below a level of significance. Therefore, consistent with the Certified EIR analysis for the Modified Project, cumulative impacts to fire protection would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

2. Schools (Construction, Operation, Cumulative)

Significant impacts to schools could occur if a project were to generate an amount of students that would exceed the capacity of the schools that serve the Project Site, thereby requiring the construction of new facilities, and/or modifications to the existing operational characteristics of the schools that serve the Project Site. Potential impacts to schools were not assessed in detail in the Certified EIR. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). While the Modified Project would not generate residents at the Project Site, the additional employment generated by the Modified Project would have the potential to generate new students that may attend LAUSD schools. However, the potential for actual student generation is anticipated to be limited because, as discussed in Section IV.M, Population, Housing, and Employment, on page 134 of the Modified Project Addendum, it is anticipated that the majority of Modified 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 Modified Project would be dispersed across many LAUSD schools, as school attendance is primarily a function of an employee's location of residence rather than his or her place of work, and Modified Project employees are anticipated to live in many different areas within LAUSD's jurisdiction.

The Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50) allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. The LAUSD collects school developer fees at a rate of $0.47 per square foot of commercial construction, $1.57 per square foot of office construction, $1.31 per square foot of retail construction, and $0.09 per square foot of parking structure construction. Payment of these fees is required prior to the 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 a less-than-significant level. As the payment of these fees is mandatory, through compliance with this regulatory requirement the Modified Project's potential impacts with regard to school facilities would be less than significant (refer to Section IV.N Comparative Analysis of Modified Project Impacts, Public Services, of the Modified Project Addendum). No mitigation measures are required. Therefore, the Modified Project would not result in any new significant impacts with respect to schools, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

With regard to potential impacts on schools during construction, as discussed in Section IV.C, Air Quality, on page 49 of the Modified Project Addendum, impacts with respect to localized air quality during construction would be less than significant under the Modified Project, consistent

the conclusions of the Certified EIR's analysis for the Original Stadium Project. As discussed in Section IV.L, Noise, on page 119 of the Modified Project Addendum, the Certified EIR determined that the Original Stadium Project would result in significant construction-related noise impacts at Receptor Location 1, which is near the southwest corner of the Project Site and represents the Ralph M. Parsons Pre-School located within the Expo-Center. This impact would remain significant and unavoidable under the Modified Project, but would not substantially increase compared to levels analyzed in the Certified EIR. As discussed in Section IV.O, Traffic/Transportation/Parking, on page 149 of the Modified Project Addendum, potential impacts from construction-related traffic were not assessed in detail in the Certified EIR. Nonetheless, the analysis in Section IV.O, Traffic/Transportation/Parking, determined that construction-related traffic impacts under the Modified Project would be less than significant. Furthermore, the Modified Project would continue to implement EIR Mitigation Measure MM G-1 requiring the preparation and implementation of a Construction Management Plan, subject to LADOT approval, which would establish proposed haul routes and staging areas for the transportation of materials and equipment with consideration for sensitive uses in the neighborhood, including schools. (Refer to Section IV.N Comparative Analysis of Modified Project Impacts, Public Services, of the Modified Project Addendum)

Further, payment of developer impact fees in accordance with Senate Bill 50 and pursuant to Section 65995 of the California Government Code would ensure that the impacts of the Modified Project on school facilities would be less than significant. Related projects would also be required to pay the developer impact fee, and thus cumulative impacts would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum). Accordingly, for the above reasons, construction of the Modified Project would not result in any new significant impacts with respect to schools, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

3. Parks and Recreation (Construction, Operation, Cumulative)

Significant impacts to parks and recreational facilities could occur if a project were to create an increased demand for parks and recreational facilities that could result in the need for new or physically altered facilities. Potential impacts to parks and recreational facilities were not assessed in detail in the Certified EIR. Parks within the City's boundaries are operated and maintained by the Los Angeles City Recreation and Parks Department. During construction of the Modified Project, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is potential for construction workers to spend their lunch breaks at the parks and recreational facilities located in proximity to the Project Site, particularly the open space areas within Exposition Park. However, any such use would be temporary and nominal and would not be anticipated to create an increased demand for parks and recreational facilities that could result in the need for new or physically altered facilities. Therefore, the Modified Project's potential impacts with respect to parks and recreational facilities would be less than significant during construction (refer to Section IV.N Comparative Analysis of Modified Project Impacts, Public Services, of the Modified Project Addendum). No mitigation measures are required.

Since no residential uses would be developed as part of the Modified Project, no new residents would be generated on site during Modified Project operations. Thus, implementation of the Modified Project would not result in on site residents who would utilize nearby parks and/or

recreational facilities. The standards and goals imposed by the City's Public Recreation Plan with respect to parks and recreation relate specifically to residential users. While the Modified Project would not generate residents at the Project Site, the additional employment generated by the Modified Project would have the potential to generate an increased demand for parks and recreation facilities, particularly the open space areas within Exposition Park adjacent to the Project Site, including recreational facilities within the Expo Center. However, this potential is anticipated to be limited because, as discussed in Section IV.M, Population, Housing, and Employment, on page 134 of the Modified Project Addendum, it is anticipated that the majority of Modified Project employees would come from the existing labor pool and would not relocate as a result of working at the Project Site. While employees could spend their lunch breaks in Exposition Park or at other nearby facilities, any such use would be for limited periods and would not be anticipated to create an increased demand for parks and recreational facilities that could result in the need for new or physically altered facilities. The uses proposed under the Modified Project could result in increased usage of Exposition Park due to the patrons that would be drawn to the Project Site as compared to existing conditions, particularly since the ancillary uses would be open on non-event days. However, it is anticipated that any potential increase in demand would be offset by the open space amenities that would be included as part of the Modified Project. Specifically, as compared the Original Stadium Project, the Modified Project would provide enhanced pedestrian improvements and open space areas, including approximately 143,000 square feet of improved public open space around the Project Site that would include pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas and could potentially include water features, public art, and seating areas. Therefore, operation of the Modified Project would not result in a substantial adverse impact to parks and recreational facilities, and impacts would be less than significant (refer to Section IV.N Comparative Analysis of Modified Project Impacts, Public Services, of the Modified Project Addendum). No mitigation measures are required.

Further, the Modified Project does not include residential uses that generate a direct need for recreational services. Furthermore, related projects would be required to provide open space and recreational amenities or comply with the parks and open space requirements established by the LAMC. Finally, the Modified Project is providing approximately 143,000 square feet of improved public open space within Exposition Park, which will provide new open space amenities for area residents, including new residents associated with related projects. Thus, cumulative impacts with respect to recreation would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to parks and recreational facilities, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

4. Other Public Facilities (Construction, Operation, Cumulative)

Significant impacts to libraries could occur if a project were to create an increased demand for library facilities that could result in the need for new or physically altered facilities. Potential impacts to other public facilities (i.e., libraries) were not assessed in detail in the Certified EIR. Library services within the Project area are provided by the Los Angeles Public Library (LAPL). The LAPL assesses service capacity based on the residential population within a specified distance of City libraries. The closest library to the Project Site is the Exposition Park–Dr. Mary McLeod Bethune Regional Library located at 3900 S. Western Avenue, approximately 1.5 miles from the Project Site. The residential population of a library's service area is the primary metric

used by the LAPL for assessing the adequacy of library services and planning for future growth. Because no residential uses would be developed as part of the Modified Project, no new residents would be generated on site. Thus, implementation of the Modified Project would not result in a direct increase in the number of residents within the service population of the Exposition Park–Dr. Mary McLeod Bethune Regional Library. As such, the Modified Project would not exceed the capacity of the local libraries to adequately serve the existing residential service population based on target service populations. In addition, it is unlikely that construction workers would utilize the libraries that serve the Project Site on their way to/from work or during their lunch hours. Rather, construction workers would likely utilize library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. While new employment at the Project Site would have the potential to generate an indirect demand for library services, this potential demand is anticipated to be limited because, as discussed in Section IV.M, Population, Housing, and Employment, on page 134 of the Modified Project Addendum, it is anticipated that the majority of Modified Project employees would come from the existing labor pool and would not relocate as a result of working at the Project Site. While employees could spend their lunch breaks at nearby libraries or visit them after work, any such use would be for limited periods and would not be anticipated to create an increased demand for libraries that could result in the need for new or physically altered facilities. Furthermore, due to the periodic, largely event-driven nature of the uses proposed on site, and the distance to the nearest library, it is unlikely that the demand for LAPL facilities would increase as a result of visitors and patrons generated by the Modified Project. Therefore, the Modified Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered LAPL facilities, and impacts would be less than significant (refer to Section IV.N Comparative Analysis of Modified Project Impacts, Public Services, of the Modified Project Addendum). No mitigation measures are required.

With regard to cumulative impacts, much of the growth associated with the Modified Project and related projects is already accounted for in the service population projections made by the LAPL. Further, as discussed above, the Modified Project would not result in a significant impact to library services and facilities. Therefore, the Modified Project would not contribute to a cumulatively considerable impact with regard to schools and libraries. Cumulative impacts would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum). As such, the Modified Project would not result in any new significant impacts with respect to other public facilities (i.e., libraries), and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

L. Public Utilities—Wastewater (Construction, Operations, Cumulative)

The Certified EIR for the Original Stadium Project concluded that impacts with respect to wastewater infrastructure and treatment capacity would be less than significant under the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Wastewater, of the Certified EIR). Specifically, the Certified EIR determined that the peak and average wastewater flows from the Project Site would not increase with implementation of the Original Stadium Project as compared to existing conditions since average and maximum attendance levels at the Project Site under the Original Stadium Project would be substantially similar to existing conditions. Therefore, the existing wastewater infrastructure in the Project Site vicinity and existing wastewater treatment facilities would be able to accommodate the Original Stadium Project's demand for wastewater

conveyance and treatment, and impacts related to wastewater would be less than significant. The thresholds on which this analysis was based are stated on page IV.I 6 of the Certified EIR.

As discussed in the Certified EIR, wastewater conveyance infrastructure and treatment services for the Project area are provided by the City of Los Angeles Department of Public Works Bureau of Sanitation Division (BOS). The Project Site is serviced by multiple BOS sewers including a sewer main in Hoover Street that is 18 inches in diameter south of South Park Drive, transitions to a 10-inch sewer line at South Park Drive and extends northerly, generally along the eastern side of South Coliseum Drive; 6- and 8-inch sewer laterals servicing the existing Sports Arena and other uses within Exposition Park; and a 72-inch-diameter North Outfall Sewer main in 41st Place, south of the Project Site.

As described in the Certified EIR and the Utility Infrastructure Technical Memorandum (Infrastructure Report), prepared by Langan Engineering and Environmental Services, dated August 28, 2015, which is included in Appendix R of the Modified Project Addendum, the existing Sports Arena is serviced by four sewer laterals: two 6-inch sewer laterals on south side of the Project Site and two additional sewer laterals, 6- and 8-inches in diameter, on the north side of the Project Site. The laterals on the north side of the Project Site head east to an existing manhole, tying into the 10-inch sewer main adjacent to the south side of South Coliseum Drive/Christmas Tree Lane. The laterals on the south side of the Project Site head west to an existing manhole, transitioning to an 8-inch sewer lateral. The 8-inch lateral continues west to an existing manhole off the existing sewer main adjacent to the east side of South Coliseum Drive. As noted above, this main is 10 inches in diameter north of South Park Drive. South of South Park Drive, it transitions to an 18-inch main, and then runs south to connect to a 72-inch North Outfall Sewer main in 41st Place.

Wastewater generated from the Project Site is conveyed via the local collector sanitary sewer system directly to the Hyperion Treatment Plant (HTP), located southwest of the Los Angeles International Airport in Playa del Rey, for treatment. The HTP has the capacity to treat approximately 450 million gallons per day (mgd) of wastewater for full secondary treatment, and currently treats approximately 362 mgd. This includes wastewater currently generated on the Project Site from the existing Sports Arena. As such, the HTP is currently operating at approximately 80 percent of its capacity, with a remaining available capacity of approximately 88 mgd. The treated water from the HTP is discharged through an outfall pipe 5 miles into the Santa Monica Bay and Pacific Ocean.

Wastewater impacts during construction were not analyzed in detail in the Certified EIR. Wastewater generation would occur incrementally throughout construction of the Modified Project. However, such use would be temporary and nominal when compared with the wastewater generated by operation of the Modified Project. In addition, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater conveyance system. As such, wastewater impacts during construction would be less than significant and no mitigation measures are required (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum).

Operational wastewater impacts are assessed based on daily wastewater generation on a maximum activity day (i.e., event day). As is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of 22,000 seats, which is within the historic attendance levels of the Sports

Arena. Therefore, wastewater impacts with respect to the stadium portion of the Modified Project would not represent a substantial increase in wastewater generation compared to existing conditions, consistent with the Certified EIR analysis. However, additional event-day wastewater generation beyond levels analyzed in the Certified EIR may result from operation of the ancillary uses proposed as part of the Modified Project. Although the estimated wastewater generation of the stadium would not change compared to levels analyzed under the Certified EIR, for informational purposes, and to be consistent with BOS methodology for determining sewer line capacity, this analysis presents the estimated wastewater generation of the entire Modified Project, including the stadium component.

As shown in Table 20 on page 175 of the Modified Project Addendum, the Modified Project's total estimated wastewater flow would be approximately 87,675 gallons per day (gpd), of which 21,675 gpd would be generated by the proposed ancillary uses. To provide a conservative analysis, this estimate is based on gross square footage (rather than floor area). Furthermore, it does not account for the wastewater reduction requirements of the City's Green Building Code, which calls for a 20 percent reduction in wastewater through the installation of water-conserving fixtures or through utilizing Los Angeles Plumbing Code-approved non-potable water systems within a building.

A Sewer Capacity Availability Request, included in Appendix B of the Infrastructure Report provided in Appendix R of the Modified Project Addendum, was obtained from the City of Los Angeles Bureau of Sanitation to evaluate the capability of the existing wastewater system to serve the Modified Project's estimated wastewater flow. Based on the current approximate flow levels and design capacities in the sewer system, and the Modified Project's estimated wastewater flow, the City determined that the existing sanitary sewer lines that serve the Project Site would have an adequate capacity to accommodate the additional infrastructure demand created by the Modified Project. Sewer service for the Modified Project would be provided utilizing new or existing sewer connections to the existing sewer main that generally runs along the east side of South Coliseum Drive within the Project Site. Except for these sewer connection pipes, no upgrades to the existing sewer mainlines are anticipated as forecasted flow levels are all below the available capacity within each of the sewers that would serve the Project Site. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Wastewater, of the Certified EIR), impacts with respect to wastewater infrastructure would be less than significant under the Modified Project (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). No mitigation measures are required.

As described above, the Hyperion Treatment Plant has a capacity of 450 mgd, and current wastewater flow levels are at 362 mgd. These flow levels include wastewater currently generated on the Project Site from the existing Sports Arena. Accordingly, the remaining available capacity at the Hyperion Treatment Plant is 88 mgd. As shown in Table 20 of the Modified Project Addendum, the Modified Project would generate a net increase wastewater flow from the Project Site of approximately 21,675 gpd, or approximately 0.022 mgd, beyond levels analyzed in the Certified EIR for the Original Stadium Project. The Modified Project's increase in average daily wastewater flow of 0.022 mgd would represent approximately 0.02 percent of the current 88 mgd remaining available capacity of the Hyperion Treatment Plant. Therefore, the net increase in wastewater generation associated with the Modified Project could be accommodated by the existing capacity of the Hyperion Treatment Plant. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Wastewater, of the Certified EIR), impacts with respect to wastewater treatment capacity would

be less than significant under the Modified Project (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). No mitigation measures are required.

Further, due to shared urban infrastructure, the Modified Project and related projects would cumulatively increase wastewater generation. However, utility system capacity must be demonstrated during the approval process for each related project. As the service providers conduct ongoing evaluations to ensure that facilities are adequate to serve the forecasted growth of the community, cumulative impacts on wastewater utilities are concluded to be less than significant. Furthermore, the Modified Project's increase in average daily wastewater flow would represent approximately 0.02 percent of the current remaining available capacity of the Hyperion Treatment Plant. Therefore, the Modified Project's impacts with respect to wastewater treatment capacity would not be cumulatively considerable, and cumulative impacts would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Accordingly, based on the analysis above, the Modified Project would not result in any new significant impacts with respect to wastewater, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

M. Public Utilities—Water (Construction)

As stated in the Certified EIR, during construction, upgrades to water service connections may cause temporary impacts on the adjacent land uses during construction. Although new service connections may occasionally result in temporary interruptions in water services for existing customers, new water service installations are generally "hot tapped" so as to avoid water service interruption. Therefore, the Certified EIR concluded that temporary disruptions in local water service during the construction period of the Original Stadium Project are not anticipated, and impacts would be less than significant.

This conclusion would not change under the Modified Project, which would implement the same standard practices to ensure that potential service interruptions are avoided to the extent feasible. Additionally, while construction of the Modified Project would result in a temporary and intermittent increase in potable water demand on the Project Site for activities such as dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, water line testing and flushing, and other short-term related activities, construction-related demand would be substantially less than the Modified Project's operational water demand analyzed in the Modified Project Addendum (refer to Section IV.I.2, Public Utilities—Water, of the Certified EIR). As demonstrated through the analysis in the Modified Project Addendum, the Modified Project's operational water demand would be within the City's available water supply, infrastructure, and treatment capacity. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Water, of the Certified EIR), impacts with respect to construction-related water demand would be less than significant under the Modified Project (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). No mitigation measures are required.

N. Public Utilities—Energy (Construction)

As stated in the Certified EIR, during construction, energy would be consumed during the demolition, excavation, and construction phases of the Original Stadium Project. The Certified EIR determined that energy demands during construction would be typical of construction projects of similar types and sizes and would not necessitate additional energy facilities or distribution infrastructure. Therefore, the Certified EIR concluded that energy demands during construction would be less than significant. The Modified Project includes design changes to the proposed stadium and additional construction associated with the proposed ancillary uses. Therefore, the Modified Project could result in additional energy consumption during the construction phases beyond levels analyzed in the Certified EIR.

As shown in Table 28 on page 198 of the Modified Project Addendum, approximately 59,767 kWh of electricity, approximately 121,516 gallons of gasoline, and approximately 217,244 gallons of diesel fuel would be consumed during Modified Project construction. Electricity would be consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. Overall, construction activities associated with the Modified Project would require limited electricity use that would not have an adverse impact on available electricity supplies. Construction activities typically do not involve the consumption of natural gas. The petroleum-based fuel use summary provided in Table 28 represents the highest amount of energy that could be consumed during Modified Project construction. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. Consistent with the conclusions in the Certified EIR, energy demands during Modified Project construction would be typical of construction projects of similar types and sizes, and would not necessitate additional energy facilities or distribution infrastructure. Thus, the Modified Project's consumption of electricity and transportation-fuel would continue to be temporary and typical of similarly sized construction projects. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.3, Public Utilities—Energy Conservation, of the Certified EIR), impacts with respect to construction-related energy demand would be less than significant under the Modified Project (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). No mitigation measures are required.

IV. IMPACTS FOUND LESS THAN SIGNIFICANT PRIOR TO MITIGATION, WHERE MITIGATION PROVIDED TO FURTHER REDUCE IMPACTS

A. Land Use Planning—Consistency with Regulatory Framework (Construction, Operation, Cumulative)

1. Description of Environmental Effects

The Certified EIR for the Original Stadium Project concluded that impacts related to consistency with applicable land use plans and policies would be less than significant under the Original Stadium Project (refer to Section IV.F, Land Use, of the Certified EIR). The thresholds on which this analysis was based are stated on page IV.F-13 of the Certified EIR. Specifically, the Certified EIR determined that the Original Stadium Project would be consistent with the underlying General Plan and zoning designations on the Project Site, the Exposition/University Park Redevelopment Plan, the California Museum of Science and Industry (CMSI)/Exposition Park Master Plan, and applicable regional plans and regulations. Although impacts would be less than significant, the Certified EIR included Mitigation Measure F-1 to reinforce requirements for permits and discretionary approvals to ensure land use consistency. Consistent with the Original Stadium

Project, the proposed stadium under the Modified Project would have a maximum seating capacity of approximately 22,000 attendees and would host MLS games, USC field events, open-air entertainment events such as concerts and civic gatherings, and exhibition soccer games. The general use of the stadium would not change with the design modifications proposed under the Modified Project. The Modified Project would also provide additional ancillary uses to the Original Stadium Project including conference facility and office space, a museum, and retail and restaurant uses. The Modified Project would also require the following discretionary approvals that were not specifically considered in the Certified EIR's analysis of the Original Stadium Project:

- Amendment of the Coliseum District Specific Plan to expressly allow development standards for Modified Project (e.g., seating capacity, FAR, height, signage, parking and uses);
- Director's Review (pursuant to Coliseum District Specific Plan);
- Alcohol Use Approval to expressly allow all establishments that would sell and serve alcohol (pursuant to Coliseum District Specific Plan);
- Sign District/Supplemental Use District (Zone Change) for Signage;
- Possible Board of Police Commissioners permit for extended interior construction hours;
- Possible approval of a property and/or project agreement by the Coliseum Commission authorizing the development of the Modified Project on the Project Site; and
- Possible approval of a Non-Disturbance Agreement or other agreements for LAFC's operation of the Modified Project by the State of California (California Science Center—Sixth District Agricultural Association), including use of State-owned properties in Exposition Park for signage, parking, and construction staging.

The Modified Project Addendum analyzed the potential for the Modified Project's ancillary uses and additional discretionary approvals to result in new significant impacts with respect to land use consistency that were not previously identified in the Certified EIR.

The Project Site is subject to the following state, regional, and local land use regulatory authorities, plans, and policies: (1) State—CMSI/Exposition Park Master Plan; (2) Regional—Southern California Association of Governments' (SCAG) Regional Comprehensive Plan and Guide (RCPG), 2008 Regional Comprehensive Plan (RCP), and Compass Growth Vision; South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP); Regional Water Quality Control Board (RWQCB); and Metropolitan Transportation Authority's (MTA) Congestion Management Plan (CMP); and (3) Local—the City of Los Angeles' General Plan, South Los Angeles Community Plan, Exposition/University Park Redevelopment Plan, and Planning and Zoning Code. The Project Site is also regulated by the City of Los Angeles' Coliseum District Specific Plan. Additionally, since certification of the Certified EIR, SCAG adopted its 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), which also pertains to the Project Site. The AQMP was also updated in 2012. Finally, while the Certified EIR addressed the Project Site's location within the Los Angeles State Enterprise Zone, the California State Enterprise Zone program has since ended and is no longer applicable to the Project Site. The Modified Project's consistency with the applicable land use plans and policies noted above is addressed below.

a. State

The CMSI/Exposition Park Master Plan (Master Plan) includes goals and objectives oriented around developing, preserving, and restoring the following areas within Exposition Park: (1)

the CMSI; (2) the Science Museum School; (3) the Science Educational Resource Center; (4) the California African-American Museum; (5) park landscaping and open space areas; (6) parking and circulation facilities; and (7) ancillary infrastructure improvement areas. The Master Plan does not include any goals or objectives related to specific alterations or renovation of the Sports Arena, and makes no specific reference with respect to goals or objectives for the long-term use of the Sports Arena. Notwithstanding, the Certified EIR determined that the Original Stadium Project would be consistent with the six general objectives of the Master Plan because it would: reinforce Exposition Park's role as a major regional community resource in the southern California region by replacing the underutilized Sports Arena with a modern, world-class sports complex; provide enhanced landscape and pedestrian circulation areas; implement a traffic management plan to minimize traffic and parking impacts on days when major events are scheduled; be compatible in scale, height, materials, architectural quality and site orientation within the context of Exposition Park as well as the surrounding built environment; and provide provisions for coordinated marketing, security, maintenance arrangements, parking, transit access, and programming with Exposition Park management, as needed for the redeveloped Project Site. The Modified Project's proposed modifications to the Original Stadium Project would not change these conclusions.

Specifically, the Modified Project would continue to reinforce Exposition Park's role as a major regional community resource in southern California by replacing the Sports Arena with a modern, world-class sports complex, and would involve substantially similar features to the Original Stadium Project that the Certified EIR concluded would be consistent with the Master Plan. In addition, the Modified Project would include enhanced landscape and pedestrian improvements as compared to the Original Stadium Project, including: (1) the Northwest Plaza, which would be designed to provide a welcoming pedestrian environment with a mix of hardscape and landscaped areas, and could include water features, public art, and seating areas; and (2) the Figueroa Street pedestrian improvements, which would include a broad pedestrian sidewalk featuring enhanced landscape and streetscape, providing sufficient space for patrons to circulate and queue on event days, and, an inviting and safe pedestrian environment on non-event days. The Modified Project's proposed ancillary uses would provide additional amenities to support stadium operations, including year-round restaurant and retail uses, which would enable the creation of a state-of-the-art sports and entertainment complex that is better able to compete with similar, modern facilities. The ancillary uses would therefore further promote the Modified Project's consistency with Master Plan Objective 1, to reinforce the park as a regional and community resource, and Objective 3, to develop employment and cultural opportunities within the park to benefit area residents. Further, as discussed in Section IV.A, Aesthetics, on page 34 of the Modified Project Addendum, the scale, mass, and height of the proposed stadium and ancillary uses would be compatible with surrounding uses within and adjacent to Exposition Park, and therefore the Modified Project would continue to be consistent with Master Plan Objective 5. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, the Modified Project would be consistent with the general objectives of the Master Plan, and impacts would be less than significant (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum). No mitigation measures are required.

b. Regional

The Project Site is located within SCAG's planning region. SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste

management, and air quality. SCAG plans that currently apply to the Project Site include the 2012–2035 RTP/SCS, the Compass Growth Vision, and the 2008 RCP.

SCAG's 2012–2035 RTP/SCS, adopted in April 2012, presents a long-term transportation vision through the year 2035 for its six county region. The mission of the 2012–2035 RTP/SCS is to provide "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians." The 2012–2035 RTP/SCS emphasizes sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of this approach, the 2012–2035 RTP/SCS establishes High-Quality Transit Areas, which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas. The Project Site is located within a High-Quality Transit Area as designated by the 2012–2035 RTP/SCS.

The Certified EIR included an analysis of the Original Stadium Project's consistency with SCAG's 2008 Regional Transportation Plan (RTP), which preceded the 2012–2035 RTP/SCS (see Table IV.F-1 in the Certified EIR). The Certified EIR explained that the Project Site is already well served by regional and local transit lines. In addition, the Certified EIR explained that the Original Stadium Project would comply with Title 20 and Title 24 standards pertaining to water and energy efficiency standards. Therefore, the Certified EIR concluded that the Original Stadium Project would be consistent with the goals of the 2008 RTP to maximize mobility and accessibility for all people and goods in the region; preserve and ensure a sustainable regional transportation system; protect the environment, improve air quality and promote energy efficiency; and encourage land use and growth patterns that complement transportation investments, among others.

Like the Original Stadium Project, the Modified Project represents an infill development within an existing urbanized area that would concentrate new development in proximity to public transit opportunities (e.g., Expo Light Rail, Harbor Transitway BRT station), thereby minimizing vehicle trips, vehicle miles traveled (VMT), and resulting air pollution. The availability and accessibility of public transit in the Project area is evidenced by the Project Site's location within a designated High-Quality Transit Area. By focusing new development within a designated High-Quality Transit Area, the Modified Project would be consistent with regional growth strategies promoted in the 2012–2035 RTP/SCS, which represent widely recognized "smart growth" planning strategies that promote higher density, infill development with access to public transit in an effort to reduce urban sprawl and its associated environmental effects. Furthermore, the Modified Project would provide bicycle parking for a minimum of 440 bicycles (two percent of the proposed stadium seating capacity) to encourage bicycling to events at the stadium. Also like the Original Stadium Project, the Modified Project would revitalize an urban infill site that is already equipped with the infrastructure to support a major sports and entertainment venue by replacing the underutilized Sports Arena with a modern, world-class sports complex. In addition, the Modified Project would include enhanced landscape and pedestrian improvements as compared to the Original Stadium Project. As discussed in Section IV.G, Greenhouse Gas Emissions, on page 75 of the Modified Project Addendum, the Modified Project would incorporate "Green" principles throughout the development to comply with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) and the sustainability intent of the U.S. Green Building Council's LEED® program. These include energy conservation,

water conservation, and waste reduction features that exceed the requirements and commitments applicable to the Original Stadium Project. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (which pertained to 2008 RTP consistency), the Modified Project would be consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS. Impacts would be less than significant, and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

As discussed in the Certified EIR, SCAG's Compass Growth Vision, adopted in 2004, encourages better relationships between housing, transportation, and employment. The Compass Growth Vision is driven by four key principles: (1) Mobility –Getting where we want to go, (2) Livability—Creating positive communities, (3) Prosperity—Long-term health for the region, and (4) Sustainability—Preserving natural surroundings. SCAG's 2004 Growth Vision Report identified 2% Strategy Opportunity Areas, which represented areas of the region that were targeted for growth, where projects, plans, and policies consistent with the key principles would best serve the goals of the Compass Growth Vision to improve mobility for all residents, foster livability in all communities, enable prosperity for all people, and promote sustainability for future generations. Since certification of the Certified EIR, the 2% Strategy Opportunity Areas have been effectively replaced with the High-Quality Transit Areas established in the 2012–2035 RTP/SCS, as discussed. The Certified EIR stated that the Original Project would provide an updated public venue for outdoor recreational opportunities or civic events in response to changing community needs and market conditions, revitalizing the Project Site and providing enhanced landscape and community use options when compared to the existing Sports Arena facility and site conditions. In addition, the Certified EIR stated that the Original Stadium Project would provide employment opportunities and would comply with Title 20 and Title 24 standards pertaining to water and energy efficiency standards. Therefore, the Certified EIR concluded that the Original Stadium Project would be consistent with the Compass Growth Vision principles. The Modified Project builds upon the energy conservation features previously identified in the Certified EIR and would comply with Title 24 of the California Code of Regulations, including Part 6 (Energy Efficiency Standards for Residential and Nonresidential Buildings) and Part 11 (California Green Building Standards Code, commonly referred to as the CALGreen Code), as well as the City of Los Angeles Green Building Code (2013), which incorporates the CALGreen Code into Chapter IX of the Los Angeles Municipal Code (LAMC), in effect at the time of the Modified Project's permit application. The Modified Project would also be designed to be capable of achieving at least Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)-BD+C or LEED-ND Rating System (v.3), or equivalent green building standards. For the reasons discussed above in relation to consistency with the 2012–2035 RTP/SCS, the Modified Project would also be consistent with the principles set forth in the Compass Growth Vision, consistent with the conclusions in the Certified EIR for the Original Stadium Project. Impacts would be less than significant, and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

As discussed in the Certified EIR, SCAG's Regional Comprehensive Plan (RCP) was adopted by SCAG in October of 2008 and serves as an advisory document for (voluntary) use by local governments in the SCAG region as an informational resource, and as a reference document for their use in developing plans and addressing local issues of regional significance. The 2008 RCP replaced SCAG's 1996 Regional Comprehensive Plan and Guide (RCPG). Because of its advisory nature, the RCP is not used in SCAG's Intergovernmental Review

process for regionally significant projects. Rather, SCAG reviews new major regional projects based on consistency with the 2012–2035 RTP/SCS and Compass Growth Vision, described above. As stated in the Certified EIR, according to SCAG, the Original Stadium Project was not considered regionally significant pursuant to SCAG Intergovernmental Review (IGR) Criteria and Section 15206 of the CEQA Guidelines. Since consistency with the 2008 RCP was not required, a consistency analysis was not provided in the Certified EIR, though, as discussed above, the Certified EIR did address the Original Stadium Project's consistency with the 2008 RTP (which preceded the 2012–2035 RTP/SCS and was in effect at the time of the Certified EIR) and the Compass Growth Vision. The changes proposed by the Modified Project would not make the Modified Project regionally significant pursuant to SCAG and CEQA criteria. Although an analysis of consistency with the RCP is not required, as was the case at the time the Certified EIR was prepared, it is noted that the Modified Project would be substantially consistent with the applicable goals and policies set forth in the RCP for the reasons discussed above in relation to consistency with the 2012–2035 RTP/SCS.

As stated in the Certified EIR, the Original Stadium Project is subject to the requirements of the SCAQMD's AQMP. The AQMP was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the air basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. A project is considered consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that form the basis of the AQMP. The Certified EIR determined that the Original Stadium Project would be consistent with the 2007 AQMP in effect at the time the Certified EIR was prepared because it would be consistent with applicable population, housing, and employment projections. As analyzed in Section IV.C, Air Quality, on page 49 of the Modified Project Addendum, the Modified Project would also be consistent with the 2012 AQMP, which was adopted subsequent to the preparation of the Certified EIR, and its applicable population, housing, and employment projections. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, impacts would be less than significant and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

As discussed in the Certified EIR, the Original Stadium Project is subject to the requirements of the Los Angeles Regional Water Quality Control Board (RWQCB). The Certified EIR determined that the Original Stadium Project would be consistent with RWQCB requirements during construction and operation (e.g., requirements pursuant to the National Pollution Discharge Elimination System (NPDES) statewide General Construction Activity Permit). As analyzed in Section IV.I, Hydrology and Water Quality, on page 95 of the Modified Project Addendum, the Modified Project would also be consistent with applicable RWQCB requirements, consistent with the conclusions in the Certified EIR for the Original Stadium Project. Additionally, the Modified Project would be required to comply with the City's Low Impact Development (LID) Ordinance (Ord. No. 181899), which expanded the applicability of SUSMP requirements by imposing rainwater LID strategies on projects that require building permits. The LID Ordinance was adopted in November 2011 and officially became effective on May 12, 2012. Therefore, impacts would be less than significant and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

Finally, the Certified EIR explained that the Original Stadium Project is subject to the requirements of the Los Angeles County Metropolitan Transportation Authority's (Metro)

Congestion Management Program (CMP). The CMP requires that, when an environmental impact report is prepared for a project, traffic and public transit impact analyses be conducted for select regional facilities based on the quantity of project traffic expected to use those facilities. The Certified EIR determined that the Original Stadium Project would be consistent with the CMP because it would not significantly impact any CMP roadway segments or freeway on-/off-ramps. As analyzed in Section IV.O, Traffic/Transportation/Parking, on page 149 of the Modified Project Addendum, the Modified Project would also be consistent with the CMP and would not significantly impact any CMP roadway segments, freeway on-/off-ramps, or transit facilities. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, impacts would be less than significant and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

c. Local

The City of Los Angeles General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles (City) and defines citywide policies regarding land use. The Land Use Chapter of the General Plan Framework provides primary objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth in appropriate locations. The Land Use Chapter establishes land use categories which are broadly described by ranges of intensity/density, heights, and lists of typical uses. The Project Site is located adjacent to and partially within a designated Regional Center that generally corresponds with Figueroa Street. A Regional Center is defined as:

> ...a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. Generally different types of Regional Centers will fall within the range of floor area ratios from 1.5:1 to 6.0:1. Some will only be commercially oriented; others will contain a mix of residential and commercial uses. Generally, Regional Centers are characterized by 6- to 20-stories (or higher). Regional Centers are usually major transportation hubs.

The Land Use Chapter also indicates that Martin Luther King, Jr. Boulevard adjacent to the Project Site is designated as a Mixed Use Boulevard. Mixed Use Boulevards are described as connections between the City's neighborhood districts and community, regional, and Downtown centers. Mixed-use development is encouraged along these boulevards, with the scale, density and height of development compatible with the surrounding areas. Additionally, the Framework Element designates the Project Site as being located within a Pedestrian-Oriented District that generally corresponds with Figueroa Street. Pedestrian-Oriented Districts are defined as "commercial and mixed-use districts that promote pedestrian activity. Such districts can become community-oriented focal points that are differentiated from the prevailing pattern of development and reduce the use of the automobile."

The Certified EIR did not include a detailed analysis of the Original Stadium Project's consistency with the General Plan Framework. Therefore, the Modified Project Addendum analyzed the Modified Project's consistency with the various land use designations

established for the Project Site and the vicinity in the General Plan Framework. As described above, each of these designations supports an overall vision of high-density, mixed-use, and pedestrian-oriented development in the Project Site vicinity, particularly along the Figueroa Street corridor. The Modified Project would implement the intent of the General Plan Framework Land Use Element by revitalizing the Project Site and providing enhanced landscape and community use options when compared to the existing Sports Arena facility. Specifically, the Modified Project would replace the underutilized Sports Arena with a modern, world-class sports complex with direct access from Figueroa Street; provide enhanced landscape and pedestrian circulation areas including pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas, and provide a mix of land uses that would support stadium operations, including year-round restaurant and retail uses, thereby enabling the creation of a state-of-the-art sports and entertainment complex that can serve as a major regional destination. Further, as discussed in Section IV.A, Aesthetics, on page 34 of the Modified Project Addendum, the scale, mass, and height of the proposed stadium and ancillary uses would be compatible with surrounding uses within and adjacent to Exposition Park. Therefore, the Modified Project would be consistent with the intent of the General Plan Framework Land Use Element. Impacts would be less than significant and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

The South Los Angeles Community Plan functions as the Land Use Element of the City's General Plan that is applicable to the Project Site. As discussed in the Certified EIR, the South Los Angeles Community Plan designates the Project Site and all of Exposition Park as Open Space (OS), and also identifies Exposition Park as a "major opportunity site." The OS designation permits parks, community centers and public serving facilities under the ownership or operation of a public agency. The Project Site is owned by the Sixth District Agricultural Association, a state agency. The Certified EIR determined that the Original Stadium Project would be consistent with the Open Space (OS) designation by providing a publicly oriented facility, and that it would be consistent with relevant policies set forth in the South Los Angeles Community Plan related to preserving recreational facilities and park space, and fostering public appreciation of historic resources in Exposition Park, specifically the Coliseum.

As compared to the Original Stadium Project, the Modified Project's stadium component would be similarly consistent with the South Los Angeles Community Plan. In addition, the Modified Project and its proposed ancillary uses would promote consistency with other South Los Angeles Community Plan policies. Specifically, the Modified Project's proposed museum would be consistent with the definition of Open Space in the Community Plan to provide for educational opportunities and cultural values. In addition, by developing a state-of-the-art sports and entertainment complex while preserving significant open space and public gathering areas, the Modified Project would be consistent with the definition of Open Space in the Community Plan to preserve and create community identity. The Modified Project's restaurant, retail, conference and office space uses, which are all ancillary facilities supporting the stadium, would also be consistent with the South Los Angeles Community Plan's principles for the "major opportunity site" of Exposition Park, which includes providing the opportunity for a variety of jobs and job training for community residents and allowing development that is reflective of community needs. By providing increased job opportunities within Exposition Park in uses that would operate seven-days a week, the Modified Project's ancillary uses would help address the community's need for increased local jobs, while providing a variety of jobs and job training for area residents. In addition, as compared the

Original Stadium Project, the Modified Project would provide enhanced pedestrian improvements and open space areas, including approximately 143,000 square feet of improved public open space around the Project Site that would include pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas and potentially including water features, public art, and seating areas. These features would further South Los Angeles Community Plan Objective 5-1 to develop new open space areas in Exposition Park. Additionally, as discussed in Section IV.E, Cultural Resources, on page 61 of the Modified Project Addendum, impacts to remaining historic resources in the vicinity, including the adjacent Coliseum, would be less than significant and would not change under the Modified Project. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, the Modified Project would remain consistent with the South Los Angeles Community Plan. Impacts would be less than significant and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

As discussed in the Certified EIR, the Project Site and all of Exposition Park are located within the Exposition/University Park Redevelopment Plan. Specifically, the Project Site is located within the Redevelopment Plan's Exposition Sub Area. As explained in the Certified EIR, real property that is owned or controlled by the State of California or the Coliseum Commission, including the Project Site, is not subject to the requirements and policies of the Redevelopment Plan. Nevertheless, the Certified EIR analyzed the Original Stadium Project's consistency with the Redevelopment Plan and determined it would be consistent with the Project Site's Public Use designation because it would replace the underutilized Sports Arena with a modern, world-class sports complex that is consistent with the site's history and would result in the development of a public venue for public, private and civic use. Further, because it would foster economic growth along the Figueroa Corridor, the Certified EIR determined that the Original Stadium Project would be consistent with the goals identified in the Community Redevelopment Agency of the City of Los Angeles' Five Year Implementation Plan. Finally, the Certified EIR examined the applicable Redevelopment Plan goals to the Project Site, including goals related to the elimination of blight and to conserve, rehabilitate, and redevelop the Expanded Project Area and provide for well-planned community uses and facilities, and determined that the Original Stadium Project would be generally consistent with those goals.

Like the Original Stadium Project, the Modified Project is located on the Project Site owned by the Sixth District Agricultural Association (State of California) and controlled by the Coliseum Commission, and accordingly the Modified Project is not subject to the requirements of the Exposition/University Park Redevelopment Plan. Nevertheless, an analysis of Redevelopment Plan consistency was provided in the Modified Project Addendum consistent with the Certified EIR analysis. The modifications proposed under the Modified Project would not change the Certified EIR's consistency analysis with the Redevelopment Plan (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

As stated in the Certified EIR, the Project Site is zoned OS-1XL (Open Space, Extra Limited Height District 1) under the City's Planning and Zoning Code, as is the majority of Exposition Park. The Certified EIR determined that the Original Stadium Project would be consistent with allowable uses in the OS zone, which include park and recreation facilities and athletic fields. In addition, the Certified EIR determined that the Original Stadium Project would exceed the limitations of height district 1XL, and would need to seek discretionary relief from

the Department of City Planning. The Certified EIR concluded that following the approval of discretionary land use entitlements from the City, the Original Stadium Project would be consistent with the applicable provisions of the Planning and Zoning Code, and no land use impact would occur.

In addition to the Project Site's zoning designation of OS-1XL, the Project Site is also located within the boundaries of the Coliseum District Specific Plan (Specific Plan). The Specific Plan provides additional land use regulations applicable to the site of the existing Sports Arena as well as the adjacent site of the Coliseum and immediately surrounding ancillary areas. As explained in Section 3.B of the Specific Plan, "[w]henever this Specific Plan contains provisions that establish regulations... which are different from, more restrictive or more permissive than what would be allowed pursuant to the provisions contained in the LAMC [Los Angeles Municipal Code], this Specific Plan shall prevail and supersede the applicable provisions of the LAMC and those relevant ordinances." Therefore, the land use regulations of the Specific Plan supersede those of the LAMC, including those of the OS-1XL zone.

The Specific Plan currently permits a variety of uses in the Specific Plan area, including the operation of sports, entertainment and public gathering facilities, the sale of concessions and alcoholic beverages for consumption on site, the sale of merchandise and other retail uses, offices, restaurants, bars, cafes and outdoor eating areas, and museums and parking facilities. The Modified Project proposes a Specific Plan Amendment, an entitlement request that was not included as part of the Original Stadium Project. The proposed Specific Plan amendment would slightly modify the boundaries of the Specific Plan to align the northern and eastern Project Site boundaries with the southern and western edges of the South Coliseum Drive and Figueroa Street rights-of-way, respectively, and would expressly allow development standards for the Modified Project (e.g., seating capacity, FAR, height, signage, parking and uses). Specifically, the proposed Specific Plan Amendment would expressly permit the development of an approximately 22,000 seat soccer stadium and approximately 119,000 gross square feet (approximately 105,900 square feet of floor area) of ancillary facilities as described in Section III, Project Description, on page 4 of the Modified Project Addendum. The total amount of development would not be permitted to exceed approximately 641,000 gross square feet. The maximum height of the stadium would not be permitted to exceed 115 feet above grade, and the maximum height of the associated ancillary facilities would be limited to approximately 75 feet above grade. In accordance with existing Specific Plan requirements, front, side, or rear yards or building setbacks would not be required.

The proposed Specific Plan amendment would also clarify the applicability of certain Specific Plan provisions to the Project Site. Although the Specific Plan area encompasses the Project Site, many of the purposes, definitions, permitted uses, design regulations, on site alcohol regulations, and signage provisions currently stated in the Specific Plan either contemplate development at the adjacent Coliseum property, or do not clearly establish parameters for redevelopment of the Sports Arena. Further, the boundaries of various zones within the Specific Plan do not currently reflect the boundaries of the Coliseum property and the Project Site. The proposed Specific Plan Amendment would provide for the proposed development and operation of the Modified Project, as well as updated internal boundaries that appropriately distinguish between the Coliseum property and the Project Site, along with immediately surrounding areas and parking lots that serve both properties and Exposition Park.

Although the Modified Project is proposing an amendment to the Specific Plan to clarify certain provisions and to provide applicable development parameters for the Project Site, the Modified Project is compatible with the Specific Plan's generally permitted uses described above. Specifically, the Modified Project would include the operation of a sports, entertainment and public gathering facility; the sale of alcoholic beverages for consumption on site; retail uses; offices; restaurants, bars, cafes and outdoor eating areas; a museum, exhibitions, cultural facilities; and other related uses. The Modified Project's application of these uses to the Project Site is generally consistent with the intent of the Specific Plan to provide for sports and cultural destination uses, along with ancillary facilities that support those uses within the Specific Plan area. Thus, with approval of the proposed Specific Plan Amendment, the Modified Project would be fully consistent with the Specific Plan, including all uses and facilities, development parameters, design regulations, and internal Specific Plan boundaries. Because the Specific Plan supersedes the LAMC, consistent with the conclusions in the Certified EIR for the Original Stadium Project, the Modified Project would also be consistent with the LAMC. Further, pursuant to Section 6 of the Specific Plan, the City Planning Director must review all projects for compliance with the Specific Plan before any demolition, grading, foundation, building, sign or use of land permit can be issued. As discussed above, the Applicant has requested this compliance review for the proposed Modified Project, which will further confirm that the Modified Project is consistent with the Specific Plan, as amended. Therefore, impacts would be less than significant and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

The Original Stadium Project did not include a detailed signage program. However, the Certified EIR stated that in the absence of any specific programmatic goals for signage, signage under the Original Stadium Project would be developed in a manner that is consistent with and adheres to all of the applicable codes of the LAMC, the design guidelines of the South Los Angeles Community Plan, as it pertains to signage, and the rules and regulations set forth in the Specific Plan. Since the certification of the Certified EIR, the City has modified its policy regarding signage and now authorizes signage through a Supplemental Use Sign District (SUD) rather than being authorized through a Specific Plan. Therefore, as discussed in Section III, Project Description, on page 4 of the Modified Project Addendum, the Modified Project is also requesting approval of an SUD to allow for the types and amounts of signage that would be included in the proposed development. Consistent with the signage program allowed under the existing Specific Plan, the proposed SUD would encompass the Project Site as well as all of the Specific Plan area. As part of the proposed Specific Plan Amendment, the existing signage authorized in the Specific Plan, which includes some signage for the Project Site, the Coliseum, and surrounding areas, would be removed from the Specific Plan and relocated into the proposed SUD, along with modifications to permit the Modified Project's signage program. Signage rights previously allowed by the Specific Plan for the Coliseum and other areas in the Specific Plan area that are unrelated to the Modified Project's signage program would not change under the proposed SUD. These actions would be consistent with the City's current policy mechanisms for regulating signage and would not represent a significant land use consistency impact. With approval of the proposed SUD, the Modified Project would be consistent with applicable land use plans and regulations related to signage. Impacts would be less than significant and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum). For an analysis of the potential aesthetic impacts of the proposed signage program, refer to Section IV.A, Aesthetics, of the Modified Project Addendum.

Because the Modified Project's ancillary uses include up to 2,550 square feet of fast food restaurant floor area, analysis of the Modified Project's consistency with applicable City land use regulations concerning fast food restaurants is required. City of Los Angeles Ordinance No. 180103 imposes interim regulations on the issuance of all permits related to the establishment of new fast food restaurants on commercial or industrial zoned properties located on streets designated as Major Highway Class I, Major Highway Class II and Secondary Highway in the West Adams–Baldwin Hills–Leimert Community Plan area and portions of the South Los Angeles and Southeast Los Angeles Community Plan areas, including the Project Site. Ordinance No. 180103 only applies to stand-alone fast food restaurants. The fast food restaurant components of the Modified Project would be integrated with the stadium and other ancillary uses as part of a cohesive development, and would not include a stand-alone fast food establishment. Therefore, the Modified Project would not be inconsistent with Ordinance No. 180103. Impacts would be less than significant and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

In addition, because the Modified Project would include on site alcohol sales and service for a full line of alcoholic beverages, analysis of the Modified Project's consistency with applicable City land use regulations concerning alcohol sales was conducted. As discussed above, the Specific Plan currently allows for the sale and service of alcoholic beverages for on-site consumption on the Project Site and other areas in the Specific Plan, subject to compliance with operational conditions set forth in the Specific Plan. Further, pursuant to Section 9 of the Specific Plan, each establishment selling alcoholic beverages in the Specific Plan area must obtain an Alcohol Use Approval from the Director determining their compliance with the Specific Plan. While the proposed Specific Plan Amendment would modify the existing zones established within the Specific Plan for alcohol consumption, it would not modify the Specific Plan's operational conditions for establishments selling alcoholic beverages. The Modified Project would comply with these requirements, and establishments selling alcoholic beverages would be required to obtain an Alcohol Use Approval from the Director as required by the Specific Plan. Because the Specific Plan supersedes other provisions of the LAMC, further analysis of other LAMC provisions related to alcohol sales and service is not required. In addition, City Ordinance No. 171681 prohibits off-site alcohol sales in the South Los Angeles area. However, the Modified Project's proposed sale and service of a full line of alcoholic beverages would be for on-site consumption only, which is permitted by the Specific Plan. Off-site alcohol sales would not be permitted. Therefore, the Modified Project would not be inconsistent with Ordinance No. 171681. Impacts would be less than significant and no mitigation measures are required (refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

As described above, the Certified EIR concluded that the Original Stadium Project would be consistent with the underlying General Plan and zoning designations, the Redevelopment Plan, the Master Plan, and applicable regional plans and regulations. Therefore the Certified EIR concluded that impacts to operational land use compatibility and consistency with the applicable land use plans and the zoning code would be less than significant and that no mitigation measures are required. Similarly, the Modified Project also would be consistent with all applicable land use plans and the zoning code with the approval of the proposed Specific Plan Amendment, the SUD, and the Alcohol Use Approval under the Specific Plan. Therefore, the Modified Project's potential impacts to operational land use compatibility and consistency with applicable land use plans and the zoning code would be less than significant

(refer to Section IV.J Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum). No mitigation measures are required.

d. Cumulative Impacts

As with the Original Stadium Project, related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Thus, consistent with the Certified EIR analysis for the Original Stadium Project, cumulative land use impacts would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

In sum, based on the analysis above, the Modified Project would not result in any new significant impacts with respect to land use consistency, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Mitigation Measures

The following mitigation measure was included in the Certified EIR to further reduce the Original Stadium Project's less than significant impacts with respect to land use consistency. This Mitigation Measure would continue to be implemented as part of the Modified Project and has been incorporated into the MMP for the Modified Project included in Appendix A of the Modified Project Addendum, but has been revised as follows to be consistent with the Modified Project:

EIR Mitigation Measure F-1:The Applicant shall obtain all applicable permits from the Building and Safety Department (and other state and municipal agencies, as may be required) for Project construction actions.

3. Findings

Although the Modified Project would not result in significant impacts to Land Use Consistency with the applicable regulatory framework prior to the implementation of mitigation measures, mitigation measures have nonetheless been incorporated into the Modified Project which further reduce these less than significant environmental effects of the Modified Project, as identified in the Certified EIR and Modified Project Addendum.

4. Rationale for Findings

As described above, the Certified EIR concluded that the Original Stadium Project would be consistent with the underlying General Plan and zoning designations, the Redevelopment Plan, the Master Plan, and applicable regional plans and regulations. Similarly, the Modified Project also would be consistent with all applicable land use plans and the zoning code with the approval of the proposed Specific Plan Amendment, the SUD, and the Alcohol Use Approval under the Specific Plan. Therefore, the Modified Project's potential impacts to consistency with applicable land use plans and the zoning code would be less than significant. However, the Modified Project would incorporate the above-described mitigation measure to further reduce the project's less than significant impacts.

5. Reference

For a complete discussion of Modified Project impacts on Land Use Consistency, please see Section IV.F of the Certified EIR and Section IV.J and IV.Q of the Modified Project Addendum.

B. Transportation Traffic and Parking (Construction)

1. Description of Environmental Effects

a. Intersections

Potential impacts from construction-related traffic were not analyzed in detail in the Certified EIR. A construction period trip generation analysis was conducted in the Los Angeles Football Club Stadium Project Draft Transportation Analysis Report (Modified Project Transportation Report) prepared by Fehr & Peers Transportation Consultants, dated August 2015, which is included in Appendix P-1 of the Modified Project Addendum, to estimate daily, morning, and evening peak-hour passenger car equivalent (PCE) trips. Construction workers often travel to and from a worksite outside of the typical peak commute hours. For the purpose of the analysis, and in accordance with Project Design Feature O-5, it was assumed that up to 70 construction workers would arrive during the peak morning commute hour and up to 180 construction workers would depart during the peak evening commute hour. Trucks were assumed to arrive and depart evenly through an 11-hour construction day. A PCE factor of 2.5 was assumed for double belly dump haul trucks while a PCE factor of 2.0 was assumed for concrete, vendor and delivery trucks, based on the 2010 Highway Capacity Manual.

Table 7 in the Modified Project Transportation Report included in Appendix P-1 of the Modified Project Addendum presents the estimated construction truck and employee vehicle trip generation for each of the Modified Project's proposed construction phases. Table 8 in the Modified Project Transportation Report presents the estimated construction trip generation by phase converted into passenger car equivalents. As shown on Table 7, the highest number of potential construction-related vehicle trips on a daily basis could occur during the concrete pour element of the building construction phase, with up to 275 workers and 50 trucks per day for a total of 788 daily vehicle trips. As shown on Table 8, the highest number of potential construction-related PCE trips on a daily basis, however, could occur during the grading phase, with up to 200 haul trucks and 40 workers per day leading to an estimate of 1,100 daily PCE trips. During peak hours, up to 125 (80 inbound and 45 outbound) PCE trips are projected during the A.M. peak hour and up to 200 (10 inbound and 190 outbound) PCE trips are projected during the P.M. peak hour.

The peak construction activity would generate fewer daily trips, A.M. peak-hour inbound trips, and P.M. peak-hour outbound trips than are projected for the Modified Project's ancillary uses on a non-event weekday (as demonstrated in the Modified Project Transportation Report, A.M. inbound and P.M. outbound trips are the most critical trips in terms of their potential to impact operating conditions at nearby study area intersections). Specifically, as discussed in Section IV.O.b, Traffic/Transportation/Parking, on page 155 of the Modified Project Addendum, the Modified Project's ancillary uses are estimated to generate a net external 2,615 daily trips on a non-event weekday, including 85 inbound trips during the A.M. peak hour and 197 outbound trips during the P.M. peak hour, which would result in less than significant impacts to study area intersections. Therefore, because Modified Project construction traffic would fall within the scope of the Ancillary

Use's operational non-event day traffic, potential traffic impacts associated with construction would also be less than significant. Nonetheless it is conservatively recognized that the influx of material and equipment could create impacts on the adjacent roadway network based on the following considerations:

- There may be intermittent periods when large numbers of material deliveries are required, such as when concrete trucks would be needed for the concrete pour.
- Some of the materials and equipment could require the use of large trucks (18 wheelers), which could create additional congestion on the adjacent roadways.
- Delivery vehicles may need to queue temporarily on adjacent roadway of Martin Luther King, Jr. Boulevard before entering the Project Site. Based on past experience, it is not uncommon for these types of deliveries to result in temporary lane closures.

The Certified EIR included Mitigation Measure G-1 requiring the preparation of a construction-related traffic management plan to reduce construction-related noise impacts. This mitigation measure would also serve to reduce construction-related traffic impacts. Mitigation Measure G-1 has been incorporated into the Modified Project's MMP (see Appendix A of the Modified Project Addendum), along with modifications that are detailed below based on recommendations from the Modified Project Transportation Report. While the Modified Project Transportation Report concludes that potential traffic impacts from Modified Project construction would be less than significant in the absence of mitigation, implementation of Mitigation Measure G-1 would further ensure that the Modified Project would not result in substantial delays and disruption of existing traffic flow. Therefore, peak-hour intersection impacts during construction would remain less than significant following the implementation of this measure (refer to Section IV.O Comparative Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum).

b. Access/Safety

During construction of the Modified Project, construction trucks and workers would access the Project Site via Martin Luther King, Jr. Boulevard. The Modified Project proposes to provide adequate construction truck staging and construction worker parking either on the Project Site or in the adjacent Exposition Park Parking Lot 6 throughout the construction period. One or two trucks may queue along the Martin Luther King, Jr. Boulevard curbside between Figueroa Street and Hoover Street before entering the Project Site. Temporary and occasional truck staging at this location may result in lane and/or sidewalks closures along Martin Luther King, Jr. Boulevard. However, it is not uncommon for these types of deliveries to result in temporary lane closures. Furthermore, as stated in revised Mitigation Measure G-1, the Construction Management Plan would include provisions to ensure driver and pedestrian safety along affected roadways and sidewalks, including: implementing a worksite traffic control plan to route traffic and/or pedestrians around lane and/or sidewalk closures; maintaining existing access for land uses in proximity of the Project Site; scheduling deliveries and pick-ups of construction materials to off-peak travel periods, to the extent feasible; and using flag persons to control traffic movement during the ingress and egress of trucks and heavy equipment to/from the Project Site. Implementation of the Construction Management Plan would minimize potential conflicts between construction activity and pedestrian and vehicular traffic in the vicinity of the Project Site, further ensuring that the Modified Project would not result in

substantial roadway and/or sidewalk closures to the extent that a hazard to roadway travelers and/or pedestrians would occur. Therefore, construction traffic impacts related to access and safety would be less than significant (refer to Section IV.O Comparative Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum).

c. Public Transit

There are a variety of public transit facilities in the vicinity of the Project Site. For purposes of evaluating potential impacts to transit resulting from Modified Project construction, transit stops immediately adjacent to the Project Site and in the vicinity of truck and construction worker access points and potential queue areas were analyzed. These transit stops include: a bus stop for the Metro Line 200 and Metro Line 40 at the northeast corner of Figueroa Street and on Martin Luther King, Jr. Boulevard; a bus stop for Metro Line 81 and the LADOT DASH Southeast Line at the southeast corner of Figueroa Street and on Martin Luther King, Jr. Boulevard; a bus stop for Metro Line 40 at the northwest corner of Martin Luther King, Jr. Boulevard and Hoover Street; and a bus stop for the Metro Lines 81, 200, 442, and 550 and the DASH Southeast Line at the southeast corner of 39th Street and Figueroa Street. These transit stops would be maintained during construction of the Modified Project, including any potential lane closures on Martin Luther King, Jr. Boulevard, which would be limited to the stretch between Hoover Street and Figueroa Street (east of the Metro Line 40 bus stop). Furthermore, pursuant to Mitigation Measure J-2 in the Certified EIR, which would be implemented under the Modified Project, the Applicant would coordinate with Metro Bus Operation Control Special Events Coordinator regarding construction activities that may affect Metro and LADOT bus line operations. Therefore, construction of the Modified Project would not result in changes to bus/transit service such that a substantial inconvenience to riders would occur, and construction traffic impacts related to bus/transit service would be less than significant (refer to Section IV.O Comparative Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum).

d. Parking

As discussed in the Modified Project Transportation Report, during all phases of Modified Project construction, construction workers would park on the Project Site and/or in the Exposition Park Parking Lot 6 adjacent to the Project Site. This combined parking supply would be sufficient to accommodate construction-related parking. Pursuant to Project Design Feature O-1, the Applicant would be required to coordinate construction parking through the Exposition Park General Manager, who manages the parking supply in Exposition Park. To the degree that any portion of Parking Lot 6 is required for parking for events occurring in Exposition Park during Modified Project construction, coordination through the General Manager would ensure that adequate parking supplies are provided either by requiring all construction workers to park on the Project Site during those events, or requiring the Applicant to secure temporary off-site parking facilities for event users in the numerous nearby lots (such as those maintained by USC). Construction is not anticipated to require the removal of, or impair access to, on-street parking spaces along Martin Luther King, Jr. Boulevard or Figueroa Street adjacent to the Project Site, as street parking is not permitted along these street segments. Therefore, construction of the Modified Project would not result in substantial loss of on-site and/or off-site parking such

that the parking needs of the Project Site area would not be met, and construction traffic impacts related to parking would be less than significant (refer to Section IV.O Comparative Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum).

2. Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to traffic, transportation, and parking:

PDF O-1: The Applicant shall coordinate construction parking through the Exposition Park General Manager. To the degree that any portion of Parking Lot 6 is required for parking for events occurring in Exposition Park during Modified Project construction, adequate parking supplies shall be provided either by requiring all construction workers to park on the Project Site during those events, or requiring the Applicant to secure temporary off-site parking facilities for event users in the numerous nearby lots (such as those maintained by the University of Southern California).

PDF O-2: If the maximum permitted amount of office floor area (i.e., 21,250 square feet) is developed, attendance at morning conference facility functions on non-event days shall be limited to 261 attendees, and attendance at evening conference facility functions on non-event days shall be limited to 430 attendees. For every reduction of 850 square feet in office space floor area that is ultimately built in the Modified Project, the number of persons attending functions in the conference facility could be increased by 5.6 persons for morning conference facility functions on non-event days, and by 3.0 persons for evening conference facility functions on non-event days.

PDF O-3: The museum, team store, other retail uses, and all restaurant uses shall not open for business until 10:00 A.M. or later.

PDF O-4: For periods at least two hours before, during, and two hours after games/events at the proposed stadium, the ancillary uses shall be open only to ticket-holding game/event patrons. For events at the adjacent Coliseum reasonably anticipated to equal or exceed 25,000 patrons in attendance, including USC home football games, the ancillary uses shall be open only to ticket-holding patrons of those events for periods at least three hours before, during, and two hours after the events.

PDF O-5: Construction activities shall be scheduled so that no more than 70 construction worker vehicles are scheduled to arrive at the Project Site between the hours of 7:00 A.M. and 9:00 A.M.

PDF O-6: The Applicant shall coordinate with Metro on appropriate service levels for Metro transit services on stadium event days, including but not limited to the Expo Light Rail.

The following mitigation measures were included in the Certified EIR to further reduce the less-than-significant traffic impacts associated with construction of the Original Stadium Project. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP included with the Modified Project Addendum (see Addendum Appendix A), but have been revised as follows to reflect the design characteristics of the Modified Project:

EIR Mitigation Measure MM G-1: The Applicant shall prepare a Construction Management Plan detailing proposed haul routes and staging areas for the transportation of materials and equipment, with consideration for sensitive uses in the neighborhood. The Construction Management Plan shall be submitted for approval by LADOT and the Department of Building and Safety prior to the issuance of any permits. The Construction Management Plan shall include the following requirements:

- The preferred haul route to and from the Project Site shall be Martin Luther King, Jr. Boulevard to and from the Harbor Freeway. Trucks shall not be permitted to travel along local residential streets.
- A flagman shall be placed at the truck entry and exit from the Project Site onto Martin Luther King, Jr. Boulevard to control the flow of exiting trucks.
- Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel periods to the degree possible and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time.
- Access shall remain unobstructed for land uses in proximity to the Project Site during construction of the Modified Project.
- In the event of a lane or sidewalk closure, a worksite traffic control plan, approved by the City of Los Angeles, shall be implemented to route traffic or pedestrians around any such lane or sidewalk closures.
- The locations of truck staging shall be identified and measures shall be included to ensure that trucks use the specified haul route and do not travel through nearby residential neighborhoods.
- Vehicle movements shall be scheduled to minimize vehicles waiting off-site and impeding public traffic flow on the surrounding streets.
- Requirements shall be established for the loading, unloading, and storage of materials on the Project Site.
- Requirements shall be established for the temporary removal of parking spaces, time limits for the reduction of travel lanes, and closing or diversion of pedestrian facilities to ensure the safety of pedestrian and access to local businesses.
- The Applicant shall coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses.
- If the construction periods for the Modified Project and the My Figueroa Street improvement project overlap, the Applicant shall coordinate with the City to minimize the potential combined effects of the two projects to the extent possible.

EIR Mitigation Measure MM J-2: The Applicant shall coordinate with Metro Bus Operation Control Special Events Coordinator at 213-922-4632 and LADOT Staff regarding construction activities that may affect Metro and LADOT bus line operations.

3. Findings

Although the construction of the Modified Project would not result in significant impacts to traffic and circulation prior to mitigation, mitigation measures were proposed under the Certified EIR and incorporated as modified under the Modified Project that further reduce these less than significant environmental effects.

4. Rationale for Findings

Although construction of the Modified Project would have a less than significant impact on traffic, circulation and parking, the Certified EIR included Mitigation Measure G-1 requiring the preparation of a construction-related traffic management plan that would serve to reduce further these non-significant construction-related traffic impacts. The Certified EIR also required Mitigation Measure J-2 to coordinate Modified Project construction with the Metro Bus Operation Control Special Events Coordinator and LADOT Staff with respect to construction activities that may affect Metro and LADOT bus lines. Each above-referenced mitigation measure would further ensure that the Modified Project would not result in substantial delays and disruption of existing traffic flow, or otherwise adversely impact intersections, public transit, access or parking. Therefore, these mitigation measures are included within the MMP for the Modified Project, and construction related traffic impacts would be reduced below already less than significant levels.

5. Reference

For a complete discussion of construction related Project impacts to traffic and circulation, please see Section IV.J of the Certified EIR and Section IV.O and IV,Q of the Modified Project Addendum.

C. Transportation, Traffic and Parking (Operations and Cumulative)

1. Description of Environmental Effects

The traffic impacts of operating the Original Stadium Project were analyzed in the Certified EIR (refer to Section IV.J, Transportation, Traffic, and Parking, of the Certified EIR), which concluded that no new significant traffic impacts would result from a game or event hosted at the proposed stadium as compared to operation of the existing Sports Arena. Further, since the Coliseum and the Sports Arena currently hold events with up to 93,000 persons in attendance combined, the Certified EIR also concluded that no new traffic impacts would result from concurrent events in the Coliseum and Original Stadium Project with combined attendees of up to 93,000 persons, and included a mitigation measure (Mitigation Measure J-1) to ensure that events in the two venues are scheduled in such a manner as to not exceed this limit. Mitigation Measure J-1 would continue to be implemented under the Modified Project, and has been incorporated into the Modified Project's MMP (see Appendix A of the Modified Project Addendum). Additionally, the Certified EIR did not account for the trip reduction associated with the Expo Light Rail stations in proximity to the Project Site. The Expo Park/USC Station is located approximately 0.35 mile from the Project Site and the Expo/Vermont Station is located approximately 0.7 mile from the Project Site. Given the proximity of these stations, it is anticipated that a substantial number of attendees at the Modified Project would use the light rail on event days, further reducing the less-than-significant event day traffic impacts identified in the Certified EIR.

The operational and cumulative impacts of the Modified Project on traffic are discussed in more detail below. Like the Original Stadium Project analyzed in the Certified EIR, the Modified Project proposes a 22,000-seat professional soccer stadium. Pursuant to Project Design Feature O-4, the ancillary uses proposed as part of the Modified Project would be open only to ticket-holding game/event patrons during a period of time before, during and after the game/event, with no material increase in event-related traffic expected. Therefore, because traffic impacts are assessed based on peak-hour conditions, the Certified EIR's conclusions with respect to event day traffic would not change under the Modified Project, and potential impacts on event days in the Modified Project would remain less than significant (refer to Section IV.O Comparative

Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum). Accordingly, the findings below are focused on the operations of the Modified Project's ancillary uses on non-event days.

a. Intersections

As described in the Modified Project Addendum, Section IV.O – Traffic/Transportation/Parking at pages 156-157, Existing Conditions (Year 2015), Existing (Year 2015) plus Project Conditions, Future Base (Year 2018) Conditions (which includes related projects and therefore analyzes cumulative impacts), and Future (Year 2018) plus Project Conditions were studied and compared with respect to fourteen signalized intersections:

1. Vermont Avenue & Exposition Boulevard
2. Vermont Avenue & Martin Luther King, Jr. Boulevard
3. Hoover Street & Martin Luther King, Jr. Boulevard
4. Figueroa Street & Exposition Boulevard
5. Figueroa Street & Flower Street
6. Figueroa Street & Exposition Park Drive/39th Street
7. Figueroa Street & Martin Luther King, Jr. Boulevard
8. Flower Street/I-110 Off-Ramp & Exposition Boulevard
9. Flower Street & 37th Street
10. Hope Street & 37th Street
11. I-110 Ramps & Martin Luther King, Jr. Boulevard
12. Hill Street/I-110 Ramps & Martin Luther King, Jr. Boulevard
13. Hoover Street & Vernon Street
14. Figueroa Street & Vernon Street

Estimates of trips associated with the Modified Project's ancillary uses on non-event weekdays reveal that the ancillary uses would generate a net external 2,615 daily trips on a non-event weekdays, including 89 trips (85 inbound/4 outbound) during the A.M. peak hour and 260 trips (63 inbound/197 outbound) during the P.M. peak hour.

As shown in Table 16 on page 160 of the Modified Project Addendum, the intersection of Figueroa Street & Martin Luther King, Jr. Boulevard (Study Intersection 7) is projected to operate at Level of Service (LOS) E during the A.M. peak period both under Existing Conditions and Existing plus Project Conditions. Based on the City of Los Angeles' thresholds of significance, which are further discussed in the Modified Project Transportation Report (refer to Appendix P-1 of the Modified Project Addendum), increased traffic resulting from Modified Project non-event weekday operations would be below the applicable thresholds of significance at the intersection of Figueroa Street & Martin Luther King, Jr. Boulevard (Study Intersection 7) and at all other study area intersections. Therefore, the Modified Project's potential traffic and transportation impacts at intersections under Existing plus Project Conditions would be less than significant, and no mitigation measures would be required (refer to Section IV.O Comparative Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum).

As shown in Table 17 on page 161 of the Modified Project Addendum, the following three intersections are projected to operate at LOS E or worse during one or both of the peak hours during both Future Base (Year 2018) Conditions, and Future (Year 2018) plus Project Conditions on a non-event day: Vermont Avenue & Exposition Boulevard (Study Intersection

1); Figueroa Street & Exposition Boulevard (Study Intersection 4); and Figueroa Street & Martin Luther King, Jr. Boulevard (Study Intersection 7). Based on the City of Los Angeles' thresholds of significance, which are further discussed in the Modified Project Transportation Report (refer to Appendix P-1 of the Modified Project Addendum), increased traffic resulting from Modified Project non-event weekday operations would be below the applicable thresholds of significance at these three intersections and at all other study area intersections. Therefore, the Modified Project's potential traffic and transportation impacts at intersections under Future plus Project Conditions would be less than significant, and no mitigation measures would be required (refer to Section IV.O Comparative Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum).

b. Congestion Management Program

The Los Angeles County Metropolitan Transportation Authority's (Metro) Congestion Management Program (CMP) requires that, when an environmental impact report is prepared for a project, traffic and public transit impact analyses be conducted for select regional facilities based on the quantity of project traffic expected to use those facilities. The closest CMP arterial monitoring station, the intersection of Alameda Street & Washington Boulevard, is approximately 2.5 miles from the Project Site. As described in the Modified Project Transportation Report (see Appendix P-1 of the Modified Project Addendum), the Modified Project would not add 50 or more vehicle trips during the A.M. or P.M. peak hours on non-event days at this intersection. Therefore, no further arterial review using CMP criteria is required.

The CMP mainline freeway monitoring stations closest to the Project Site are I-10 at Budlong Avenue and I-110 at Slauson Avenue. According to the trip generation and distribution estimates discussed above, the Modified Project is projected to result in an increase of fewer than 150 trips for both the morning and evening peak hours on non-event days at both of these locations. Additionally, the Modified Project is projected to result in an increase of fewer than 150 trips for both the morning and evening peak hours on non-event days on I-110 at Exposition Boulevard and Martin Luther King, Jr. Boulevard and on I-10 at Vermont Avenue and Hoover Street, which represent the freeway segments closest to the Project Site. Since fewer than 150 trips would be added during the A.M. or P.M. peak hours to the freeways serving the study area, no further analysis of the freeway segments is required for CMP purposes.

As further discussed in the Modified Project Transportation Report (refer to Appendix P-1 of the Modified Project Addendum), the Modified Project would generate an estimated 22 transit riders in A.M. peak hour and an estimated 75 transit riders in the P.M. peak hour on non-event days. The Project Site is well served by numerous established local and regional transit routes, including the Metro Expo light rail transit line (with the Expo Park/USC Station located approximately 0.35 mile from the Project Site), the Metro Silver Line and numerous express bus routes on the Harbor Transitway (with the 37th Street/USC station located approximately 0.37 mile from the Project Site), four local lines, one rapid line, and two express routes operated by Metro, and two LADOT DASH routes. The total estimated capacity for transit services in the Project Site vicinity is approximately 24,380 persons in the peak hours. The Modified Project would utilize approximately 0.3 percent of available transit capacity during the peak hours on non-event days.

As stated in the Certified EIR, the operation of Phase I of Metro's Exposition Light Rail Transit Project was anticipated to commence in 2011, prior to the anticipated build-out of the Original Stadium Project. With a dedicated station to serve Exposition Park (the Expo Park/USC Station), the planned capacity of the Expo Line accounted for existing uses within Exposition Park, including the existing Sports Arena. The Original Stadium Project would not increase the maximum historic attendance levels on site compared to the existing Sports Arena, therefore, the planned capacity of the Expo Line also accounted for the potential operation of the Original Stadium Project including stadium events. Operation of the Expo Line has since commenced with the actual opening of Phase 1 in 2012, and the Expo Line currently provides service for approximately 30,300 riders on an average daily basis. Phase 2 of the Expo Line is under construction to Santa Monica and will open in spring 2016. As is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of 22,000 seats, which is within the historic attendance levels of the Sports Arena. On event days, the Project's ancillary uses would be open only to ticket-holding patrons already traveling for the event. Therefore, like the Original Stadium Project, the Modified Project's stadium would not change the event day ridership levels from those anticipated at the time the Expo Line was planned. The Applicant will, however, coordinate with Metro regarding appropriate service levels on event days, pursuant to Project Design Feature O-6.

Based on the analysis above, the Modified Project would result in less-than-significant impacts to CMP transit facilities (refer to Section IV.O Comparative Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum). No mitigation measures are required.

c. Access/Safety

As shown in Table 16 and Table 17 on pages 160 and 161 of the Modified Project Addendum, each of the analyzed intersections that provide primary access to the Project Site are projected to operate at LOS C or better under Existing plus Project conditions and at LOS D or better under Future with Project Conditions on non-event days. Therefore, with the addition of Modified Project traffic under these conditions, no significant impact would occur (refer to Section IV.O Comparative Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum).

d. Parking

The Certified EIR determined that the LAMC-required parking requirement for the Original Stadium Project was 4,400 parking spaces. The thresholds on which this analysis was based are stated on page IV.J-5 of the Certified EIR. At the time the Certified EIR was prepared, there were approximately 19,981 parking spaces available within the Exposition Park and USC Campus area that were generally available to meet the parking demands of the land uses within the general vicinity of the Project Site. Specifically, there were approximately 7,340 parking spaces within the Exposition Park area alone that could meet the parking demands of the Coliseum, Sports Arena, and other Exposition Park uses. As such, the Certified EIR determined that an adequate supply of parking existed within the area to meet the LAMC-required parking and the parking demands of future events held under the Original Stadium Project. Therefore, parking impacts were determined to be less than significant.

Like the Original Stadium Project, the Modified Project proposes the development of a 22,000-seat MLS stadium. Therefore, the parking demand associated with the stadium portion of the Modified Project would not change. However, an increase in parking demand beyond levels analyzed in the Certified EIR could result from the Modified Project's ancillary uses on non-event days, as well as from employees of the ancillary uses on event days. Potential parking impacts associated with each of these conditions are addressed below. The following analysis also addresses potential bicycle parking impacts, which were not analyzed in detail in the Certified EIR.

As discussed in Section III, Project Description, of the Addendum, consistent with the Original Stadium Project, parking for the Modified Project would be provided by the supply available at Exposition Park. Based on an updated parking supply inventory, as detailed in Table 1 in the Modified Project Parking Analysis included in Appendix Q of the Modified Project Addendum, Exposition Park currently provides approximately 5,961 parking spaces in multiple parking lots and on streets within Exposition Park. These spaces are used by the Coliseum, the Sports Arena, the California Science Center, the Los Angeles County Natural History Museum, the California African American Museum, and other park visitors. Per the terms of the Non-Disturbance Agreement between the California Science Center and the University of Southern California, during special events at the Coliseum or Sports Arena (i.e., events with a reasonably anticipated or actual attendance of 3,000 people or more), 600 parking spaces may be reserved by the California Science Center in the Science Center Structure and 375 spaces may be reserved by the Natural History Museum in Parking Lot 3. If these reservations occur, an estimated 4,986 vehicle spaces would be available for events in the Exposition Park parking supply. The Modified Project would not alter the parking space allocations in the Non-Disturbance Agreement between the California Science Center and USC.

It should also be noted that the on site VIP parking lot, which contains approximately 238 vehicle parking spaces, is not included in the approximately 5,961-space parking supply in Exposition Park. Under the Modified Project, this parking lot would be retained and reconfigured to provide up to approximately 250 spaces. This would increase the vehicle parking supply in Exposition Park up to approximately 6,211 spaces (5,236 on special event days if the Science Center and Natural History Museum reservations occur).

The parking requirements for the Modified Project were analyzed pursuant to LAMC Section 12.21A.4, which establishes vehicle parking space ratios based on square feet or seats, and Section 12.21A.16, which establishes requirements for bicycle parking spaces. The ratios used to determine the required number of vehicle parking spaces for the Modified Project are shown in Table 18 on page 166 of the Modified Project Addendum and described in detail in the Modified Project Parking Analysis included in Appendix Q of the Modified Project Addendum. As shown in Table 18, after applying the aforementioned LAMC parking requirements, the required parking for the stadium component of the Modified Project on event days would be 4,400 vehicle parking spaces, consistent with the Certified EIR analysis. For non-event days, as shown in Table 18, the required parking for the Modified Project's ancillary uses under the LAMC is estimated at 676 vehicle parking spaces. As discussed below, the Modified Project would provide 107 bicycle parking spaces in LAMC-compliant bike racks (58 as short-term spaces and 49 as long-term spaces), thus satisfying the LAMC-required bicycle parking for the ancillary uses on non-event days. The LAMC permits reductions in the required number of vehicle spaces at a ratio of one vehicle space reduced for every four bicycle spaces provided, up to a maximum of 20 percent of the required vehicle

spaces for non-residential uses. Thus, 648 vehicle parking spaces would be required on non-event days for the ancillary uses when taking a credit for bicycle parking pursuant to the LAMC. Pursuant to Project Design Feature O-4, on event days, the ancillary uses would only be open to ticketed patrons of the stadium; thus, the 648 vehicle spaces for the ancillary uses would not be needed separate from the stadium requirement. However, to the extent that some of the ancillary uses may be considered additional to the typical uses considered in the LAMC requirement for a stadium, there could be some additional parking need for Ancillary Use employees on event days. As described in the Modified Project Parking Analysis, it is estimated that up to approximately 178 parking spaces may be needed for employees of the ancillary uses if they all were to be open during stadium events and were all considered to be additional employees beyond those normally required to operate a stadium (see Table 19 on page 168 of the Modified Project Addendum). This could conservatively increase the Modified Project's potential parking need on event days to as many as 4,578 spaces (4,400 for the stadium and 178 for the additional ancillary uses employees), which would still be fully accommodated by the parking supply provided for events in Exposition Park (approximately 4,986 to 5,961 existing spaces and up to 5,236 to 6,211 spaces with the Modified Project). On non-event days, the parking supply provided by Exposition Park (approximately 5,961 existing spaces and up to 6,211 spaces with the Modified Project) would adequately meet the LAMC requirement of 648 vehicle parking spaces for the Modified Project's ancillary uses. Therefore, consistent with the conclusions in the Certified EIR for the Approved Stadium Project (refer to Section IV.J, Transportation, Traffic, and Parking, of the Certified EIR), impacts with respect to parking would be less than significant under the Modified Project on event days and non-event days (refer to Section IV.O Comparative Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum). No mitigation measures are required.

With regard to bicycle parking, the Modified Project would be required to provide at least 440 bicycle parking spaces (two percent of the proposed stadium seating capacity) pursuant to the bicycle parking requirements set forth in a proposed Specific Plan amendment that would require sufficient bicycle parking to accommodate two percent of stadium seating capacity. One-hundred and seven of these spaces would be provided in LAMC-compliant bike racks (58 as short-term spaces and 49 as long-term spaces), thus satisfying the LAMC-required bicycle parking for the ancillary uses on non-event days. The remaining 333 bicycle spaces would be provided through a bicycle valet service on event days. In the event that bicycle parking needs increase over time, the bicycle valet service on event days could be expanded. As discussed further in the Modified Project Parking Analysis, the proposed amount of bicycle parking would exceed the bicycle parking rates at the other recently approved professional sports stadiums, including Farmers Field in Los Angeles, Avaya Stadium in San Jose, and Levi's Stadium in Santa Clara. Therefore, the proposed bicycle parking supply would be adequate to satisfy the anticipated bicycle parking demand of the Modified Project, and would be consistent with required bicycle parking rates with approval of the requested Specific Plan amendment. Therefore, impacts related to bicycle parking would be less than significant (refer to Section IV.O Comparative Analysis of Modified Project Impacts, Traffic/Transportation/Parking, of the Modified Project Addendum). No mitigation measures are required.

For all the above reasons, the Modified Project would have less than significant traffic/transportation/parking impacts during operation. The operational traffic analysis for Future Base (Year 2018) Conditions includes related projects and therefore analyzes cumulative impacts. Therefore, cumulative traffic impacts of the Modified Project in

conjunction with related projects would also be less than significant. Accordingly, the Modified Project would not result in any new significant impacts with respect to traffic, transportation, and parking, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to traffic, transportation, and parking:

PDF O-1: The Applicant shall coordinate construction parking through the Exposition Park General Manager. To the degree that any portion of Parking Lot 6 is required for parking for events occurring in Exposition Park during Modified Project construction, adequate parking supplies shall be provided either by requiring all construction workers to park on the Project Site during those events, or requiring the Applicant to secure temporary off-site parking facilities for event users in the numerous nearby lots (such as those maintained by the University of Southern California).

PDF O-2: If the maximum permitted amount of office floor area (i.e., 21,250 square feet) is developed, attendance at morning conference facility functions on non-event days shall be limited to 261 attendees, and attendance at evening conference facility functions on non-event days shall be limited to 430 attendees. For every reduction of 850 square feet in office space floor area that is ultimately built in the Modified Project, the number of persons attending functions in the conference facility could be increased by 5.6 persons for morning conference facility functions on non-event days, and by 3.0 persons for evening conference facility functions on non-event days.

PDF O-3: The museum, team store, other retail uses, and all restaurant uses shall not open for business until 10:00 A.M. or later.

PDF O-4: For periods at least two hours before, during, and two hours after games/events at the proposed stadium, the ancillary uses shall be open only to ticket-holding game/event patrons. For events at the adjacent Coliseum reasonably anticipated to equal or exceed 25,000 patrons in attendance, including USC home football games, the ancillary uses shall be open only to ticket-holding patrons of those events for periods at least three hours before, during, and two hours after the events.

PDF O-5: Construction activities shall be scheduled so that no more than 70 construction worker vehicles are scheduled to arrive at the Project Site between the hours of 7:00 A.M. and 9:00 A.M.

PDF O-6: The Applicant shall coordinate with Metro on appropriate service levels for Metro transit services on stadium event days, including but not limited to the Expo Light Rail.

The following mitigation measures were included in the Certified EIR to further reduce the less-than-significant traffic operational and cumulative impacts associated with the Original Stadium Project. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP included with the Modified Project Addendum (see Addendum Appendix A), but have been revised as follows to reflect the design characteristics of the Modified Project:

EIR Mitigation Measure MM J-1: Combined with the Coliseum, the campus supervised by the Coliseum Commission currently holds events ranging from 500 to 93,000 people in attendance. The Applicant and USC shall schedule events at the two facilities in such a manner that the event attendance size at the two venues combined does not exceed 93,000 people.

2. Findings

Although operation of the Modified Project would not result in significant impacts to traffic and circulation prior to mitigation, mitigation measures were proposed under the Certified EIR and incorporated into the Modified Project that further reduce these less than significant environmental effects.

3. Rationale for Findings

The Modified Project proposes a 22,000-seat professional soccer stadium similar in scale and projected game day attendance to the existing Sports Arena. The ancillary uses proposed as part of the Modified Project would be open only to ticket-holding game/event patrons during a period of time before, during and after the game/event, with no material increase in event-related traffic expected. Because traffic impacts are assessed based on peak-hour conditions, the Certified EIR's conclusions with respect to event day traffic would not change under the Modified Project. Further, additional impacts of the Modified Project's proposed ancillary uses were studied and determined to result in less than significant impact. Mitigation Measure J-1 will ensure that events at the Project Site and adjacent Coliseum will continue to be scheduled in such a manner as to not exceed the 93,000 person historical attendance volumes of those venues.

4. Reference

For a complete discussion of construction related Project impacts to traffic and circulation, please see Section IV.J of the Certified EIR and Section IV.O and IV,Q of the Modified Project Addendum.

D. Public Utilities—Water (Operation and Cumulative)

1. Description of Environmental Effects

Water demand during operation is analyzed by estimating domestic, fire (sprinkler and fire hydrant), and irrigation uses. Fire flow demands require high flow rates and constitute a relatively short term demand. Domestic and irrigation flow demands require low to moderate flow rates and constitute long term demand.

As set forth in the Certified EIR, the existing Sports Arena hosts a variety of sports and civic events as well as concerts and shows throughout the year. As described in Table II-1 on page II-6 of the Certified EIR, the Sports Arena has hosted an average of 69 annual events, including 60 events per year with an average attendance of 4,100 persons, 6 events per year with an average attendance of 13,500 and 3 events per year with an average attendance of 37,800. Based on these data, Sports Arena events generate an average annual attendance of approximately 440,400 persons. Like the Original Stadium Project, the Modified Project proposes a 22,000-seat MLS stadium. Therefore, peak day attendance under the Modified Project is also expected to be

similar to peak historic attendance levels at the Sports Arena. However, based on preliminary programming data provided by LAFC, annual attendance in the Modified Project's stadium could range from 628,500 persons to a maximum of approximately 1,403,500 persons. In addition to peak day attendance, these annual attendance estimates are relevant for determining the Modified Project's annual water demand as it relates to SB 610 requirements, as discussed below.

a. Fire Flow

Los Angeles Fire Code (Fire Code) Chapter 5, Section 507, establishes fire flow standards by development type. The Modified Project is within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gallons per minute (gpm) from four to six fire hydrants flowing simultaneously (1,500 gpm per hydrant). The Fire Code also requires hydrants to be spaced to provide adequate coverage of the building exterior and deliver a minimum pressure of 20 pounds per square inch (psi) at full flow. Industrial and Commercial uses require one hydrant per 80,000 square feet of land area with 300 feet distance between hydrants on roads and fire lanes. Required hydrant types include 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Fire hydrant demands therefore act as the baseline for any water system upgrades.

The Certified EIR stated that the Original Stadium Project would be required to comply with LAFC and building code fire flow requirements for the Project Site. Based on information in the Modified Project Infrastructure Report, the hydrant coverage around the Project Site is considered adequate pursuant to LADWP and LAFD standards. Existing hydrant and/or fire department connections within the Project Site may need to be removed and replaced as required if necessary as part of the Sports Arena demolition or if the City requires increased coverage around the Modified Project. Based on recent correspondence from LADWP, which is included in Appendix A of the Modified Project Infrastructure Report, the static water pressure at 3939 Figueroa Street is 89 psi in the high pressure system and 71 psi in the low pressure systems. Therefore, there are no known existing deficiencies in the water system that would preclude the system from being able to provide the required fire flow to the Modified Project. Upon finalization of the Modified Project design, a pressure flow report would be requested from LADWP to ensure that existing water pressure is sufficient to serve the Modified Project. Furthermore, as stated in Section IV.N.a, Public Services—Fire Protection, on page 137 of the Modified Project Addendum, based on its preliminary review of the Modified Project, the LAFD has not identified any substantial deficiencies in the fire flow infrastructure that serves the Project Site, or in the design of the Modified Project, that would prohibit the Modified Project from meeting applicable Fire Code requirements. Notwithstanding, as with the Original Stadium Project, the final fire-flow requirement for the Modified Project would be determined by the LAFD and the Applicant would be responsible for constructing any necessary infrastructure upgrades. Thus, with adherence to LAFD and Fire Code requirements for the Project Site, impacts with respect to fire flow would be less than significant, consistent with the conclusions of the Certified EIR (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). No mitigation measures are required.

b. Domestic and Irrigation Water Demand

The Certified EIR determined that the peak and average water demand for the Project Site would not increase with implementation of the Original Stadium Project as compared to

existing conditions since average and maximum attendance levels at the Project Site under the Original Stadium Project would be substantially similar to existing conditions. Therefore, the Certified EIR concluded that existing water infrastructure in the vicinity of the Project Site, as well as projected water supplies, would be able to accommodate the Original Stadium Project's water demand, and impacts related to water supply would be less than significant. For the same reason, the Certified EIR also determined that the Original Stadium Project would not require a Water Supply Assessment (WSA) pursuant to SB 610.

Operational impacts related to water are assessed in terms of both peak daily consumption (in relation to infrastructure capacity) and annual consumption (in relation to water supplies and SB 610 requirements). With regard to peak daily consumption, as is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of approximately 22,000 seats, which is within the historic maximum attendance levels of the Sports Arena (i.e., up to 55,132 attendees, as shown in Table II-3 in the Certified EIR). Therefore, potential water supply and infrastructure capacity impacts with respect to the stadium portion of the Modified Project during a maximum activity day (i.e., event day) would not represent a substantial increase compared to existing conditions, consistent with the Certified EIR's analysis.

However, additional event-day water consumption beyond levels analyzed in the Certified EIR may result from operation of the ancillary uses proposed as part of the Modified Project. Although the estimated water consumption of the stadium would not change compared to levels analyzed under the Certified EIR, for informational purposes, and to be consistent with LADWP methodology for determining pipeline capacity, the analysis in the Modified Project Addendum presents the estimated peak daily water consumption of the entire Modified Project, including the stadium component. Furthermore, as discussed above, while maximum event day attendance in the stadium portion of the Modified Project would be substantially the same as under the Original Stadium Project, annual attendance at the proposed stadium could increase under the Modified Project as compared to levels projected under the Original Stadium Project. Therefore, the Modified Project Addendum analysis estimates the annual water consumption for the entire Modified Project in order to determine the Modified Project's potential water supply impacts, or whether the Modified Project would result in the need for a WSA in accordance with SB 610.
As shown in Table 22 on page 183 of the Modified Project Addendum, the Modified Project's total estimated water demand on an event day would be approximately 94,322 gpd, of which 72,647 gpd would be associated with the stadium and 21,675 gpd would be associated with the proposed ancillary uses. To provide a conservative analysis, this estimate is based on gross square footage (rather than floor area). Furthermore, it conservatively does not account for implementation of Project Design Feature P 1, which reflects the water conservation commitment of the Modified Project. Specifically, the Modified Project would commit to reducing indoor potable water demand by at least 20 percent below 2013 CALGreen requirements. Additionally, the Modified Project would implement Mitigation Measure MM I.2-1 in the Certified EIR, which reflects DWP requirements for new construction. Mitigation Measure MM I.2-1 has been incorporated into the MMP for the Modified Project (see Appendix A to the Modified Project Addendum) with revisions to reflect current DWP requirements.

The total Modified Project demand of 94,322 gpd on an event day converts to a peak flow demand of approximately 66 gallons per minute (gpm). Utilizing a peaking factor of 3, the peak demand on an event day would be 198 gpm. This is significantly lower than the fire flow

requirement of 1,500 gpm from a single hydrant discussed above. Thus, sufficient infrastructure capacity would be available to accommodate the Modified Project's daily water demand on an event day. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Water, of the Certified EIR), impacts with respect to water infrastructure would be less than significant under the Modified Project (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). No mitigation measures are required.

Annual water demand has also been evaluated to determine whether the Modified Project would result in the need for a WSA in accordance with SB 610. As summarized above and described in detail in the Certified EIR, existing events within the Sports Arena have generated an average annual attendance of 440,400 persons. Using a per patron water demand rate of 8.8778 units, consistent with LADWP's methodology for analyzing annual water demand associated with professional sports stadiums, this average annual attendance generates an annual demand for approximately 3.9 million gallons (11.97 acre-ft) of water. As discussed above, based on preliminary programming data provided by LAFC, annual attendance would range from 628,500 persons to a maximum of approximately 1,403,500 persons under the Modified Project. Based on water demand from the maximum annual attendance projected for events, the proposed ancillary uses, and use of irrigation, the annual water demand for the Modified Project was estimated and is summarized in Table 23 on page 185 of the Modified Project Addendum. As shown therein, the Modified Project would result in a net annual water demand of approximately 15,094,769 gallons, or 46 acre-feet. This estimate is highly conservative in that it is based on the following assumptions:

- Maximum number of potential events occurring at the proposed stadium with maximum potential attendance;
- Irrigation occurring four days a week, year-round, for each square foot of landscaped surface; and
- Gross square feet rather than floor area for the proposed ancillary uses.

As shown in Table 21 on page 178 of the Modified Project Addendum, the water demand for the City in 2018 (the Modified Project's buildout year) is expected to be approximately 637,120 acre-feet during average year hydrological conditions, approximately 675,340 acre-feet during a single-dry year, and approximately 675,400 acre-feet during a multiple-dry year. As concluded in LADWP's 2010 UWMP, the projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2035, as well as the intervening years (i.e., 2018). The Modified Project's estimated net increase in water demand of approximately 46 acre-feet per year would comprise less than 0.008 percent of the water demand for the City in 2018 during an average year, single-dry year, and multiple-dry year period. Therefore, the Modified Project would be well within the available and projected water supplies for normal, single-dry, and multiple-dry years for the Modified Project build-out year, as such, LADWP would be able to meet the water demand for the Modified Project as well as existing and planned water demands of its future service area.

LADWP's water supplies are facing challenges due to environmental concerns and litigation associated with LADWP's sources of water supply. Additionally, changes in hydrological conditions due to climate change could also have an impact on MWD's water supplies. However, along with MWD's water management and reliability initiatives, LADWP is

committed to, as outlined in the 2010 Urban Water Management Plan, providing a reliable water supply for the City. The 2010 Urban Water Management Plan takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2010 Urban Water Management Plan addresses the current and future State Water Project supply shortages. However, the 2010 Urban Water Management Plan specifically concludes that MWD's actions in response to the threats to the State Water Project will ensure continued reliability of its water deliveries. Furthermore, by focusing on demand reduction, LADWP will ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, water conservation and recycling will play an increasing role in meeting future water demands.

With regard to SB 610 requirements, conservatively using the Bureau of Sanitation wastewater generation rate for a one-bedroom dwelling unit of 110 gallons per day per dwelling unit, 500 residential units generate a demand of approximately 20,075,000 gallons of water per year, or 61.6 acre-ft. As discussed above, the net annual water demand for the Modified Project is well below this number. As such, consistent with the conclusions of the Certified EIR, a Water Supply Assessment is not required for the Modified Project pursuant to SB 610.

Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Water, of the Certified EIR), operational impacts with respect water supply and infrastructure capacity would be less than significant under the Modified Project (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). No mitigation measures are required.

c. Cumulative

As analyzed in the Modified Project Addendum, due to shared urban infrastructure, the Modified Project and related projects would cumulatively increase water consumption. However, utility system capacity must be demonstrated during the approval process for each related project. As service providers conduct ongoing evaluations to ensure that facilities are adequate to serve the forecasted growth of the community, cumulative impacts on water supply utilities are concluded to be less than significant. Furthermore, the estimated net increase in water demand attributable to the Modified Project would comprise less than 0.008 percent of the water demand for the City in 2018. Therefore, the Modified Project's impacts with respect to water supply would not be cumulatively considerable, and cumulative impacts would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Accordingly, based on the analysis above, the Modified Project would not result in any new significant impacts with respect to water supply and infrastructure capacity, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to water:

PDF P-1: The Modified Project would reduce indoor potable water demand by at least 20 percent below Section 5.303.3 of the 2013 California Green Building Standards Code—January 1, 2014, Errata.

The following mitigation measure was included in the Certified EIR to further reduce the Original Stadium Project's less-than-significant impacts with respect to water. This Mitigation Measure would continue to be implemented as part of the Modified Project and has been incorporated into the MMP for the Modified Project included in Appendix A of the Modified Project Addendum, but has been revised as follows to reflect current City conservation requirements:

EIR Mitigation Measure MM I.2-1: The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). In addition, the Department of Water and Power requires the following conservation measures for all new development in the City of Los Angeles:

- High-efficiency toilets (1.28 gallons per flush or less, includes dual flush);
- High-efficiency dual flush toilets in single-use bathrooms;
- High-efficiency urinals (0.125 gallons per flush or less, includes waterless urinals);
- Restroom faucet flow rate of 0.35 gallons per minute or less;
- Public restroom self-closing faucets;
- Showerhead flow rate of 1.5 gallons per minute or less;
- Limit of one showerhead per shower stall;
- High-efficiency clothes washers (water factor of 6.0 or less);
- High-efficiency dishwashers (ENERGY STAR rated);
- Use of tankless and on-demand water heaters as feasible;
- Cooling towers must be operated at a minimum of 5.5 cycles of concentration;
- Require onsite water recycling systems for wastewater discharge for commercial laundries, dye houses, food processing, certain manufacturing operations, etc. (subject to a payback threshold of five years or less). Mandate water recycling system for all new car wash facilities.
- Strict prohibition of single-pass cooling; (Note: Single-pass cooling refers to the use of potable water to extract heat from process equipment)
- Irrigation system requirements:
  - Weather-based irrigation controller with rain shutoff;
  - Flow sensor and master valve shutoff (large landscapes);
  - Matched precipitation (flow) rates for sprinkler heads;
  - Drip/microspray/subsurface irrigation where appropriate;
  - Minimum irrigation system distribution uniformity of 75 percent;
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials;
  - Use of landscape contouring to minimize precipitation runoff;
- Metering:

- All irrigated landscapes of 5,000 square feet or more require separate metering or submetering;
- Mandated use of recycled water (where available) for appropriate end uses (irrigation, cooling towers, sanitary);
- Standard Urban Stormwater Mitigation Plan (SUSMP): Compliance with all City of Los Angeles SUSMP requirements, and encouraging implementation of Best Management Practices that have stormwater recharge or reuse benefits.

3. Findings

Although the Modified Project would not result in significant impacts to water supply prior to mitigation, mitigation measures have nonetheless been incorporated into the Modified Project that further reduce these less than significant environmental effects, as identified in the Certified EIR and Modified Project Addendum.

4. Rationale for Findings

Construction and implementation of the Modified Project would involve less than significant impacts with respect to water supply. Nonetheless, LADWP imposes water conservation mitigation measures for all projects within its jurisdiction. Implementation of these water conservation measures would further ensure that already insignificant impacts related to water supply would be less than significant.

5. Reference

For a complete discussion of impacts of the Project on water supply, please see Section IV.I.2 of the Certified EIR and Section IV.P and IV. Q of the Modified Project Addendum.

E. Public Utilities—Solid Waste (Construction, Operation, Cumulative)

1. Description of Environmental Effects

The Certified EIR for the Original Stadium Project determined that the amount of solid waste generated during construction and operation of the Original Stadium Project would fall within the available permitted capacity of area landfills and recycling centers (refer to Section IV.I.4, Public Utilities—Solid Waste, of the Certified EIR). Therefore, the Certified EIR concluded that solid waste impacts associated with construction and operation would be less than significant. The thresholds on which this analysis was based are stated on pages IV.I 30–IV.I-31 of the Certified EIR. Although impacts would be less than significant, the Certified EIR included Mitigation Measures I.4-1 and I.4-2, which requires implementation of recycling programs during construction and operation, respectively, to further ensure that potential solid waste impacts remain less than significant.

As stated in the Certified EIR, construction of the Original Stadium Project would require the demolition of the existing Sports Arena. The Certified EIR estimated that approximately 5.4 million cubic feet of debris would be generated from this activity. Construction debris from building activities would also be generated included concrete, asphalt, wood, drywall, metals, and a variety of other miscellaneous and composite materials. The Certified EIR concluded that the amount of solid waste generated during construction would fall within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with

demolition and construction debris would be less than significant under the Original Stadium Project.

Like the Original Stadium Project, the Modified Project would require the demolition of the existing Sports Arena. The estimated amount of demolition debris from the Sports Arena (5.4 million cubic feet of debris according to the Certified EIR) would not change under the Modified Project. As shown in Table 25 on page 191 of the Modified Project Addendum, construction of the Modified Project's stadium and ancillary uses would generate an estimated 1,478 tons of solid waste. Combined with the demolition of the Sports Arena, which was addressed in the Certified EIR but is provided herein for informational purposes, Modified Project demolition and construction activities would generate a total of 121,478 tons of solid waste. This estimate is conservative in that it does not account for implementation of Project Design Feature P-2, which reflects the Modified Project's commitment to utilize building materials with at least 20 percent recycled-contents. Additionally, pursuant to revised Mitigation Measure I.4-1, the Modified Project would implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills, which exceeds the City of Los Angeles Green Building Code (Ordinance No. 181,480) requirement of 50 percent. Mitigation Measure I.4-1 from the Certified EIR has been incorporated into the Modified Project's MMP included as Appendix A to the Modified Project Addendum, and has been revised to reflect the specific diversion rate that would be implemented under the Modified Project. Therefore, following the implementation of this measure, a total of approximately 30,370 tons of construction and demolition waste from the Modified Project would be disposed of in area landfills that accept construction and demolition waste generated within the City of Los Angeles. As shown in Table 26 on page 192 of the Modified Project Addendum, the combined estimated remaining permitted capacity of these landfills is 156.28 million tons. The Modified Project's estimated generation of construction and demolition waste would represent approximately 0.02 percent of this total. Therefore, the landfills that serve the Project Site would have sufficient capacity to accommodate the Modified Project's construction and demolition-related solid waste disposal needs. Accordingly, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.4, Public Utilities—Solid Waste, of the Certified EIR), impacts with respect to solid waste generation during construction would be less than significant under the Modified Project, and would be further reduced through implementation of Mitigation Measure I.4-1 and Project Design Feature P-2 (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). No additional mitigation measures are required.

With respect to solid waste generated during operation, the Certified EIR concluded that implementation of the Original Stadium Project would not result in a substantial change in the amount of solid waste generated at the Project Site on an event day because the Original Stadium Project would redevelop the Project Site with the same general use (i.e., sports stadium) that currently exists on site, and maximum attendance of the stadium would be within historic attendance levels of the Sports Arena. Therefore, the Certified EIR concluded that any additional solid waste generated by the Original Stadium Project would not result in significant impacts on solid waste services.

As is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of 22,000 seats. Therefore, impacts associated with the stadium portion of the Modified Project would not change compared to levels analyzed in the Certified EIR. However, the Modified Project would include additional ancillary uses, which would operate in conjunction with the stadium on event days and could increase solid waste generation on maximum generation days as compared to levels

analyzed in the Certified EIR. As shown in Table 27 on page 193 of the Modified Project Addendum, the Modified Project's ancillary uses would have the potential to generate an additional 348 tons of solid waste per year. This estimate is conservative as it does not account for the solid waste reduction features provided for in Project Design Feature P-3, or implementation of Mitigation Measure I.4-2 in the Certified EIR, which requires implementation of an on site recycling plan to achieve an operational diversion rate of at least 40 percent. These measures are anticipated to substantially reduce solid waste generated by the Modified Project.

As shown in Table 26 of the Modified Project Addendum, based on information provided in the Los Angeles County Integrated Waste Management Plan 2013 Annual Report, the total combined remaining disposal capacity for the Class III landfills that accept municipal solid waste generated within the City of Los Angeles is estimated to be approximately 93.94 million tons. The estimated additional generation of 348 annual tons of solid waste from the Modified Project's ancillary uses would represent approximately 0.0004 percent of this total each year. Furthermore, the additional solid waste disposal associated with the Modified Project's ancillary uses would represent approximately 0.009 percent of the City's annual solid waste disposal quantity at these landfills in 2013 (i.e., approximately 3.8 million tons, as shown in Table 26 on page 192 of the Modified Project Addendum). Therefore, the Modified Project's estimated increase in solid waste generation as compared to levels analyzed in the Certified EIR would increase the City's solid waste stream by a negligible amount, and the landfills that serve the Project Site would have sufficient capacity to accommodate the Modified Project's operational solid waste disposal needs. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.4, Public Utilities—Solid Waste, of the Certified EIR), impacts with respect to solid waste generation during operation would be less than significant under the Modified Project, and would be further reduced through implementation of Mitigation Measure I.4-2 (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). No additional mitigation measures are required.

Finally, as analyzed in the Modified Project Addendum, the Modified Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, since unclassified landfills in the County do not generally have capacity concerns, inert landfills serving the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regard to operational waste disposal needs, the Modified Project's estimated increase in solid waste generation would represent approximately 0.0004 percent of the total combined remaining disposal capacity for the Class III landfills that accept municipal solid waste generated within the City of Los Angeles. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Modified Project's impacts with respect to solid waste would not be cumulatively considerable, and cumulative impacts would be less than significant (refer to Section IV.Q Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Accordingly, based on the analysis above, the Modified Project would not result in any new significant impacts with respect to solid waste, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to solid waste:

PDF P-2: A minimum of 20 percent of all Construction Specifications Institute (CSI) divisions three through ten building materials and products for development, measured by cost, shall consist of pre-consumer and post-consumer recycled content or shall be manufactured within a 500-mile radius of the Project Site.

PDF P-3: During operation, the Modified Project shall:

- Divert solid waste from landfills through robust recycling, the donation of durable goods, and implementing a front-of-house composting program that includes sourcing biodegradable concessions packaging. The composting program shall incorporate appropriate odor management practices to reduce odor emissions at adjacent receptors. Examples of such practices include nutrient balance, temperature, moisture content, and aeration control.
- Utilize a minimum of 90 percent of on-going consumable paper, janitorial, and lighting products that meet the following criteria:
  - Bio-based materials and/or chemicals
  - Minimal presence of exposure to potentially harmful chemicals
  - No Volatile Organic Compounds (VOC)
  - Biodegradable
  - Non-toxic
  - Low flammability

The following mitigation measures were included in the Certified EIR to further reduce the Original Stadium Project's less than significant impacts with respect to solid waste. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP for the Modified Project included in Appendix A of the Modified Project Addendum, but have been revised as follows to reflect the specific solid waste diversion commitment of the Modified Project:

EIR Mitigation Measure MM I.4-1: The Applicant shall develop a construction and demolition debris recycling program to divert a minimum of 75 percent of construction related solid waste and demolition debris from area landfills.

EIR Mitigation Measure MM I.4-2: The Applicant shall develop an operational project recycling plan that includes the design and allocation of recycling collection and storage space in the Project. The Applicant shall demonstrate through annual compliance reports submitted to the City of Los Angeles Department of Public Works, Bureau of Sanitation, an annual operational diversion rate of at least 40 percent.

3. Findings

Although the Modified Project would not result in significant impacts to solid waste disposal prior to mitigation, mitigation measures have nonetheless been incorporated into the Modified Project that further reduce these less than significant environmental effects, as identified in the Certified EIR and Modified Project Addendum.

4. Rationale for Findings

Construction and implementation of the Project would involve less than significant impacts with respect to solid waste disposal. Nonetheless, the Project proposes to require the Applicant to develop a construction and demolition debris recycling program and an operational project

recycling plan to ensure further that already insignificant impacts related to solid waste would remain less than significant.

5. Reference

For a complete discussion of impacts of the Project on solid waste disposal, please see Section IV.I.4 of the Certified EIR and Section IV.P and IV.Q of the Modified Project Addendum.

F. Public Utilities—Energy (Operation and Cumulative)

1. Description of Environmental Effects

The Certified EIR determined that peak and average electricity and natural gas demand from the Project Site would not increase since average and maximum attendance levels at the Project Site under the Original Stadium Project would be substantially similar to existing conditions (i.e., operation of the Sports Arena). Therefore, the Certified EIR determined that existing electricity and natural gas infrastructure and supplies would be able to accommodate the Original Stadium Project's energy demand, and impacts related to energy would be less than significant. While impacts would be less than significant, the Certified EIR included mitigation measures to reflect LADWP-recommended energy efficiency features, which would further reduce impacts. As the Modified Project includes design changes to the proposed stadium, changes to the stadium's operational program, and additional construction associated with the ancillary uses, the Modified Project could result in additional energy consumption beyond levels analyzed in the Certified EIR. Accordingly, the Modified Project Addendum presents an analysis of the operational-related energy consumption of the entire Modified Project, including the proposed stadium.

Operational impacts related to energy are assessed in terms of both peak daily consumption (in relation to infrastructure capacity) and annual consumption (in relation to supplies and overall energy efficiency). With regard to peak daily consumption, as is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of approximately 22,000 seats, which is within the historic peak attendance level of the Sports Arena (i.e., a maximum attendance of 55,132 attendees was recorded in 2009, as shown in Table II-3 in the Certified EIR). In addition, the Modified Project would implement energy conservation features under the Los Angeles Green Building Code that were not required when the Original Stadium Project was approved. Therefore, energy impacts with respect to the stadium portion of the Modified Project during a maximum activity day (i.e., event day) would not represent a substantial increase in energy consumption compared to existing conditions, consistent with the Certified EIR's analysis.

However, additional event-day electricity and natural gas consumption beyond levels analyzed in the Certified EIR would result from concurrent operation of the ancillary uses proposed as part of the Modified Project. Although the estimated electricity and natural gas consumption of the stadium would not change compared to levels analyzed under the Certified EIR, for informational purposes, the analysis provided in the Modified Project Addendum presents the estimated peak daily electricity and natural gas consumption of the entire Modified Project, including the stadium component, on an event day.

As shown in Table 29 and Table 30 on pages 200 and 201 of the Modified Project Addendum, the Modified Project's total estimated electricity demand on an event day would be approximately 42,263 kilowatt-hours (kWH), of which 37,003 kWh would be associated with the stadium and 5,260 kWh would be associated with the proposed ancillary uses. The Modified Project's total

estimated natural gas demand on an event day would be approximately 140 therms per day, of which 16 therms would be associated with the outdoor stadium and 124 therms would be associated with the proposed ancillary uses. To provide a conservative analysis, these estimates are based on gross square footage (rather than floor area). Furthermore, they conservatively do not account for implementation of the energy conservation features discussed below.

According to the Infrastructure Report, off-site electrical and natural gas service is available for the Project Site, and LADWP and SCG have confirmed that existing infrastructure has adequate capacity to serve the peak demand of the Modified Project (see Appendix R of the Modified Project Addendum, Infrastructure Report). As stated in the Certified EIR, depending on the exact location and size of the requested services (to be determined as site plans are finalized), the Applicant may be financially responsible for some on site infrastructure improvements. Such improvements may include installation of meters and/or service lateral connections, or the relocation of service laterals or the undergrounding of power lines necessary to serve the Project Site. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.3, Public Utilities—Energy Conservation, of the Certified EIR), impacts with respect to electricity and natural gas infrastructure would be less than significant under the Modified Project (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). No mitigation measures are required.

While the stadium's energy demand on an event day would be substantially the same as that of the Original Stadium Project (i.e., comparable or less than existing event-day demand under the Sports Arena), the number of events held at the stadium on an annual basis could increase under the Modified Project as compared to levels projected under the Original Stadium Project. As shown in Table II-2 and Table II-3 in Section II, Project Description, of the Certified EIR, the existing Sports Arena hosts an average of 69 events a year (29 weekday events and 40 weekend events). Based on the programming proposed for the Modified Project, up to 88 stadium events could occur each year. In addition, the proposed ancillary uses would be operational up to seven days a week. Therefore, the following analysis estimates the annual operational energy consumption for the entire Modified Project to assess (1) whether adequate energy supplies are available to serve the Modified Project, and (2) the extent to which the Modified Project would incorporate energy conservation features to avoid wasteful, inefficient, and unnecessary consumption of energy. In accordance with Appendix F of the CEQA Guidelines, the estimate of the Modified Project's annual energy consumption includes estimated transportation energy consumption.

As shown in Table 31 on page 203 of the Modified Project Addendum, a total of approximately 5,019,673kWh of electricity, approximately 50,978 therms of natural gas, approximately 1,057,248 gallons of gasoline, and approximately 180,542 gallons of diesel fuel would be consumed annually during Modified Project operation. The annual electricity and natural gas shown in Table 31, reflects the Modified Project's consumption of electricity and natural gas after implementation of project design features, regulatory requirements, and mitigation measures, which are provided below. The Modified Project would comply with the required measures of the 2013 Los Angeles Green Building Code and implement additional efficiency measures to achieve a reduction in energy consumption that is greater than 25 percent relative to the ASHRAE 90.1-2007 standard, but no less than minimum compliance with the 2013 California energy efficiency standards (Title 24, Part 6). The 2013 CALGreen Code (applicable to the Modified Project) is anticipated to be 30 percent more efficient than the 2008 Title 24 (applicable to the Original Stadium Project) for nonresidential construction. Therefore, while the Modified Project would

represent an increase in annual energy consumption over existing conditions with the Sports Arena due to the additional number of events and proposed ancillary uses, the Modified Project would be more energy efficient than both the Sports Arena and the Original Stadium Project. With regard to transportation energy consumption, the gasoline and diesel fuel usage estimates provided reflect internalization and the use of transit by people visiting the Project Site. In particular, the Expo Light Rail Line had not been completed when the Original Stadium Project was analyzed in the Certified EIR. This rail line now provides substantial access to the Project vicinity via public transit and provides a substantial source of conservation of transportation energy. As shown in Table 31, the Modified Project's conservation features would result in a reduction of energy use of 12 to 20 percent. Therefore, the Modified Project would not result in the wasteful, inefficient, or unnecessary consumption of energy.

With respect to energy supplies, the Modified Project would result in a net increase in 2,770,954 kWh/year in electricity consumption when accounting for the removal of the existing Sports Arena. Based on LADWP's 2014 Power Integrated Resource Plan, LADWP forecasts that its total energy sales in 2018 (the Modified Project's buildout year) will be 22,807 gigawatt-hours (GWh) of electricity. As such, the Modified Project-related net increase in annual electricity consumption of 2,770,954 kWh/year would represent approximately 0.01 percent of LADWP's projected sales (i.e., supplies) in 2018. Therefore, it is anticipated that LADWP's existing and planned electricity supplies would be sufficient to support the Modified Project's electricity demand. Impacts would be less than significant and no mitigation is required (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum).

As stated above, the Modified Project's estimated net increase in annual gas consumption is 50,978 therms. Based on the California Energy Commission's staff demand forecast for the 2014–2024 period, annual natural gas supply within SoCalGas's service area is estimated to be approximately 7,161 million therms in 2018. Therefore, the Modified Project would account for approximately 0.001 percent of the 2018 forecasted consumption in SCG's planning area. Therefore, it is anticipated that SCG's existing and planned natural gas supplies would be sufficient to support the Modified Project's net increase in demand for natural gas. Impacts would be less than significant and no mitigation is required (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum).

Furthermore, with respect to cumulative impacts, development of the Modified Project and related projects would increase the use of electricity and natural gas. Nevertheless, as required by the City Building Code, the Modified Project and all related projects would incorporate Title 24 Energy Efficiency Standards into their project design. In addition, new buildings would be subject to the requirements of the City's Green Building Ordinance which incorporates CALGreen requirements. Therefore, the Modified Project and related projects would achieve the highest standards of energy efficiency mandated by applicable regulations. Furthermore, as discussed above, the net increase in electricity and natural gas usage associated with the Modified Project would represent approximately 0.01 percent of LADWP's projected sales (i.e., supplies) in 2018 and approximately 0.001 percent of the 2018 forecasted consumption in SCG's planning area, respectively. Therefore, the Modified Project's impacts with respect to energy would not be cumulatively considerable, and cumulative impacts would be less than significant (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Based on the analysis above, and consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.3, Public Utilities—Energy Conservation, of the Certified EIR), impacts with respect to operational-related energy demand would be less than significant under the Modified Project (refer to Section IV.P Comparative Analysis of Modified Project Impacts, Utilities and Service Systems, of the Modified Project Addendum). Accordingly, the Modified Project would not result in any new significant impacts with respect to operational-related energy demand, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Project Design Features and Mitigation Measures

The Modified Project would incorporate sustainability as part of its key design and operation criteria. In so doing, the Modified Project would comply with Title 24 of the California Code of Regulations, including Part 6 (Energy Efficiency Standards for Residential and Nonresidential Buildings) and Part 11 (California Green Building Standards Code, commonly referred to as the CALGreen Code), as well as the City of Los Angeles Green Building Code (2013), which incorporates the CALGreen Code into Chapter IX of the LAMC, in effect at the time of the Modified Project's permit application. The Modified Project would also be designed to be capable of achieving at least Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)-BD+C or LEED-ND Rating System (v.3), or equivalent green building standards.

The Modified Project would also implement the following Project Design Features related to energy conservation:

PDF P-4: The Modified Project shall explore the feasibility of additional energy efficiency options as applicable to demonstrate compliance with AIA2030 challenge goal of 60-percent reduction from the 2003 Commercial Building Energy Consumption Standard (CBECS) for "Public Assembly—Recreation" facilities. The CBECS baseline for similar building types is 65 kBtu/sf. In order to achieve a 60-percent reduction the Modified Project shall investigate setting an energy consumption goal of 26 kBtu/sf.

PDF P-5: The Modified Project shall explore the feasibility of achieving a 10-percent reduction in energy use below the 2013 California energy efficiency standards (Title 24, Part 6). In so doing, the Modified Project shall register for the savings of the design program.

The following mitigation measures were included in the Certified EIR to further reduce the Original Stadium Project's less than significant impacts with respect to energy. These mitigation measures would continue to be implemented as part of the Modified Project and has been incorporated into the MMP for the Modified Project included in Appendix A of the Modified Project Addendum, but have been revised as follows to reflect current City conservation requirements:

EIR Mitigation Measure MM I.3-1: Built-in appliances, refrigerators, and space-conditioning equipment shall exceed the minimum efficiency levels mandated in the California Code of Regulations.

EIR Mitigation Measure MM I.3-2: The Applicant shall install high-efficiency air conditioning controlled by a computerized energy-management system in the office and retail spaces that provides the following:

- A variable air-volume system that results in minimum energy consumption and avoid hot water energy consumption for terminal reheat;
- A 100-percent outdoor air-economizer cycle to obtain free cooling in appropriate climate zones during dry climatic periods;
- Sequentially staged operation of air conditioning equipment in accordance with building demands;
- The isolation of air conditioning to any selected floor to floors; and
- Where feasible, reduce building conditioning load by reducing the amount of conditioned building area.

EIR Mitigation Measure MM I.3-3: The Proposed Project shall be designed in a manner that utilizes Cascade (i.e., passively transferred) ventilation air from high-priority areas before exhausted, thereby decreasing the volume of ventilation air required. For example, air could be passively transferred from occupied space to corridors then to mechanical spaces before being exhausted.

EIR Mitigation Measure MM I.3-4: The Applicant shall incorporate a recycle lighting system heat for space heating during cool weather. Exhaust lighting-system heat from buildings, via ceiling plenum, shall be used to reduce cooling loads in warm weather.

EIR Mitigation Measure MM I.3-5: The Applicant shall install low and medium static-pressure terminal units and ductwork to reduce energy consumption by air-distribution systems.

EIR Mitigation Measure MM I.3-6: The Applicant shall ensure that buildings are well sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads.

EIR Mitigation Measure MM I.3-7: The Applicant shall conduct a performance check of the installed space-conditioning system prior to the issuance of the certificate of occupancy to ensure that energy-efficiency measures incorporated into the Project operate as designed.

EIR Mitigation Measure MM I.3-8: Exterior walls shall be finished with light-colored materials and high-emissivity characteristics to reduce cooling loads. Interior walls shall be finished with light-colored materials to reflect more light and, thus, increase lighting efficiency.

EIR Mitigation Measure MM I.3-9: White, high albedo, and reflective material shall be used for roofing in order to meet California standards for reflectivity and emissivity to reject heat, and be Energy Star rated.

EIR Mitigation Measure MM I.3-10: Thermal insulation that exceeds requirements established by the California Code of Regulations shall be installed in walls and ceilings in accordance with the following specifications as feasible:

- Exterior walls abutting to conditioned spaces: R-60
- Roof areas abutting conditioned spaces: R-80[1]

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[1] Insulation is rated in terms of thermal resistance, called R-value, which indicates the resistance to heat flow. The higher the R-value, the greater the insulating effectiveness. The R-value of thermal insulation depends on the type of material, its thickness, and its density.

EIR Mitigation Measure MM I.3-11: Window systems shall be designed to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.

EIR Mitigation Measure MM I.3-12: The Applicant shall install heating-rejecting window treatments, such as films, blinds, draperies, or other on appropriate exposures.

EIR Mitigation Measure MM I.3-13: The Applicant shall install light-emitting diode (LED), fluorescent, and high-intensity-discharge (HID) lamps, which give the highest light output per watt of electricity consumed, wherever possible including all street and parking lot lighting to reduce electricity consumption. Reflectors shall be used to direct maximum levels of light to work surfaces.

EIR Mitigation Measure MM I.3-14: The Applicant shall install photosensitive controls and dimmable electronic ballasts to maximize the use of natural daylight available and reduce artificial lighting load.

EIR Mitigation Measure MM I.3-15: The Applicant shall install occupant-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption

EIR Mitigation Measure MM I.3-16: The Applicant shall install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.

EIR Mitigation Measure MM I.3-17: Mechanical systems (HVAC) and lighting building shall be controlled with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.

EIR Mitigation Measure MM I.3-18: The Applicant shall incorporate windowless walls or passive solar inset of windows into the Project for appropriate exposures.

EIR Mitigation Measure MM I.3-19: Design Project shall focus pedestrian activity within sheltered outdoor areas.

3. Findings

Although the Modified Project would not result in significant impacts to Public Utilities – Energy Conservation prior to the implementation of mitigation measures, mitigation measures have nonetheless been incorporated into the Project which further reduce these less than significant environmental effects of the Project upon Public Utilities – Energy Conservation, as identified in the Certified EIR and Modified Project Addendum.

4. Rationale for Findings

Although the Modified Project would have a less than significant impact on public utilities' energy, mitigation measures were included in the Certified EIR to further reduce the Original Stadium Project's less-than-significant impacts with respect to energy. Like the Original Stadium Project, the Modified Project would accordingly incorporate the above described mitigation measures to reflect current City of Los Angeles conservation requirements and to further reduce the project's less than significant impacts.

5. Reference

For a complete discussion of Project impacts on Public Services – Energy Conservation, please see Section IV.M. of the Certified EIR and Section IV.P and IV.Q of the Modified Project Addendum.

V. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

A. Aesthetic Impacts—Light and Glare (Operation)

1.

2. Description of Environmental Effects

The Certified EIR for the Original Stadium Project concluded that impacts with respect to lighting during operation would be less than significant through compliance with mitigation measures (refer to Section IV.A, Aesthetics, of the Certified EIR). As set forth on page IV.A-22 the Certified EIR, impacts with respect to light and glare would be significant if a project would result in a new substantial source of light or glare, which would adversely affect day or nighttime views in the area. In the context of the applicable thresholds identified in the Certified EIR and applicable LAMC requirements related to lighting, an Environmental Impact Lighting Study (Lighting Study) was prepared for the Modified Project by Francis Krahe & Associates, dated August, 2015, which is included in Appendix B of the Modified Project Addendum, to determine whether potential lighting and glare from Modified Project operations would result in any new significant impacts that were not identified in the Certified EIR, or whether the previously identified significant impacts would be substantially more severe. The Lighting Study specifically considers light and glare impacts to be significant if the Modified Project: (1) generates light intensity levels of 2.0 foot-candles or more at the property boundary from exterior on site light sources; (2) generates light emissions associated with an illuminated sign that produces a light intensity exceeding 3.0 foot-candles at the property line of a residence or other sensitive receptor; (3) creates new high contrast conditions visible from a field of view from sensitive receptor; or (4) incorporates substantial amounts of highly reflective building materials or signage (i.e., daytime glare) in areas that are highly visible to off-site glare-sensitive uses.

As discussed in the Certified EIR, the Original Stadium Project would include stadium lights and other sources of lighting such as pole-mounted lighting for parking lot areas, pedestrian walkways, and security lighting for pedestrian plaza areas that could result in light spillage onto adjacent properties and land uses. In particular, when compared with the existing indoor Sports Arena facility, nighttime events and games held at the Original Stadium Project would generate a high degree of artificial lighting in the night sky. However, under the Original Stadium Project, proposed lighting would be designed in a manner that limits spillover and light pollution to the maximum extent feasible. For example, the Certified EIR explained that the lighting system would employ directional lighting fixtures to illuminate the field level. In addition, Mitigation Measure A-1

required that outdoor lighting shall be designed and installed with shielding such that the light source cannot be seen from adjacent residential properties or the public right-of-way. With regard to daytime glare, Mitigation Measure A-2 limited the types of building materials to be employed in order to address potential daytime glare impacts. Thus, with the implementation of these measures, the Certified EIR concluded that Original Stadium Project's potential aesthetic impacts associated with light and daytime glare would be less than significant.

As with the Original Stadium Project, the Modified Project includes lighting and signage to support stadium operations. Lighting would include lighting of the stadium, including the field and associated amenities and ancillary uses (e.g., outdoor dining and seating areas, plazas, and walkways). New signage would be provided as part of a signage program for the Modified Project to emphasize the event and entertainment-oriented aspect of the Project that would be implemented via the proposed SUD. As described in detail in Section III, Project Description, on page 4 of the Modified Project Addendum, and within Appendix C of the Modified Project Addendum, signage types for the Modified Project could include identification signs, temporary event signs, electronic digital displays, changeable message LED boards, static signs, identification signs and retail/tenant identification signs, with both on site and off-site signage allowed. Lighting emissions resulting from the illuminated signage are expected to be emitted from three types of signs: front-lit signs, electronic digital displays, and changeable message LED boards.

A detailed analysis of the potential light and glare impacts associated with proposed lighting and signage under the Modified Project was provided in the Lighting Study included as Appendix B of the Modified Project Addendum. To analyze potential lighting impacts, both illuminance and glare from the Modified Project were evaluated. Also included in the evaluation of potential glare impacts is an analysis of daytime glare.

a. Illuminance Impacts

The analysis in the Modified Project Addendum assumed incorporation of specific Project Design Features relative to lighting that would be implemented as part of the Modified Project and would reduce impacts associated with lighting. Specifically, as set forth in Project Design Feature A-2, stadium field lighting would be designed based on Major League Soccer (MLS) standards that stipulate the use of high performance lights with good color and good glare control. In accordance with Project Design Feature A-3, the Project's field lighting would include high-intensity LED fixtures in specified areas and a no lighting fixture zone would be specified as shown in Figure 34 of the Lighting Study. Furthermore, in accordance with Project Design Feature A-4, design elements would be incorporated to limit the direct view of the light source surface of all stadium light fixtures and to ensure that the light source cannot be seen from adjacent residential properties or the public right-of-way. In accordance with Project Design Feature A-5, all light sources, including illuminated signage, would comply with CALGreen (Part 11 of Title 24, California Code of Regulations). Finally, in accordance with Project Design Feature A-6, signage brightness would not exceed 800 candelas per square meter at night.

As summarized in Table 3 on page 44 of the Modified Project Addendum, potential illuminance impacts resulting from field and other on-site lighting proposed under Modified Project would be well below the 2.0-foot-candle significance threshold. In addition, the maximum calculated illuminance would be less than the IESNA recommendations of 8 lux (0.76 foot-candle) for Lighting Zone 3 in which the Project Site is located. As discussed in

detail in the Lighting Study, the highest illumination levels would be along Figueroa Street. However, this area is already well illuminated with existing horizontal illuminance levels above 3.0 foot-candles directly across Figueroa Street from the Project Site. Furthermore, Mitigation Measures A-1 and A-2 set forth in the Certified EIR would continue to be incorporated to ensure that impacts associated with illumination from on-site lighting would be less than significant. Thus, no additional mitigation measures are required (refer to Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics, of the Modified Project Addendum).

Lighting emissions resulting from the illuminated signage proposed by the Modified Project are expected to be emitted from three types of signs: front-lit signs, electronic digital displays, and changeable message LED boards. In accordance with Project Design Feature A-5, illuminated signage would comply with the requirements outlined in CALGreen, and as such, would require 65 percent dimming of signage at night. In addition, in accordance with Project Design Feature A-6, signage brightness would not exceed 800 candelas per square meter at night. As described in detail in the Lighting Study and summarized in Table 4 on page 45 of the Modified Project Addendum, lighting impacts resulting from the proposed illuminated signage on neighboring residential properties would be below the 3.0 foot-candle threshold. Thus, potential illumination impacts associated with signage would be less than significant and no mitigation measures are required (refer to Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics, of the Modified Project Addendum).

b. Glare Impacts

The Modified Project would include a variety of lighting types, including high-intensity LED field lighting and LED pole lighting. However, as discussed in detail in the Lighting Study, the design of the Modified Project, together with the proposed Project Design Features, would limit direct view of any light sources from areas outside of the Specific Plan boundary. Specifically, as demonstrated by the detailed analysis in the Lighting Study, the receptors to the east of Figueroa Street would not experience high glare conditions due to design features of the Modified Project that screen the field surface and direct view of the field light fixtures, the use of opaque façades and walls that eliminate direct light, and the use of directed and shielded lighting per CALGreen. As such, the resulting contrast from lighting under the Modified Project would be low to medium, resulting in no glare impacts from new lighting sources. With respect to potential glare from signage, as stated above, in accordance with Project Design Feature A-6, signage brightness would not exceed 800 candelas per square meter at night, which would ensure that adjacent sensitive receptors do not experience substantial glare effects from Modified Project signage. In addition, as required by the Outdoor Advertising Act, Modified Project signage would not contain flashing images that are visible from freeways. Electronic digital display signage with changing messages, including those visible from the freeway, would consist of static images that remain at a constant brightness for no less than 8 seconds, and then complete an instant refresh to the next image which would then be static for no less than 8 seconds. Accordingly, potential nighttime glare impacts from the Modified Project, including the proposed signage program, would be less than significant and no mitigation measures are required (refer to Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics, of the Modified Project Addendum).

With regard to potential impacts from daytime glare, Mitigation Measure A-2 in the Certified EIR requires that the exterior of the proposed structure shall be constructed of materials including, but not limited to high-performance and/or non-reflective tinted glass (no mirror-like

tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat. With continued implementation of this Mitigation Measure, potential daytime glare impacts under the Modified Project would be less than significant (refer to Section IV.A Comparative Analysis of Modified Project Impacts, Aesthetics, of the Modified Project Addendum).

3. Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to aesthetics:

PDF A-1: The perimeter of the Project Site shall be screened during primary construction activities to limit views of construction activities.

PDF A-2: Stadium field lighting shall be designed based on Major League Soccer (MLS) standards that stipulate the use of high performance lights with good color and good glare control.

PDF A-3: The Project's field lighting shall be implemented in accordance with the zones established in Figure 34 of the Lighting Study.

PDF A-4: Design elements shall be incorporated to limit the direct view of the light source surface for all stadium light fixtures and to ensure that the light source cannot be seen from adjacent residential properties or the public right-of-way. Such design elements could include one or more of the following: use of light fixtures that comply with the ratings specified in CALGreen Table 5.106B; use of light fixtures with a focused output where the output angles greater than 20 degrees from beam centerline do not exceed 500 candelas; glare shields and louvers attached to the front face of the light fixture; and/or architectural screens to conceal the direct view of the LED light fixtures from the center of Figueroa Street to the east and the Coliseum District Specific Plan boundary to the north, south, and west.

PDF A-5: All light sources, including illuminated signage, shall comply with CALGreen (Part 11 of Title 24, California Code of Regulations).

PDF A-6: Signage luminance shall not exceed 800 candelas per square meter after sunset or before sunrise.

The following mitigation measures were included in the Certified EIR to reduce potential aesthetics impacts to less than significant levels. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP included with the Modified Project Addendum (see Addendum Appendix A):

MM A-1: Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.

MM A-2: The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

4. Findings

Changes or alternations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the potentially significant effects of implementation of the Project on light and glare, as identified in the Certified EIR for the Original Stadium Project and the Modified Project Addendum, to less than significant levels.

5. Rationale for Findings

Mitigation Measure A-1 is recommended to ensure lighting impacts from exterior and field lighting fixtures are minimized to the maximum extent possible. Mitigation Measures A-2 is recommended to mitigate any potential impacts of highly reflective stadium materials, and the impacts of glare on surrounding land uses and drivers, to a less than significant level. With implementation of the above mitigation measures, the Modified Project would result in less than significant impacts with respect to light and glare. Further, the Modified Project would not result in any new significant impacts with respect to light and glare, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

6. Reference

For a complete discussion of Project impacts from light and glare, please see Section IV.A of the Certified EIR and Section IV.A of the Modified Project Addendum.

B. Hazards and Hazardous Materials (Construction, Operation, Cumulative)

1. Description of Environmental Effects

Significant impacts with respect to hazards and hazardous materials could occur if a project were to expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. The Certified EIR for the Original Stadium Project concluded that impacts with respect to hazards and hazardous materials would be less than significant under the Original Stadium Project through compliance with applicable regulatory requirements (refer to Section V, General Impact Categories, of the Certified EIR). The Certified EIR analyzed the demolition of the existing Sports Arena and stated that there is a potential for the Sports Arena to contain asbestos containing materials (ACMs) and lead. Subsequent to the preparation of the Certified EIR, an ACM Survey was conducted for the Sports Arena in January 2012 (see Appendix L of the Modified Project Addendum), which confirmed that ACMs are present in some ceiling materials, roofing materials, ceiling tiles, floor tiles and mastic, and insulation.

As stated in the Certified EIR, on-site ACMs must be removed by licensed contractors using specific control methods prescribed in SCAQMD Rule 1403, which would ensure that impacts related to ACMs would be less than significant. As with the Original Stadium Project, construction of the Modified Project would involve demolition of the Sports Arena and compliance with SCAQMD Rule 1403, which would ensure impacts would be less than significant for the Modified Project. With regard to lead-based paint, prior to issuance of a demolition permit, the Applicant would be required to submit verification to the City of Los Angeles Department of Building and Safety that a lead-based paint survey has been conducted for the Sports Arena. If lead-based paint is found, the Applicant must comply with all procedural requirements and regulations for proper lead removal and disposal, which would ensure that impacts related to lead-based paint would be less than significant. Construction of the Modified Project would conform to these

requirements. Furthermore, similar to the Original Stadium Project, 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 during construction of the Modified Project. Like with the Original Stadium Project, all potentially hazardous materials associated with construction of the Modified Project would be used and stored in accordance with applicable regulatory requirements and manufacturers' instructions. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), impacts with respect to handling ACM, lead-based paint, and hazardous materials during construction would be less than significant under the Modified Project through compliance with existing regulatory requirements (refer to Section IV.H Comparative Analysis of Modified Project Impacts, Hazards and Hazardous Materials, of the Modified Project Addendum). No mitigation measures are required.

The Certified EIR also analyzed potential impacts related to hazards and hazardous materials during operation of the Original Stadium Project. As stated therein, minor amounts of hazardous materials such as motor oil, paints, solvents, pesticides, herbicides and fertilizers may be used at the Project Site. However, the use and disposal of such materials would be in compliance with the State Health and Safety Code, the LAMC, and the Uniform Fire Code (UFC). Therefore, the Certified EIR concluded that operation of the Original Stadium Project would not result is any significant impacts associated with hazards or hazardous materials. The general use of the stadium and the types and quantities of hazardous materials that could be used and stored in association with stadium operations would not change with the design and use modifications proposed under the Modified Project. The Modified Project also would provide ancillary uses to the proposed stadium analyzed in the Certified EIR, including office and conference facilities, a museum, and retail and restaurant uses. These types of land uses are not typically associated with the use and handling of substantially hazardous materials. Rather, the types and quantities of hazardous materials that could be used during operation of the ancillary uses would be similar to those analyzed in the Certified EIR (e.g., motor oil, paints, solvents, pesticides, herbicides and fertilizers), and would be characteristic of typical commercial land uses. Furthermore, consistent with the Certified EIR's analysis, all potentially hazardous materials associated with operation of the Modified Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), impacts with respect to the use, handling, and storage of hazardous materials would be less than significant under the Modified Project through compliance with existing regulatory requirements (refer to Section IV.H Comparative Analysis of Modified Project Impacts, Hazards and Hazardous Materials, of the Modified Project Addendum). No mitigation measures are required.

Subsequent to the preparation of the Certified EIR, a Phase I Environmental Site Assessment (Phase I ESA) dated August 26, 2015 was conducted for the Project Site. The Phase I ESA is included in Appendix M of the Modified Project Addendum. To identify potential on site hazards, the Phase I ESA included interviews with property owner representatives, a review of environmental records, a site reconnaissance, historical reviews, and interviews with public agency personnel. The Phase I ESA identified the following environmental concerns on the Project Site:

- Various containers of paint, oil, coolant, gasoline, and propane, as well as batteries and tires, that would be removed and disposed of in conjunction with demolition activities;
- Exterior evaporate Chillers that contain ACMs (not previously identified in the ACM Survey discussed above) located north of the VIP Parking Lot;
- Leaking piping containing glycol located underneath the Sports Arena floor; and
- The potential presence of a historical gasoline tank on the Project Site related to development prior to construction of the Sports Arena. No records were found related to the potential gasoline tank; therefore, it is unknown if it was an above-ground storage tank (AST) or underground storage tank (UST). According to the Phase I ESA, the approximate location of the tank was near the southern boundary line of the Project Site.

No significant stains or spills were observed in the areas where hazardous materials are stored on site, and all materials appeared to be property stored and maintained. During demolition activities under the Modified Project, hazardous materials on the Project Site would be handled, transported, and disposed of in accordance with manufacturers' instructions and applicable federal, state, and local regulations. The Chillers, glycol, and glycol-related materials would also be removed and disposed of in accordance with applicable regulations. As stated above, on site ACMs must be removed by licensed contractors using specific control methods prescribed in SCAQMD Rule 1403, which would ensure that impacts related to ACMs would be less than significant. With regard to the potential historical gasoline storage tank on site, the Phase I ESA recommended that a geophysical survey be conducted to further evaluate the area for a possible tank excavation. Accordingly, Mitigation Measures MP-H-1 and MP-H-2 have been incorporated into the Modified Project's MMP included as Appendix A to the Modified Project Addendum. With the implementation of these measures, the Modified Project's potential impacts with respect to hazards and hazardous materials would be less than significant. Additionally, the Project Site is not within a Methane Zone or Methane Buffer Zone identified by the City, so no further analysis of issues related to methane are required (refer to Section IV.H Comparative Analysis of Modified Project Impacts, Hazards and Hazardous Materials, of the Modified Project Addendum).

Further, as with the Original Stadium Project, all related development located within the vicinity of the Project Site would be subject to local, regional, State, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, development of the Modified Project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Based on the above, with implementation of Mitigation Measures MP-H-1 and MP H-2, the Modified Project would not result in any new significant impacts with respect to hazards and hazardous materials, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Mitigation Measures

The Modified Project would implement the following Mitigation Measures to mitigate potential impacts to hazards and hazardous materials to a less-than-significant level:

MM MP-H-1: Prior to the issuance of a demolition permit, a geophysical survey shall be prepared in the area of the identified potential historical gasoline tank (i.e., near the southern boundary line of the Project Site). If a storage tank is identified during the geophysical survey or uncovered during subsequent construction and/or demolition activities, the tank shall be removed

(abandoned) in accordance with applicable federal, state, and local laws, to the satisfaction of the California Department of Conservation Division of Oil, Gas, and Geothermal Resources (DOGGR), the South Coast Air Quality Management District (SCAQMD), the Los Angeles Regional Water Quality Control Board (RWQCB), and/or the City of Los Angeles Fire Department (LAFD), as applicable. Soil sampling of the tank excavation site shall be completed by personnel appropriately trained in accordance with the Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response Standard (HAZWOPER). If contamination is detected above acceptable regulatory levels, remediation activities shall be conducted. The remediation could consist of excavation and disposal of impacted soil; in-situ treatment; and/or vapor extraction. If necessary, remedial efforts shall be conducted under the oversight of regulatory agencies including, but not limited to, the Department of Toxic Substances Control (DTSC); the LAFD; and the RWQCB.

MM MP-H-2: If soil contamination is identified during the soil sampling procedures outlined in Mitigation Measure MP-H-1, prior to issuance of a permit(s) for activities involving construction dewatering, evidence shall be provided to the Los Angeles Department of Building and Safety that a valid National Pollutant Discharge Elimination System (NPDES) or Industrial Waste Discharge Permit is in place. The NPDES or Industrial Waste Discharge Permit shall include provisions for evaluating the groundwater for potential contamination and, if necessary, the need for treatment of dewatering discharge.

3. Findings

Changes or alternations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the potentially significant effects of implementation of the Project from hazardous materials, as identified in the Certified EIR for the Original Stadium Project and the Modified Project Addendum, to less than significant levels.

4. Rationale for Findings

With implementation of Mitigation Measures MP-H-1 and MP-H-2, the Modified Project would result in less than significant impacts with respect to hazards and hazardous materials. Accordingly, the Modified Project would not result in any new significant impacts with respect to hazards and hazardous materials, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

5. Reference

For a complete discussion of impacts from hazardous materials, please see Section IV.A of the Certified EIR and Section IV.H and IV.Q of the Modified Project Addendum.

C. Hydrology and Water Quality (Construction, Operation, Cumulative)

1. Description of Environmental Effects

a. Construction

The Certified EIR for the Original Stadium Project concluded that impacts with respect to hydrology and water quality would be less than significant during construction of the Original Stadium Project through compliance with applicable regulatory requirements (refer to Section

IV.E, Hydrology and Water Quality, of the Certified EIR). Mitigation Measures E-1 and E-3 are included in the Certified EIR to further ensure implementation of the applicable regulatory requirements that support this conclusion (i.e., compliance with a SWPPP and NPDES waste discharge requirements, respectively). The thresholds on which this analysis was based are stated on pages IV.E-8–IV.E-9 of the Certified EIR.

With regard to surface water hydrology and water quality impacts during construction, the Original Stadium Project was required to prepare and implement a SWPPP, as reflected in Mitigation Measure E-1 in the Certified EIR. The SWPPP would be prepared and implemented in compliance with the Construction General Permit administered by the State Water Resources Control Board (SWRCB). The SWPPP would include temporary controls, or BMPs, to address construction impacts to hydrology and water quality, particularly during soil disturbing activities when soils are exposed to wind, rain, and concentrated flows that cause erosion, and that would minimize the transmission of sediment into the storm drain system. The SWPPP control measures would be designed to convey the 25-yr and 50-yr rainfall events from the Project Site. Additionally, the SWPPP would also address proper usage and storage of common construction materials such as vehicle fluids (e.g., oil, grease, etc.), asphalt concrete and Portland cement concrete, paints, solvents and thinners, metals and plated products and fertilizers. Finally, the SWPPP would address construction related waste such as wastewater from vehicle cleaning operations, trash from material packaging, employee's meal breaks, slurries from sawing and grinding operations, wastewater/waste from concrete washout operations and sanitary waste. The Certified EIR concluded that following the implementation of Mitigation Measure E-1, which requires implementation of a SWPPP, impacts to surface water hydrology and water quality during construction would be less than significant under the Original Stadium Project.

Construction activities under the Modified Project would be substantially similar to those of the Original Stadium Project in terms of the amount of ground disturbance and the types of pollutants that could be introduced to the Project Site. As is the case for the Original Stadium Project, potential impacts to surface water quality and hydrology would be mitigated to a less-than-significant level through preparation and implementation of a SWPPP. Mitigation Measure E-1 from the Certified EIR has been incorporated into the Modified Project's MMP included as Appendix A to the Modified Project Addendum. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.E, Hydrology and Water Quality, of the Certified EIR), construction-related impacts with respect to surface water hydrology and water quality under the Modified Project would be less than significant through implementation of a SWPPP prepared to the satisfaction of LADBS, as reflected in Mitigation Measure E-1 of the Certified EIR (refer to Section IV.I, Comparative Analysis of Modified Project Impacts, Hydrology and Water Quality, of the Modified Project Addendum). No additional mitigation measures are required.

As it relates to impacts to groundwater during construction, the Certified EIR stated that the Project Site is not an area that provides substantial groundwater recharge. Furthermore, the project contractor would be required to comply with existing regulatory requirements pertaining to water quality that would ensure that the Original Stadium Project would not result in any significant impacts to groundwater. Such requirements include the preparation and implementation of a SWPPP as reflected in Mitigation Measure E-1 in the Certified EIR, and compliance with NPDES waste discharge requirements for construction dewatering, which is reflected in Mitigation Measure E-3 in the Certified EIR. Therefore, the Certified EIR

concluded that the Original Stadium Project would not adversely affect groundwater conditions with implementation of the aforementioned mitigation measures.

As discussed in the Hydrology and Water Quality Technical Memorandum (Hydrology Report) prepared for the Modified Project by Langan Engineering and Environmental Services, dated September 2, 2015, which is included in Appendix N of the Modified Project Addendum, and consistent with the analysis in the Certified EIR, appreciable groundwater recharge does not occur on the Project Site. Furthermore, as discussed above, the Modified Project's SWPPP would include BMPs for the proper handling, storage, and disposal of hazardous materials during construction to avoid subsurface contamination. With regard to the potential for encountering groundwater during construction, as discussed in the Hydrology Report, the proposed stadium under the Modified Project would be constructed within a portion of the excavation and footprint area currently occupied by the Sports Arena, consistent with the Original Stadium Project. The basement level of the Sports Arena currently extends to a depth of approximately 25 feet below grade level (approximately el 155). The excavation areas following removal of the Sports Arena not occupied by the proposed stadium footprint would be backfilled to existing grade. As discussed in Section IV.F, Geology and Soils, of the Modified Project Addendum (see page 69), based on the information provided in the Geotechnical Report, the excavation required for the proposed development would not extend deeper than the current below-grade areas of the Sports Arena. Both historical groundwater levels and recently monitored groundwater levels are well below the lowest proposed grade of the Modified Project (refer to Section IV.F, Geology and Soils, on page 69 of the Modified Project Addendum). Therefore, it is not expected that groundwater would be encountered during construction of the Modified Project. Nonetheless, the potential exists for shallower, perched water to be encountered at the Project Site depending on seasonal rainfall. Therefore, while not anticipated, temporary construction dewatering may be required. Construction dewatering, if required, would be performed using conventional gravity routing and collection in sump pits, with pumping performed as needed to dispose of any water accumulated in these areas, in accordance with Project Design Feature F-1 in Section IV.F, Geology and Soils, of the Modified Project Addendum. Additionally, Mitigation Measure E-3 from the Certified EIR has been incorporated into the Modified Project's MMP included as Appendix A to the Modified Project Addendum, which requires that construction dewatering comply with applicable NPDES permit requirements. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.E, Hydrology and Water Quality, of the Certified EIR), construction-related impacts with respect to groundwater under the Modified Project would be less than significant through compliance with Mitigation Measures E-1 and E-3 of the Certified EIR (refer to Section IV.I, Comparative Analysis of Modified Project Impacts, Hydrology and Water Quality, of the Modified Project Addendum). No additional mitigation measures are required.

Based on the analysis above, through the implementation of mitigation measures identified in the Certified EIR, construction of the Modified Project would not result in any new significant impacts with respect to hydrology and water quality, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

b. Operation

The Certified EIR for the Original Stadium Project concluded that impacts with respect to hydrology and water quality would be less than significant during operation of the Original Stadium Project through compliance with applicable regulatory requirements (refer to Section

IV.E, Hydrology and Water Quality, of the Certified EIR). Mitigation Measure E-2 is included in the Certified EIR to further ensure implementation of the applicable regulatory requirements that support this conclusion (i.e., compliance with Standard Urban Stormwater Mitigation Plan (SUSMP) requirements). The thresholds on which this analysis was based are stated on pages IV.E-8–IV.E-9 of the Certified EIR.

With regard to surface water quality, the Certified EIR stated that the Original Stadium Project would have the potential to introduce additional contaminants that could impact the urban runoff flows on the Project Site, such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides. As reflected in Mitigation Measure E-2 in the Certified EIR, the Original Stadium Project would be required to prepare and implement a SUSMP in accordance with the Los Angeles County RWQCB MS4 Program, which would reduce surface water quality impacts to a less-than-significant level. The Modified Project would introduce similar types of pollutants to the Project Site as the Original Stadium Project. As is typical of commercial developments with restaurant uses, anticipated pollutants would include pathogens, nutrients, pesticides, sediments, trash and debris, oxygen demanding substances and oil and grease. Like the Original Stadium Project, the Modified Project would be subject to Mitigation Measure E-2 in the Certified EIR and would be required to prepare and implement a SUSMP with permanent on site BMPs to reduce the quantity and improve the quality of rainfall runoff from the Project Site. Additionally, the Modified Project would be required to comply with the City's Low Impact Development (LID) Ordinance (Ord. No. 181899), which expanded the applicability of SUSMP requirements by imposing rainwater LID strategies on projects that require building permits. The LID Ordinance was adopted in November 2011 and officially became effective on May 12, 2012. LID consists of site design approaches and BMPs that are designed to address runoff and pollution at the source. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. The LID ordinance requires rainwater from a 0.75 inch rainstorm to be captured, infiltrated, and/or used on site at most developments and redevelopments where more than 500 square feet of hardscape is added. In so doing, the City's LID Manual prioritizes the following BMPs: infiltration systems, stormwater capture and use, high efficient biofiltration/bioretention systems, or a combination of the above. The Modified Project would incorporate one or more of these BMPs to achieve compliance with LID Ordinance requirements. Because runoff from the Project Site is currently untreated, implementation of the Modified Project would result in a beneficial impact with regard to surface water quality as compared to existing conditions. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.E, Hydrology and Water Quality, of the Certified EIR), operational impacts with respect to surface water quality under the Modified Project would be less than significant (and in fact beneficial) through implementation of applicable regulatory requirements, including compliance with a SUSMP prepared to the satisfaction of LADBS, as reflected in Mitigation Measure E-2 of the Certified EIR, and the City's LID Ordinance (refer to Section IV.I, Comparative Analysis of Modified Project Impacts, Hydrology and Water Quality, of the Modified Project Addendum). Mitigation Measure E-2 has been incorporated into the Modified Project's MMP included as Appendix A to the Modified Project Addendum. No additional mitigation measures are required.

With regard to surface water hydrology, as stated in the Certified EIR, the Project Site in its existing state is mostly impervious. Stormwater that is not absorbed in the pervious areas is collected as runoff and is conveyed via sheet flow to the City storm drainage systems in Hoover Street and Martin Luther King, Jr. Boulevard. The Sports Arena roof, the eastern

depressed areas, and some structured areas collect stormwater runoff into a building drainage system and utilize pumps to convey the stormwater to the existing surface drainage system. The Certified EIR concluded that permeable areas would slightly increase as compared to the existing conditions under the Original Stadium Project, thereby improving runoff conditions by reducing the flow to the storm drain system. Therefore, because stormwater runoff conditions would be improved compared to existing conditions, the Certified EIR determined that surface water hydrology impacts under the Original Stadium Project would be less than significant (refer to Section IV.I, Comparative Analysis of Modified Project Impacts, Hydrology and Water Quality, of the Modified Project Addendum). The Hydrology Report for the Modified Project analyzes post-development stormwater flows based on the Modified Project design. The amount of impervious surface area on site would be approximately the same under the Modified Project as compared to existing conditions. As shown in Table 10 on page 100 of the Modified Project Addendum, peak flow rates from the Project Site would not increase under the Modified Project during a 25- or 50-year storm event. Therefore, the Modified Project would not create nor contribute to stormwater runoff levels that would exceed the capacity of the existing storm water drainage systems. Accordingly, consistent with the Certified EIR's conclusions for the Original Stadium Project, the Modified Project's potential surface water hydrology impacts would be less than significant. No mitigation measures are required (refer to Section IV.I, Comparative Analysis of Modified Project Impacts, Hydrology and Water Quality, of the Modified Project Addendum).

The Certified EIR also analyzed the Original Stadium Project's potential operational impacts on groundwater. As stated therein, the Project Site is not an area that provides substantial groundwater recharge, and the Original Stadium Project would not affect this condition. Furthermore, the Project Site is not a source of groundwater pumping for potable water usage. Therefore, the Certified EIR concluded that impacts related to groundwater would be less than significant during operation of the Original Stadium Project. Similar to the Original Stadium Project, the Modified Project would be serviced by the municipal water and sewer system, and no production wells would be installed. As stated above, the amount of impervious surface area on site would be approximately the same under the Modified Project as compared to existing conditions. The Modified Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge since limited groundwater recharge currently occurs on site. Furthermore, the Modified Project would implement BMPs pursuant to SUSMP requirements (pursuant to Certified EIR Mitigation Measure E-2) and the City's LID Ordinance to control and mitigate surface pollutants. Therefore, consistent with the conclusions in the Certified EIR, the Modified Project would result in less than significant impacts associated with groundwater hydrology and quality (refer to Section IV.I, Comparative Analysis of Modified Project Impacts, Hydrology and Water Quality, of the Modified Project Addendum).

c. Cumulative

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Modified Project, related projects would be subject to NPDES permit requirements for both construction and operation, including development of SWPPPs for construction projects greater than 1 acre, compliance with SUSMP requirements during operation and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would be evaluated on an individual basis by City of Los

Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Furthermore, as discussed above, the Modified Project would not increase runoff from the Project Site as compared to existing conditions or provide for uses that generate substantial pollutants. Therefore, the Modified Project's hydrology/water quality impacts would not be cumulatively considerable, and cumulative impacts related to hydrology/water quality would be less than significant (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

In sum, based on the analysis above, through the implementation of mitigation measures identified in the Certified EIR, operation of the Modified Project would not result in any new significant impacts with respect to hydrology and water quality, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Mitigation Measures

The following mitigation measures were included in the Certified EIR to reflect the regulatory requirements that would ensure that the Original Stadium Project's hydrology and water quality impacts would be less than significant. These Mitigation Measures would continue to be implemented as part of the Modified Project, as revised, and have been incorporated into the MMP for the Modified Project included in Appendix A of the Modified Project Addendum:

EIR Mitigation Measure MM E-1: The Applicant shall ensure that a Stormwater Pollution Prevention Plan (SWPPP) is prepared and implemented during construction. The SWPPP shall be prepared to the satisfaction of the City of Los Angeles Department of Building and Safety prior to the issuance of building permits.

EIR Mitigation Measure MM E-2: The Applicant must prepare and implement a SUSMP, in accordance with the LA County RWQCB MS4 Program. The SUSMP shall be submitted and prepared to the satisfaction of the City of Los Angeles Department of Building and Safety.

EIR Mitigation Measure MM E-3: The Applicant must comply with LARWQCB's General NPDES Permit and General Waste Discharge Requirements (WDRs) (Order No. R4-2003-0111, NPDES No. CAG994004) governing construction-related dewatering discharges (the "General Dewatering Permit").

3. Findings

Changes or alternations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the potentially significant effects of the Modified Project on hydrology and water quality, as identified in the Certified EIR and Modified Project Addendum, to less than significant levels.

4. Rationale for Findings

Mitigation Measure E-1 from the Certified EIR, which requires the Applicant to prepare and implement a SWPPP during construction, has been incorporated into the Modified Project's MMP. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project,

construction-related impacts with respect to surface water hydrology and water quality under the Modified Project would be less than significant through implementation of a SWPPP prepared to the satisfaction of LADBS, and no additional mitigation measures are required.

Mitigation Measure E-2 from the Certified EIR, which requires the Applicant to prepare and implement a SUSMP with permanent on-site BMPs in accordance with the LA County RWQCB MS4 Program, would also be implemented under the Modified Project. Further, the Modified Project would comply with local regulatory requirements such as the City's LID Ordinance. Consistent with the conclusions in the Certified EIR, with implementation of Mitigation Measure E-2, the Modified Project would result in less than significant impacts associated with surface water and groundwater hydrology and quality.

Mitigation Measure E-3 from the Certified EIR, which requires that the Applicant comply with the General NPDES Permit and General Waste Discharge Requirements (WDRs) governing construction-related dewatering discharges, would also be implemented under the Modified Project. Construction-related impacts with respect to groundwater under the Modified Project would be less than significant through compliance with Mitigation Measures E-1 and E-3 of the Certified EIR, and no additional mitigation measures are required.

5. Reference

For a complete discussion of impacts to hydrology and water quality, please see Section IV.E of the Certified EIR and Section IV.I and Section IV.Q of the Modified Project Addendum.

D. Public Services—Fire Protection Services (Operation)

1. Description of Environmental Effects

The Certified EIR for the Original Stadium Project concluded that potential operational impacts related to fire protection service would be mitigated to a less than significant level under the Original Stadium Project with implementation of Mitigation Measures H.1-1 through H.1-12 in the Certified EIR (refer to Section IV.H.1, Public Services—Fire Services, of the Certified EIR). The thresholds on which this analysis was based are stated on page IV.H-4 of the Certified EIR. As discussed in the Certified EIR, the Los Angeles Fire Department (LAFD) provides fire protection services to the Project Site. The LAFD focuses on the following metrics in assessing a project's potential demands on fire protection and emergency medical services: current equipment and staffing levels, emergency response times, fire flow requirements, and emergency access. The Modified Project Addendum addressed each of these topics in the context of both the Original Stadium Project and the Modified Project to determine whether substantial changes have occurred since preparation of the Certified EIR.

As stated in the Certified EIR, three fire stations provide initial response to the Project Site, including Fire Station No. 46, located at 4370 S. Hoover Street, approximately 0.8 mile from the Project Site; Fire Station No. 15, located at 915 W. Jefferson Boulevard, approximately 0.9 mile from the Project Site; and Fire Station No. 14, located at 3401 S. Central Avenue, approximately 1.6 miles from the Project Site. These three stations continue to serve the Project Site and would be the first response stations under the Modified Project. At the time the Certified EIR was prepared, Fire Station No. 46 was equipped with an engine and two rescue ambulances. Fire Station No. 15 was equipped with an engine, an assessment light force, and a paramedic ambulance. Fire Station No. 14 was equipped with a task force station, engine and truck

companies, and paramedic ambulances. Based on current data from the LAFD, the equipment inventory at Fire Station No. 46 has been augmented to include a basic life support (BLS) rescue ambulance and an EMS battalion captain (in addition to the equipment listed above); the equipment inventory at Fire Station No. 15 has not changed; and the equipment inventory at Fire Station No. 14 has been restructured to include a paramedic rescue ambulance, a BLS rescue ambulance, and an assessment engine. Therefore, current equipment levels at the fire stations serving the Project Site are commensurate with the levels that were assessed in the Certified EIR.

Fire protection service to the Project Site was considered to be adequate at the time the Certified EIR was prepared, based on a comparison of existing service levels to Citywide response standards. Based on the most recent data available from the LAFD, the average response time for emergency medical services (EMS) was 4 minutes and 4 seconds for Fire Station No. 46, 3 minutes and 35 seconds for Fire Station No. 15, and 3 minutes and 8 seconds for Fire Station No. 14. The Citywide average response time for EMS is 4 minutes and 9 seconds; therefore, each station that serves the Project Site is currently achieving a response time that is less than the Citywide average, indicating that these stations continue to provide adequate service to the Project Site area. Furthermore, the response time for each station currently meets the national standard (i.e., nine minutes for urban areas). It should also be noted that since preparation of the Certified EIR, the LAFD has been reorganized into four geographic bureaus in an effort to reduce response times and improve performance.

Fire flow requirements, as determined by the LAFD, vary by site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in Section 57.507.3.1 of the LAMC, fire flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high-density commercial or industrial areas, with a minimum residual water pressure of 20 pounds per square inch (psi) to remain in the water system. As stated in the Certified EIR, the LAFD-required fire flow for the Original Stadium Project is 6,000 gallons per minute (gpm) from four fire hydrants flowing simultaneously, which corresponds with the LAMC-required fire flow for industrial and commercial land uses. Based on information in the Certified EIR, a fire hydrant is located directly north of the Sports Arena on the west side of Figueroa Street and is connected to a 16-inch water main. In addition, two fire hydrants are located at the intersection of Martin Luther King, Jr. Boulevard and Figueroa Street, one on the southeast corner (connected to a 12-inch water main) and one on the southwest corner (connected to an 8-inch water main). The Certified EIR determined that, based on infrastructure present at the time, improvements to water system in the area could be necessary to meet the fire flow requirement of 6,000 gpm, and such improvements would be the responsibility of the developer. The Modified Project proposes the construction of a 22,000-seat MLS stadium, similar to the Original Stadium Project, in addition to approximately 105,900 square feet of commercial facility floor area (i.e., the ancillary uses). Thus, like the Original Stadium Project, the Modified Project would include exclusively commercial land uses. Based on its preliminary review of the Modified Project, the LAFD has not identified any substantial deficiencies in the fire flow infrastructure that serves the Project Site, or in the design of the Modified Project, that would prohibit the Modified Project from meeting applicable Fire Code requirements. Notwithstanding, as with the Original Stadium Project, the final fire-flow requirement for the Modified Project would be determined by the LAFD and the Applicant would be responsible for constructing any necessary infrastructure upgrades. The Modified Project would also implement Mitigation Measures H.1-2 through H.1-3 in the Certified EIR (with revisions proposed to reflect amendments to the City's Fire Code that have

occurred since the Certified EIR) which include requirements for the provision of fire hydrants (see the MMP for the Modified Project included in Appendix A of the Modified Project Addendum).

As discussed in the Certified EIR, emergency access to the Project Site is currently provided via public roadways located directly adjacent to the Project Site, including primary access from Martin Luther King, Jr. Boulevard to the south and Figueroa Street to the east. The Modified Project does not propose reconfiguration of any existing roadways within Exposition Park or in the surrounding area, and therefore emergency access to the Project Site would remain the same for the Modified Project. Additionally, the Modified Project would implement Mitigation Measures H.1-4 through H.1-11 in the Certified EIR to ensure that adequate access is provided to the Project Site (see the MMP for the Modified Project included in Appendix A of the Modified Project Addendum). As stated in the Certified EIR, the three fire stations serving the Project Site have established response plans for the Sports Arena, and it is anticipated that these response plans would be carried over to the Modified Project along with any needed modifications. Pursuant to Section 57.507.3.3 of the LAMC, commercial and industrial land uses with a required fire flow of 6,000 to 9,000 gpm should be within one mile of an engine company and 1.5 mile of a truck company. If these response distances are exceeded, automatic sprinkler systems are required. Based on the information above, fire and emergency medical services for the Modified Project are available within acceptable response distances. Additionally, based on its preliminary review of the Modified Project, the LAFD has not identified any substantial deficiencies in the fire flow infrastructure that serves the Project Site, or in the design of the Modified Project, that would prohibit the Modified Project from meeting applicable Fire Code requirements. Furthermore, the Modified Project would implement Mitigation Measure H.1-1 in the Certified EIR, which requires the installation of sprinkler systems (see the MMP for the Modified Project included in Appendix A of the Modified Project Addendum).

As previously discussed, a project's potential demands on fire protection and emergency medical services are assessed based on current LAFD equipment and staffing levels, emergency response times, fire flow requirements, and emergency access. Based on the analysis above, current equipment levels at the fire stations serving the Project Site are commensurate with the levels that were assessed in the Certified EIR. Each station is currently achieving a response time that is less than the Citywide average and in compliance with the national standard for urban areas. Like the Original Stadium Project, the fire flow requirement for the Modified Project would be determined by the LAFD and the Applicant would be responsible for implementing any required improvements to the water system. Additionally, there would be no appreciable change to emergency access under the Modified Project. Furthermore, the Modified Project would be reviewed by the LAFD to ensure that it complies with applicable regulatory requirements related to fire protection and emergency medical services, including those contained within the LAMC, which incorporates by reference California Building Code and Fire Code building construction standards as well as policies within the City of Los Angeles General Plan Safety Element. As stated above, based on its preliminary review of the Modified Project, the LAFD has not identified any substantial deficiencies in the fire flow infrastructure that serves the Project Site, or in the design of the Modified Project, that would prohibit the Modified Project from meeting applicable Fire Code requirements. Finally, the Modified Project would continue to implement Mitigation Measures H.1-1 through H.1-12 in the Certified EIR (with revisions proposed to reflect amendments to the City's Fire Code that have occurred since the Certified EIR), which have been incorporated into the MMP for the Modified Project (see Appendix A to the Modified Project Addendum). Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.H.1, Public Services—Fire Services, of the Certified EIR), operational impacts with respect to fire protection services would be less than significant under

the Modified Project with implementation of Mitigation Measures H.1-1 through H.1 12 in the Certified EIR (as revised), and no additional mitigation measures are required (refer to Section IV.N, Comparative Analysis of Modified Project Impacts, Public Services, of the Modified Project Addendum).

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to fire services, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Mitigation Measures

The following mitigation measures were included in the Certified EIR to address the Original Stadium Project's potential impacts with respect to fire protection and emergency medical services. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP for the Modified Project included in Appendix A of the Modified Project Addendum, but have been revised as follows to reflect amendments that were made to the City of Los Angeles Fire Code (Chapter V, Article 7 of the LAMC) after preparation of the Certified EIR pursuant to Ordinance No. 182,822 (effective January 10, 2014):

EIR Mitigation Measure MM H.1-1: Sprinkler systems shall be required throughout any structure to be built, consistent with the LAMC requirements for public venue structures (Section 57.903).

EIR Mitigation Measure MM H.1-2: All first-story portions of any commercial or industrial building must be within 300 feet of an approved fire hydrant (Section 57.507.3.2).

EIR Mitigation Measure MM H.1-3: The maximum distance between fire flow hydrants on the roads and fire lanes in a high-density residential and commercial area is 300 feet.

EIR Mitigation Measure MM H.1-4: Any person owning or having control of any facility, structure, group of structures or premises shall provide and maintain Fire Department access (Section 57.4701.4).

EIR Mitigation Measure MM H.1-5: If any portion of the first story exterior walls of any building structure is more than 150 feet from the edge of the roadway of an approved street, an approved fire lane shall be provided so that such portion is within 150 feet of the edge of the fire lane. (Section 57.503.1.4)

EIR Mitigation Measure MM H.1-6: When required access is provided by an improved street, fire lane or combination of both which results in a dead-end in access of 700 feet in length from the nearest cross street, at least one additional ingress-egress roadway shall be provided in such a manner that an alternative means of ingress-egress is accomplished (Section 57.503.1.5).

EIR Mitigation Measure MM H.1-7: All public and private streets shall be dedicated and improved in conformance with Board of Public Works, Standard Dimension Plan, Number D-22549.

EIR Mitigation Measure MM H.1-8: Construction of public or private roadways in the proposed development shall not exceed 15 percent in grade.

EIR Mitigation Measure MM H.1-9: Fire lanes, where required, and dead ending streets, shall terminate in a cul-de-sac or other approved turning area.

EIR Mitigation Measure MM H.1-10: All access roads, including fire lanes, shall be maintained in an unobstructed manner. 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 (Section 57.503.4.2).

EIR Mitigation Measure MM H.1-11: Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

3. Findings

Changes or alternations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the potentially significant effects of Project operations on fire protection services, as identified in the Certified EIR and Modified Project Addendum, to less than significant levels.

4. Rationale for Findings

Like the Original Stadium Project, the Modified Project would satisfy LAFD metrics used to assess project demands on fire protection and emergency services with implementation of the above mitigation measures. The Certified EIR for the Original Stadium Project concluded that potential operational impacts related to fire protection service would be mitigated to a less than significant level with implementation of EIR Mitigation Measures H.1-1 through H.1-11 in the Certified EIR. The Modified Project would also be required to implement these measures, and following their implementation potential impacts would be less than significant. Accordingly, the Modified Project would not result in any new significant impacts with respect to fire services, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR. As under the Original Stadium Project, therefore, implementation of the above-referenced mitigation measures would ensure that the Modified Project design meets its regulatory obligations to the satisfaction of LAFD and would further avoid significant impacts.

5. Reference

For a complete discussion of operational impacts of the Modified Project on fire protection services, please see Section IV.H.1 of the Certified EIR and Section IV.N and IV.Q of the Modified Project Addendum.

E. Public Services—Police Protection Services (Construction, Operation, Cumulative)

1. Description of Environmental Effects

The Certified EIR for the Original Stadium Project concluded that under the Original Stadium Project, potential impacts related to police protection service would be mitigated to a less than significant level with implementation of Mitigation Measures H.2-1 through H.2-3 in the Certified EIR (refer to Section IV.H.2, Public Services—Police Protection, of the Certified EIR). The thresholds on which this analysis was based are stated on pages IV.H 9–IV.H-10 of the Certified

EIR. As discussed in the Certified EIR, the Project Site is served by the Los Angeles Police Department's (LAPD) Southwest Area Police Station located at 1546 W. Martin Luther King, Jr. Boulevard, approximately 1.2 miles west of the Project Site. At the time the Certified EIR was prepared, staff at the Southwest Area Police Station included 347 sworn officers and 26 civilian support staff that served a population of 191,041 (or approximately one officer per 551 residents). The staff at this police station currently consists of 352 sworn personnel and 32 civilian personnel serving a population of approximately 165,000 (or approximately one officer per 469 residents). Thus, the officer-to-resident ratio and staffing levels at the Southwest Area Police Station have improved since the preparation of the Certified EIR. Additionally, at the time the Certified EIR was prepared, the Southwest Area Police Station responded to 2,462 violent crimes and 6,038 property crimes annually. Based on current data from the LAPD, in 2014, the Southwest Area Police Station responded to 690 violent crimes and 2,128 property crimes. Thus, crime levels in the Southwest Area Police Station service area have also decreased since the preparation of the Certified EIR.

As described in the Certified EIR, on-site construction activities could result in an increased demand for police protection services due to the potential for theft and vandalism at the Project Site. Thus, the Certified EIR includes Mitigation Measure H.2-1, which requires temporary fencing to properly secure the construction site. Given the similarity in construction duration and activities to the Original Stadium Project analyzed in the Certified EIR, the Modified Project would result in a similar demand for police protection services during construction. The Modified Project would also continue to implement Mitigation Measure H.2-1 as set forth in the Certified EIR, which has been incorporated into the MMP included in Appendix A of the Modified Project Addendum. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.H.2, Public Services—Police Protection, of the Certified EIR), impacts with respect to police protection services during construction would be less than significant under the Modified Project with implementation of Mitigation Measure H.2-1 in the Certified EIR (refer to Section IV.N, Comparative Analysis of Modified Project Impacts, Public Services, of the Modified Project Addendum). No additional mitigation measures are required.

Like the Original Stadium Project, the Modified Project would introduce crowds of up to 22,000 people during an event day, which could increase the number of calls requesting police responses due to burglaries, damage to vehicles, traffic-related incidents, and crimes against persons. Under the Modified Project, maximum attendance on event days would be the same as under the Original Stadium Project analyzed in the Certified EIR, since the Modified Project's proposed ancillary uses would only be open to ticket-holding patrons (refer to Project Design Feature O-4 in Section IV.O, Traffic/Transportation/Parking, on page 169 of the Modified Project Addendum). Thus, the anticipated demand for police protection services on event days would be substantially similar to that of the Original Stadium Project. While the Modified Project would result in a greater demand for police protection services on non-event days due to the operation of the ancillary uses, this demand would be far less than the demand on event days, and therefore within the service capabilities of the LAPD. Furthermore, the Modified Project would continue to implement Mitigation Measures H.2-2 to H.2-3 from the Certified EIR (as revised to reflect the Modified Project's design characteristics) to further reduce impacts related to police services and ensure that impacts would remain less than significant both on event days and on non-event days (see the MMP for the Modified Project included in Appendix A of the Modified Project Addendum). Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.H.2, Public Services—Police Protection, of the Certified EIR), impacts with respect to police protection services during operation would be less than significant under the Modified Project with implementation of Mitigation Measures H.2-2 and

H.2-3 in the Certified EIR (as revised) (refer to Section IV.N, Comparative Analysis of Modified Project Impacts, Public Services, of the Modified Project Addendum). No additional mitigation measures are required.

Furthermore, development of the Modified Project in conjunction with related projects would cumulatively increase the demand for police services. While the Southwest Area Police Station can accommodate additional demand from cumulative development, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes) to which the Modified Project and related projects would contribute. Moreover, it is anticipated that related projects would be reviewed by the LAPD to ensure that sufficient security measures would be implemented to reduce potential impacts to police protection services. Furthermore, given the Modified Project's proposed security design features, the Modified Project's contribution to cumulative impacts to police protection would not be cumulatively considerable and would be less than significant (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum).

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to police protection services, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Mitigation Measures

The following mitigation measures were included in the Certified EIR to address the Original Stadium Project's potential impacts with respect to police protection services. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP for the Modified Project included in Appendix A of the Modified Project Addendum, but have been revised as follows to reflect the design characteristics of the Modified Project:

EIR Mitigation Measure H.2-1: The Applicant shall erect temporary fencing around the Project Site during construction activities to secure the Project Site and discourage trespassers.

EIR Mitigation Measure H.2-2: Event Sponsors at the Project Site shall employ private security guards to monitor and secure the Project Site during events and deter any potential criminal activity.

EIR Mitigation Measure H.2-3: The Applicant shall develop and implement a Security Plan in consultation with the LAPD outlining the security services and features to be provided in conjunction with the Project. The plan shall be coordinated with the LAPD and a copy of the said plan shall be filed with the LAPD Central Bureau commanding Officer. Said security plan may include some or all of the following components:

i. Provisions for an on-site private security force that shall provide 24-hour presence. Security officers shall be responsible for patrolling all common areas including the back service corridors and walkways, parking-lots, and stairwells.
ii. The VIP parking lot on the Project Site shall be fitted with emergency features such as closed circuit television (CCTV) or emergency call boxes that would provide a direct connection with the on-site security force or the LAPD 911 emergency response system.
iii. The proposed security shall incorporate low level and directional lighting features to effectively illuminate project entryways, seating areas, lobbies, elevators, service areas, and parking areas with sufficient illumination and minimum dead space to eliminate areas of concealment. Full cut-off fixtures shall be installed that minimize glare from the light source and provide light downward and inward to structures to maximize visibility.

3. Findings

Changes or alternations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the potentially significant effects of project construction and operations on police services, as identified in the Certified EIR and Modified Project Addendum, to less than significant levels.

4. Rationale for Findings

Like the Original Stadium Project, construction and operation of the Modified Project could result in an increased demand for police protection services. The Certified EIR for the Original Stadium Project concluded that potential construction and operational impacts related to police protection services would be mitigated to a less than significant level with implementation of EIR Mitigation Measures H.2-1 through H.2-3 in the Certified EIR. Mitigation Measure H.2-1 requires temporary fencing to properly secure the construction site and Mitigation Measures H.2-2 and H.2-3 provide for private security guards and a Security Plan (respectively). The Modified Project would also be required to implement these measures, and following their implementation potential impacts would be less than significant. Accordingly, the Modified Project would not result in any new significant impacts with respect to police protection services, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

5. Reference

For a complete discussion of impacts of the Modified Project on police protection services, please see Section IV.H.2 of the Certified EIR and Section IV.N and IV.Q of the Modified Project Addendum.

VI. IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE

A. Air Quality—Regional Emissions (Construction and Cumulative Construction)

1. Description of Environmental Effects

The Certified EIR for the Original Stadium Project concluded that air quality impacts from construction of the Original Stadium Project would be significant and unavoidable for regional emissions (refer to Section IV.B, Air Quality, of the Certified EIR). The thresholds on which this

analysis was based are stated on pages IV.B-21–IV.B-24 of the Certified EIR. As stated in the Certified EIR, the Original Stadium Project would generate pollutant emissions from the following construction-related activities and sources: demolition and site clearing, grading and site preparation; building construction, including the application of architectural coatings; paving and asphalting; construction workers traveling to and from the Project Site; delivery and hauling of construction supplies and debris to and from the Project Site; and, the fuel combustion generated by on site construction equipment.

The Modified Project would consist of the Original Stadium Project (reconfigured on the Project Site) together with the addition of up to approximately 105,900 square feet of ancillary facility floor area (up to approximately 119,000 gross square feet). In addition, as described in Section III, Project Description, on page 4 of the Modified Project Addendum, the Modified Project would have a slightly longer construction period (by 0.5 month) and a total import/export of up to 30,000 cubic yards (cy) of soil compared to the Original Stadium Project's estimated import of approximately 125,000 cy of soil. Therefore, construction haul trips are anticipated to be less under the Modified Project. However, as a result of the modifications proposed under the Modified Project, potential construction-related emissions associated with the Modified Project were quantified in the Modified Project Addendum to determine whether the changes in the proposed development program would have the potential to increase the severity of previously identified significant impacts or result in new, previously unidentified significant impacts related to construction air emissions.

With regard to regional emissions, the Certified EIR determined that the peak daily emissions generated during construction of the Original Stadium Project would exceed the regional emissions threshold recommended by the South Coast Air Quality Management District (SCAQMD) for nitrogen oxides (NOX) during the grading/site preparation phase, as well as the threshold for reactive organic compounds (ROG) during the building and coating phase. The Certified EIR included Mitigation Measures MM B-1 and MM B-2, requiring compliance with SCAQMD Rule 403 and the use of low-volatile organic compound (VOC) paints, respectively, to reduce these impacts to the extent feasible. However, even with implementation of these mitigation measures, the Certified EIR determined that levels of NOX and ROG would exceed applicable thresholds. Therefore, the Certified EIR concluded that regional air quality impacts associated with construction emissions would be significant and unavoidable under the Original Stadium Project.

Construction of the Modified Project would generate regional pollutant emissions from the same general sources as the Modified Project, as described above (e.g., heavy-duty construction equipment, haul truck trips, and construction worker trips). Construction-related emissions associated with these sources were calculated using CalEEMod. Model results are provided in Appendix D of the Modified Project Addendum. The calculations reflect the estimated types and quantities of construction equipment that would be used to remove existing structures and pavement; grade and excavate the Project Site; construct the proposed structures and related improvements; pave new parking; and plant new landscaping within the Project Site under the Modified Project. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust (as reflected in Mitigation Measure MM B-1 in the Certified EIR) and that construction activities would utilize low-VOC paints (as reflected in Mitigation Measure MM B-2 in the Certified EIR). In addition, the Modified Project would incorporate Project Design Feature C-1 related to the control of exhaust emissions from on-site heavy-duty construction equipment, which is reflected in the emission calculations presented in Table 5 on page 51 of the Modified Project Addendum. The Modified Project would also

implement Project Design Feature C-2 to encourage Project contractors to apply for SCAQMD Surplus Off-Road Opt-In for NOX (SOON) funds, if applicable and available at the time of construction. The SOON program provides funding assistance to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOX emissions from in use off-road diesel vehicles. Implementation of Project Design Feature C-2 is not reflected in the Modified Project's emission calculations.

As shown in Table 5 on page 51 of the Modified Project Addendum, peak daily construction emissions under the Modified Project would be less than those under the Original Stadium Project for all pollutants. However, as with the Original Stadium Project, peak daily emissions of NOX and VOC would exceed the SCAQMD regional thresholds even with implementation of Mitigation Measures MM B-1 and MM B-2 set forth in the Certified EIR, which have been incorporated into the Modified Project's MMP included as Appendix A to the Modified Project Addendum. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.B, Air Quality, of the Certified EIR), impacts with respect to regional air emissions during construction would be significant and unavoidable under the Modified Project. However, emissions would be less than levels analyzed in the Certified EIR. No other feasible mitigation measures have been identified to reduce impacts to a less-than-significant level (refer to Section IV.C, Comparative Analysis of Modified Project Impacts, Air Quality, of the Modified Project Addendum). Therefore, the Modified Project would not result in any new significant impacts with respect to air quality during construction, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

Further, as stated in the Certified EIR, according to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Because impacts with respect to regional air emissions during construction would be significant and unavoidable under the Modified Project, albeit less than levels analyzed in the Certified EIR, consistent with the analysis in the Certified EIR for the Original Stadium Project, cumulative impacts related to construction air quality would be significant and unavoidable under the Modified Project. However, the Modified Project's contribution to cumulative impacts would be reduced compared to that of the Original Stadium Project (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum). Therefore, the Modified Project would not result in any new significant impacts with respect to cumulative air quality impacts during construction, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to construction period air quality:

Project Design Feature C-1: Off-road diesel-powered construction equipment greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of construction activities, shall meet Tier 3 off-road emissions standards.

Project Design Feature C-2: The Applicant shall encourage construction contractors to apply for South Coast Air Quality Management District Surplus Off-Road Opt-In for

NO_X (SOON) funds, should they be applicable and available at the time of construction initiation. The "SOON" program accelerates clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines.

The following mitigation measures were included in the Certified EIR to reduce to the maximum extent feasible the significant air quality impacts associated with construction of the Original Stadium Project. These Mitigation Measures would continue to be implemented as part of the Modified Project, as revised, and have been incorporated into the MMP included with the Modified Project Addendum (see Addendum Appendix A):

EIR Mitigation Measure MM B-1: The Applicant shall comply with SCAQMD Rule 403—Fugitive Dust. Examples of the types of dust control measures currently required and recommended include, but are not limited to, the following:

- Water active grading/excavation sites and unpaved surfaces at least three times daily;
- Sweep daily (with water sweepers) all paved construction parking areas and staging areas;
- Provide daily clean-up of mud and dirt carried onto paved streets from the site;
- Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site;
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more; and
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

EIR Mitigation Measure MM B-2: The Applicant shall use low-VOC paints for all interior and exterior surfaces.

3. Findings

Changes or alterations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the significant environmental impact of construction on regional emissions, as identified in the Certified EIR and the Modified Project Addendum. However, although such measures would reduce Project construction emissions, the Modified Project would still exceed the regional emissions threshold recommended by the SCAQMD for NOx and ROG. Although impacts would be reduced under the Modified Project compared to the Original Stadium Project, regional construction-related air quality impacts would be considered significant and unavoidable. Nonetheless, specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or project alternatives in the Certified EIR and Modified Project Addendum.

4. Rationale for Findings

Implementation of the mitigation measures described above would reduce construction emissions for all criteria pollutants. However, as with the Original Stadium Project, peak daily emissions of

NOX and VOC during Modified Project construction would exceed the SCAQMD regional thresholds, even with implementation of the above mitigation measures which have been incorporated into the Modified Project's MMP. Further, as found under the Certified EIR, the Basin is in non-attainment for NOx. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, project and cumulative impacts with respect to regional air emissions during construction would be significant and unavoidable under the Modified Project.

5. Reference

For a complete discussion of impacts of construction on regional air quality, please see Section IV.B of the Certified EIR and Section IV.C and IV. Q of the Modified Project Addendum.

B. Historic Resources (Construction and Operations)

1. Description of Environmental Effects

According to CEQA Guidelines, a project has the potential to impact a historic resource when the project involves a "substantial adverse change" in the significance of an historical resource. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." The Guidelines continue to state that "[t}he significance of an historical resource is materially impaired when a project:... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources... local Register of historic resources... or its identification in a historic resources survey." Based on this guidance, the City of L.A. CEQA Thresholds Guide states that a substantial adverse change in the significance of a historic resource would occur if a project results in:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

The Certified EIR for the Original Stadium Project concluded that impacts with respect to historic resources would be significant and unavoidable even with implementation of mitigation (refer to Section IV.D, Historic Resources, of the Certified EIR). As set forth in the Certified EIR, the Los Angeles Memorial Sports Arena was constructed in 1959, after more than two decades of planning by various agencies and individuals, to provide the City of Los Angeles with a world-class facility for a variety of indoor sporting and other events. Designed by Welton Becket and Associates, the Sports Arena has hosted many notable civic and sporting events, including the 1960 Democratic National Convention that nominated John F. Kennedy as the Democratic Party's candidate for President, professional and college basketball games, and events at the 1984 Olympic Games. The Sports Arena is now more than 50 years of age and, based on an evaluation by ICF Jones & Stokes included in the Certified EIR, appears eligible for the California Register of Historical Resources under Criteria 1 (Pub. Res. Code Section 5024.1, Title 14 CCR,

Section 44852) for its association with events that have made a significant contribution to Los Angeles history. Because the Original Stadium Project proposed the demolition of the Sports Arena, Mitigation Measure MM D-1 was included in the Certified EIR, which requires preparation of a report documenting the architectural and historical features of the Sports Arena. Nonetheless, because the Original Stadium Project would involve the loss of a facility that has association with events that have made a significant contribution to Los Angeles history, the Certified EIR concluded that impacts to historic resources would remain significant and unavoidable following the implementation of mitigation. As the Modified Project would also result in the demolition of the Sports Arena, historic resources impacts associated with its demolition would continue to be significant and unavoidable.

The Modified Project proposes a stadium with a larger footprint and massing than under the Original Stadium Project. In addition, the Modified Project also would include ancillary uses that were not part of the Original Stadium Project. As such, a Historic Resources Technical Report (Modified Project Historic Report) was prepared by Historic Resources Group to analyze the Modified Project's potential impacts to historic resources in the vicinity of the Project Site and is included in Appendix G of the Modified Project Addendum. As shown in Table 8 on page 66 of the Modified Project Addendum, the Modified Project Historic Report documented several historic resources within the vicinity of the Project Site located within Exposition Park. Due to their close proximity to the Project Site, the evaluation focused on the Coliseum located to the west of the Project Site and North and South Coliseum Drives and Christmas Tree Lane located to the north of the Project Site. Specifically the Modified Project Historic Report evaluated the potential for the Modified Project to affect the integrity of those resources.

The Modified Project Historic Report reiterates the Coliseum Commission's determination from the Certified EIR that removal of the Sports Arena would result in a significant impact to an historic resource that cannot be mitigated to a less-than-significant level. With regard to the Coliseum to the west, the Modified Project Historic Report discusses its designation as a National Historic Landmark, a designated State Historical Landmark, and its listing on the National Register of Historic Places. The Modified Project Historic Report explains that while the Modified Project would not physically alter the Coliseum structure, it would have the potential to affect aspects of the Coliseum's historic integrity. Specifically, the Modified Project Historic Report identifies the Coliseum's park setting characterized by landscape areas, access roads, sidewalks and plazas as features that contribute to the Coliseum's historic integrity.

Based on review and analysis of the Modified Project's plans and comparison of those plans to the Coliseum's historic setting and the existing physical environment with the Sports Arena, the Modified Project Historic Report determined that the Modified Project would not alter the setting in the vicinity of the Coliseum such that the Coliseum would no longer convey its historic significance. Specifically, the Modified Project Historic Report recognizes that the Modified Project would have an increased height and footprint as compared to the existing Sports Arena, and a more contemporary architectural design, which would alter the existing setting of the Coliseum. However, the Modified Project Historic Report determined that following development of the Modified Project the general configuration and orientation of the Coliseum would remain discernible, the primary east-facing façade would remain intact and unobstructed, and trees and landscaping along the Modified Project's north and northwestern edges would provide screening when viewed from the Coliseum that would reduce the perception of the Modified Project's height and mass. The proposed building heights would be visually compatible with and within the context of the adjacent Coliseum, which reaches a height of approximately 75 feet above grade at the Coliseum Bowl and a height of 124 at the top of the peristyle. The Modified Project was

specifically designed to respect the height of the Coliseum, so that its maximum height (115 feet) occurs at the edge furthest from the Coliseum (southeast corner), transitioning down to its lowest height of approximately 75 feet at the edge closest to the Coliseum. Furthermore, the roof canopy skin, which would consist of a translucent, ETFE material, would moderate the perceived height of the stadium because it would be permeable to light and would not be perceived as solid. The new stadium would also include signage to support stadium operations (refer to Appendix C of the Modified Project Addendum). The proposed signage plan would be designed to be consistent with the character of a sports and entertainment venue. Based on its assessment of the Modified Project's massing, height, and signage program in the context of the Coliseum, the Modified Project Historic Report concluded that the Modified Project would not adversely impact the historic significance of the Coliseum. Specifically, the Modified Project Historic Report concludes that the Coliseum's historic significance would not be materially impaired by the Modified Project, and the change in setting under the Modified Project would result in a less than significant impact to the historic significance of the Coliseum.

With regard to North and South Coliseum Drives and Christmas Tree Lane to the north of the Project Site, the Modified Project Historic Report discusses their eligibility for the National Register, due to their contribution to the setting of the Coliseum, as an important view corridor to the Coliseum, and as an example of Beaux Arts landscape and roadway planning. The street pattern, sidewalks, rows of trees, and central green space are critical elements in the formal, park-like setting for the Coliseum. As detailed in the Modified Project Historic Report, after implementation of the Modified Project, the street pattern, sidewalks, rows of trees, and central green space of North and South Coliseum Drives and Christmas Tree Lane would remain intact. Specifically, the street edge along Coliseum Drive would be retained under the Modified Project and the historic configuration of street trees would be enhanced through the Modified Project's landscaping program. Accordingly, because the historic configuration of street pattern, street trees and sidewalks would be maintained by the Modified Project, the Modified Project Historic Report concluded that the Modified Project would avoid potential impacts to the Coliseum Drives and Christmas Tree Lane, which would further avoid potential impacts to the Coliseum's historic setting.

With regard to other identified historic resources in the Project Site vicinity, the Modified Project Historic Report concludes that the Modified Project would not affect any other identified historic resources within the area. All of the other historic buildings and structures identified in the Modified Project Historic Report are located approximately 700 feet or more from the Project Site and have little or no relation to the Project Site. Thus, construction of the Modified Project would not alter important spatial relationships or impede important views of these resources.

In summary, consistent with the conclusion in the Certified EIR for the Original Stadium Project (refer to IV.D. Historic Resources, of the Certified EIR), impacts with respect to historic resources would continue be significant and unavoidable under the Modified Project due to the demolition of the Sports Arena (refer to Section IV.E, Comparative Analysis of Modified Project Impacts, Cultural Resources, of the Modified Project Addendum). In addition, as set forth in the Modified Project Historic Report, impacts to other historic resources within the Project vicinity would be less than significant, as the Modified Project would not demolish, relocate, alter, or involve construction that reduces the integrity or significance of other nearby historic resources, including the Coliseum, North and South Coliseum Drives, and Christmas Tree Lane. Therefore, the Modified Project would not result in any new significant impacts with respect to historic resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Mitigation Measures

As with the Original Stadium Project, impacts under with Modified Project would continue to be significant after implementation of the following mitigation measure included in the Certified EIR, which have been revised as follows under the Modified Project Addendum to reflect recommendations in the Modified Project Historic Report:

EIR Mitigation Measure D-1. Prior to the issuance of a demolition permit, a report documenting the architectural and historical features of the Sports Arena shall be prepared and offered to the Southern California Information Center at California State University, Fullerton, and the City. The report shall include the following:

a) A written report according to the Historic American Building Survey (HABS) narrative format, which includes historical and descriptive information, including site history, historic context, a significance statement, and character-defining features;
b) Duplicates of historic photographs, if available;
c) Duplicates of existing drawings including plans, elevations, and sections, if available; and
d) Large format (4 inch by 5 inch negative or larger) archival photographs based on HABS guidelines and 35 millimeter photographs of additional spaces and features not documented in large format. The photographs shall be keyed to a floor and site plan to show the location of each photograph taken. Views shall include the setting, important site features including select landscape, all exterior elevations, detailed views of significant exterior architectural features, and interior views of significant spaces and features.

3. Findings

Changes or alterations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the significant environmental impact of construction and operation of the Modified Project on historic resources, as identified in the Certified EIR and Modified Project Addendum. Although such measures may reduce the impacts, the Modified Project may be considered to result in a significant and unavoidable impact on historic resources due to the demolition of the Los Angeles Memorial Sports Arena. Specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or project alternatives identified in the Certified EIR and Addendum.

4. Rationale for Findings

The Modified Project, like the Original Stadium Project, would result in the demolition of a significant historic resource, the Los Angeles Memorial Sports Arena. Demolition would therefore constitute an unavoidable adverse impact upon the environment. As determined by the Historic Resources Technical Report for the Project Addendum, no further significant and unavoidable impacts to historic resources would result from the Modified Project. While there are no mitigation measures available to reduce the significant and unavoidable impacts to less than significant levels, the above mitigation measure is incorporated to document the Sports Arena and reduce the identified significant impact to the extent feasible.

5. Reference

For a complete discussion of impacts of the Modified Project on historic resources, please see Section IV.D of the Certified EIR and Section IV.E and IV.Q of the Modified Project Addendum.

C. Land Use and Planning—Land Use Compatibility (Construction)

1. Description of Environmental Effects

The Certified EIR for the Original Stadium Project concluded that impacts related to land use compatibility during construction would be significant and unavoidable under the Original Stadium Project (refer to Section IV.F, Land Use, of the Certified EIR). The thresholds on which this analysis was based are stated on page IV.F-13 of the Certified EIR. The analysis in the Certified EIR concluded that construction of the Original Stadium Project would cause temporary and intermittent impacts to adjacent land uses due to temporary increases in air emissions (including fugitive dust), noise, and traffic congestion. These potential effects are discussed in their respective sections of the Certified EIR, and mitigation measures are recommended to further reduce construction-related impacts to adjacent land uses. Nonetheless, the Certified EIR concluded that from a land use compatibility standpoint, construction impacts would be significant and unavoidable, although the extent of impacts would be temporary and sporadic and would only persist through the construction period. The potential environmental impacts from construction of the Modified Project are discussed in their respective sections of the Modified Project Addendum, and it has been determined that the Modified Project would not result in new construction-related significant impacts or increase the severity of construction-related significant impacts that were previously evaluated and disclosed in the Certified EIR. From a land use compatibility standpoint, since construction activities under the Modified Project would be substantially similar to those under the Original Stadium Project in terms of overall scope, duration, and activities, land use compatibility impacts associated with construction of the Modified Project would be substantially the same as the Original Stadium Project. Accordingly, potential impacts would continue to be significant and unavoidable, but the changes proposed under the Modified Project would not increase the severity of those impacts analyzed in the Certified EIR (refer to Section IV.J, Comparative Analysis of Modified Project Impacts, Land Use and Planning, of the Modified Project Addendum).

2. Mitigation Measures

Construction of the Original Stadium Project and Modified Project would cause temporary and intermittent impacts to adjacent land uses due to temporary increases in air emissions (including fugitive dust), noise, and traffic congestion. These potential effects are discussed in their respective sections of the Certified EIR and the Modified Project Addendum, and mitigation measures are recommended to further reduce construction-related impacts to adjacent land uses. However, from a land use compatibility perspective, construction of the Modified Project in Exposition Park (similar to any major construction project within this area) would conflict with adjacent land uses.

3. Findings

Changes or alterations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the significant environmental impact of construction on land use compatibility, as identified in the Certified EIR and Modified Project Addendum. Although such measures may reduce the impacts, the Modified Project may be considered to result in a significant and unavoidable impact to land use compatibility. Specific economic, legal, social,

technological, or other considerations make infeasible additional mitigation measures or project alternatives identified in the Certified EIR and the Modified Project Addendum.

4. Rationale for Findings

The Modified Project, like the Original Stadium Project, would cause temporary and intermittent impacts to adjacent land uses due to temporary increases in air emissions (including fugitive dust), noise, and traffic congestion. Construction would therefore constitute an unavoidable adverse impact upon the environment with respect to land use compatibility in Exposition Park. Air, noise, and traffic mitigation measures have been incorporated in their respective sections of the Certified EIR and the Modified Project Addendum to further reduce construction-related impacts to adjacent land uses. Nevertheless, land use compatibility impacts from Modified Project construction on adjacent land uses would be significant and unavoidable.

5. Reference

For a complete discussion of impacts of the Modified Project on historic resources, please see Section IV.F of the Certified EIR and Section IV.J and Section IV. Q of the Modified Project Addendum.

D. Noise (Construction)

1. Description of Environmental Effects

As set forth in the Certified EIR, construction of the Original Stadium Project would generate noise from the following construction-related activities and sources: demolition and site clearing, grading and site preparation; building construction; paving and asphalting; construction workers traveling to and from the Project Site; and delivery and hauling of construction supplies and debris to and from the Project Site. As set forth in the Certified EIR, under the Original Stadium Project, off-site construction noise levels would range from 67.9 dBA Leq near the southwest corner of the Project Site to 83.1 dBA Leq at the northern boundary of the Project Site. When compared with the existing ambient noise environment, construction activities associated with the Original Stadium Project would result in a temporary or periodic increase in noise levels at the off-site noise sensitive receptor locations near the southwestern corner of the Project Site (Receptor Location 1) and near the northern boundary of the Project Site (Receptor Location 2). While Mitigation Measures MM G-1 through MM G-4 would reduce the impacts to the maximum extent feasible, such impacts would remain significant and unavoidable.

a. On-Site Construction Activities

It is anticipated that the types of construction equipment that would be used for construction of the Modified Project would be similar to those used for the Original Stadium Project. A detailed construction noise model was created in the Noise Study prepared for the Modified Project by Acoustical Engineering Services (AES), dated August, 2015 included in Appendix O of the Modified Project Addendum to calculate the construction-period noise levels at the off-site sensitive receptors, using the construction equipment reference noise levels provided by the Federal Highway Administration (FHWA). The average (hourly Leq) noise level associated with each construction phase is calculated based on the anticipated quantity and type of equipment that would be used during each construction phase. Table 12 on page 124 of the Modified Project Addendum provides the estimated construction noise levels for various

construction phases at the Project Site's off-site noise-sensitive receptors. To represent the maximum construction noise levels at the off-site sensitive receptors, all construction equipment was assumed by the Noise Study to operate simultaneously and was assumed to be located at the construction area nearest to the affected receptors. As indicated in Table 12, the estimated construction-related noise would exceed the significance threshold (existing ambient plus 5 dBA) at the noise-sensitive uses located near the southwest corner of the Project Site (Receptor Location 1) and at the northern boundary of the Project Site (Receptor Location 2), similar to the Original Stadium Project. Mitigation Measures G-1 through G-4 set forth in the Certified EIR would reduce these impacts to the maximum extent feasible. However, as with the Original Stadium Project, such impacts would continue to be significant and unavoidable (refer to Section IV.L, Comparative Analysis of Modified Project Impacts, Noise, of the Modified Project Addendum). Therefore, the Modified Project would not result in any new significant impacts with respect to on-site construction noise, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

b. Off-Site Construction Noise

As set forth in the Certified EIR, the projected haul route that would be used by haul and delivery trucks for the Original Stadium Project was anticipated to be east/west bound on Martin Luther King, Jr. Boulevard to/from the Project Site utilizing the Interstate 110 (I 110) Freeway. In addition, a secondary haul truck route for the Modified Project may use Figueroa Street to Martin Luther King, Jr. Boulevard and then to the I-110 Freeway. The Certified EIR concluded that the noise levels generated by construction trucks would be substantially similar to the existing noise levels generated by other buses, trucks, and automobiles along the haul route and as such, determined that off-site construction noise impacts would be less than significant.

c. **As discussed in detail in the Noise Study, to present a worst-case scenario for the Modified Project, the off-site construction noise analysis is based on the construction phase with the maximum number of construction trucks. Based on an 11-hour work day and even distribution of haul trucks, there would be approximately 36 haul truck trips and 35 worker trips (based on the A.M. peak hour). The estimated noise level from Project construction-related truck and worker traffic would be 67.6 dBA Leq at the residential uses along Martin Luther King, Jr. Boulevard (between the Project Site and the I-110 freeway) and 60.7 dBA at the residential uses east of Figueroa Boulevard. These noise levels would be below existing ambient noise levels for both the projected haul route and the secondary haul route. Therefore, similar to the Original Stadium Project, noise impacts associated with off-site construction under the Modified Project would be less than significant (refer to Section IV.L, Comparative Analysis of Modified Project Impacts, Noise, of the Modified Project Addendum). No mitigation measures are required. Therefore, the Modified Project would not result in any new significant impacts with respect to off-site construction noise, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.**

d. Construction Vibration

As set forth in the Certified EIR, vibration levels associated with construction of the Original Stadium Project could reach as high as approximately 87 VdB within 25 feet of the Project

Site from the operation of construction equipment. The nearest sensitive uses would not experience construction related vibration levels above 78.1 VdB. Consequently, the vibration level that would be experienced by these uses would not exceed the Federal Transit Administration's (FTA) vibration impact thresholds, and construction vibration impacts would be considered less than significant.

The vibration analysis for the Modified Project provided in the Modified Project Addendum conservatively used the closest distance to construction activity and the construction phase with the equipment mix that would result in the greatest potential vibration. Under the Modified Project, the closest receptor to construction activities would continue to be Receptor Location 2 north of the Project Site. Based on an approximate distance of 50 feet, the construction-related vibration level at this location would be approximately 78 VdB, similar to the Original Stadium Project. This vibration level is less than the FTA's vibration impact threshold. Therefore, ground-borne vibration impacts associated with Modified Project construction would also be less than significant, consistent with the analysis of the Original Stadium Project (refer to Section IV.L, Comparative Analysis of Modified Project Impacts, Noise, of the Modified Project Addendum). No mitigation measures are required. Therefore, the Modified Project would not result in any new significant impacts with respect to construction vibration, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Mitigation Measures

The Certified EIR included code required measures and mitigation measures to mitigate the Original Stadium Project's noise impacts to the extent feasible. These code required measures and mitigation measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP included with the Modified Project Addendum (see Addendum Appendix A), with the revisions indicated below to reflect the design characteristics of the Modified Project. It should be noted that the exterior construction hour restrictions established for the Original Stadium Project by code required measure CR G-2 in the Certified EIR, which would also apply to the Modified Project, are more restrictive than the construction hour noise regulations currently set forth in Section 41.40 of the LAMC, which prohibit construction activities before 7:00 A.M. and after 9:00 P.M. Monday through Friday, before 8:00 A.M. and after 6:00 P.M. on Saturday or on a national holiday, and at any time on Sunday.

Code Required Measures

CR G-1: The Applicant shall comply with the LAMC, which prohibits the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

CR G-2: The Applicant shall ensure exterior construction and demolition activities are limited to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

Project-Specific Mitigation Measures

MM G-1: The Applicant shall prepare a Construction Management Plan detailing proposed haul routes and staging areas for the transportation of materials and equipment, with consideration for sensitive uses in the neighborhood. The Construction Management Plan shall be submitted for approval by LADOT and the Department of Building and Safety prior to the

issuance of any permits. The Construction Management Plan shall include the following requirements:

- The preferred haul route to and from the Project Site shall be Martin Luther King, Jr. Boulevard to and from the Harbor Freeway. Trucks shall not be permitted to travel along local residential streets.
- A flagman shall be placed at the truck entry and exit from the Project Site onto Martin Luther King, Jr. Boulevard to control the flow of exiting trucks.
- Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel periods to the degree possible and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time.
- Access shall remain unobstructed for land uses in proximity to the Project Site during construction of the Modified Project.
- In the event of a lane or sidewalk closure, a worksite traffic control plan, approved by the City of Los Angeles, shall be implemented to route traffic or pedestrians around any such lane or sidewalk closures.
- The locations of truck staging shall be identified and measures shall be included to ensure that trucks use the specified haul route and do not travel through nearby residential neighborhoods.
- Vehicle movements shall be scheduled to minimize vehicles waiting off-site and impeding public traffic flow on the surrounding streets.
- Requirements shall be established for the loading, unloading, and storage of materials on the Project Site.
- Requirements shall be established for the temporary removal of parking spaces, time limits for the reduction of travel lanes, and closing or diversion of pedestrian facilities to ensure the safety of pedestrian and access to local businesses.
- The Applicant shall coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses.
- If the construction periods for the Modified Project and the My Figueroa street improvement project overlap, the Applicant shall coordinate with the City to minimize the potential combined effects of the two projects to the extent possible.

MM G-2 The Applicant shall ensure all construction equipment engines be properly tuned and muffled according to manufacturers' specifications. For example, Table IV.G-6 in the Certified EIR indicates that noise levels of 82 dBA at 50 feet could be reduced to a noise level of 76 dBA at 100 feet with the proper use of mufflers.

MM G-3 Adjacent museums and residents shall be given regular notification of major construction activities and their durations. A visible and readable sign (at a distance of 50 feet) shall be posted on the construction site identifying a telephone number where residents can inquire about the construction process and register complaints.

MM G-4 The perimeter of the Project Site shall be enclosed with a temporary barrier wall for security and noise protection purposes during project construction. This barrier wall shall consist of a solid, heavy vinyl material or 0.75-inch plywood positioned to block direct line of sight from the active construction areas and other open space areas and sensitive uses.

3. Findings

Changes or alterations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the significant environmental impact of construction noise, as identified in the Certified EIR and Modified Project Addendum. Although such measures may reduce the impacts, the Modified Project may be considered to result in a significant and unavoidable impact on the environment with respect to construction noise. Specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or project alternatives identified in the Certified EIR and Modified Project Addendum.

4. Rationale for Findings

Construction related noise arising primarily from the use of on-site equipment during the construction phase was studied under the Certified EIR and found to produce noise that would exceed 5 dBA above measured ambient noise at passive recreational and open space areas in Exposition Park north and west of the Sports Arena, as well as at the Los Angeles County and State Museums in Exposition Park. With compliance with the LAMC and the implementation of the Mitigation Measures G-1 through G-4, which would require the implementation of noise reduction devices and techniques during construction at the project site, construction-related noise impacts associated with the Modified Project would be reduced to the maximum extent feasible. Nevertheless, because construction noise levels are likely to exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three-month period, construction noise impacts would be significant and unavoidable.

5. Reference

For a complete discussion of impacts associated with construction noise, please see Section IV.G of the Certified EIR and Section IV.L and IV.Q of the Modified Project Addendum.

E. Noise (Operation)

1. Description of Environmental Effects

a. Stadium Use

(1) Event Day Use

Operational noise sources contemplated and evaluated under the Certified EIR included crowd noise (particularly yells and cheers at high attendance events), a public address system (amplified public announcements and/or play-by-play announcements), amplified concert music, traffic-related noise, and helicopters and other aircraft covering the events. As set forth in the Certified EIR, the noise levels during soccer games and related sporting events would be substantially similar to the peak noise generating events currently occurring at the Coliseum. However, noise levels generated during concert and related events that would involve the use of amplified music and announcements would be increased compared to existing conditions and could have the potential to adversely impact neighboring uses to the east and south of the Project Site. Accordingly, the Certified EIR determined that concert noise would exceed ambient conditions by five decibels at adjacent residential adjacent areas during off-peak traffic times when ambient noise levels in surrounding communities are lower. Therefore, operational noise impacts

from stadium events were determined to be significant. The Certified EIR concluded that no feasible mitigation has been identified to reduce the noise level below the applicable significance threshold, and therefore that impacts from stadium events would be significant and unavoidable.

Under the Modified Project, noise impacts associated with the stadium use including MLS soccer games, concerts, and community events would be similar to those analyzed in the Certified EIR for the Original Stadium Project. Thus, noise associated with the stadium use, including crowd noise including yelling and cheering at high attendance events and the public address system, would also exceed the ambient levels at the off-site sensitive uses by 5 dBA or more. Therefore, as with the Original Stadium Project, impacts associated with stadium operations under the Modified Project (i.e. related to concerts, crowd noise including yelling and cheering, a public address system, amplified music, and announcements) would also be significant. No feasible mitigation measures have been identified to reduce the noise level below the applicable significance threshold, and therefore impacts would remain significant and unavoidable.

While not specifically discussed in the Certified EIR for the Original Stadium Project, during existing events held at the Sports Arena, crowds gather in the parking areas and outdoor spaces immediately surrounding the Sports Arena before or after an event when entering and exiting the stadium. The Modified Project's use of outdoor spaces is anticipated to be similar to the existing conditions on an event day. As part of the Noise Study included at Appendix O of the Modified Project Addendum, an analysis was conducted of use of the Modified Project's outdoor spaces including the Northwest Plaza (e.g., the outdoor dining/seating areas), rooftop terraces (e.g., seating areas, gathering spaces, water features (such as a reflection pool or pool), and art), and the outdoor spaces along the northern and eastern side of the Project Site with people gathering and talking before or after an event. The Noise Study estimated that up to 22,000 people could gather within these outdoor spaces, which is the maximum capacity of the Modified Project stadium. As discussed in Section IIII.C, Modified Project Description, and pursuant to Project Design Feature O-4 in Section IV.O, Traffic/Transportation/Parking, on event days the ancillary uses proposed as part of the Modified Project would be open only to ticket-holding game/event patrons during a period of time before, during and after the game/event. Therefore, 22,000 represents a maximum number of people who could gather within the outdoor spaces at the Project Site on an event day. While a total of 22,000 people were analyzed, this represents a conservative worst-case analysis because all game/event patrons are not anticipated to utilize the outdoor spaces at once.

Reference noise levels of 75 dBA and 71 dBA (Leq at a distance of 3.3 feet) for a male and a female speaking in a loud voice, respectively, were used for analyzing noise from the use of these outdoor areas surrounding the Modified Project. In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. Table 3 of the Noise Study presents the estimated noise levels from simultaneous use of the outdoor spaces at the off-site sensitive receptors. As indicated in the Table 3 of the Noise Study, the estimated noise levels at the off-site sensitive uses would be below the significance threshold of 5 dBA Leq above ambient noise levels. Thus, potential impacts associated with the use of the outdoor spaces during an event day would be less than significant and no mitigation measures would be required. (refer to Section IV.L, Comparative Analysis of Modified Project Impacts, Noise, of the Modified Project Addendum)

(2) Use of Project Site During Non-Event Days

The Modified Project includes approximately 105,900 square feet of Ancillary Use floor area, including office and conference facility space, a "World Football" museum, a team store and other retail space, and restaurants (including outdoor dining). Most of the ancillary uses would be centered around the stadium's main entry plaza at the northwest corner of the Project Site (Northwest Plaza), which would also contain outdoor seating and gathering space, and thus would be shielded from the off-site residential uses to the east and south of the Project Site. In addition, the Modified Project would provide a 40- to 70 foot setback along Figueroa Street to activate the pedestrian realm. This area would be developed as a broad, landscaped sidewalk to provide sufficient space for patrons to circulate and queue on event days, and to provide an inviting and safe pedestrian environment on non-event days. Additionally, up to 3,975 sf of retail and restaurant use floor area could be located along the stadium's Figueroa Street frontage.

Noise sources at the Northwest Plaza (e.g., the outdoor dining/seating areas), rooftop terraces (e.g., seating areas, gathering spaces, water features (such as a reflection pool or pool), and art) and the outdoor spaces along the northern and eastern side of the Project Site would include people gathering and talking and the use of an outdoor amplified sound system. Use of the outdoor areas could occur seven days a week with potential hours of operation until 2:00 A.M. For an event day an analysis was conducted of 22,000 people gathering in these outdoor spaces. To provide a conservative analysis, the analysis of a non-event day added the use of an outdoor amplified sound system to the analysis of people gathering in the outdoor spaces on an event day. Consistent with the event day analysis, it was estimated that up to 22,000 people could gather at the outdoor spaces, which is substantially higher than the number of people anticipated on the Project Site on non-event days. The same assumptions regarding reference noise levels and persons talking that were used in the event day outdoor gathering noise analysis were used for the non-event day. In addition, in accordance with Project Design Feature L-1, the amplified program sound system would be designed so as not to exceed a maximum noise level of 85 dBA Leq and 75 dBA Leq at a distance of 50 feet within the Northwest Plaza and the Figueroa Street frontage, respectively. Table 13 on page 128 of the Modified Project Addendum presents the estimated noise levels from simultaneous use of the outdoor spaces at the off-site sensitive receptors with the amplified program sound system. As indicated in Table 13 of the Modified Project Addendum, the estimated noise levels at the off-site sensitive uses on non-event days would be below the significance threshold of 5 dBA Leq above ambient noise levels. Thus, potential impacts associated with the use of the outdoor spaces on non-event days, along with an amplified program sound system complying with Project Design Feature L-1, would be less than significant and no mitigation measures would be required (refer to Section IV.L, Comparative Analysis of Modified Project Impacts, Noise, of the Modified Project Addendum).

(3) VIP Parking Lot

As set forth in the Certified EIR, the Original Stadium Project would not increase the maximum size of the events currently held at the existing Sports Arena. Combined with the Coliseum, the Project Site currently holds events ranging from 500 to 93,000 people in attendance. Events and attendance proposed at the new event/soccer stadium facility are

within the purview of the existing operations of the Sports Arena and the Coliseum and would not result in an increase in the number of people (or motor vehicles) for individual events at the Sports Arena. Accordingly, parking related noise would not be increased as a result of the Original Stadium Project as compared to existing conditions. Thus, parking-related noise impacts under the Certified EIR were concluded to be less than significant.

Under the Modified Project, the existing VIP parking lot west of the stadium would be reconfigured and re-landscaped to provide a secure, VIP parking lot with up to approximately 250 parking spaces. The parking lot would be surrounded by a perimeter fence and gates and accessed from South Coliseum Drive, similar to existing conditions. The proposed VIP parking lot would be similar to that set forth under the Original Stadium Project, and for the reasons described above and in the Certified EIR, would result in less than significant noise impacts (refer to Section IV.L, Comparative Analysis of Modified Project Impacts, Noise, of the Modified Project Addendum). No mitigation measures are required.

(4) Loading Dock Activities

While not specifically evaluated in the Certified EIR for the Original Stadium Project, noise associated with the loading dock activities would not increase the ambient noise levels at the off-site noise sensitive uses due to the sound attenuation provided by the relatively long distances and intervening structures between the sensitive off-site uses and the loading dock. As such impacts associated with use of the loading dock under the Original Stadium Project would be less than significant. The Modified Project could include both above-grade and below-grade loading docks, which would be located within the northwest portion of the Project Site along the southern and western perimeters of the ancillary uses, respectively. The nearest residences to the south and to the east would be at least approximately 615 feet and 900 feet, respectively, from the above-grade loading dock (which has the greater potential to generate noise that could be heard at nearby sensitive receptors). As stated in the Noise Study, noise levels would be approximately 65 dBA Leq at a distance of 100 feet, based on measured noise levels from other loading dock facilities. Based on this reference noise level, distance attenuation, and intervening structures, loading dock noise levels at Receptor Location 4 (to the south) and Receptor Location 3 (to the east) would be approximately 39 dBA Leq and 36 dBA, respectively, which would be well below the measured ambient noise levels. Furthermore, the above-grade loading dock would be shielded from the off-site sensitive receptors to the east (Receptor Location 3) by the new stadium structure and the off-site sensitive receptors to the south (Receptor Location 4) by part of the ancillary uses structure. Additionally, the majority of the loading activities would occur at the below-grade loading docks. Therefore, noise impacts associated with loading dock operations under the Modified Project would be less than significant and no mitigation measures would be required (refer to Section IV.L, Comparative Analysis of Modified Project Impacts, Noise, of the Modified Project Addendum).

b. Off-Site Traffic

As discussed above and in the Certified EIR, the Original Stadium Project would not increase the maximum size of the events currently held at the Project Site in the existing Sports Arena. Accordingly, the number of vehicles and vehicular-related noise would not be increased as a

result of the Original Stadium Project. Thus, traffic noise impacts evaluated the Certified EIR were concluded to be less than significant.

As set forth in the Modified Project Transportation Report included as Appendix P-1 of the Modified Project Addendum, similar to the Original Stadium Project, the Modified Project would not generate substantial additional traffic on an event day. Therefore, as with the Original Stadium Project, noise impacts from off-site traffic on event days would be less than significant under the Modified Project. However, the proposed ancillary uses do not currently exist on the Project Site and were not included as part of the Original Stadium Project. Therefore, noise impacts associated with the off-site traffic generated from the ancillary uses on a non-event day have been analyzed based on the traffic volumes provided in the Modified Project Transportation Report. As provided in the Modified Project Transportation Report, the ancillary uses are estimated to generate approximately 2,615 daily trips on a non-event day. As such, Modified Project-related traffic would increase the existing traffic volumes along the roadway segments in the vicinity of the Project Site when compared with "Future (2018) Without Project" conditions set forth in the Modified Project Transportation Report (see Appendix P-1 of the Modified Project Addendum). This increase in roadway traffic was analyzed to determine if any traffic-related noise impacts would result from the ancillary uses.

Twenty (20) roadway segments were selected to evaluate potential traffic noise impacts. These segments were selected based on proximity to noise-sensitive uses along the roadway segments and potential increases in traffic volumes from the Modified Project. Traffic noise levels were calculated using the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) and traffic volume data from the Modified Project Transportation Report. The TNM traffic noise prediction model calculates the hourly Leq noise levels based on specific information including the hourly traffic volume, vehicle type mix, vehicle speed, and lateral distance between the noise receptor and the roadway. To calculate the 24-hour CNEL levels, the hourly Leq levels were calculated during daytime hours (7:00 A.M. to 7:00 P.M.), evening hours (7:00 P.M. to 10:00 P.M.), and nighttime hours (10:00 P.M. to 7:00 A.M.). To determine the Modified Project-related noise impacts, the roadway noise conditions under "Future (2018) Without Project" conditions set forth in the Modified Project Transportation Report (see Appendix P-1 of the Modified Project Addendum) were calculated and compared to noise levels that would occur with implementation of "Future (2018) Plus Project" conditions set forth in the Modified Project Transportation Report.

Table 5 of the Noise Study provides the calculated off-site roadway noise levels in the vicinity of the Project Site for the Future (2018) Without Project and Future (2018) Plus Project conditions. The calculated CNEL levels are applicable to the front of the roadways and do not account for the presence of any physical sound barriers or intervening structures. As shown in Table 5, traffic from the ancillary uses would result in a maximum increase of up to 0.1 dBA (CNEL) at some of the roadway segments. The 0.1-dBA increase in traffic noise levels is considered negligible and would be well below the 3-dBA significance threshold (applicable when noise level falls within the normally unacceptable category; i.e., 70 CNEL or greater at noise-sensitive uses). Therefore, off-site traffic noise impacts associated with the ancillary uses would be less than significant. Thus, similar to the Original Stadium Project, noise impacts associated with off-site roadways under the Modified Project would be less than significant (refer to Section IV.L, Comparative Analysis of Modified Project Impacts, Noise, of the Modified Project Addendum). No mitigation measures are required.

The Modified Project and related projects in the area would 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 Plus Project conditions to the applicable significance criteria. Future cumulative conditions include traffic volumes from future ambient growth, related projects, and the Modified Project. The calculated traffic noise levels under Existing and Future Plus Project conditions are presented in Table 6 of the Noise Study. As shown therein, cumulative traffic volumes would result in a maximum increase of 0.6 dBA CNEL along Figueroa Street (north of Exposition Avenue). The estimated cumulative noise increase would be below the 3 dBA significance threshold. Therefore, cumulative noise impacts due to off-site mobile noise sources associated with the Modified Project, future growth, and related projects would be less than significant (refer to Section IV.Q, Comparative Analysis of Modified Project Impacts, Cumulative Impacts, of the Modified Project Addendum). No mitigation measures are required.

2. Project Design Features and Mitigation Measures

The Certified EIR included code required measures and mitigation measures to mitigate the Original Stadium Project's noise impacts to the extent feasible. These code required measures and mitigation measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP included with the Modified Project Addendum (see Addendum Appendix A), with the revisions indicated below to reflect the design characteristics of the Modified Project.

Code Required Measures

CR G-1: The Applicant shall comply with the LAMC, which prohibits the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Project-Specific Mitigation Measures

3. Findings

Changes or alterations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the significant environmental impact of operational noise of the Modified Project from events. Although such measures may reduce the impacts, the Modified Project may be considered to result in a significant and unavoidable impact stemming from operational noise. Specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or project alternatives identified in the Certified EIR and the Modified Project Addendum.

4. Rationale for Findings

The Original Stadium Project was found to involve the replacement of an existing indoor venue with an outdoor venue generating a new source of noise studied under the Certified EIR and estimated to exceed ambient conditions by five decibels. As with the Original Stadium Project, impacts associated with stadium operations under the Modified Project (i.e. related to concerts, crowd noise including yelling and cheering, a public address system, amplified music, and announcements) would also be significant. As no feasible mitigation has been identified to reduce these noise levels below five decibels, operational noise impacts from events in the Modified Project would be considered significant and unavoidable.

5. Reference

For a complete discussion of impacts associated with operational noise, please see Section IV.G of the Certified EIR and Section IV.L and IV.Q of the Modified Project Addendum.

VII. ALTERNATIVES TO THE MODIFIED PROJECT

In addition to the Original Stadium Project, the Certified EIR evaluated two reasonable alternatives to the Original Stadium Project. These alternatives are: (1) the No Project Alternative, and (2) the Historic Retention Alternative. In accordance with CEQA requirements, these alternatives include a no project alternative and alternatives capable of eliminating the significant adverse impacts of the Original Stadium Project. These alternatives and their impacts, which are summarized below, are more fully described in Section VI of the Certified EIR.

A. Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no alternative or feasible mitigation measure within its powers would substantially lessen or avoid any significant effect the Modified Project would have on the environment.

B. Project Objectives

An important consideration in the analysis of alternatives to the Modified Project is the degree to which such alternatives would achieve the objectives of the Project. Chapter 2.0, Project Description, of the Certified EIR, in recognition of the Coliseum Commission's duties under Section 12(f) of the Los Angeles Coliseum Commission Joint Powers Agreement, states that the underlying purpose of the Project is to address the major repairs and renovation required for the Sports Arena to extend its structural lifespan, increase programming options and generate revenues to become an economically self-sustaining entertainment venue.

The Certified EIR states several specific Project objectives applicable to both the then-available Mixed-Use Option and the Original Stadium Project:

1. To plan for the long-term use and operation of the Sports Arena property to fulfill the duties of the Coliseum Commission as identified in the Joint Powers Agreement. Specifically, the Coliseum Commission seeks to evaluate and develop a successful plan that will enable the Coliseum Commission to manage and use the Sports Arena property for competitive sports, athletics, games, pageants, plays, celebrations, patriotic or religious gatherings, festivals, exhibits, industrial, trade, horticultural or agricultural shows, conventions, and exhibitions and productions of a local, regional, national, or international character in a manner that is economically self-sufficient and consistent with the terms of the Sports Arena ground lease between the Coliseum Commission and the Sixth District Agricultural Association.
2. To enhance the prestige and visibility of Exposition Park and the City of Los Angeles through the development of a modern, world-class sports, entertainment, and cultural use complex.
3. To assure that Project Site operations generate enough revenue to enable the Coliseum Commission to preserve and maintain the Project Site and its sister facility, the Coliseum, in a self-sufficient manner.
4. To utilize the existing topography of the Project Site without the need for a substantial amount of additional grading.

5. To serve the community's need for public outdoor gathering spaces.

The Certified EIR further states an additional set of Project objectives applicable to the Original Stadium Project:

6. To provide a stadium venue in conformance with the generally accepted standards of design for Major League Soccer (MSL) stadiums, thus enabling the Coliseum Commission to host MSL games in Exposition Park.
7. To provide a stadium venue in conformance with the generally accepted standards of design for collegiate soccer, thus enabling a landlord/tenant relationship with a USC soccer team.
8. To provide spectators and users of the stadium with the amenities and conveniences consistent with a state-of-the-art facility, including restrooms, concession, and press facilities; spectator viewing; luxury suites and club seating; locker and dressing facilities; and parking and circulation space.
9. To utilize the existing topography of the Project Site without the need for a substantial amount of additional grading.

C. Project Alternatives

1. No Project Alternative

a. Description of Alternative

Alternative 1, the No Project Alternative, assumes that no new development would occur within the Project Site. As discussed previously, the Project Site is currently occupied primarily by the Los Angeles Memorial Sports Arena. Under the No Project Alternative, the Sports Arena would not be demolished in favor of a state-of-the-art approximately 22,000 seat MLS Stadium and ancillary uses providing a mix of retail, restaurant, office, conference facilities, museum, and team store uses.

At the time of the Certified EIR, as stated therein, the utilization of the Sports Arena included hosting on average, approximately 69 events a year with an average of approximately 60 events (or approximately 87 percent of the annual bookings) attracting fewer than 10,000 attendees, 6 events (or approximately 9 percent of the annual bookings) attracting crowds between 10,000 and 20,000 attendees, and an average of 3 events per year (or roughly 4 percent of the total annual bookings) with attendance levels above 20,000. (See Table VI.1 of the Certified EIR) Theses attendance records generally project continued use and operations at the Sports Arena under the No Project Alternative.

b. Impact Summary of No Project Alternative

Implementation of the No Project Alternative would not result in new environmental impacts, and overall would result in a reduced level of impact when compared to the Modified Project. Specifically, this alternative would result in no impact or less than significant impact to aesthetics/visual resources; agriculture and forestry resources; air quality; biological resources; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; mineral resources; noise; population, housing and employment; public services; traffic and circulation; and utilities and

service systems. Additionally, all of the significant and unavoidable impacts associated with the proposed Modified Project would be avoided under the No Project Alternative.

c. Finding

With this No Project Alternative, the new environmental impacts projected to occur from development of the Modified Project would be avoided or reduced. Therefore, this Alternative would be an environmentally superior alternative to the Modified Project. However, while the No Project Alternative could partially meet Objective 4 to utilize existing grounds without substantial grading and Objective 5 to serve the community's need for outdoor spaces, it would not meet these objectives as fully as the Modified Project. Further, this Alternative does not meet the remaining objectives identified in the Certified EIR. Therefore, it is found pursuant to Public Resources Code Section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the No Project Alternative described in the Certified EIR.

d. Rationale for Finding

The No Project Alternative would reduce the Modified Project's significant and unavoidable impacts for construction air quality, construction and special event noise, and historic resources. However, the No Project Alternative would not fulfill the Modified Project's goals and objectives.

As stated in Certified EIR Section 2.0, Project Description, the Sports Arena and Coliseum complex is supported solely by revenue generated from its operations and no taxpayer funds are used to support the existing facilities. Because the Sports Arena is in need of major repairs and renovation in order to extend its structural lifespan and programming opportunities to become an economically self-sufficient sports and entertainment venue, the No Project Alternative could jeopardize the ability for the Sports Arena to continue its current operations into the foreseeable future. At the time of the Certified EIR, the Los Angeles Memorial Sports Arena had an operating loss of between $750,000 and $900,000 each of the prior five fiscal years. It is anticipated that the Sports Arena will continue to lose a significant amount of money for the foreseeable future. Further, the Sports Arena will require significant capital expenditures just to keep it operating, including expenditures on new seats, a new HVAC system, new ice floor and plumbing, bathroom remodeling, and concession stand remodeling. Furthermore, the above improvements would merely maintain the status quo, and would not make the Sports Arena any more competitive with other similar venues in and around Los Angeles. Ultimately, the Coliseum Commission concluded in the Certified EIR that the No Project Alternative would necessitate closure of the Sports Arena. The City concurs with this conclusion.

Accordingly, this Alternative fails to meet the Project objectives. The No Project Alternative would preclude the ability of the Sports Arena to operate as an economically viable and self-sufficient facility capable of hosting a wide variety of athletic, cultural, political, and community events. Overall, the No Project Alternative would be inferior to the Modified Project with respect to achieving all of the important Project objectives. Therefore, this Alternative is infeasible and less desirable than the Modified Project and is rejected.

e. Reference

For a complete discussion of impacts associated with the No Project Alternative, please see Section VI.A of the Certified EIR.

2. Historic Retention Alternative

a. Description of Alternative

Alternative 2, the Historic Retention Alternative, would involve renovating the Sports Arena in accordance with the Secretary of Interior's Standards for the Rehabilitation of Historic Structures. The existing structure would not be demolished and renovation efforts would be aimed at maintenance projects and providing modern amenities to make the facility an attractive and desirable location for sporting, entertainment and civic events.

Improvements necessary to keep the Sports Arena operational under this Alternative would include new seats, a new HVAC system, new ice floor and plumbing, bathroom remodeling, and concession stand remodeling. Exterior improvements would be limited to upkeep of the landscaped grounds and painting the exterior facade of the structure. As the Coliseum Commission found in the Certified EIR, due to the age of the facility, the continued use and renovation of the Sports Arena would require significant short term capital expenditures.

b. Impact Summary of Historic Retention Alternative

Implementation of the Historic Retention Alternative would result in no impact or less than significant impacts to aesthetics/visual resources; agriculture and forestry resources; air quality; biological resources; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; mineral resources; noise; population, housing and employment; public services; traffic and circulation; and utilities and service systems. Additionally, all of the significant and unavoidable impacts associated with the proposed Modified Project would be avoided under the Historic Retention Alternative.

c. Finding

With this Historic Retention Alternative, new environmental impacts projected to occur from development of the Modified Project would be avoided or reduced. Therefore, this Alternative would be an environmentally superior alternative to the Modified Project. However, while the Historic Retention Alternative could partially meet Objective 4 to utilize existing grounds without substantial grading and Objective 5 to serve the community's need for outdoor spaces, it would not meet these objectives as fully as the Modified Project. Further, this Alternative does not meet the remaining objectives identified in the Certified EIR. Therefore, it is found pursuant to Public Resources Code Section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Historic Retention Alternative described in the Certified EIR.

d. Rationale for Finding

The Historic Retention Alternative would reduce the Modified Project's significant and unavoidable impacts for construction air quality, historic resources, construction and special event

noise, and land use compatibility (construction). However, the Historic Retention Alternative would not fulfill any of the Modified Project's goals and objectives.

As stated in Certified EIR Section 2.0, Project Description, the Sports Arena and Coliseum complex is supported solely by revenue generated from its operations and no taxpayer funds are used to support the existing facilities. Because the Sports Arena is in need of major repairs and renovation in order to extend its structural lifespan and programming opportunities to become an economically self-sufficient sports and entertainment venue, the Historic Retention Alternative could jeopardize the ability for the Sports Arena to continue its current operations into the foreseeable future. At the time of the Certified EIR, the Los Angeles Memorial Sports Arena had an operating loss of between $750,000 and $900,000 each of the prior five fiscal years. It is anticipated that the Sports Arena will continue to lose a significant amount of money for the foreseeable future. Further, the Sports Arena will require significant capital expenditures just to keep it operating, including expenditures on new seats, a new HVAC system, new ice floor and plumbing, bathroom remodeling, and concession stand remodeling. Furthermore, the above improvements would merely maintain the status quo, and would not make the Sports Arena any more competitive with other similar venues in and around Los Angeles.

Ultimately, the Coliseum Commission concluded in the Certified EIR that the Historic Retention Alternative would preclude the ability of the Sports Arena to operate as an economically viable and self-sufficient facility capable of hosting a wide variety of athletic, cultural, political, and community events. The City concurs with this conclusion. It is anticipated that the costs associated with the ongoing maintenance and repair of the aging facility, and the requirements to maintain the structure's eligibility for listing as a historic resource on the California or National Register would exceed the operating revenue of the limited ongoing use of the facility. Overall, the Historic Retention Alternative would be inferior to the Modified Project with respect to achieving all of the important Project objectives. Therefore, this Alternative is infeasible and less desirable than the Modified Project and is rejected.

e. Reference

For a complete discussion of impacts associated with the Historic Retention Alternative, please see Section VI.A of the Certified EIR.

3. 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 the EIR. The State CEQA Guidelines further state that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. Accordingly, the environmentally superior alternative is the No Project Alternative. The No Project Alternative would eliminate all of the Project's potentially adverse effects upon the environment as it would maintain the status-quo.

In accordance with the State CEQA Guidelines requirement to identify an environmentally superior Alternative other than the No Project Alternative, the Historic Retention Alternative, which like the No Project Alternative fails to meet project objectives, would be considered the Environmentally Superior

Alternative. Both the No Project Alternative and the Historic Retention Alternative would generate identical impacts with respect to operational impacts. While the Historic Retention Alternative would result in some short-term construction related impacts associated with interior and exterior improvements and maintenance, it would avoid all of the significant unavoidable impacts that were identified for the Original Stadium Project and the Modified Project.

VIII. OTHER CEQA CONSIDERATIONS

A. Growth Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in an Environmental Impact Report. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA growth must not be assumed as beneficial, detrimental, or of little significance to the environment (refer to Section V, General Impact Categories, of the Certified EIR).

The Modified Project could foster economic growth by increasing the number of visitors to the Project Site, mainly on weekends and weekday evenings. New employment opportunities provided during the construction and operation of the Modified Project could bring new residents to the City. Increased operating and tax revenues accruing to the Coliseum Commission could promote further reinvestment in the Project area, leading to further redevelopment and revitalization of the immediate neighborhood.

Ultimately, however, the Modified Project is a contained development within the Project Site. The replacement of the Sports Arena with an approximately 22,000-seat MLS stadium under the Modified Project merely updates an existing stadium use at the Project Site. Additionally, as existing roadways and infrastructure (e.g., water facilities, electricity transmission lines, natural gas lines, etc.) are will adequately serve project, no growth is anticipated by cause of new project-related infrastructure. Accordingly, considering the above reasons, the Modified Project would not induce additional growth beyond current projections for the Project Site based on its existing use.

B. Significant Irreversible Environmental Changes

According to Sections 15126(c) and 15126.2(c) of the CEQA Guidelines, an EIR is required to address any significant irreversible environmental changes that would occur should the proposed Modified Project be implemented. As stated in CEQA Guidelines Section 15126.2(c):

"[u]ses 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 likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

Consistent with the analysis on pages V-6 through V-7 of the Certified EIR, development of the Modified Project would necessarily consume limited, slowly renewable and non-renewable resources during construction and operation. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site. Non-renewable and slowly-renewable resources that

would be consumed under the Modified Project include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics) and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment. The commitment of resources required for the type and level of proposed development could limit the availability of these resources for future generations for other uses during the operation of the Modified Project.

The Modified Project would contribute to a land use pattern that would help to reduce reliance on private automobiles and the consumption of non-renewable resources when considered in a larger context. Further, the Modified Project would include design features and be subject to development regulations that would reduce the demands for energy resources needed to support Modified Project operation. Continued use of non-renewable resources would be on a relatively small scale and consistent with regional and local growth forecasts in the area, as well as state and local goals for reductions in the consumption of such resources. The Modified Project would not affect access to existing resources, nor interfere with the production or delivery of such resources. The Project Site contains no energy resources that would be precluded from future use through Project implementation. Accordingly, the Modified Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant.

IX. STATEMENT OF OVERRIDING CONSIDERATIONS

The Certified EIR and Modified Project Addendum identified unavoidable significant impacts that would result from implementation of the Modified Project. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), 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 have been identified in the EIR which cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Certified EIR, the reference library to the Certified EIR, and documents and materials that constitute the record of proceedings including the Modified Project Addendum.

The following impacts are not mitigated to a less than significant level for the Modified Project: Air Quality (Regional NOX and ROG emissions during Construction); Historic Resources; Land Use Compatibility (Construction); and Noise (Construction and Operational Events Impacts). It is not feasible to mitigate such impacts to a less than significant level.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby finds that the project benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

The below stated reasons summarize the benefits, goals and objectives of the Modified Project, and provide, in addition to the above findings, the detailed rationale for the benefits of the project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the project justify

approval of the Modified Project Addendum in connection with the Coliseum Commission's previous certification of the Certified EIR, and support approval of the Modified Project. Many of these overriding considerations individually would be sufficient to outweigh the adverse environmental impacts of the Modified Project.

1. The Modified Project will create an iconic sports and entertainment venue with an approximately 22,000 seat state-of-the-art MLS stadium and ancillary uses which will complement the existing Coliseum and serve as a catalyst for the revitalization of Exposition Park.
2. The Modified Project will create a landmark stadium with contemporary, streamlined architecture that complements the aesthetic character of the Exposition Park through appropriate scale and high-quality architectural design and detail.
3. The Modified Project will allow an MLS expansion franchise to locate its home stadium within the heart of Los Angeles, instead of other potential franchise locations, and anchor the southern end of Figueroa Corridor's sports venues including LA Live and Dodger Stadium.
4. The Modified Project will provide needed new ancillary uses benefiting the surrounding community, including new restaurants and eating options serving Exposition Park visitors and nearby residents.
5. The Modified Project will provide a "World Football" museum that complements Exposition Park's other museum experiences.
6. The Modified Project will provide conference facilities lacking in the area that would serve as meeting spaces for outside organizations that will invigorate Exposition Park on non-event days.
7. The Modified Project will revitalize an urban infill site that is already equipped with the infrastructure to support a major sports and entertainment venue and easily accessed by transit, including Metro's Expo Light Rail Line and seven Metro bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Project Site, which will encourage the use of public transit.
8. The Modified Project would provide extensive new landscaping along public streets, sidewalks and pedestrian areas in character with the surrounding land uses within Exposition Park.
9. The Modified Project will provide approximately 143,000 square feet of improved public open space that would consist of pedestrian walkways and plazas featuring a mix of hardscape and landscape areas that will complement and expand the existing open space opportunities provided in Exposition Park.
10. Development of the Modified Project would include the Northwest Plaza, a welcoming pedestrian environment with a mix of hardscape and landscaped areas that could include water features, public art, and seating areas, and serve as an active public space on non-event days (e.g., for small concerts, red carpet events, and community events such as food festivals or art fairs) as well as a gathering space for pre-game events and other game-day activities. The Northwest Plaza would link the pedestrian improvements and open space areas that would encircle the stadium, and provide a significant and lively new public gathering area within Exposition Park.
11. The Modified Project would activate the pedestrian realm along Figueroa Street with a broad, landscaped sidewalk to provide space for patrons to circulate and queue on event days, and to provide an inviting and safe pedestrian environment on non-event days, and includes the potential to further activate Figueroa Street with restaurant and retail options on the street frontage.
12. The Modified Project will enhance Exposition Park, one of the City of Los Angeles's preeminent public parks and reservations of open space, by modernizing and beautifying the Sports Arena site and opening its retail, restaurant, conference and other ancillary offerings to the general public.

13. The Modified Project will preserve the visual character and views of the historic Los Angeles Memorial Coliseum, including preservation of the adjacent Christmas Tree Lane and iconic westward Coliseum views from Figueroa Boulevard.
14. The Modified Project reinforces public investment in transit infrastructure by concentrating new employment density and sports and entertainment uses adjacent to existing major transit options.
15. The Modified Project would support pedestrians and the use of bicycles through the use of setbacks and wide sidewalks, the addition of pedestrian friendly landscaping, and provision of substantial new bicycle parking.
16. The Modified Project would incorporate sustainability in its key design and operation criteria, through compliance with California's Energy Efficiency Standards for Residential and Nonresidential Buildings, the California Green Building Standards Code, and the City of Los Angeles Green Building Code (2013).
17. The Modified Project would result in an energy-efficient and environmentally conscious development designed to be capable of achieving at least Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) or equivalent green building standards.
18. Construction of the Modified Project will result in an approximately $274 million in economic output and operation of the Modified Project will generate approximately $129 million in annual economic output.
19. Implementation of the Modified Project will maintain and enhance the economic vitality of the region by providing approximately 1,228 job temporary job opportunities associated with the construction of the Modified Project and approximately 1,840 permanent jobs opportunities during operation of the Modified Project.

The Modified Project would maximize revenues to the City of Los Angeles in the form of increased tax revenues while also contributing economic benefits to local businesses in the City of Los Angeles. Construction of the Modified Project is anticipated to result in approximately $103 million in tax revenues and operation of the Modified Project is anticipated to result in $83 million in annual tax revenues.