

VI. Other CEQA Considerations



VI. Other CEQA Considerations

A. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2 (b) states:

Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Based on the analysis contained in Section IV, Environmental Impact Analysis, of this Draft EIR, significant and unavoidable environmental impacts would occur within the following topics of study:

1. Transportation

a. Intersections

The Proposed Project's transportation mitigation program would reduce the number of impacted intersections, in some cases to below a significant level of impact, and in others would partially mitigate the impacts. The analysis of the proposed temporary event street closures indicates that while post-event street closures would reduce vehicle-pedestrian conflicts in the immediate area of the Project Site, they would in certain cases cause secondary significant traffic impacts along routes to which traffic was diverted. In summary, the mitigation program would reduce the number of significantly impacted intersections from 11 to 4 during the Sunday Day Pre-Event Hour, and would partially mitigate an additional 3 intersections. Due to the temporary street closures, the number of significantly impacted intersections would increase from 18 to 20 during the Sunday Day Post-Event Hour, but would partially mitigate impacts at 9 intersections. The mitigation program would reduce the number of significantly impacted intersections from 31 to 28 during the Saturday Day Pre-Event Hour, and would partially mitigate an additional 24 intersections. Also due to the temporary street closures, the number of significantly impacted intersections would increase from 36 to 42 during the Saturday Day Post-Event

Hour, but would partially mitigate an additional 12 intersections. Project design features and mitigation measures would reduce the number of significantly impacted intersections from 77 to 72 during the Weekday Evening Pre-Event Hour, and would partially mitigate significant impacts at an additional 41 intersections. During the Weekday Evening Post-Event Hour, the number of significantly impacted intersections would decrease from 9 to 6, and significant impacts at an additional 4 intersections. The intersection mitigations would be effective in avoiding or substantially reducing the number of intersections operating at Level of Service (LOS) F before and after events. However, Proposed Project impacts would still be significant at both a Proposed Project and cumulative level.

Table VI-1 on page VI-3 identifies the locations of the significant impacts by time period. The impacts described above would not occur on a daily or regular basis, and would occur irregularly associated only with major events at the Event Center. As discussed in Section IV.B.1, Transportation, of this Draft EIR, the number of impacts would also be reduced with the implementation of additional trip reduction and greater use of transit measures, as well as implementation of the Transportation Management Plan (TMP) and SB 292, although for purposes of conservative analysis no credit is taken for such measures in determining the significance of the impacts. Furthermore, the Spectator Events that would generate traffic during the Weekday Pre-Event Hour would most likely occur infrequently (i.e. up to two times per year per team when an NFL game is scheduled on a Monday or a Thursday). All other Spectator Events would generate traffic outside of the normal peak commute hours and when traffic is generally lighter on area streets and freeways.

b. Freeways

Proposed Project operations would result in significant freeway impacts on certain freeway mainline segments, and freeway off-ramps and on-ramps during pre-event and post-event hours. These freeway segment impacts would not occur on a regular daily basis but rather would occur irregularly before and after Spectator Events at the Event Center.

(1) Freeway Segments

Proposed Project operations before and after Spectator Events at the Event Center would result in significant impacts at 4 freeway segments during the Sunday Day Pre-Event Hour, 9 freeway segments during the Sunday Day Post-Event Hour, 6 freeway segments during the Saturday Day Pre-Event Hour, 13 freeway segments during the Saturday Day Post-Event Hour, 13 freeway segments during the Weekday Evening Pre-Event Hour, and 3 freeway segments during the Weekday Post-Event Hour.

**Table VI-1
Summary of Intersections with Significant Impacts After Mitigation by Event Scenario**

Int. No.	Intersection	Sunday		Saturday		Weekday	
		Pre-Event	Post-Event	Pre-Event	Post-Event	Pre-Event	Post-Event
1	Georgia Street & Olympic Boulevard				X	X	
3	Figueroa Street & Olympic Boulevard			X	X	X	
4	Flower Street & Olympic Boulevard		X	X	X	X	
5	Grand Avenue & Olympic Boulevard				X		
6	Olive Street & Olympic Boulevard			X	X	X	
8	Broadway & Olympic Boulevard					X	
9	Main Street & Olympic Boulevard					X	
18	Grand Avenue & 11th Street					X	
26	Figueroa Street & Pico Boulevard					X	
27	Flower Street & Pico Boulevard					X	
28	Grand Avenue & Pico Boulevard		X				
30	Hill Street & Pico Boulevard				X	X	
32	Main Street & Pico Boulevard					X	
33	Blaine Street & Olympic Boulevard			X	X	X	
37	Figueroa Street & Venice Boulevard				X	X	
38	Flower Street & Venice Boulevard				X		
39	Grand Avenue & Venice Boulevard		X		X		
40	Olive Street & Venice Boulevard				X		
42	Olive Street & 17th Street	X		X		X	
43	Hill Street & 17th Street		X	X	X	X	X
44	Broadway & 17th Street			X		X	
45	Main Street & 17th Street			X		X	
46	Los Angeles Street & 17th Street			X		X	
48	Grand Avenue & 18th Street		X				
49	Olive Street & 18th Street				X		
50	Hill Street & 18th Street		X		X		X
52	Main Street & 18th Street		X		X		X
53	Los Angeles Street & 18th Street		X		X		
54	Figueroa Street & Washington Boulevard					X	
56	Grand Avenue & Washington Boulevard				X	X	
57	Olive Street & Washington Boulevard					X	
58	Hill Street & Washington Boulevard					X	
59	Broadway & Washington Boulevard					X	
60	Main Street & Washington Boulevard				X		
62	San Pedro Street & Washington Boulevard				X		
65	I-110 NB Off-Ramps & Adams Boulevard			X		X	
66	Grand Avenue & Adams Boulevard					X	
67	Hill Street & Adams Boulevard			X		X	
78	Figueroa Street & Martin Luther King Jr Boulevard		X		X		

Table VI-1 (Continued)
Summary of Intersections with Significant Impacts After Mitigation by Event Scenario

Int. No.	Intersection	Sunday		Saturday		Weekday	
		Pre-Event	Post-Event	Pre-Event	Post-Event	Pre-Event	Post-Event
79	I-110 SB Ramps & Martin Luther King Jr Boulevard		X		X		
80	I-110 NB Ramps & Martin Luther King Jr Boulevard					X	
81	Georgia Street & 9th Street				X	X	
83	Figueroa Street & 9th Street					X	
84	Flower Street & 9th Street				X		
86	Bixel Street & 8th Street					X	
88	Figueroa Street & 8th Street		X	X	X	X	
89	Flower Street & 8th Street			X	X		
93	Figueroa Street & Wilshire Boulevard				X	X	
94	Lucas Avenue & 6th Street					X	
95	Bixel Street & 6th Street					X	
96	Figueroa Street & 6th Street					X	
102	Figueroa Street & 5th Street					X	
104	Olive Street & 5th Street					X	
110	Hope Street & 1st Street					X	
111	Grand Avenue & 1st Street		X		X	X	
116	Hope Street & Temple Street					X	
119	Grand Avenue & US-101 NB Ramps		X		X		X
123	Spring Street & Cesar Chavez Avenue			X		X	
129	Hill Street & College Street				X		
132	Glendale Boulevard & Temple Street			X	X		
138	Western Avenue & Wilshire Boulevard			X		X	
139	Normandie Avenue & Wilshire Boulevard					X	
140	Vermont Avenue & Wilshire Boulevard					X	
141	Alvarado Street & Wilshire Boulevard					X	
144	Western Avenue & Olympic Boulevard		X		X	X	
145	Normandie Avenue & Olympic Boulevard					X	
146	Vermont Avenue & Olympic Boulevard	X	X	X	X	X	X
147	Alvarado Street & Olympic Boulevard			X	X	X	
148	Union Avenue & Olympic Boulevard			X	X	X	
151	Vermont Avenue & Pico Boulevard		X			X	
152	Alvarado Street & Pico Boulevard	X	X	X	X	X	
153	Union Avenue & Pico Boulevard					X	
155	Western Avenue & Venice Boulevard					X	
156	Normandie Avenue & Venice Boulevard					X	
157	Vermont Avenue & Venice Boulevard			X		X	
158	Hoover Street & Venice Boulevard		X	X	X	X	
161	Vermont Avenue & Washington Boulevard			X		X	
162	Hoover Street & Washington Boulevard			X	X	X	

Table VI-1 (Continued)
Summary of Intersections with Significant Impacts After Mitigation by Event Scenario

Int. No.	Intersection	Sunday		Saturday		Weekday	
		Pre-Event	Post-Event	Pre-Event	Post-Event	Pre-Event	Post-Event
163	I-10 WB Ramps & 20th Street		X		X		
164	Vermont Avenue & I-10 EB Ramps	X		X		X	
165	Hoover Street & I-10 EB Ramps			X		X	
166	Hill Street & 16th Street		X	X	X	X	X
168	Main Street & 16th Street					X	
170	San Pedro Street & 16th Street			X	X	X	
172	Central Avenue & Washington Boulevard				X	X	
174	Arlington Avenue & Olympic Boulevard					X	
176	Arlington Avenue & Venice Boulevard				X	X	
177	Arlington Avenue & Washington Boulevard					X	
179	Crenshaw Boulevard & Olympic Boulevard					X	
181	Crenshaw Boulevard & Venice Boulevard					X	
182	Crenshaw Boulevard & Washington Boulevard					X	
184	La Brea Avenue & Olympic Boulevard					X	
Source: The Mobility Group and Matrix Environmental, 2012.							

Table VI-2 on page VI-6 identifies the locations of the significant impacts by time period. It is expected that these impacts would be reduced through the implementation of the TMP and would be further reduced (and in some cases perhaps eliminated) by the trip reduction and greater use of transit measures to be implemented as part of the TMP and SB 292. However, for purposes of conservative analysis no credit is taken for such measures in determining the significance of the impacts. Therefore, it is conservatively concluded for the purposes of this EIR that these would all remain unavoidable significant impacts at both a Proposed Project and cumulative level.

(2) Off Ramps

Proposed Project operations during events, after mitigation, would result in significant freeway off-ramp impacts at 3 locations during the Sunday Day Pre-Event Hour, at 5 locations in the Saturday Pre-Event Hour, and at 7 locations in the Weekday Evening Pre-Event Hour. Table VI-3 on page VI-7 identifies the locations where significant impacts would occur by time period. It is expected that these impacts would be reduced through the implementation of the TMP, as well as measures such as changeable message signs, fixed signage, ramp metering upgrades, and would be significance of the impacts. Therefore, it is conservatively concluded these would all remain significant and unavoidable impacts at both a Proposed Project and cumulative level.

Table VI-2
Summary of Freeway Segments with Significant Impacts After Mitigation by Event Scenario

Intersection	Sunday		Saturday		Weekday	
	Pre-Event	Post-Event	Pre-Event	Post-Event	Pre-Event	Post-Event
SR-110 South of Ave 43 (NB)		X				
SR-110 North of Alpine Street (SB)	X				X	
SR-110 North of Alpine St (NB)				X		
SR-110 South of US-101 (NB)		X		X		X
SR-110 South of US-101 (SB)					X	
SR-110 Between James Wood Blvd and Olympic Blvd (NB)		X		X		
SR-110 Between James Wood Blvd and Olympic Blvd (SB)					X	
I-110 North of Martin Luther King Jr. Blvd (HOV) (NB)			X			
I-110 North of Martin Luther King Jr. Blvd (HOV) (SB)				X		
I-110 South of Martin Luther King Jr. Blvd (Mainline) (NB)					X	
I-110 at Vernon Ave (Mainline) (SB)		X		X		
I-110 at Vernon (Mainline) (NB)					X	
I-110 at Slauson Ave (HOV) (NB)			X			
I-110 at Slauson Ave (HOV) (SB)				X		
I-5 South of Stadium Way (SB)	X		X		X	
I-5 South of Stadium Way (NB)				X		
I-5 West of Indiana Street (SB)		X		X		X
I-5 West of Indiana Street (NB)					X	
US-101 South of Vermont Ave (SB)	X		X	X	X	
US-101 South of Vermont (NB)		X				
US-101 North of Vignes St (SB)		X		X		
US-101 North of Vignes St (NB)			X		X	
US-101 at Glendale Blvd (NB)		X		X		X
US-101 at Glendale Blvd (SB)	X		X		X	
I-10 East of Crenshaw Blvd (EB)					X	
I-10 West of Vermont Ave (WB)		X		X		
I-10 West of Vermont Ave (EB)					X	
I-10 East of San Pedro Street (EB)				X		
I-10 East of San Pedro St (WB)					X	
Source: The Mobility Group and Matrix Environmental, 2012.						

Table VI-3
Summary of Freeway Off-Ramps with Significant Impacts After Mitigation by Event Scenario

Off-Ramp	Sunday		Saturday		Weekday	
	Pre-Event	Post-Event	Pre-Event	Post-Event	Pre-Event	Post-Event
Los Angeles Street WB Off-Ramp (Mainline)			X		X	
Hoover Street EB Off-Ramp (Lane)	X		X			
Hoover Street EB Off-Ramp (Mainline)			X		X	
Grand Avenue NB Off-Ramp (Lane)	X		X			
Grand Avenue NB Off-Ramp (Mainline)					X	
9th Street NB Off-Ramp (Lane)	X		X			
9th Street NB Off-Ramp (Mainline)					X	
6th Street SB Off-Ramp (Mainline)					X	
Olympic Boulevard SB Off-Ramp (Mainline)						
Martin Luther King Jr. Boulevard NB Off-Ramp (Lane)					X	
Adams Boulevard NB Off-Ramp (Lane)					X	
Source: The Mobility Group and Matrix Environmental, 2012.						

(3) Freeway On-Ramps

Proposed Project operations during events would result in significant freeway on-ramp impacts at 7 locations during the Sunday Day Post-Event Hour, at 11 locations in the Saturday Post-Event Hour, and at 6 locations in the Weekday Evening Post-Event Hour. Table VI-4 on page VI-8 identifies the locations where significant impacts would occur by time period. It is expected that these impacts would be reduced through the implementation of the TMP including measures such as changeable message signs, fixed signage, and ramp metering upgrades, and would be further reduced (and in some cases perhaps eliminated) by trip reduction and greater use of transit measures to be implemented as part of the TMP and SB 292, however, for purposes of conservative analysis no credit is taken for such measures in determining the significance of the impacts. Therefore, it is conservatively concluded for the purposes of this EIR that these would all remain significant and unavoidable impacts at both a Proposed Project and cumulative level.

c. Congestion Management Program

Proposed Project operations during events would result in less than significant traffic impacts at CMP monitoring intersections, but would cause significant impacts at 19 CMP freeway monitoring locations during the Weekday Evening Pre-Event Hour. These impacts

Table VI-4
Summary of Freeway On-Ramps with Significant Impacts After Mitigation by Event Scenario

On-Ramp	Sunday		Saturday		Weekday	
	Pre-Event	Post-Event	Pre-Event	Post-Event	Pre-Event	Post-Event
Los Angeles Street EB On-Ramp (US 101)				X		
Los Angeles Street EB On-Ramp (I-10)		X		X		X
Washington Boulevard SB On-Ramp		X		X		
Blaine Street SB On-Ramp		X		X		X
5th Street NB On-Ramp		X		X		X
8th Street SB On-Ramp		X		X		
8th Street NB On-Ramp		X		X		X
9th Street NB On-Ramp				X		X
11th Street NB On-Ramp		X		X		X
Grand Avenue WB On-Ramp				X		
Glendale Boulevard NB On-Ramp				X		
<i>Source: The Mobility Group and Matrix Environmental, 2012.</i>						

would not occur on a regular daily basis, but would occur infrequently as few weekday evening events would start at 5:30 P.M. While no feasible mitigation measures were identified for these infrequent mainline freeway impacts, it would be expected that these impacts would be reduced through the implementation of the TMP, and would be further reduced (and in some cases perhaps eliminated) by the trip reduction and greater use of transit measures to be implemented as part of the TMP and SB 292. However, for purposes of conservative analysis no credit is taken for such measures in determining the significance of the impacts. Therefore, it is conservatively concluded for the purposes of this EIR that these impacts would remain significant and unavoidable at both a Proposed Project and cumulative level.

d. Construction

Impacts from construction on the transportation system would be temporary, and would cause some temporary and intermittent reductions in street and intersection capacity on roadways adjacent to the Project Site. As increases in delays and travel times would be noticeable to drivers, traffic impacts would be potentially significant temporary impacts. The preparation and implementation of Construction Traffic Management Plans for all phases of construction activity at the Project site would reduce impacts, but Proposed Project and cumulative impacts are conservatively considered to remain significant and unavoidable.

2. Aesthetics/Visual Resources

a. Visual Quality/Aesthetics

As discussed in detail in Section IV.I.1, Cultural Resources—Historical Resources, and the Historical Resources Assessment in Appendix S, of this Draft EIR, the Project Site does not appear to include any buildings eligible for inclusion in the National Register, California Register, or as a local Historic Cultural Monument designation under any criteria. However, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local Historical Cultural Monument (HCM). If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall because under the *City of Los Angeles CEQA Thresholds Guide* historic resources are considered to be visual resources. Therefore, for purposes of a conservative analysis herein, demolition of the West Hall is considered to represent the loss of a visual resource in the event that the West Hall were to be determined eligible as a historic resource. Thus, demolition of the West Hall would result in potentially significant project and cumulative impacts associated with visual resources.

b. Views

The Proposed Project would not substantially obstruct views of the majority of the valued visual resources in the Project area from most nearby vantage points. However, the obstruction of views of the Downtown skyline along SR-110 for an approximately 0.5-mile segment, roughly from the I-10 interchange to Chick Hearn Court, would be a significant Proposed Project and cumulative unavoidable impact since this portion of SR-110 is designated as a scenic freeway. This designation appears in the Central City Community Plan, but SR-110 is not a State-designated scenic highway, nor is it designated at a citywide level as a scenic highway within the Transportation Element of the General Plan. In addition, given the conservative treatment of the demolition of the West Hall, the removal of this building would represent the loss of a view resource, resulting in a Proposed Project and cumulative significant and unavoidable impact.

3. Artificial Light and Glare

Artificial Light and Glare is discussed in Section IV.D.2 of this Draft EIR. Significant Proposed Project and cumulative lighting impacts would occur during the following circumstances, as discussed further below: (1) construction; (2) special event lighting; (3) pyrotechnics; and (4) unusual atmospheric conditions. In addition, in the event that a Glare Rating below 55 cannot be achieved at residential locations or other sensitive

receptors, a significant impact may occur with respect to Event Center lighting during events.

a. Construction

Construction lighting impacts would only be significant when Event Center construction lighting occurs at elevations of 80 feet above grade or higher (i.e., above the proposed parking garages) for locations to the west and north of the Event Center. Nighttime construction cannot be avoided in order to complete the Proposed Project within the timeframe identified in the Project Objectives. Thus, no feasible mitigation measures beyond the project design features exist to reduce Proposed Project and cumulative construction impacts to a less than significant level.

b. Special Events

Temporary lighting during Project operations for productions and special events, including but not limited to traveling shows, concerts, and performances, would result in a variety of temporary installations of lighting. The type, intensity, aiming, and distribution of these temporary lights cannot be clearly identified for all types of events due to the uniqueness of each event and the myriad of different lighting configurations that could be required. Thus, it is not possible to identify with certainty specific mitigation measures that would mitigate impacts from all types of special events that could occur. As such, no feasible mitigation measures beyond the project design features exist that could reduce this Proposed Project and cumulative impact to a less than significant level.

c. Pyrotechnic and Firework Events

Light impacts related to pyrotechnic and firework events could only be reduced by eliminating such events. However, the elimination of pyrotechnics and fireworks is not feasible, as such features are integral to the fan experience as set forth in the Project Objectives. As such, no feasible mitigation measures exist that could reduce this Proposed Project and cumulative impact to a less than significant level.

d. Unusual Atmospheric Conditions

The Proposed Project causes significant spill light impacts at Receptor Location 8 (the Ritz Residences at 900 West Olympic Boulevard) with sports lighting on at times when low cloud ceilings with high albedo (+50 percent) are present. These specific conditions are likely to occur less than 5 percent of the year. No feasible mitigation measures have been identified that could reduce this impact to a less than significant level during these infrequent weather events.

4. Noise

a. Construction Noise

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

If the related projects were to occur concurrently with the Project's construction, cumulative construction noise impacts could be significant. Noise impacts would be reduced through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Therefore, the noise impacts generated by the construction activities for each of the related projects would likely be reduced. However, given the dense urban environment found within the Project area, cumulative impacts are likely to be significant if construction of the related projects in the vicinity occurs concurrently with Proposed Project construction. Therefore, cumulative construction noise impacts are considered significant and unavoidable.

b. Operation Noise

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

receptors, including residential uses. Therefore, noise impacts associated with outdoor plaza operations would be significant and unavoidable.

Noise from firework display shows and noise from the parking garage would also be significant at some of the sensitive receptors and unavoidable. Furthermore, there are no feasible mitigation measures to reduce the off-site traffic, public transit, and media helicopter noise to a less than significant level. The off-site traffic impacts occur only during the post-event hour and along roadways leading to the freeway ramps in proximity to the Project Site and are also focused on areas east and south of the Project Site, with limited locations north and west of the Project Site. As such, noise impacts at these locations from these Project operations would be significant and unavoidable. Transit impacts are limited to locations along the existing Metro Blue Line and the future Expo line during the post-event hour. Traffic noise impacts identified at the 10th Street Elementary school would also be less than significant as the normal operating hours for the school end prior to the weekday pre-event hour.

5. Air Quality

a. Construction Impacts

As analyzed in Section IV.F.1, Air Quality, of this Draft EIR, emissions associated with the Proposed Project, with the implementation of the identified mitigation measures, would exceed the South Coast Air Quality Management District (SCAQMD) regional significance thresholds for volatile organic compounds (VOC), carbon monoxide (CO), and nitrogen oxides (NO_x) during the most intense construction period. As such, Proposed Project construction would result in a significant regional impact even with incorporation of all feasible mitigation measures. With regard to localized air quality impacts during peak construction activity, the Proposed Project would remain in exceedance of the SCAQMD Localized Significance Threshold (LST) for nitrogen dioxide (NO₂), even with the incorporation of mitigation measures. On most days during construction, emissions would be lower than the maximum daily emissions analyzed in this Draft EIR. In addition, these impacts would be temporary in nature. Nevertheless, the Project and cumulative impacts noted above would be considered significant and unavoidable.

b. Operational Impacts

Regional operational emissions would exceed the SCAQMD daily emission thresholds for regional NO_x, VOC, PM₁₀, PM_{2.5}, and CO after implementation of feasible mitigation measures. Therefore, operation of the Proposed Project would have a significant and unavoidable impact on regional air quality even with incorporation of all feasible mitigation measures. Cumulative operational air quality impacts would also remain significant. Localized operational emissions would also exceed their respective state and

federal thresholds and localized PM₁₀ and NO_x impacts would be significant and unavoidable. The exceedance is primarily a function of high ambient background concentrations, as reflected in the fact that the background annual NO₂ concentration represents approximately 98.5 percent of the National Ambient Air Quality Standards (NAAQS) and the background 1-hour NO₂ concentration represents approximately 77 percent of the NAAQS. Furthermore, the air quality analysis is conservative in that it did not take into account reductions in emissions as a result of SB 292.

During operations significant localized PM₁₀ concentration levels would occur in certain areas surrounding the Project Site when there is a 72,000 attendee Event Center event, a 90th percentile Convention Center event, and worst case meteorological conditions. As this is likely to occur seldom, if ever, and significant impacts would occur only a limited number of days per year at most and only for a few hours, requiring permanent full time mitigation would not be appropriate.

c. Concurrent Construction and Operational Emissions

Portions of the Project Site would be completed and occupied while construction of the later Proposed Project components would be ongoing. Based on a review of the Proposed Project's construction schedule, it was determined that the maximum concurrent emissions could potentially occur during excavation of the Event Center while the New Hall is in operation. Concurrent construction and operational regional emissions of VOC, CO, and NO_x would exceed SCAQMD regional thresholds. Additionally, concurrent construction and operational localized emissions of NO_x would exceed their respective localized thresholds. It is expected that localized emissions would be significant relative to both the national and state 1-hour and state annual standards. As such, localized emissions that result from concurrent construction and operations would result in a significant and unavoidable impact.

6. Cultural Resources—Historical Resources

As discussed in detail in the Historical Resources Assessment, the Project Site does not include any buildings that appear eligible for inclusion in the National Register, California Register, or for local Historical Cultural Monument designation under any criteria. However, it is possible a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. Such commission would also have to conclude that despite the fact that it is not 50 years old, the property is of exceptional importance. If any such determination were to be made, demolition of the West Hall would be considered a

significant adverse impact. To the extent that the related projects would affect a historical resource, cumulative impacts are also conservatively concluded to be significant.

7. Utilities—Solid Waste

Operation of the Proposed Project would involve the continued implementation of on-site waste management and recycling programs to divert solid waste generated at the Project Site from requiring disposal at regional landfills. The City of Los Angeles Solid Waste Integrated Resources Plan objective is to achieve a 70 percent diversion goal by 2015. The Countywide Integrated Waste Management Plan 2010 Annual Report identifies multiple scenarios in which sufficient and on-going landfill capacity would be available and forecasts that through the use of alternative technologies, successfully permitting the Mesquite Regional Landfill, and gradually increasing the Countywide diversion rate to 65 percent, the County would be able to adequately serve future disposal needs through 2025.¹

Should one of these scenarios be realized, then both Project and cumulative impacts would be less than significant. However, due to the uncertainty as to precisely how the need for future landfill capacity will be addressed, it is conservatively assumed that the Project's operational impacts with regard to landfill capacity would remain significant and unavoidable. Likewise, as diversion measures cannot be ensured for related projects, cumulative impacts with regard to regional landfill disposal capacity would also remain significant and unavoidable. It should be noted that the identification of additional landfills is generally addressed at the City and County levels (e.g., through the County's Countywide Siting Element) and, as such, is not under the control of the Applicants. Other than waste minimization and diversion, which are project design features, no other feasible mitigation measures have been identified to address this potential impact.

8. Implementation of Mitigation

Note that if any of the specific mitigation measures within the City of Los Angeles or any other jurisdiction identified in this Draft EIR are determined to be infeasible or necessary permits/approvals to implement the mitigation measures cannot be obtained, then a significant impact (or impacts) may remain unless alternative feasible measures that are equivalent are implemented. Furthermore, if implementation of any measure is delayed, a significant impact would also occur until the implementation of the measure unless alternative feasible measures that are equivalent are implemented in the interim.

¹ Los Angeles County Integrated Waste Management Plan 2010 Annual Report, October 2011.

B. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of the project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines requires that the reasons why the project is being proposed, notwithstanding these impacts, be described. Section II, Project Description, of this Draft EIR describes the reasons for and objectives of the Proposed Project. As described therein, the underlying purpose for the Proposed Project is to "enhance the marketability of the Los Angeles Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District." Under the Proposed Project, the outmoded West Hall would be replaced with a modern New Hall contiguous to the existing South Hall, thereby allowing the Convention Center to be more competitive nationally in order to increase the anticipated number of trade shows and conventions attracting largely out-of-town visitors.

The objective of the Event Center is to construct a multi-purpose facility that complements and promotes the adjacent convention and sports and entertainment uses by providing a state-of-the-art venue capable of attracting and maintaining up to two NFL teams that would be expandable to host occasional major sporting events (e.g., an NFL Super Bowl) and that could be used for event floor exhibit hall space.

In addition, the Proposed Project promotes General Plan goals, objectives, and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles. Specifically, the Proposed Project would create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area in close proximity to transportation corridors and transit stations. The Proposed Project builds upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level, and create a catalyst to further enhance the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another. By taking maximum advantage of existing and planned transportation infrastructure and efficiently using existing parking resources to conserve resources, reduce environmental impacts and improve access, the Proposed Project is also consistent with smart growth and urban design principles.

The Proposed Project would also be constructed in a manner that limits disturbance to ongoing Convention Center operations, while still completing the Event Center prior to the 2016 NFL season.

Further, the Proposed Project would promote job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism. The Proposed Project would be undertaken at no risk to the City's General Fund by constructing the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship. In addition, the development of entertainment and sports facilities on public lands provides a return to the City's General Fund and/or provides civic, cultural and sporting amenities that serve a wide range of public interests in the City and region, and generate substantial additional revenues for the City government, stimulate economic activity in the greater Los Angeles area, and create thousands of good paying construction and permanent jobs as soon as possible. The Proposed Project is also anticipated to provide economic development opportunities in Pico-Union and South Los Angeles by attracting out-of-town visitors to additional exhibition events, and local and out of town fans to additional spectator events.

As discussed under Section D, Growth-Inducing Impacts, the Proposed Project has the potential to generate substantial benefits to the local economy of Los Angeles. The enhanced facilities for the Convention Center that result from the Proposed Project (i.e., more contiguous space, additional floor area via use of the Event Center), are anticipated to be a stimulus to the economy in terms of job growth, City general fund revenues, and additional off-site collateral development.

C. Significant Irreversible Environmental Changes

1. Introduction

In accordance with Section 15126.2(c) of the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the Proposed Project. 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 unlikely. 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.”

The Proposed Project would necessarily consume limited, slowly renewable, and non-renewable resources, resulting in irreversible environmental changes. This consumption would occur during construction of the Proposed Project and would continue throughout its operational lifetime. The development of the Proposed Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation and the associated impacts related to air quality. The Project's consumption of these resources is discussed below in addition to a discussion regarding environmental hazards, as required by CEQA Guidelines Section 15126.2(c). Potential growth-inducing effects of the Proposed Project are discussed under Section VI.D of this EIR Section.

2. Building Materials and Solid Waste

Construction of the Proposed Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would 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), and petrochemical construction materials (e.g., plastics).

The design materials and resources for the Proposed Project would be selected to minimize environmental impacts. As discussed in Section IV.K.3, Utilities—Solid Waste, and the Sustainability Program included in Appendix E of this Draft EIR, project design features have been established with regard to extending the existing on-site solid waste recycling programs to include both the Event Center and the New Hall. For the New Hall, a

minimum of 20 percent of all building materials and products for development would consist of recycled content or would be manufactured regionally, while a minimum of 5 percent of all building materials and products for development would be rapidly renewable, thereby reducing impacts from the extraction and processing of virgin materials. The construction of the New Hall would include a Construction Waste Management Plan to achieve these waste diversion percentages. To support local industry and reduce environmental impacts associated with the transport of materials, it is anticipated that a minimum of 20 percent of the overall construction materials would be extracted, processed or manufactured within a 500-mile radius of the Project Site.

In addition, at least 75 percent of construction waste and/or debris for both the demolition and new construction phases for the New Hall would be diverted from landfills.

For the Event Center, a minimum of 50 percent of solid waste would be diverted during both construction and operation. The Event Center would divert waste from landfill disposal during operation through recycling, the donation of durable goods, and implementation of a front-of-house composting program that includes biodegradable concessions packaging. Thus, the consumption of non-renewable building materials such as lumber, aggregate materials, and plastics would be reduced.

As discussed in Section II, Project Description, of this Draft EIR, the Project would meet all aspects of the City of Los Angeles Green Building Code and would include a variety of design features to accomplish the Project's sustainability goals. The proposed New Hall would be designed to achieve LEED® Gold Certification, consistent with the Convention Center's existing facilities, while the Event Center would be designed to achieve a minimum of LEED® Certification.

3. Water

Project consumption of water during construction and operation of the Proposed Project is addressed in Section IV.K.1, Utilities—Water, of this Draft EIR. Water would be consumed during Proposed Project construction (e.g., for dust control, concrete mixers, etc.). As concluded in Section IV.K.1, water consumption during Proposed Project construction and operations would not result in a significant impact on water supplies.

Various water conservation features, including low-flow toilets, waterless urinal fixtures, drought tolerant plants, and efficient irrigation systems would be utilized throughout the Project Site. As described in the Sustainability Plan for the Proposed

Project, the New Hall would achieve an overall water use reduction of 33 percent, while the Event Center would achieve an overall water use reduction of 35 percent.²

As discussed in Section IV.H.1, Water Resources—Hydrology and Surface Water Quality, of this Draft EIR, the Proposed Project would help to conserve water through a storm water management plan aimed at reducing storm water run-off through on-site infiltration and capturing and treating rainfall. This captured water can be used for non-potable domestic purposes and the infiltrated water can be used to recharge groundwater. The Proposed Project would also comply with the City's Low Impact Development standards, which are intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. While Proposed Project operation would result in the irreversible consumption of water, the Proposed Project would not result in a significant impact with respect to water supply.

4. Energy Consumption and Air Quality

During ongoing operation of the Proposed Project, non-renewable fossil fuels would represent the primary energy source and thus the existing finite supplies of these resources would be incrementally reduced. The consumption of non-renewable fossil fuels for energy use is analyzed in Section IV.K of this Draft EIR. Fossil fuels, such as diesel, gasoline and oil, would also be consumed in the use of construction vehicles and equipment. Construction activities for the Proposed Project would not require the consumption of natural gas, but would require the use of fossil fuels and electricity. As the consumption of fossil fuels would occur on a temporary basis during construction, impacts related to the construction consumption of fossil fuels would be less than significant.

Operation of the Proposed Project would increase the demand for natural gas resources within the Project Site. Overall the Proposed Project is forecasted to consume approximately 501,835.70 therms per year, a five- to six-fold increase over existing conditions. This increase in natural gas consumption results from the fact that the New Hall would be heated by natural gas whereas the existing West Hall is heated via electricity, and due to the increase in annual attendance under the Proposed Project. These projections are conservative in nature because they do not account for the potential reduction in natural gas consumption that would occur as a result of the incorporation of the energy conservation measures discussed in Section IV.K. As this increase in natural gas usage constitutes a small percentage of the supply available to The Gas Company, long-term impacts associated with the consumption of natural gas would be less than significant.

² Baseline calculated according to Title 24 2008, as cited in the 2010 Los Angeles Green Building Code.

In addition, based on the Proposed Project's projected increase in electrical consumption of 33,542 MWh per year within the Project Site, this increase in consumption accounts for only 2.57 percent of the Los Angeles Department of Water and Power's (LADWP) projected increase in electrical consumption over the next 6 years. The Project's percentage of the total increase in consumption is sufficiently low to support the conclusion that the Proposed Project's impacts relative to electricity consumption is less than significant. Also, as analyzed in Section IV.K, the Proposed Project's estimated electricity and natural gas demand would be within the anticipated service capabilities of the LADWP and The Gas Company, respectively.

Central to the development concept for the Proposed Project are sustainability features intended to reduce the potential for impacts related to climate change by minimizing air and greenhouse gas (GHG) emissions, water and energy usage, and solid waste generation and disposal. A number of the measures and programs set forth in the sustainability program (see Appendix E of this Draft EIR) pertain to energy conservation and reductions of impacts related to electrical usage. The New Hall would implement additional efficiency measures to achieve a 20 percent reduction in energy consumption relative to the California Energy Efficiency Standards and would also comply with the required measures of the 2010 Los Angeles Green Building Code. The Event Center would implement additional efficiency measures to achieve a 14 percent reduction from the estimated baseline.³ This would be achieved, in part, by optimizing energy performance through the installation of best available technology, where feasible, for heating, ventilation and air conditioning systems (HVAC), lighting, and all major electrical appliances and control systems, and through educating employees on energy efficiency through an Energy Management System (EMS). The two larger, more efficient parking garages that would be constructed west of L.A. Live Way to replace the existing Bond Street surface parking lot, the existing Cherry Street Garage, and the parking that is currently located beneath the existing West Hall, would also feature energy efficient lighting and electric car charging stations.

Demand control ventilation would be used in HVAC systems as required by the 2010 California Energy Code in order to reduce the costs of cooling outside air while still maintaining good indoor air quality and comfort. The Event Center would also reduce potential GHG emissions contributing to global climate change by using refrigerants in heating, ventilation and air conditioning equipment with low GHG emission rates. In addition, as discussed in Section IV.F.2, Air Quality—Climate Change, the Event Center would offset the GHG emissions from private automobile trips to Spectator Events at the

³ *Energy Baseline calculated according to Title 24 2008, as cited in the City of Los Angeles Green Building Code.*

Event Center under SB 292. To ensure energy-related systems would be incorporated into the Event Center as feasible, a third party would be engaged to oversee the building commissioning.

The Event Center would be designed, constructed and operated to optimize indoor air quality and minimize indoor air contaminants. An indoor air quality plan would be prepared prior to construction. The design for the Event Center would specify interior finish materials such as adhesives, sealants, paints, flooring and composite wood products with low generation rates of volatile organic compounds (VOCs) and to reduce the generation of indoor air contaminants that are odorous, irritating and/or harmful to the comfort and well being of the construction work force and building occupants. The Event Center's design would optimize natural air flow to ensure healthy indoor air quality. Prior to occupancy a purge of the building's interior air would be performed where feasible to remove a large portion of VOCs generated during construction and installation of building materials.

The Project Site is located on a previously developed urban site in Downtown Los Angeles with substantial existing infrastructure in place. This site location provides convenient pedestrian access to the Metro Rail Blue Line Pico Station and the Metro Rail Red Line 7th/Metro Center Station and is well served by bus service. As discussed in Section IV.B.1, Transportation, of the Draft EIR, the Proposed Project would also provide a TMP addressing alternative transportation for both employees and the public featuring both existing bus lines and light rail stations. As provided in SB 292, the Event Center is subject to the "Best in the NFL" trip-reduction requirements. Please refer to Section IV.F.2, Air Quality—Climate Change, for additional discussion of proposed sustainability features.

With the project design features and mitigation measures incorporated into the Proposed Project, energy would not be used in a wasteful manner and long-term impacts associated with the consumption of fossil fuels would not be significant.

5. Environmental Hazards

As discussed in Section IV.L, Environmental Hazards, of this Draft EIR, 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 grading and building construction. The Proposed Project would also involve the limited use of potentially hazardous materials typical of commercial uses, including cleaning solvents, fertilizers and/or pesticides for landscaping.

These materials would be contained, stored, and used on-site in accordance with manufacturers' instructions and applicable government regulations and standards. In addition, demolition activities would comply with regulatory requirements to ensure that

asbestos and lead-based paints would not be released into the environment. Compliance with regulations and standards would serve to protect against significant and irreversible environmental changes that could result from the accidental release of hazardous materials.

As analyzed in Section IV.L, Environmental Hazards, of this Draft EIR, currently utilized on-site hazardous materials include materials related to the maintenance of the Convention Center and STAPLES Center arena and fuel storage for vehicles and emergency equipment. The Proposed Project has the potential to increase the acquisition, use, handling, and storage of these hazardous materials on-site through the expansion of existing facilities and development of new facilities. With continued implementation of hazardous materials management at the Project Site and continued compliance with applicable laws, as well as implementation of the identified project design features and mitigation measures, impacts associated with the use, storage, and management of hazardous materials during operation of the Proposed Project would be less than significant.

6. Conclusion

Based on the discussion under items C.2 through C.5 above, Proposed Project construction and operation would require the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Proposed Project's building site for future generations or for other uses. However, the consumption of such resources would be on a relatively small scale and consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant.

D. Growth-Inducing Impacts

1. Introduction

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

Growth can be induced or fostered as follows:

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

Because the Proposed Project does not include the construction of new housing that would generate new population, it would not result in direct population growth. However, the Proposed Project is expected to result in varying types of indirect growth. Below is a discussion of the potential indirect growth-inducing impacts of the Proposed Project in accordance with the above-stated CEQA Guidelines. This discussion includes the Proposed Project's effect on fostering growth in the market and surrounding area. This discussion also includes an analysis of the potential effects on the Pico-Union area.

2. Effects on the Pico-Union Community

a. Introduction and Overview of Pico-Union Characteristics

The Pico-Union community of the City of Los Angeles is the nearest residential neighborhood to the Project Site. The heavily urbanized Pico-Union community is located adjacent to downtown and is bounded by Olympic Boulevard to the north, Normandie

Avenue on the west, Washington Boulevard and the Santa Monica Freeway on the south and the 110 freeway to the east. Because of its proximity to the Project Site, some members the Pico-Union community have expressed concerns about the following issues in relationship to the potential effects of the Proposed Project on the land use-economics of their community:

Housing Costs. Concerns were raised that the Proposed Project could lead to a significant escalation in housing costs in Pico-Union, thus potentially leading to a displacement of the community's existing population and a reduction in the stock of affordable housing. This is of concern in light of the fact that many of the residents of Pico-Union depend on the availability of affordably priced rental units to remain in the community.

Retail Uses. At present, the Pico-Union area has a mix of community oriented retail establishments that are primarily focused on meeting the needs of the immediate neighbors. Concerns have been expressed that the Event Center, along with its entertainment and sports oriented tenants, would lead to the proliferation of sports themed retail outlets in the community and force out existing retail establishments, leading to an imbalanced retail mix in the community.

Population. The Pico-Union area has a population of approximately 45,000 people living in just under 13,000 households. This represents 0.44 percent of the total population of Los Angeles County. The median age in the area is 28.1 years of age, which is younger than the countywide median age of 32.8. Approximately 87.7 percent of the total population of the community is Hispanic. This is nearly double the representation of the Hispanic population in the County of Los Angeles as a whole.

Residential Uses. The community is primarily made up of older residential units and contains two districts included in the National Register of Historic Places. The community is also home to a large number of low and very low income households. At present, Pico-Union has 13,125 total dwelling units, the majority of which are older multifamily units. The vast majority of these are renter occupied with owner occupied housing comprising just under 10 percent of the total available housing stock. This compares to the countywide average of approximately 46 percent. Single-family detached units account for just fewer than 19 percent of the total number of dwelling units in the community, as compared to almost 50 percent single-family detached housing in the County as a whole.

Commercial Uses. Commercial development is concentrated along the arterial corridors and is generally community-oriented and caters to the specific needs of the resident population. This character is distinct from the commercial and industrial land uses that are predominant in the nearby South Park district. Much of this retail space is made

up of smaller sized stores with a few notable exceptions, including the La Curacao department store. In terms of the mix of businesses located in Pico-Union, community-serving uses, such as retail food and beverage sales and eating and drinking places, tend to predominate. This is consistent with its character as a residential urban community.

Income and employment. Pico-Union is home to a large concentration of low and very low income households, with over 30 percent of all community households reporting an annual income of less than \$15,000. These low income households occur at over twice the rate as Los Angeles County as a whole. An additional 20 percent of the community's population reports household incomes less than \$25,000, which is a rate that also occurs at over twice the County average. Median household income in 2010 was reported at slightly over \$23,000. This represents just over 40 percent of the countywide median household income of just over \$54,000.

At present, the area reports an employed civilian population of just over 19,000 people. In terms of industry of employment, manufacturing, construction and miscellaneous services are the leading sectors of employment of community residents. This means that the population of the community is exposed as changes in these sectors occur. In the current economic downturn, the construction industry has been particularly severely impacted. This is likely to have a long-term effect on the structure of employment within the community. The largest major group for employment in the community is retail trade, with food and beverage stores making up the largest single category of retail store. Services, wholesale trade and accommodation and food services are leading sectors of businesses located in Pico-Union.

Housing market. Beginning in April 1996, the median value for all dwelling units in Pico-Union's two ZIP Code areas was \$130,800. This was considerably lower than the Los Angeles County average of \$158,900 and the statewide average of \$154,600. From 1996 through 2002, which covers the three years before and the three years after the opening of STAPLES Center, median sales prices in the community ZIP Codes trended upward at approximately the same rate as the State and County as a whole. From 1996 until 2004, median sales prices in Pico-Union were lower than the average for Los Angeles County and the State, as a whole. However, as part of the overall run-up in housing values that was experienced from 2002 through 2007, values in the Pico-Union area began to accelerate much more rapidly than the State or the County. This led to a peak median sales price of just over \$640,000 in Pico-Union in March of 2007.

Similar to the rest of Southern California, Pico-Union has since experienced a steep decline in the value of housing from a peak that began to decline rapidly with the onset of the national recession in 2007. With the collapse of regional real estate values, median sales value in Pico-Union has declined faster than either the State or the County and did

not benefit from the effects of the first-time homebuyer tax credit and the federal making home affordable program that slowed the decline in housing values in the County and the State in 2008 and 2009. Since that time, values in Pico-Union have declined more rapidly than the State and the County as a whole, such that by February 2010, prices in Pico-Union were lower than the Los Angeles County median for the first time since early 2004. Presently, values are reverting back toward the State wide median. As of April 2011, the median sales price in the Pico-Union community was slightly over \$325,000, whereas the median sales price was just over \$314,000 in the State as a whole and over \$362,000 for Los Angeles County. The median rent reported by the ACS for 2010 within Pico-Union was just under \$630 per month, compared to countywide median of \$970.

As conditions have improved throughout downtown Los Angeles by the provision of community amenities, new cultural facilities, and housing opportunities brought about by the City's adaptive reuse ordinance, Downtown Los Angeles has seen increased levels of development for market rate and luxury housing units over the last 5 to 7 years. The recent downturn in the national real estate economy has slowed this effect within Downtown Los Angeles as the regional housing market has suffered substantial losses.

b. Analysis of Potential Effects on Pico-Union

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

Through outreach programs at local job training centers, union halls, community faith based organizations, job fairs, and job training programs at LA Trade Tech, a substantial number (over 5,000) of new, quality, living wages job opportunities have been created at STAPLES Center, Nokia Theatre, L.A. LIVE and the Ritz Carlton/JW Marriott Hotels at L.A. LIVE. The emphasis on local job hiring has also had a favorable stabilizing effect on the local community despite the challenging nationwide economic downturn.

The STAPLES Center Foundation has established a number of partnerships in the Los Angeles community to assist charities in raising funds and awareness for their organizations with a special emphasis on the low-income neighborhoods surrounding the center, including Pico-Union. The Foundation has donated more than \$10 million in

financial and in-kind support to many community-based organizations, including major partnerships with numerous programs. Youth programs at the Red Shield Center and 10th Street Elementary School have provided after school support for working families, as well as special reading, art, and recreational programs and activities.

The combination of local jobs, numerous housing and open space projects, new and upgraded community facilities, and local youth programs all stimulated by the development of STAPLES Center and L.A. LIVE, have resulted in positive impacts in many areas of Pico-Union and have contributed to further stability in other Project adjacent neighborhoods. By being an economic anchor tenant for the community, STAPLES Center activities have contributed to growth in the local economy through direct employment of area residents as well providing business opportunities for a wide variety of local enterprises providing goods and services required by both visitors and event patrons as well as by providing inputs to the operations of the facilities themselves.

Similar local hiring initiatives and employment opportunities as well as continued and expanded community enhancement programs are anticipated to be implemented by the Proposed Project.

With respect to housing costs, an analysis of seven comparable markets did not provide consistent evidence of a sustained increase in housing costs in communities adjacent to new NFL stadiums, either in terms of absolute increases in costs or relative position compared to state and metro area markets.⁴ The stadium-adjacent communities on average experienced a 5 percent increase in community housing values compared to housing values in their greater metro area. However, given this sample size and the diversity of factors affecting housing costs, this percentage increase is not considered conclusive, as some of the surveyed communities experienced a reduction in value, and the case studies overall are decidedly mixed in their outcome in terms of effects on housing costs. As such, it is concluded that there is insufficient evidence to support the conclusion that the development of the Event Center in the neighborhood adjacent to Pico-Union would bring about large-scale increases in housing costs that would have the effect of undermining housing affordability in the community.

In addition, the operation of STAPLES Center since its opening in 1999 further suggests that the presence of event space and public assembly facilities does not in and of itself lead to gentrification, although these facilities nevertheless have provided substantial economic and other community benefits to the Pico-Union community. Pico-Union has not

⁴ *Pico-Union Market Impacts, prepared by MR+E, February 2011 (see Appendix 2 of this Draft EIR).*

been the site of large scale conversions of rental space or development of gentrifying residential projects after the introduction of STAPLES Center, a facility with over 200 event days a year. Since the opening of STAPLES in 1999 to the present, housing prices in Pico-Union have generally varied with Los Angeles County prices, and in general the presence of STAPLES Center has not led to a transformation in the available housing stock in the community.

As discussed in Appendix H, the Proposed Project is not expected to cause urban decay or have an adverse effect on housing affordability. Therefore, secondary indirect effects of the Proposed Project would have a less than significant impact.

The modernized Convention Center is anticipated to become more competitive for large-scale citywide events that drive visitor spending and the consumption of hotel room nights. The Event Center would host a substantial number of large-scale spectator events, including NFL football games, that would create demand for goods and services by spectators. Some residents in the Pico-Union community have expressed concern that new spending by visitors and the additional economic activity generated by the Proposed Project would distort the local retail market in such a manner that demand for sports apparel and related items would overwhelm community serving retail.

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

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

The analysis of comparable NFL communities suggests that there is likely to be a nominal increase in demand for sporting goods and related memorabilia within 1 mile of the Event Center. It is likely that the 18 existing sporting goods outlets located within the Pico-Union area would reorient more of their offerings to meet the demand of patrons drawn to the area by the presence of spectator events at the Event Center.⁵ The increased demand also could support between two and four additional sporting good outlets, an increase of approximately 0.6 percent to 1.7 percent of the total mix of retail businesses in the Pico-Union area. This increase in demand for sporting goods and related items does not represent a level of change that can be anticipated to significantly alter the community serving nature of retail outlets in Pico-Union as a whole. As a result, it is anticipated that the Proposed Project would have a less than significant impact on the retail uses located within the Pico-Union neighborhood.

Based on the analyses presented above, the Proposed Project would have a less than significant impact regarding the potential for adverse impacts to the Pico-Union community.

3. Indirect Growth from Employment and Infrastructure Improvements

a. Land Use and Transportation Improvements

The Proposed Project is an infill development on a previously developed site in Downtown Los Angeles, an intensely developed urban community. The Proposed Project would support the Project Site's designation as part of the Downtown Center, defined as "the location for major cultural and entertainment facilities... and the Convention Center." Designed as a transit-oriented development, the Proposed Project would capitalize on its location in downtown Los Angeles, which is the hub of the rail and bus transit system for the metropolitan Los Angeles area, thus supporting strategic investments in the public transportation system and encouraging the use of alternative modes of transportation.

The Project Site is identified within SCAG's Compass Growth Vision as a Compass 2% Strategy Opportunity Area targeted for infill development that expands upon employment, makes use of nearby highway infrastructure and transit, and supports the area's regional importance. Development of the Proposed Project would be consistent with and support these and related SCAG strategies set forth in the Compass Growth Vision, as discussed in Section IV.A, Land Use, of this Draft EIR. Based on the analysis presented

⁵ *Pico-Union Market Impacts, prepared by MR+E, February 2011 (see Appendix _ of this Draft EIR).*

therein, the Proposed Project would be consistent with the policies of SCAG's Compass Blueprint Growth Vision and, thus, impacts with regard to consistency with the Compass Growth Vision would be less than significant.

In addition, the Proposed Project would not remove impediments to growth. The area surrounding the Project Site is already developed with commercial and residential uses. With regard to infrastructure-induced population growth, all roadway improvements planned for the Proposed Project or as mitigation are intended to provide for better circulation flows throughout the area or to improve pedestrian safety and would not open any large undeveloped areas for new use.

With the implementation of the Proposed Project, the Project Site would function as a unified center for convention, sports, and entertainment uses. One of the explicit goals of the Proposed Project is to upgrade the Convention Center and increase its competitiveness with facilities outside of the market area. The proposed replacement and improvements associated with the Proposed Project would reinforce the Convention Center's position as the primary convention site in the Los Angeles market and allow it to become more effective in areas where it is already seeking market position with regards to regional and national competitors. The Convention Center competes on a national level and the Proposed Project's development program is intended to contribute to the Convention Center's ability to compete for events that would not otherwise occur in the Los Angeles region without the contiguous exhibit hall space and other improvements to the Convention Center's facilities. The Convention Center modernization would be expected to increase the number of annual events, the majority of which would be trade shows and conventions (attracting largely out-of-town visitors). The modernized Convention Center is anticipated to become more competitive for large-scale events that drive visitor spending and the consumption of hotel room nights and restaurants. For example, citywide conventions are multi-day events that occupy space in the Convention Center and generate more than 1,200 room nights on the peak night of activity.

The effect of the Proposed Project on the market area also has the potential to add net new spectator events and public assembly activity to the area. This is particularly true of NFL football, which has not been present in the Los Angeles market since 1995. One or two NFL teams would be long-term tenants of the Event Center, which would become a major destination for residents and visitors from all over the region. The Event Center would host a substantial number of large-scale spectator events, including NFL football games that would create demand for goods and services by spectators.

The Proposed Project aims to contribute to an urban entertainment destination within the downtown Los Angeles area that synergistically builds upon existing on- and off-site venues, including STAPLES Center and L.A. LIVE, and that is recognized at a local,

regional, national, and international level. The implementation of the Proposed Project would also further enhance the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another. The scale of the Proposed Project would place the Event Center in the market for events ranging from 25,000 to 72,000 spectators (and up to 76,250 for special events from time to time). In addition, some spectator events, such as international soccer events and concerts that are currently occurring at other facilities in the Los Angeles region, could also relocate to the Proposed Project. These events would increase daytime and nighttime activity in the area and would generate additional demand for restaurants, bars, and retail establishments. As evidenced by the opening of L.A. Live in 2008, activity at existing commercial businesses would increase, and new eateries and businesses catering to spectator event attendees would likely develop. Therefore, the Proposed Project can be expected to result in both direct and indirect increased visitor generation and associated growth in hotel, restaurant, bar, and retail establishments in the area. The Project Site is situated in an urban downtown area that has revitalization as one of its goals. It is expected that such growth of these uses would be in conformance with the most recent land use zone and planning regulations in place at the time these off-site uses are developed. In addition, the area surrounding the Project Site has substantial infrastructure in place for such uses and is located at an existing and expanding regional transit hub currently serviced by multiple local and regional rail and bus lines and located at the regional freeway hub for the Metropolitan Los Angeles Area. This growth has the potential for substantial benefits to the local economy of Los Angeles, including an opportunity for economic development and new expenditures in Pico-Union.

The enhanced facilities for the Convention Center that result from the Proposed Project (i.e., more contiguous space, additional floor area via use of the Event Center), are anticipated to be a stimulus to total development, particularly to the Downtown area and the economy overall in terms of job growth, City general fund revenues, and additional off-site collateral development, etc.). They are also expected to address the current imbalance in the payment of the Convention Center's existing bond obligations. Therefore, for these reasons, the potential growth-inducing impacts of the Proposed Project discussed above in downtown Los Angeles are considered beneficial.

b. Employment

As noted above, the Proposed Project does not propose any housing units and thus, would not generate a direct increase in residential population. However, the Proposed Project would have the potential to generate indirect population growth in the Project Site vicinity as a result of the new employees generated by the Proposed Project. The Proposed Project would create an estimated 12,000 full-time temporary jobs during construction. Given the supply of construction workers in the local work force and temporary nature of such jobs, it is likely that these workers would come from within the

Los Angeles area. Therefore, given the availability of local workers, the Proposed Project would not be considered growth inducing from a short-term employment perspective, but rather would provide substantial opportunities that offset the substantial down turn in construction jobs in the last few years resulting from the national recession.

As discussed in more detail in Section IV.A, Land Use Planning, of the Draft EIR, the Proposed Project would also create approximately 4,123 permanent daily jobs (both part time and full time), or 1,866 full-time equivalent (FTE) jobs during operations, thereby adding to the developed urban community in and around Downtown that serves as a major employment hub. This indirect population growth would be expected to be well within the established population forecasts for the Community Plan area. As discussed in Section IV.A, Land Use Planning, of this Draft EIR, the Proposed Project's maximum net FTE employment would represent 0.10 percent of SCAG's estimated employment forecast for the Los Angeles Subregion in 2017, and 3.96 percent of the anticipated growth in employment between 2011 and 2017. Therefore, the Proposed Project would be consistent with SCAG's employment forecasts for the Subregion as it would not cause an exceedance.

c. Utility Infrastructure Improvements

The Project Site is within an already urbanized area with utilities and other infrastructure in place. Consequently, the Proposed Project would not involve the extension of utilities or infrastructure into areas where they are not currently present.

Utility and other infrastructure upgrades that are identified in Section IV, Environmental Impact Analysis, of this Draft EIR are intended to meet Project-related demand and do not create excess infrastructure capacity that would be considered growth inducing. The Proposed Project would be consistent with regional policies to reduce urban sprawl and efficiently utilize existing infrastructure.

The City of Los Angeles Department of Water and Power, via the issuance of its Water Supply Assessment for the Proposed Project (see Appendix V of this Draft EIR), has concluded that adequate water supplies are available to serve the Proposed Project (see Section IV.K.1, Utilities—Water, of this Draft EIR). In addition, as discussed in Section IV.K.1, Utilities—Water, of this Draft EIR, with implementation of local water line upgrades, the existing water infrastructure would be adequate to accommodate the water demands of the Proposed Project. Such upgrades to the local water lines would not be of sufficient size to result in growth-inducing impacts.

As analyzed in Section IV.K.2, Utilities—Wastewater, of this Draft EIR, there is adequate regional wastewater treatment capacity within the City through 2020, and based

on the Bureau of Sanitation's more recent wastewater generation projections, adequate capacity would likely be available through 2030. Therefore, the Proposed Project would not require upgrades to any wastewater treatment facilities and thus would not be considered growth-inducing in this regard.

While the Project may require local infrastructure upgrades to maintain and improve water, sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the Project Site, the Project would not necessitate regional utility infrastructure improvements that have not otherwise been accounted for and planned for on a regional level. As such, secondary impacts associated with utilities systems would be less than significant.

d. Urban Decay

In the context of CEQA, another potential indirect physical impact to consider is urban decay. For the purpose of this analysis, urban decay is defined as physical deterioration that is so substantial, it impairs the proper utilization of affected real estate or the health, safety, and welfare of the surrounding community. Physical deterioration includes, but is not limited to: abnormally high vacancies; abandoned buildings; and social dislocation resulting from decreased use at competing sites. Using the standard of decay, a project could be said to have an influence on the physical conditions of the competing facilities if its presence in the market place leads to a cycle of dis-use and dis-investment of the area that is consistent with urban decay.

The issue of urban decay was analyzed in terms of both spectator events and public assemblies on the physical condition of comparable public assembly facilities in the Los Angeles market and the potential for the Project to result in urban decay at these facilities.

One important cause of urban decay is the lack of reinvestment in existing facilities. Urban decay comes about as a result of existing facilities in the market becoming so economically disadvantaged that they are unable to keep up with basic maintenance and repairs, let alone expand and improve their capital stock. Urban decay would not simply be the loss of market share or relative business volumes of a competing facility, but rather the creation of a circumstance that results in the physical deterioration of a facility that has been accelerated by the implementation of the Proposed Project.

(1) Spectator Events

Spectator Events include NFL Football, concerts/music festivals, the PAC-12 Football Championship, High school football championships, ESPN X games, international soccer matches, MLS exhibition games, and major boxing events. The key competitive facilities that could potentially be affected by the Proposed Project include: the Los

Angeles County Memorial Coliseum; the Pasadena Rose Bowl; Dodger Stadium; and the Home Depot Center in Carson.

Each of these spectator venues has a contract in place with one or more tenants, which has the effect of providing long term economic use of the facilities. All of these existing facilities are anticipated to retain their anchor tenants. In addition, the Rose Bowl and Coliseum have been engaged in an ongoing program of investment and recapitalization of their assets. Both of these facilities currently have long term lease agreements with master tenants that secure revenue streams for each facility.

The scale of the Proposed Project would place the Event Center in the market for events generally ranging from 25,000 to 72,000 spectators. NFL football is not presently accommodated in the market. Use by an NFL team is constrained at both the Los Angeles Memorial Coliseum and the Rose Bowl due to existing lease agreements and operations policies. Although it is possible that an NFL football franchise could occupy either stadium as an interim use, current lease agreements at the Coliseum and policies of the City of Pasadena would impede their use as a permanent home stadium for an NFL team. In the case of the Rose Bowl, the City of Pasadena limits the number of events with attendance over 20,000 to 12 per year. This includes the six regularly scheduled UCLA home football games and the Rose Bowl game on New Year's Day.

The primary use of the Los Angeles Memorial Coliseum is for USC football games, and its lease with USC effectively reserves USC as the only football user of the stadium. Other events that have used the Coliseum stadium include uses that are tied to Exposition Park, such as hosting the charitable Revlon Run, an annual Fourth of July picnic and fireworks display, or public events such as mass citizenship ceremonies and concerts. Use of the facility for these secondary events would not be affected by the Proposed Project. The Proposed Project does not involve relocation of a master tenant from either facility, nor does it require the reallocation of football events.

In terms of spectator events, the only foreseeable areas of direct competition between the Proposed Project and existing facilities in the market are confined to international soccer events and, to a lesser degree, concerts and high school football. It is primarily in these categories that existing events already occurring at Los Angeles area facilities could be anticipated to relocate to the Project Site. However, as a whole, the potential loss of this activity would not be in itself enough to lead to significant capital disinvestment. The Los Angeles Memorial Coliseum and the Rose Bowl currently have long term lease agreements with master tenants that secure revenue streams for each facility. Neither of these master tenant arrangements would be affected by the development of the Proposed Project, nor would they lead to abandonment by the master tenants of either the Coliseum or the Rose Bowl. As discussed in more detail in

Appendix H, it is unlikely that the loss of business volumes related to secondary users would be sufficient to undermine the basic financial security of these facilities over the long term.

Therefore, based on the characteristics of the spectator event locations within the market and recent and ongoing investments in these facilities, the Proposed Project would not result in the closure of, or dis-investment in, competing facilities leading to their abandonment or decay.

(2) Public Assemblies

Public Assemblies evaluated were citywide conventions, tradeshow and consumer shows. With respect to public assembly facilities, the Convention Center competes on a national level and the development program for the Proposed Project is intended to contribute to the Convention Center's ability to compete for events that would not occur in the Los Angeles region without the contiguous exhibit hall space and other improvements to the Convention Center's facilities. There is some likely overlap in the regional market between the Convention Center and other free standing public assembly facilities over 100,000 square feet in the Los Angeles area. These other facilities include the following: the Long Beach Convention Center, the Los Angeles County Fair Association (Fairplex)—Pomona, and the Pasadena Center.

All of the identified competitive facilities that could potentially be affected by the Proposed Project are public assets. In the case of the Long Beach Convention Center and Fairplex, the facilities are operated by private entities; however, the underlying asset in both cases remains with the City of Long Beach and Los Angeles County, respectively. For these facilities, as well as for the Pasadena Center, successful operation of the public assembly facilities is an important part of each community's long-term economic development strategy through the promotion of on-site sales and room night generation. The economic performance of these facilities reinforces the public sector's interest in their long-term vitality.

Public assembly facilities generally depend on transient business rather than long-term tenants. The expansion of the Pasadena Center and the construction of the new Fairplex represent over \$180 million in recapitalization of competitive public assembly venues. These investments will help to preserve the long-term viability and physical infrastructure of two major facilities in the local market that have the potential to be competitive with the Los Angeles Convention Center.

The increases in capacity and performance at the Convention Center that would result from implementation of the Proposed Project are designed to place it in a more

competitive position in regard to national competitors. As a result, the new facility is unlikely to be attractive to existing business at the smaller public assembly facilities elsewhere in the Los Angeles market either because of cost or the size of available space. As discussed in Appendix H, at present, none of the existing facilities elsewhere in the market are in a position to compete on a national basis for large-scale citywide public assembly events. Each of these facilities is effective in accommodating its own particular segment of the meetings market, which at present has only limited overlap with the Los Angeles Convention Center's capacity.

(3) Conclusion

At present, the Convention Center is the largest public assembly venue in the market and it would remain so after completion of the Project. The Proposed Project improvements would not prevent the opportunity for any of the existing facilities in the market from competing with the Los Angeles Convention Center in the classes of business where they presently compete. As stated above, NFL football is not presently accommodated in the market. Although some classes of spectator events may shift from existing spectator facilities, as a whole the potential loss of this activity would not in itself lead to significant capital disinvestment. The capacities of the Proposed Project do not fundamentally alter the market dynamics for public assembly events in Los Angeles County. Therefore, based on the above, it can be reasonably concluded that the Proposed Project would not result in the closure of, or disinvestment in, competing facilities leading to their abandonment or decay or decay of the surrounding area. Thus, potential impacts associated with urban decay would be less than significant.

E. Effects Not Found To Be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the EIR. An Initial Study was prepared for the project and is included in Appendix B of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Proposed Project would not result in potentially significant impacts related to the following: Agricultural Resources; Biological Resources; Paleontological Resources; Mineral Resources; Population/Housing; Public Services: Schools, Parks and Libraries; and Recreation. Please refer to Appendix B of this Draft EIR for additional information.