

Appendix B

Initial Study/NOP/NOP Comments





CONVENTION CENTER MODERNIZATION and FARMERS FIELD PROJECT

Initial Study

City of Los Angeles

March 2011

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I. Introduction

The subject of this Initial Study is the proposed Convention Center Modernization and Farmers Field Project (the “Project”), a development of 1,750,000 square feet of net new gross floor area. The proposed Project would involve the expansion and modernization of the Los Angeles Convention Center and would include the following three main components: (1) the existing West Hall of the Convention Center would be demolished and replaced with a new building of similar size and capacity built in part over Pico Boulevard such that it would be contiguous with the existing South Hall (the “Replacement Hall”); (2) Farmers Field, a new multi-use event center, that could be configured with 72,000 seats expandable to 76,250 seats for spectator events or as 169,650 square feet of useable exhibition space and 56,000 square feet of useable meeting room space for a combined total of 225,650 square feet of useable floor area, would be constructed on the former West Hall building site; and (3) the construction of larger, more efficient parking structures, located west of LA Live Way replacing the existing Bond Street surface parking lot and the Lot C Garage (formerly Cherry Street Garage) to provide approximately 1,290 net additional parking spaces. The Project is proposed to be implemented through adoption of a new Specific Plan. Although the Specific Plan encompasses the entire Project Site, its primary focus would be on regulation of the proposed buildings and features, including signage, and on regulation of transportation and parking.

The proposed Project Site is currently occupied by the Los Angeles Convention Center and STAPLES Center, located in the Downtown area of the City of Los Angeles. The Project Site is generally bounded by I-110 Harbor Freeway to the west; Chick Hearn Court and L.A. LIVE to the north, Figueroa Street to the east, and Venice Boulevard to the south.

The proposed Project Applicants (the “Applicants”) are the City of Los Angeles and L.A. Event Center, LLC. A detailed description of the proposed Project is contained in Section II, Project Description, of this Initial Study. The City of Los Angeles Department of City Planning is the Lead Agency pursuant to the provisions of the California Environmental Quality Act (CEQA).

PROJECT INFORMATION

Project Title: Convention Center Modernization and Farmers Field Project

Project Location: The Project Site occupies roughly 68 acres generally bounded by Chick Hearn Court on the north, Figueroa Street on the east, Venice Boulevard on the south, and the 110 Harbor Freeway on the west, in the downtown Los Angeles area

Project Applicant: City of Los Angeles and L.A. Event Center, LLC

Lead Agency: City of Los Angeles Department of City Planning
200 N. Spring St., Room 750
Los Angeles, CA 90012

ORGANIZATION OF INITIAL STUDY

This Initial Study is organized into four sections as follows:

1. Introduction: This section provides introductory information such as the Project title, the Project Applicant and the Lead Agency for the Project.
2. Project Description: This section provides a description of the proposed Project, the existing environmental setting, and the discretionary actions required.
3. Initial Study Checklist: This section contains the completed City of Los Angeles Initial Study Checklist.
4. Explanation of Checklist Determinations: This Section presents an assessment and discussion of the potential impacts associated with each environmental issue identified in the Initial Study Checklist.

II. Project Description

A. Environmental Setting

1. Project Location

The proposed Los Angeles Convention Center Modernization and Farmers Field Project (the “Project”) would occur within an approximately 68-acre site that includes all of the existing Los Angeles Convention Center property (the “Convention Center”), including the Bond Street Parking Lot and the Lot C Garage (formerly the Cherry Street Parking Garage), STAPLES Center, as well as the air space over Pico Boulevard and LA Live Way, collectively referred to herein as the “Project Site.” The Project Site is generally bounded by the following major roadways: the I-110 Harbor Freeway to the west; Chick Hearn Court to the north; Figueroa Street to the east; and Venice Boulevard to the south. Figure 1 on page 4 depicts the regional vicinity of the Project Site, whereas Figure 2 on page 5 depicts the Project’s precise location, and Figure 3 on page 6 provides an aerial view of the Project Site and its environs.

The Project Site is located within the Central City Community Plan Area (Community Plan Area) of the City of Los Angeles (City), which includes the City’s Downtown area as well as the following neighborhoods and districts: Civic Center, Bunker Hill, Little Tokyo, Financial District, Jewelry District, South Park, and Convention Center/STAPLES Center/L.A. LIVE. The Project Site occupies the south-westernmost portion of the Community Plan Area. To the east of the Project Site is the South Park District, a mixed-use neighborhood characterized by a growing residential community as well as new commercial construction interspersed with older commercial and industrial buildings scattered throughout the area.

2. Existing Project Site

As previously stated, the Project Site would encompass the Los Angeles Convention Center property, STAPLES Center, as well as the air space over Pico Boulevard and LA Live Way. Further description of the existing Project Site is provided below.

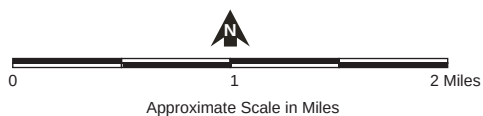
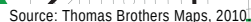
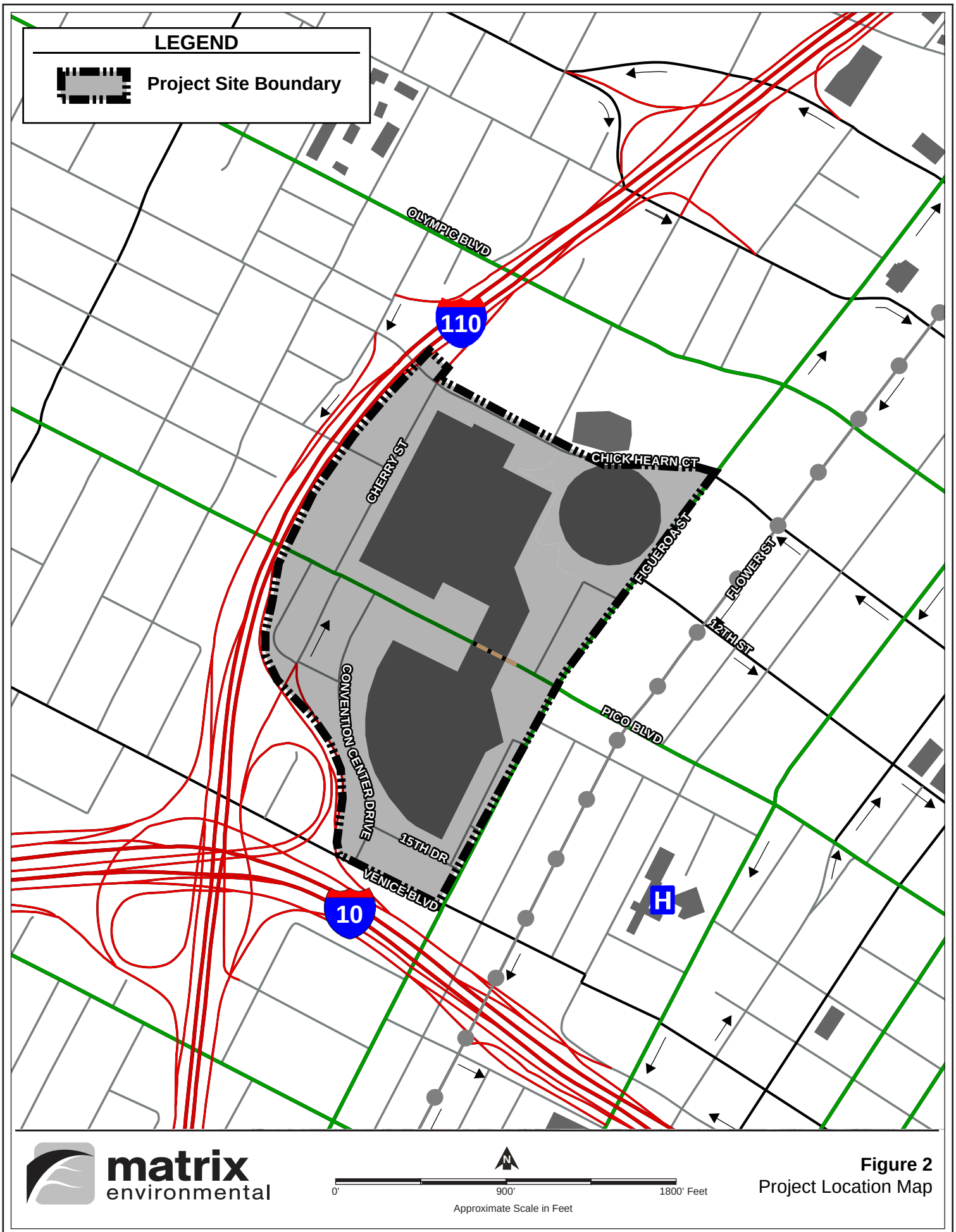


Figure 1
Regional Vicinity Map



LEGEND



Project Site Boundary



Source: Google Earth Pro 2011.

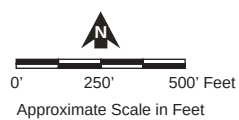


Figure 3
Aerial View of Project Site

The approximately 4.2 million gross square foot existing Convention Center facility provides roughly 867,000 useable square feet of combined exhibit hall/meeting room space and currently consists of three main structures: the West Hall, the South Hall, and the Concourse as well as supporting parking facilities. The West Hall was built in 1971. A major renovation of the Convention Center was completed in 1993, which included the addition of the South Hall and the Concourse, which includes Concourse Hall. Kentia Hall was built beneath the South Hall in 1997. Level 1 of the Convention Center generally consists of exhibit space, dining areas, and ancillary services. Level 2 of the Convention Center generally consists of meeting rooms. The following provides additional information regarding the existing Convention Center facilities, particularly as it relates to the proposed Project.

The Convention Center's West Hall is situated on an approximately 14-acre parcel bounded roughly by Chick Hearn Court to the north; STAPLES Center and Gilbert Lindsay Plaza to the east, which fronts on Figueroa Street; Pico Boulevard to the south; and LA Live Way (formerly Cherry Street) to the west.¹ The West Hall was constructed in 1971 with a total of 210,685 square feet of useable exhibition space on the first floor. Petree Hall is located on the first level of the West Hall building and offers an additional 21,557 useable square feet of exhibit space. The Galaxy Café and Plaza Dining area are also located on the first level of the West Hall. In addition, Level 2 of the West Hall offers 46,303 useable square feet of meeting room space.

The South Hall site is situated on an approximately 24-acre parcel bounded roughly by Pico Boulevard to the north, Figueroa Street to the east, Venice Boulevard to the south, and the Harbor Freeway/Santa Monica Freeway interchange and LA Live Way to the west. The South Hall was constructed in 1993 with a total of 346,890 useable square feet on the first level. Level 2 of the South Hall offers 19,475 useable square feet of meeting room space. Kentia Hall, which is located beneath South Hall and is therefore part of the South Hall building, was constructed in 1997 as a 162,000 useable square foot addition.

The Concourse provides pedestrian connectivity between the South and West Halls as it spans Pico Boulevard and includes several components including: Concourse Hall, consists of 26,342 useable square feet of exhibit space, 39,805 useable square feet of meeting room space, the lobby pavilions for the South and West Hall buildings, the Compass Café (located in the South Hall), a foyer, and a 299-seat theatre.

¹ *Note: The street orientations described herein are approximate as the roadways do not run in a true north- south or east-west direction.*

STAPLES Center is located on an approximately 8.5-acre site occupying the southwest corner of Figueroa Street and Chick Hearn Court. STAPLES Center opened in 1999 with 950,000 square feet of total arena space, STAPLES Center has capacity for 20,000 seats and is currently home to four professional sports franchises: the Los Angeles Kings, the Los Angeles Lakers, the Los Angeles Clippers, and the Los Angeles Sparks; and is host to other high-profile sporting and entertainment events that receive attention at a national and international level.

The Convention Center site also includes the Bond Street Parking Lot and the Lot C Garage. The Bond Street Parking Lot is located west of the South Hall, near the Harbor Freeway between Bond Street and Pico Boulevard, fronting LA Live Way. This parking lot contains 190 surface parking spaces. The Lot C Garage is located west of the West Hall, near the Harbor Freeway between Pico Boulevard and Chick Hearn Court, fronting LA Live Way. This multi-level, enclosed parking garage contains 858 parking spaces.

Circulation and Transit

Seven freeways serve downtown Los Angeles, with four freeways directly serving the Project Site: I-10 Santa Monica Freeway to the west, I-10 Santa Monica Freeway to the east, I-110 Harbor Freeway to the south, and SR-110 Harbor Freeway to the north. These freeways also provide direct connections to several other freeways thereby providing efficient freeway access to the Project area from throughout Southern California. In addition, there are over forty freeway ramps connecting the freeways themselves to downtown streets to access/egress the Project Site, with fourteen ramps in close proximity to the Project Site. The area of the Project Site is served by eight arterial roadways with many more arterials serving the Downtown area.

With respect to public transit, the Project Site is located at the hub of the regional rail and bus transit system in the metropolitan Los Angeles area. There are two rail transit stations within short walking distance (Flower & Pico Station and Seventh & Flower Station) and approximately 35 bus lines, including five Metro Rapid bus lines, within 3/4 mile of the Project Site. The Metro Silver Line is a rapid bus line that connects the South Bay and the San Gabriel Valley to Downtown with frequent, direct connections and several stops in the Project area including a stop at Figueroa Street and Pico Boulevard. The Red and Purple subway lines serve Downtown Los Angeles from the San Fernando Valley, Hollywood and Mid-Wilshire areas, with a station at 7th Street & Flower Street, only five blocks from the Project Site. The Long Beach to Los Angeles Blue Line light rail runs along Flower Street two blocks east of the Project Site, with a station at Flower Street & Pico Boulevard/12th Street. The Exposition Line will serve Downtown from Culver City (opening in 2012) and from Santa Monica (anticipated to open in 2015), which will also run along Flower Street and stop at the Flower Street & Pico/12th station. These lines all connect to Union Station

via the Red & Purple Lines to access the Pasadena Gold Line, the Eastside Gold Line, and the five regional Metrolink commuter rail lines serving Ventura, Los Angeles, San Bernardino, Riverside, and Orange Counties.

Parking

Existing parking facilities at the Project Site include the Convention Center West Hall and South Hall parking structures containing 1,625 spaces and 1,671 spaces, respectively; the LA Live Way (Lot C/ Cherry Street) structure containing 858 spaces; and the Bond Street surface lot containing 190 spaces. Additional parking is provided via the Venice Boulevard structure containing 1,121 spaces. These lots combined provide a total of 5,465 parking spaces. Further, an additional 3,792 parking spaces are located at L.A. LIVE that are under the control of one of the Applicants. These parking spaces combined with those on the Project Site yield a total of 9,257 parking spaces. It should be noted that there also numerous additional, private, independently-operated parking lots located off-site in the immediate Project area.

Land Use and Zoning Designations

The Project Site is regulated by the City's Central City Community Plan, which is one of 35 Community Plans that comprise the City of Los Angeles General Plan Land Use Element. The Convention Center and parking facilities portion of the Project Site are designated "PF" – Public Facilities. The STAPLES Center is also designated PF in the Community Plan, with the exception of the two most northerly parcels fronting Figueroa Street, which are designated as "Regional Commercial." These General Plan land use designations correspond with the Los Angeles Municipal Code (LAMC) zoning designations. The Convention Center and parking facilities portion of the Project Site is zoned "PF-4D-O", whereas the STAPLES Center is zoned PF-4D-O, with the exception of the two most northerly parcels fronting Figueroa Street which are zoned C2-4D-O.

The Project Site is also located within various economic development areas that establish goals germane to planning with respect to fiscal initiatives: the South Park Business Improvement District (BID), which is part of the federally-designated Los Angeles Renewal Community; the Los Angeles State Enterprise Zone; and the Central City Revitalization Zone.

3. Surrounding Uses

Existing land uses in the vicinity of the Project Site consist of various commercial, entertainment, industrial, and residential uses, as well as supporting parking areas

characterized by a range of architectural styles, building heights, and construction dates. It should be noted that almost all of the properties that border the Project Site are designated for commercial, Los Angeles Sports and Entertainment District (LASED), or public facilities uses. As previously described and depicted in Figure 2 on page 5, the Project Site is generally bounded by the following major features: the I-110 Harbor Freeway to the west; Chick Hearn Court/L.A. LIVE to the north; Figueroa Street to the east; and the I-10 Santa Monica Freeway to the south. The following paragraphs describe the areas that surround the Project Site to the north, east, south, and west.

L.A. LIVE including the Nokia Theatre L.A. LIVE, Regal Cinemas, various restaurants and offices, Nokia Plaza L.A. LIVE and the West Garage comprise the properties north of the Project Site bounded by Chick Hearn Court to the south, Figueroa Street to the east, Olympic Boulevard to the north, and the Harbor Freeway to the west. The Figueroa Street corridor bounds the Project Site roughly to the east and is primarily characterized by surface parking lots and auto-related uses between Chick Hearn Court/11th Street and Venice Boulevard with the exception of the Citylights multi-family housing development at the corner of Pico Boulevard. Venice Boulevard forms the Convention Center's southern boundary and is characterized by auto-related uses including the Venice Parking Garage, which is located adjacent to the Convention Center's South Hall. The Harbor/Santa Monica Freeway interchange is located west of the South Hall flanking the Convention Center's southern perimeter. A group of commercially-designated properties is situated within the freeway on/off ramp loop. The Harbor Freeway and landscape buffer area roughly serves as the Project Site's western boundary which effectively separates the Convention Center from the uses west of the freeway with large overpasses and multiple north/south bound travel lanes. Properties west of the Project across the Harbor Freeway are predominantly designated for manufacturing and related land uses and also include a wide range of industrial, commercial, and residential uses.

B. Proposed Project Characteristics

The Project proposes the expansion and modernization of the Los Angeles Convention Center and would involve the following three major components: (1) the existing West Hall building and parking would be demolished and replaced with the Replacement Hall, comprised of a new Convention Center building of similar size and capacity that would be built spanning Pico Boulevard so as to be contiguous with the South Hall; (2) Farmers Field, a new multi-use event center, that can be configured with 72,000 seats expandable to 76,250 seats for spectator events or as 169,650 square feet of useable exhibition space and 56,000 square feet of useable meeting room space for a combined total of 225,650 square feet of usable floor area, would be constructed on the former West Hall site; (3). the construction of larger, more efficient parking structures,

located west of LA Live Way replacing the existing Bond Street surface parking lot and the Lot C Garage (formerly Cherry Street Garage) to provide approximately 1,290 net additional parking spaces.

The Project is proposed to be implemented through adoption of a new Specific Plan. Although the Specific Plan encompasses the entire Project Site, its primary focus would be on regulation of the proposed buildings and features, including signage, and on regulation of transportation and parking.

With the implementation of the Project, the Project Site would function as a unified center for convention, sports and entertainment uses. A brief overview of each of the proposed components is provided below.

Project development would occur pursuant to a proposed Specific Plan which would establish development standards that include, but may not be limited to, building height, massing, signage, parking and lighting. In addition, notable elements of environmental sustainability will be comprehensively integrated into the Project and will be one of the key elements that will guide the design of the Project.

Total building square footage to be constructed under the proposed Project would be approximately 1,750,000 square feet of net new gross floor area. The first component of the Project would involve the demolition and replacement of the existing West Hall (278,545 useable square feet). The Replacement Hall would bridge over a portion of Pico Boulevard such that it would adjoin the existing South Hall and would consist of roughly the same amount of square footage as the former West Hall (312,685 useable square feet); however, the amount of functional space would effectively increase as more contiguous floor space would be available throughout the Convention Center.

The second component of the Project would involve the development of Farmers Field, a multi-purpose, entertainment and sports center with a potentially retractable roof on the former West Hall site. The approximately 1,750,000 square foot structure would offer approximately 72,000 permanent seats with expandable seating capacity to approximately 76,250 seats to be used for major marquee events, such as the Super Bowl. Farmers Field would also be available as Convention Center exhibit and meeting space, providing roughly 169,650 square feet of useable exhibition space and 56,000 useable square feet of meeting room space.

The third component of the Project would involve the construction of new larger, more efficient parking facilities on the existing Bond Lot and Lot C Garage sites. As the West Hall would be demolished, the existing 1,625 parking spaces under the West Hall

would be removed by the Project. Existing parking under the South Hall and in the Venice Garage of the Convention Center would remain unchanged. The existing Lot C (Cherry Street) Garage would be rebuilt and expanded from the existing 858 spaces to approximately 3,000 parking spaces. A new parking garage would be constructed on the Bond Street Lot, which would increase parking on that site from approximately 190 to 928 parking spaces. These improvements would result in a net increase of approximately 1,290 parking spaces. Additionally, above-ground pedestrian bridges would provide connectivity between Farmers Field and one or both of these parking structures, as well as to L.A. LIVE West.

The South Hall of the Convention Center and the Concourse Hall, including associated parking, are proposed to remain.

C. Construction/Phasing

Construction would commence immediately upon approval of the proposed Project, which is anticipated to occur in 2012. Project implementation would occur in accordance with the following phases: (1) construction of the Replacement Hall and new parking facilities; (2) demolition of the West Hall; and (3) construction of Farmers Field. Project construction is estimated to be completed in 2015.

D. Discretionary Approvals

Permits and approvals required from the City of Los Angeles, as the Lead Agency under CEQA, for development of the proposed Project are anticipated to include, but are not limited to, the following:

- Specific Plan to regulate development within the Project Site;
- Vesting Zone Change or Zone Change;
- General Plan Amendment to establish a Specific Plan land use designation for the Project Site;
- Development Agreement;
- Transactional agreements with respect to financing and development of the Replacement Hall and for the right to privately construct and operate Farmers Field ;

- Approval of signage pursuant to the new Specific Plan or Supplemental Use District;
- Creation/vacation of air space parcels over Pico Blvd and LA Live Way;
- Design review approval by the Cultural Affairs Commission;
- Bond financing for construction of the new hall;
- Haul Route approval; and;
- Any additional actions deemed necessary.

Required ministerial approvals from the City of Los Angeles are expected to include, but are not limited to, the following:

- Department of Public Works permits for excavation and shoring in public ways and installation of public improvements;
- Street Closure permits;
- Department of Building and Safety permits including demolition, grading, foundation, and building permits; and
- Any additional ministerial actions or approvals required.

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY AND CHECKLIST

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
CITY OF LOS ANGELES	CD-9	March 9, 2011

RESPONSIBLE AGENCIES

PROJECT TITLE/NO.	CASE NO.
Convention Center Modernization and Farmers Field Project	

PREVIOUS ACTIONS CASE NO.	☒ DOES have significant changes from previous actions.
See Attachment A	☐ DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION:

The Project proposes the expansion and modernization of the Los Angeles Convention Center and the development of Farmers Field, which combined consists of 1,750,000 million square feet of net new gross floor area and includes the following three main components: (1) the West Hall would be demolished and replaced with a new hall built in part over Pico Boulevard so as to be contiguous with the South Hall; (2) Farmers Field, a new multi-use event center that can be configured with 72,000 seats expandable to 76,250 seats for spectator events or as 169,650 square feet of useable exhibition space and 56,000 square feet of useable meeting room space for a combined total of 225,650 square feet of useable floor area, would be constructed on the former West Hall site; (3) and two new parking structures would be constructed in place of the existing Bond Street surface parking lot and Lot C Garage (formerly Cherry Street Garage) and would provide 1,290 net additional parking spaces located to the west of LA LIVE Way. The Project also includes signage in support of the proposed uses.

ENVIRONMENTAL SETTING:

The Project Site includes the existing Los Angeles Convention Center, STAPLES Center, as well as the Bond Street Parking Lot and the Lot C Garage (formerly the Cherry Street Parking Garage).

PROJECT LOCATION

The Project Site is generally bounded by the following major roadways: the I-110 Harbor Freeway to the west; Chick Hearn Court to the north; Figueroa Street to the east; and Venice Boulevard to the south.

PLANNING DISTRICT	STATUS:	
Central City Community Plan	☐ PRELIMINARY ☐ PROPOSED 1/8/2003 ☒ ADOPTED date	
EXISTING ZONING	MAX. DENSITY ZONING	☐ DOES CONFORM TO PLAN
PF-4D-O/ C2-4D-O		
PLANNED LAND USE & ZONE	MAX. DENSITY PLAN	☒ DOES NOT CONFORM TO PLAN
SPECIFIC PLAN		



DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

SIGNATURE

SENIOR CITY PLANNER

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - 1) Earlier Analysis Used. Identify and state where they are available for review.
 - 2) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - 3) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - 1) The significance criteria or threshold, if any, used to evaluate each question; and
 - 2) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| ☒ Aesthetics | ☒ Greenhouse Gas Emissions | ☐ Population/Housing |
| ☐ Agricultural and Forestry Resources | ☒ Hazards & Hazardous Materials | ☒ Public Services |
| ☒ Air Quality | ☒ Hydrology/Water Quality | ☐ Recreation |
| ☐ Biological Resources | ☒ Land Use/Planning | ☒ Transportation/Traffic |
| ☒ Cultural Resources | ☐ Mineral Resources | ☒ Utilities/Service Systems |
| ☒ Geology/Soils | ☒ Noise | ☒ Mandatory Findings of Significance |

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

PROPONENT NAME**PHONE NUMBER**

Ted Tanner and Pouria Abbassi

PROPONENT ADDRESS

Ted Tanner
L.A. Event Center, LLC
800 W. Olympic Boulevard, Suite 305
Los Angeles, California 90015

Pouria Abbassi
Los Angeles Convention Center
1201 S. Figueroa Street
Los Angeles, California 90015

AGENCY REQUIRING CHECKLIST**DATE SUBMITTED**

City of Los Angeles

March 10, 2012

PROPOSAL NAME (If Applicable)

**ENVIRONMENTAL IMPACTS**

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐
II. AGRICULTURAL AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

III. AIR QUALITY. Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	☒	☐	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☒	☐	☐	☐

IV. BIOLOGICAL RESOURCES. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

V. CULTURAL RESOURCES: Would the project:

a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	☒	☐	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐

VI. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☒	☐	☐	☐
ii. Strong seismic ground shaking?	☒	☐	☐	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☒	☐	☐	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

VII. GREENHOUSE GAS EMISSIONS. Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	☒	☐	☐	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project result in:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☒	☐	☐	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☒	☐	☐	☐
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☒	☐	☐	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other governmental services (including roads)?	☐	☐	☒	☐
XV. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b. Conflict with an applicable congestion management program including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
e. Result in inadequate emergency access?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐

XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☒	☐	☐	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	☒	☐	☐	☐
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☒	☐	☐	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☒	☐	☐	☐
h. Other utilities and service systems?	☒	☐	☐	☐

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
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	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☒	☐	☐	☐
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

**DISCUSSION OF THE ENVIRONMENTAL EVALUATION** (Attach additional sheets if necessary)

PREPARED BY	Bruce Lackow Matrix Environmental 6701 Center Drive West Suite 900 Los Angeles, CA 90045	TITLE	President	TELEPHONE #	(424) 207-5333	DATE	March 10, 2012
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IV. Explanation of Checklist Determinations

I. Aesthetics

- a. Would the project have a substantial adverse effect on a scenic vista?

Potentially Significant Impact

The Project Site is located within the City of Los Angeles' Downtown core and is generally bounded by the following major features, which predominate the visual setting in the immediate vicinity of the Project Site (also referred to as the "Project area"): the I-110 Harbor Freeway to the west, which is elevated in the Project area; L.A. LIVE to the north; Figueroa Street to the east; and Venice Boulevard and the I-10 Santa Monica Freeway to the south, which is also elevated in the Project area. Several high rise buildings are visually prominent particularly to the north and east, including the 54-story Ritz Residences and Ritz Carlton and JW Marriott Hotels tower. With respect to visual access, public vantage points are available largely from the public streets and freeway corridors approaching or adjacent to the Project Site.

Scenic resources that may be visible in the Project area include the Downtown skyline, which is defined by high-rise buildings primarily to the north/northeast in the foreground (i.e., L.A. LIVE), the mid-ground (i.e., buildings in Bunker Hill), and the more distant silhouettes of the mountain ranges to the north and the east. The Project Site exhibits little topographic relief and, coupled with the highly urbanized nature of the Project area, views of the identified visual resources in the area are limited. Private vantage points are available primarily from the upper levels of the mid- to high-rise buildings in the area.

The Project involves the expansion and modernization of the Los Angeles Convention Center (Convention Center), which along with STAPLES Center may be considered visual resources due to their size, location, design and function of the buildings. The South Hall is the most visually prominent Convention Center building as viewed from the Harbor/Santa Monica Freeway interchange and is defined by its curved, green building exterior, signage (temporary and permanent), and solar panels. The rectangular, functionally-designed West Hall is visible primarily looking east from the Harbor Freeway north of the interchange. The Concourse and Concourse Hall, which are proposed to remain, are characterized by varying façade features consisting of steel and glass construction with curvilinear multi-story pavilions defining the main entrances to each hall

(South and West Halls). Concourse Hall is interior to the site and provides connectivity via an enclosed pedestrian corridor that spans over Pico Boulevard between the West and South Halls with exposed stairways to provide outdoor corridor access.

The proposed Project, with the construction of a new building as a replacement for West Hall (also referred to as the "Replacement Hall") and Farmers Field, and to a lesser extent the proposed expanded parking structures, would visually alter the existing Convention Center site and further study is recommended to determine whether the Project would adversely affect views of the scenic resources in the Project area. As the Project has the potential to affect existing views of a visual resource, further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) an identification and description of the valued view resources present in the area; (2) an identification of the public vantage points that have access to the identified valued view resources; (3) an analysis of changes to the visual environment attributable to the new structures and proposed signage; and (4) an analysis of the Project's potential to block views of the identified view resources from public vantage points and from more than a limited number of private vantage points.

- b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?

No Impact

While one or more of the buildings at the Convention Center may or may not be historically significant, none of the surrounding roadways in the Project area have been designated as scenic highways by the City of Los Angeles.² Therefore, as the Project would not damage any scenic resources within a City-designated scenic highway, no impact would occur. Therefore, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required. Please refer to Question V.a. for additional information regarding the potential for historic structure(s) to be present at the Project Site.

² City of Los Angeles Department of City Planning—Citywide Transportation Section, *Scenic Highways Map*, June 1998.

- c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Impact

The Project area consists of dense and diverse urban development with little topographic relief, no natural features, and limited landscaping. Existing properties in the vicinity consist of various commercial, sports and entertainment, as well as industrial, and residential uses representing a range of architectural styles, building heights, and construction dates. As described above in response to Question 1(a), the visual character of the area proximal to the Project Site, the Project area, is demarcated primarily by the I-110 Harbor Freeway to the west-northwest, L.A. LIVE to the north, Figueroa Street to the east, and the I-10 Santa Monica Freeway to the south. The visual character of the Project Site is primarily defined by the Los Angeles Convention Center facilities, with construction of the West Hall dating back to 1971 and major expansions completed in 1993 and 1997, which included the South Hall and Kentia Hall, respectively; as well as STAPLES Center, a sports and entertainment arena that opened in 1999. These on-site structures are visually compatible with and complimentary to L.A. LIVE with respect to the scale and nature of the development.

With the construction of the Replacement Hall and Farmers Field, as well as the demolition of the existing parking and the development of expanded, more efficient parking and pedestrian facilities, the appearance of the Project Site would be considerably altered. As a result, impacts to the visual character of the site and its immediate surroundings could occur. Thus, further analysis of this issue in an EIR is recommended. More specifically, the EIR analysis will: (1) describe the visual character and quality of the Project Site, as viewed from offsite locations under existing and proposed conditions; (2) evaluate potential impacts as may be perceived from surrounding uses; and (3) analyze Project consistency with all applicable urban design/aesthetic policies as set forth in applicable planning documents (e.g., Central City Community Plan, etc.).

- d. Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Artificial Light: Potentially Significant Impact

Artificial light may be generated from point sources (i.e., indoor artificial light sources that can be identified) as well as from indirect sources of reflected light. Uses such as residences, hotels, and hospitals are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours. The Project area exhibits high ambient nighttime light levels due to the densely developed nature of this part of the Downtown area. Major light sources include various types of lighting (e.g., security, architectural, indoor, signage, strobes) from the existing

Convention Center, L.A. LIVE, including the 54-story Ritz Residences and Ritz Carlton and JW Marriott Hotels tower, STAPLES Center, as well as vehicle headlights and street lighting along the Harbor and Santa Monica Freeways, as well as the surface streets adjacent to the Project Site. It should be noted that lighting generated by STAPLES Center and L.A. LIVE is substantially greater than typical urban uses and, thus, the Project area likely constitutes one of the most intensely lit areas of the City. Other light sources in the area generally include illuminated signage, indoor and outdoor lighting emanating from a mixture of surrounding buildings, and pedestrian lighting along pathways and in the public plazas in the area (e.g., Nokia Plaza L.A. LIVE).

The Project would expand and modernize the Convention Center, creating additional square footage onsite to accommodate the proposed new multi-use event center to be known as Farmers Field which would be programmed to host a variety of event types including, but not limited to, a stadium for sporting events. Because the Project would intensify existing on-site uses and introduce a new event center with associated lighting and signage, impacts could occur to off-site light sensitive uses. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) a description of the regulatory environment as it relates to artificial light; (2) a description of the existing lighting conditions and illuminated signage within the Project Site, along adjacent streets, and within the areas immediately surrounding the Project Site; (3) the identification of light sensitive uses in the surrounding area; (4) a description of the proposed Project's artificial light sources (e.g., buildings, signage); and (5) a description of changes in the lighting characteristics of the Project Site as seen from off-site light sensitive uses.

Glare: Potentially Significant Impact

Moderate to high glare conditions exist in the Project area due to numerous varied building surfaces and vehicles occupying surface parking lots and from patrons of STAPLES Center exiting events at night. The existing on-site buildings are sources of glare themselves, particularly with regard to Concourse Hall with its curvilinear entry pavilions consisting of expansive steel and glass construction. The Project proposes to expand and modernize the Convention Center, creating new structures and signage that could introduce new sources of glare to the Project area. As the Project has the potential to generate glare impacts, further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) a description of the regulatory environment as it relates to reflective building materials; (2) a description of the existing glare sources within the Project Site and within the areas immediately surrounding the Project Site; (3) the identification of uses that could be impacted by glare in the surrounding area; and (4) a description of the proposed Project's glare sources as seen from the identified offsite uses.

Shade/Shadow: Potentially Significant Impact

The issue of shade/shadow pertains to the blockage of direct sunlight by on-site buildings that affect certain land use types. Land uses that are normally considered sensitive to changes in shading conditions (i.e., shadow sensitive uses) include those uses and activities that are largely dependent on access to natural light, such as routinely used outdoor spaces associated with residential, recreational, or institutional uses (e.g., schools); or commercial uses such as pedestrian-oriented outdoor spaces or outdoor seating areas. The proposed expansion and modernization of the Convention Center would modify the existing building arrangement and construct additional structures that are much greater in height than what currently exists. Thus, the Project has the potential to shade existing off-site land uses to a greater extent than what currently occurs. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) an identification of shadow sensitive uses in the Project area; (2) diagrams that depict the shadow patterns and duration of shading that would occur as a result of the proposed Project during the Summer and Winter solstices and the Spring and Fall equinoxes; and (3) an evaluation of the Project's potential to substantially shade shadow sensitive uses such that an adverse impact would occur.

II. Agriculture

- a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact

The proposed Project would generally involve the expansion and modernization of the Los Angeles Convention Center and the construction of Farmers Field on a previously developed, urban site within Downtown Los Angeles. The Convention Center was established in 1971 and STAPLES Center was opened in 1999; thus, the Project Site is not used, nor has it been used in the recent past, for agricultural purposes. The site is not zoned for agricultural use nor is it designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation, Division of Land Resources Protection.³ Thus, the proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Therefore, no impacts would occur

³ California Department of Conservation, Division of Land Resource Protection, *Farmland Mapping and Monitoring Program, GIS data, website:*
http://www.consrv.ca.gov/DLRP/fmmp/overview/survey_area_map.htm, February 1, 2011.

with respect to this issue and no mitigation measures are necessary. Further evaluation of this issue in an EIR is not recommended or required.

- b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact

As discussed above under Question II (a), the proposed Project would involve the construction of urban uses within the existing urbanized Project Site. The Project Site is not zoned nor has it been used in the recent past for agricultural purposes. The Project Site is currently zoned for public facilities and commercial uses and is not enrolled under the Williamson Act.⁴ The proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract and no impact would occur. Therefore, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact

As discussed above under Question II (a), the proposed Project would involve the redevelopment of urban uses within the existing urbanized Project Site. The Project Site is not zoned for forest or timberland uses. The Project Site is currently zoned for public facilities and commercial uses. The proposed Project would not conflict with existing zoning for, or cause the rezoning of, forest land and no impact would occur. Therefore, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact

As discussed above under Question II (a), the proposed Project would involve the development of urban uses within the existing urbanized Project Site. The Project Site is currently occupied by the Convention Center, STAPLES Center, and parking facilities and does not contain forest land. The proposed Project would not result in the loss of forest

⁴ California Department of Conservation, Division of Land Resource Protection, Williamson Act Protection, website: <http://www.consrv.ca.gov/DLRP/lca/index.htm>, February 1, 2011.

land or conversion of forest land to non-forest use and no impact would occur. Therefore, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- e. Would the project involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

No Impact

As discussed above under Questions II (a through d), the proposed Project would involve the development of urban uses within an existing highly urbanized area of the City. The Project Site is located in Downtown Los Angeles and does not contain any agricultural uses, nor are any agricultural uses located in the vicinity of the Project Site.⁵ Thus, development of the proposed Project would not convert any Farmland to non-agricultural use and no impact would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

III. Air Quality

- a. Would the project conflict with or obstruct implementation of the South Coast Air Quality Management District (SCAQMD) Plan or Congestion Management Plan?

Potentially Significant Impact

Pursuant to the federal Clean Air Act, the SCAQMD, amongst other obligations, is required to reduce emissions of criteria pollutants (e.g., ozone, PM₁₀ and PM_{2.5}) for which it is in nonattainment. The SCAQMD's Air Quality Management Plan (AQMP) is designed to do so by meeting both State and federal air quality planning requirements for all areas under its jurisdiction including the South Coast Air Basin within which the Project Site is located. As such, the proposed Project would be subject to the SCAQMD's AQMP. The SCAQMD has adopted criteria for determining consistency with regional plans and the AQMP in its CEQA Air Quality Handbook, which the City has adopted as its thresholds of significance. The AQMP is based, in part, on land use and growth projections originating with the City of Los Angeles General Plan.

The proposed Project involves the expansion and modernization of the Convention Center including the construction of the Replacement Hall at a new site adjacent to the South Hall, construction of the Farmers Field event center, and the development of

⁵ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, GIS data, website:
<http://www.conservation.ca.gov/dlrp/fmmp/products/Pages/DownloadGISdata.aspx>, February 1, 2011.

expanded, more efficient parking, which would result in an increase in stationary and mobile source air emissions associated with construction and operation of the Project. As a result, Project development could have an adverse effect on the SCAQMD's implementation of the AQMP. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will include an evaluation of the proposed Project's consistency with the SCAQMD's AQMP in accordance with the procedures established in the SCAQMD's CEQA Air Quality Handbook as well as an assessment of Project consistency with the applicable policies of the City's General Plan Air Quality Element. Potential Project impacts with regard to the Los Angeles County Congestion Management Plan are addressed in Section XV (g) below.

- b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

As discussed above under Question III (a), the Project Site is located within the South Coast Air Basin, which is in nonattainment for certain criteria pollutants according to the applicable State and federal air quality standards. Because the Project would involve demolition, grading, and other construction activities and increase the amount of development on-site, it would contribute to regional and localized air pollutant emissions during construction (short-term) and Project occupancy (long-term). Therefore, further analysis of this issue in an EIR is recommended as is discussed further below.

Construction Emissions: Potentially Significant Impact

The proposed Project would involve the following three main components: (1) the existing West Hall of the Convention Center would be demolished and replaced with the Replacement Hall built in part over Pico Boulevard, such that it would be contiguous to the existing South Hall, (2) the Farmers Field event center would be constructed in the location of the existing West Hall building; and (3) larger, more efficient parking facilities would be constructed. Air emissions would occur during all phases of Project construction (e.g., demolition, site preparation, and constructing the buildings themselves). As a result, the proposed Project has the potential to exceed SCAQMD-prescribed emission thresholds during its construction. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will: (1) describe the air quality regulatory environment; (2) develop the proposed Project's regional construction emissions inventory using the mobile-source and fugitive dust emissions factors derived from the SCAQMD's recently released CalEEMod model; (3) identify sensitive receptors (i.e., uses that may be more sensitive to air quality conditions than others) in the Project area that may be impacted by Project construction; and (4) analyze potential localized impacts to sensitive receptors from the proposed Project's daily construction emissions.

Operational Emissions: Potentially Significant Impact

Project development would generate air emissions during its operational phase from motor vehicle travel, energy consumption and onsite activities primarily associated with Convention Center uses and multi-use event venue operations. These emissions have the potential to exceed SCAQMD-prescribed emission standards. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) a forecast of daily regional emissions from mobile and stationary sources that would occur during long-term Project operations; (2) an evaluation of localized pollutant concentrations; and (3) potential impacts to off-site receptors. The analyses will address both criteria pollutants (i.e., pollutants for which ambient air quality standards have been established) and toxic air contaminants.

In addition to potential impacts related to SCAQMD criteria pollutants and toxic air contaminants, activities associated with construction and operation of the proposed Project could result in impacts with respect to greenhouse gas emissions. The State of California is undertaking initiatives to address the effects of greenhouse gas emissions and to establish emission reduction strategies. A discussion of Project-generated greenhouse gas emissions and applicable emission reduction strategies within the context of the ongoing State process will be undertaken in the EIR.

- c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is in non-attainment (ozone, carbon monoxide, and PM₁₀) under an applicable federal or state ambient air quality standard?

Potentially Significant Impact

The SCAQMD's approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. The proposed Project, as described above, would result in increases in air emissions from construction and operations occurring in the South Coast Air Basin, which is currently in nonattainment of federal and state air quality standards for ozone, PM₁₀ and PM_{2.5}. Therefore, implementation of the proposed Project could potentially contribute to air quality impacts, which combined with other existing and future emissions sources in the area, could cause a cumulative impact. Therefore, further analysis of this issue in an EIR is recommended. The EIR's cumulative air quality analysis will be conducted in accordance with the procedures established by the SCAQMD and will address the degree to which the proposed Project would or would not result in a cumulatively considerable net increase of any criteria pollutant for which the South Coast Air Basin is classified as nonattainment under an applicable federal or State ambient air quality standard.

- d. Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact

Project construction activities and operations, as described above, would increase air emissions above current levels. Land uses that are considered more sensitive to air pollution include hospitals, schools, residences, playgrounds, childcare centers, athletic facilities, and retirement homes. This issue will be analyzed further in an EIR as the proposed Project could expose these sensitive receptors to substantial pollutant concentrations. As previously described, the air quality analysis will identify the presence of sensitive receptors and evaluate Project impacts with respect to pollutant concentrations during construction as well as long-term operations.

- e. Would the project create objectionable odors affecting a substantial number of people?

Potentially Significant Impact

Objectionable odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other pungent elements used in manufacturing processes, as well as sewage treatment facilities and landfills. Since the proposed Project involves the development of convention center and event center uses, no elements related to the types of identified odor producing uses are anticipated. However, emissions from construction equipment operating within the Project Site may create temporary objectionable odors. Odors from construction equipment would be mainly limited to the immediate environs of the Project Site. Notwithstanding, as a potential odor impact could occur, this issue will be evaluated further in an EIR.

IV. Biological Resources

- a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact

The Project Site is located in a highly urbanized location within the Downtown area of Los Angeles, surrounded by a major roadway network, including the Harbor and Santa Monica Freeways, and large-scale development (e.g., STAPLES Center and L.A. LIVE). The Project Site is occupied by the Convention Center, STAPLES Center, and parking uses with limited ornamental landscaping consisting mainly of planted street trees and

shrubs and does not contain any natural habitat. Gilbert Lindsay Plaza located along the eastern edge of the Project Site consists largely of ornamental landscape elements contained within concrete planters, paved pedestrian pathways, and seating areas. The area in the vicinity of the Project Site is not located within a City-identified biological resources area⁶ and no sensitive species have been identified onsite.⁷ The Project Site and surrounding area do not provide suitable habitat for sensitive species and would not directly affect or modify the habitat of any identified sensitive species; therefore, no impact would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

The City of Los Angeles has adopted an ordinance to protect selected Southern California native tree species, which is discussed below under Question IV (e). Additionally, the potential exists to disturb trees that may provide habitat for bird species that are not identified as sensitive or protected, which is discussed below under Question IV (d).

- b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact

As discussed above under Question IV (a), the Project Site is developed with Convention Center, STAPLES Center, and parking uses and is located in a highly urbanized location within the Downtown area of the City of Los Angeles. The Project Site is not located within a biological resources area and no riparian habitat or other sensitive natural communities are present in the Project area as identified in City or regional plans or in regulations administered by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Therefore, no impact would occur with respect to this issue. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

⁶ Los Angeles Citywide General Plan Framework Draft EIR, Figure BR-1B, January 1995

⁷ California Department of Fish and Game Natural Diversity Database, <http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>. Accessed February 9, 2011

- c. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact

As discussed above under Question IV (a), the Project Site and the surrounding area are almost entirely developed with structures or impervious surfaces. There are no federally protected waters or wetlands, as defined by Section 404 of the Clean Water Act, on the Project Site or within the surrounding area. Additionally, no water features or other topographic depressions are present onsite that could support wetlands. Therefore, no impact would occur with respect to this issue. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant With Mitigation

As discussed above under Questions IV (a through c), the Project does not contain natural areas or water features. The developed nature of the Project Site as well as the extent and nature of the surrounding urban development preclude the area from serving as a wildlife corridor. However, Project implementation could disturb trees that may provide habitat for resident or migratory bird species that are not identified as sensitive or protected. With the implementation of the following mitigation measure, impacts with regard to nesting and/or migratory birds would be less than significant. As such, no further analysis in an EIR or additional mitigation measures are recommended or required.

Mitigation Measure Bio-1: To avoid impacting nesting birds, including migratory birds and raptors, one of the following shall be implemented:

- Conduct vegetation removal associated with building demolition and construction from September 1st through January 31st, when birds are not nesting. Initiate grading activities prior to the breeding season (which is generally February 1st through August 31st) and keep disturbance activities constant throughout the breeding season to prevent birds from establishing nests in surrounding habitat (in order to avoid possible nest abandonment); if there is a lapse in activities of more than five days, pre-construction surveys shall be necessary as described in the bullet below.

- OR -

- Conduct pre-construction surveys for nesting birds if vegetation removal, building demolition or grading is initiated during the nesting season. A qualified wildlife biologist shall conduct a weekly pre-construction bird survey no more than 30 days prior to initiation of grading to provide confirmation on the presence or absence of active nests in the vicinity (at least 300 to 500 feet around the individual construction site, as access allows). The last survey should be conducted no more than three days prior to the initiation of clearance/construction work. If active nests are encountered, clearing and construction in the vicinity of the nest shall be deferred until the young birds have fledged and there is no evidence of a second attempt at nesting. A minimum exclusion buffer of 300 feet (500 feet for raptor nests) or as determined by a qualified biologist, shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area. Construction personnel should be instructed on the sensitivity of the area. A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable state and federal regulations protecting birds shall be submitted to the City and County Department of Planning in charge of Mitigation Monitoring, depending on within which jurisdiction the construction activity is occurring. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.
- e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant

The City has adopted policies that address potential impacts on protected tree species (e.g., oak trees, black walnut, sycamore and California bay trees are protected tree species that meet certain criteria). The Project Site is occupied by Convention Center, STAPLES Center, and parking uses with limited ornamental landscaping consisting mainly of planted street trees and shrubs. Because the exact species of the onsite trees are as yet unknown, the proposed Project has the potential to impact one or more protected trees. However, through compliance with Los Angeles Municipal Code requirements impacts would be less than significant. As such, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact

As discussed above under Questions IV (a through c), the Project Site and surrounding area are not included in any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, state or federal habitat conservation plans. Therefore, no impact would occur with respect to this issue. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

V. Cultural Resources

- a. Would the project cause a substantial adverse change in the significance of an historical resource as defined in CEQA §15064.5?

Potentially Significant Impact

Section 15064.5 of the State CEQA Guidelines defines an historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

The Project would involve the expansion and modernization of the Los Angeles Convention Center, which is not currently listed as an historical resource in the National or California Register of Historic Places or as a City of Los Angeles Historic-Cultural Monument. It should be noted that the California Register of Historic Places includes all the resources listed or formally determined eligible for listing in the National Register. In part, to be eligible for the California Register, a potential resource is determined significant at the local, State, or national level by meeting one or more of several criteria related to: its association with significant events or persons that contributed to history and/or cultural heritage; whether it has yielded or has potential to yield historically or prehistorically important information; and/or whether it possesses high artistic values, or distinctive characteristics of a type, period, region, method of construction, or represents the work of a master. In part, to be eligible for the City of Los Angeles Historic-Cultural Monuments

designation, a resource must have a special aesthetic, architectural, or engineering interest, or historic value.

The West Hall was built in 1971 and designed by notable architect Charles Luckman. A portion of the Convention Center (the North Hall) was demolished to allow for the development of the STAPLES Center. While resources that are less than 50 years old are not typically eligible for the National Register and the California Register, due to the age of the West Hall and its association with a notable architect, further study is recommended to determine whether the West Hall could be considered to be an historic resource under CEQA. As the proposed Project would involve the demolition of the existing West Hall, a potentially significant could occur and further analysis of this issue in an EIR is recommended. The EIR analysis will: (1) evaluate the historical significance of the West Hall based upon criteria used by the National Register, the California Register of Historic Places, the City of Los Angeles Historic-Cultural Monuments, and the survey methodology of the State Office of Historic Preservation; and (2) analyze the Project's potential to cause a substantial adverse change in the significance of an historical resource, if such a resource is determined to be present onsite.

- b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA §15064.5?

Potentially Significant Impact

Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." The Project Site has already been subject to extensive ground disturbance due to construction of the existing Convention Center. Given the extent of development on the Project Site, if any archaeological resources were present, they have likely been disturbed due to previous grading and excavation activities. Further, the Project area is not identified as containing archaeological resources.⁸ Construction activities associated with the new structures to be developed as part of the proposed Project are likely to require excavation to a greater depth than previously required for the existing on-site development. Although the Project would comply with regulatory requirements with respect to the discovery of archeological resources during construction, further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) a records search of past archaeological investigations in the Project area; and (2) an assessment of whether Project development may affect any archaeological resources, if present on-site.

⁸ Los Angeles Citywide General Plan Framework Draft EIR, Figure CR-1, January 1995

- c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation

The Project Site does not contain any observed geologic features and it has not been identified as having the potential to yield vertebrate paleontological resources.⁹ Yet, as with much of the region, the Project area consists of surface sediments with unknown fossil potential.¹⁰ As discussed above under Question V (b), the Project Site is developed with highly urbanized uses and the soils underlying the site have been disturbed; however, the Project would likely require more extensive excavation and grading than previous construction activities at the site. With implementation of the following mitigation measure, potential impacts would be mitigated to a less than significant level. As such, no further analysis in an EIR or additional mitigation measures are recommended or required.

Mitigation Measure Paleo-1: To avoid impacting unique paleontological resources or geologic features, the following shall be implemented:

- If any paleontological materials are encountered during the course of the Project development, the Project shall be halted until the services of a qualified paleontologist are secured and a curation agreement with an appropriate paleontological curation facility is secured.
- The services of a qualified paleontologist shall be secured by contacting the Los Angeles County Natural History Museum to assess the resources and evaluate the impact.
- A report on the paleontological findings shall be prepared by a qualified paleontologist. A copy of the paleontological report shall be submitted to the Los Angeles County Natural History Museum.
- A letter of retainer from a qualified paleontologist shall be secured prior to obtaining a grading permit.

⁹ Los Angeles Citywide General Plan Framework Draft EIR, Figure CR-2, January 1995

¹⁰ Los Angeles Citywide General Plan Framework Draft EIR, Figure CR-3, January 1995

- d. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Potentially Significant Impact

As discussed above under Question V (b), the Project Site is developed with urban uses and the soils underlying the site have been disturbed; however, the Project would likely require more extensive excavation and grading than previous construction activities at the Project Site. As the potential for Project construction to disturb human remains is presently unknown, the proposed Project may have an impact and further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) a records search of past archaeological investigations in the Project area and (2) an assessment of how Project development may affect any human remains that may be present within the Project Site.

VI. Geology and Soils

- a. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Potentially Significant Impact

Numerous active and potentially active faults with surface expressions have been mapped adjacent to, within, and beneath the City of Los Angeles. The active and potentially active faults in the City that are considered capable of producing fault rupture due to seismic activity are the Newport-Inglewood, Hollywood, Elysian Park, Santa Monica, San Fernando, Raymond, Sierra Madre, Verdugo, Northridge, and Palos Verdes Faults.¹¹ However, the Project Site is not located within an Alquist-Priolo zone or City-designated Fault Rupture Study Area and no active faults are known to exist within the Project Site.¹² Further, the Project must comply with the most current Los Angeles Building Code regulations, which address structural design for stability in seismic events. Though this potential impact would be less than significant, the EIR analysis will identify all known faults in the area including their distance from the Project Site and evaluate the potential for fault rupture to impact people or structures generated by the Project.

¹¹ Los Angeles Citywide General Plan Framework Draft EIR, January 1995.

¹² Los Angeles Citywide General Plan Safety Element, Exhibit A, March 1994.

ii. Strong seismic ground shaking?

Potentially Significant Impact

As described above under Question VI (a)(i), the Project Site is within the seismically active region of southern California and is in proximity to several faults. As such, the Project Site could be subject to ground shaking during seismic events. The Project would increase the amount of development onsite, thereby increasing the number of employees and visitors on-site. Therefore, additional people and structures would be exposed to potential adverse effects from ground shaking than under existing conditions. Although Project development must comply with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, further analysis of this issue in an EIR is recommended. The EIR analysis will identify the potential for seismic ground shaking in the Project area to impact Project structures, employees, and visitors.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact

As described above under Question VI (a)(i), the Project Site is within the seismically active region of southern California. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. The Project Site is not located in an area identified as having liquefaction potential.¹³ Further, Project development would be required to comply with the most current Los Angeles Building Code regulations, which require an analysis of site geologic conditions and subsurface soils prior to the issuance of a grading permit. Though this potential liquefaction-related impact would be less than significant, the EIR analysis will include a description of the soils underlying the Project Site and evaluate the potential for seismically induced ground failure.

iv. Landslides?

No Impact.

Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area exhibit little topographic relief and are largely covered in impermeable surfaces, whereby landslides and other forms of natural slope instability do not represent a significant hazard. In addition, the Project Site is

¹³ Los Angeles Citywide General Plan Safety Element, Exhibit B, March 1994.

not located within a City-designated Landslide Inventory or Hillside Area.¹⁴ Therefore, no impact would occur with respect to the exposure of people or structures to landslides. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- b. Would the project result in substantial soil erosion or the loss of topsoil?

Potentially Significant Impact

Implementation of the proposed Project would require grading, excavation, and other construction activities, which could result in soil erosion due to temporary exposure to rainfall and wind. However, the Project Site is developed with urban uses and does not contain topsoil; thus, no impact would occur with respect to the loss of this resource. Though development on the Project Site would be required to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES), which address soil erosion and runoff during the construction and operational phases of projects, further analysis of this issue is recommended. Refer to the response to Question IX (a), for further description of the NPDES requirements. Discussion and evaluation of potential Project impacts related to soil erosion will be included in the EIR's hydrology and water quality analysis.

- c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Potentially Significant Impact

As discussed in response to Questions VI (a.iii and iv), the Project Site is not susceptible to landslides or liquefaction, which precludes the potential for lateral spreading. Subsidence hazards involve either the sudden collapse of the ground to form a depression or the slow subsidence, or downward settling of the earth's surface. One cause of land subsidence is the withdrawal of fluids (oil, gas, or water) from deep geologic formations leaving void spaces at depths. The Project Site is located within the boundaries of a State-designated oil field and proximal to the Los Angeles Downtown Oil Field,¹⁵ whereby ongoing or historic oil extraction and related activities may affect soil stability in the area. Although Project development would comply with the most current Los Angeles Building Code regulations and an analysis of site geologic conditions and subsurface soils would be conducted prior to construction, further analysis of this issue in an EIR is recommended.

¹⁴ Los Angeles Citywide General Plan Safety Element, Exhibit C, March 1994.

¹⁵ Los Angeles Citywide General Plan Safety Element, Exhibit E, March 1994.

The EIR analysis will assess the stability of soils and geologic conditions at the Project Site and evaluate the potential impacts to Project structures, employees, and visitors.

- d. Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Potentially Significant Impact

The potential for soil expansion occurs during wet conditions (i.e., during periods of extended heavy rainfall) and generally relies on the presence of soils with a high clay content. No soil risk or hazard data, as provided by the United States Department of Agriculture Natural Resources Conservation Service soil survey, is currently available for the Project Site.¹⁶ As the specific composition of the soils underlying the Project Site is as yet unknown, a soil analysis will be conducted in accordance with applicable requirements. Although Project development must comply with the most current Los Angeles Building Code regulations and an analysis of site geologic conditions and subsurface soils would be conducted prior to construction, further analysis of this issue in an EIR is recommended. The EIR analysis will identify the potential for soil expansion to occur on-site and evaluate potential impacts to Project structures, employees, and visitors.

- e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact

The Project Site is located in a developed area of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are any proposed. As the use of septic tanks or alternative wastewater disposal systems would not be required, no impact with regard to this issue would occur. Accordingly, no mitigation measures are necessary and no further evaluation of this issue in an EIR is recommended.

¹⁶ United States Department of Agriculture Natural Resources Conservation Service, Web Soil Survey, <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx> accessed February 3, 2011.

VII. Greenhouse Gas Emissions

- a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact

Gases that trap heat in the atmosphere are referred to as greenhouse gases. Greenhouse gases are different than the criteria pollutants and air toxics discussed above. Greenhouse gases are emitted by both natural processes and human activities. As construction and operation of the proposed Project could result in impacts with respect to greenhouse gas emissions, further analysis in an EIR is recommended. The EIR will include: (1) a discussion of existing greenhouse gas emissions at the Project Site; (2) an estimation of Project-generated greenhouse gas emissions; (3) and an evaluation of the potential for Project-generated greenhouse gas emissions to create a significant impact.

- b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact

The State of California is undertaking initiatives to address the effects of greenhouse gas emissions and to establish emission reduction strategies. A discussion of Project-generated greenhouse gas emissions and applicable emission reduction strategies within the context of the ongoing State process will be undertaken in the EIR.

VIII. Hazards and Hazardous Materials

- a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Potentially Significant Impact

The proposed Project's construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, mastics, solvents, and other acidic or alkaline solutions that would require special handling, transport, and disposal. During operation, the proposed uses would generally require commercial cleaning and landscape materials. The proposed uses at the Project Site would require the use of materials that are typically associated with convention and event center uses as well as parking facilities. In addition, the Project includes the demolition of the West Hall, which may contain hazardous asbestos containing materials (ACM) and/or lead-based paints (LPB) as it was built in 1971. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) a summary of applicable federal,

State, and local regulatory standards and procedures; (2) the role of the City of Los Angeles Fire Department (LAFD) in implementing State statutes for the use, storage, or transport of common hazardous materials; (3) summaries of prior investigations, if any, conducted at the Project Site; and (4) background information regarding hazardous materials stored and used on the property, if any; (5) current hazardous management practices, and hazardous waste storage and disposal practices, if applicable; and (6) evaluate the use, handling and transport of hazardous materials that would be used during Project construction and operation; including paints, cleaning materials, vehicle fuels, and caustic construction compounds.

- b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact

Refer to response to Section VIII (a), above.

- c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact

As previously described under Section VIII (a), hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials could occur; however, the Project Site is not located within one-quarter mile of any existing schools or schools that are known to be planned. The nearest schools to the Project Site include: Olympic PC (kindergarten), which is roughly 0.9 miles away; 10th Street Elementary, which is roughly 1 mile away; Liechty Middle School, which roughly is 1.6 miles away, and Santee Educational Complex, which is roughly 1.2 miles away. Los Angelitos Children's Center is located roughly 0.6 miles away. Because the proposed Project is not located within one-quarter mile of any existing schools, further analysis of this issue is not required in an EIR and no mitigation measures are necessary. Notwithstanding, the EIR will identify the location of all existing and proposed schools in the vicinity of the Project Site and evaluate the potential for the release of hazardous materials associated with the proposed Project's construction or operations that could affect schools located within the vicinity of the Project Site.

- d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Potentially Significant Impact

Existing onsite Convention Center activities involve the storage and use of hazardous materials, including the acquisition, use, storage, and disposal of hazardous materials that support routine maintenance and facility operations. The Project Site is not listed as a hazardous materials site; however, a further evaluation of this issue in an EIR is recommended as hazardous materials may exist on or nearby the Project Site. The EIR analysis will: (1) identify the location of all listed sites within the Project area; (2) summarize the conclusions of the Phase I Environmental Site Evaluation; and (3) evaluate the potential hazard of such sites with respect to the public and environment in accordance with the procedures described in Section VIII (a and b), above.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact

The Project Site is not located within two miles of an airport or within an airport planning area. Therefore, no impact with respect to this issue would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- f. For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for the people residing or working in the area?

No Impact

There are no private airstrips in the vicinity of the Project Site. Therefore, the proposed Project would not result in airport-related safety hazards for the people residing or working in the area, and no impact would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended.

- g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Potentially Significant Impact

Implementation of the Project would not result in the permanent closure of any street designated as an evacuation route in an adopted emergency response or evacuation plan; however, there are several designated disaster routes in the Project area (e.g., Figueroa Street, which fronts the Project Site, and the Harbor and Santa Monica Freeways).¹⁷ The Project may affect emergency access as it proposes to modify the existing arrangement of buildings onsite including constructing the Replacement Hall at a new location that spans over a portion of Pico Boulevard and the construction of the Farmers Field event center on the West Hall site. Though roadways would remain open to through traffic to the extent feasible, construction activities and staging areas have the potential to physically block adjacent streets or impair access to the Project Site. With respect to project operations, though the proposed Project would be designed to conform to the standards of the LAFD for emergency access, it is recommended that the Project's emergency access provisions be analyzed in an EIR. The EIR analysis will identify any existing emergency response plans and emergency access provisions that are associated with the Project Site and evaluate the potential impacts of the Project with respect to this issue.

- h. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact

The Project Site is located in a heavily urbanized area of Los Angeles and, thus, the Project Site is not located near wildlands or other vegetated natural open areas. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires, and no impact would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

¹⁷ Los Angeles Citywide General Plan Safety Element, Exhibit H, March 1994.

IX. Hydrology and Water Quality

- a. Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact

Implementation of the proposed Project would require grading, excavations, and other construction activities, which could degrade water quality due to erosion due to temporary exposure to rainfall and wind as well as other constructed-related contaminants. All Project construction activities would comply with federal, State, and City water quality regulations, including a National Pollutant Discharge Elimination System (NPDES) Construction Permit, a Storm Water Pollution Prevention Plan (SWPPP) and a Wet Weather Erosion Control Plan (WWECP). With compliance with the previously described water quality regulations, impacts to water quality during Project construction would be less than significant. As such, no further analysis in an EIR or additional mitigation measures are recommended or required.

With respect to Project operations, the Project would introduce new facilities and increase the amount of development onsite and, thus, the potential exists for the transport of pollutants due to the exposure of surface runoff to typical urban contaminants (e.g., oil and grease). As required under the NPDES permit for Los Angeles County, the Project would prepare a Stormwater Mitigation Plan (SUSMP) to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site during operation. With compliance with the previously described regulations, impacts to water quality during Project operations would be less than significant. As such, no further analysis in an EIR or additional mitigation measures are recommended or required.

- b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact

The Project Site is almost entirely covered with impervious surface area as it is developed with Convention Center, STAPLES Center, and parking uses in a highly urbanized location within the Downtown area of the City of Los Angeles. Therefore, the Project area is not an important groundwater recharge area and does not contain any

active groundwater wells.¹⁸ The Project would not involve groundwater extraction; however, the increase in development onsite would generate additional water demand. An analysis of the Project's potential impact on water supply from all relevant sources will be included in an EIR in the discussion of utilities and service systems (see Question IX (d) below). As impacts would be less than significant, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Potentially Significant Impact

The Project area exhibits little topographic relief and is densely developed with a mix of urban uses including various buildings and parking areas. The Project Site is not adjacent to, nor does it contain, any streams or rivers, and surface runoff is conveyed through existing urban storm drain systems. The development of the proposed Project would involve demolition, grading, and excavation during construction, which could result in erosion. With respect to operation, the Project would change the existing building configuration as well as introduce new structures to the Project Site that may alter the drainage patterns on the Project Site. Though, as discussed under Question IX (a), the Project would comply with NPDES permit regulations as they pertain to erosion and runoff controls, it is recommended that this issue be analyzed further in an EIR. The EIR analysis will describe existing drainage patterns and facilities onsite and in the surrounding area as well as how Project development may affect these patterns.

- d. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Potentially Significant Impact

As stated in Response IX (c) above, the Project Site is not located in proximity to streams or rivers; however, Project development could alter existing drainage patterns. Though the Project would comply with the SUSMP, which requires the reduction of stormwater runoff, it is recommended that this issue be analyzed further in an EIR. The EIR will describe regulatory standards regarding the design and construction of stormwater

¹⁸ Los Angeles County Department of Public Works Groundwater Wells Website, Data for 1 mile radius of well no. 5138016912, <http://gis.dpw.lacounty.gov/wells/displayAttributeDataWellIdentify.asp>, accessed February 16, 2011.

conveyance facilities and analyze the potential for the Project to increase the amount and/or rate of runoff such that it would cause on- and off-site flooding impacts.

- e. Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Impact

As stated in Response IX (c), the Project could alter existing drainage patterns through the demolition, excavation, and development of new structures. This change in on-site conditions could generate polluted surface water runoff across the site, if left untreated before entering the storm drain system that serves the Project Site. Though, as discussed under Question IX (a), the Project would comply with NPDES permit regulations as they pertain to the quality and quantity of site runoff, it is recommended that this issue be analyzed further in an EIR. The EIR analysis will identify existing and proposed drainage facilities, analyze the effects of proposed development on the capacity of existing and proposed drainage systems, and evaluate the Project's potential to generate substantial additional sources of polluted runoff.

- f. Would the project otherwise substantially degrade water quality?

Less Than Significant Impact

As stated in Response IX (a), the Project would alter existing drainage patterns through demolition, excavation, and development of new structures and has the potential to degrade water quality during construction and operation. However, the Project would comply with NPDES permit regulations as they pertain to the quality and quantity of site runoff. With compliance with the previously described regulations, impacts related to water quality would be less than significant. As such, no further analysis in an EIR or additional mitigation measures are recommended or required.

- g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact

The Project Site is not located within a delineated flood zone as mapped by the Federal Emergency Management Agency (FEMA) or within a 100- or 500-year flood hazard zone as mapped by the City of Los Angeles¹⁹ and the Project does not include a

¹⁹ City of Los Angeles Zoning Information and Map Access System (ZIMAS) Parcel Profile Reports APN #s: 5134007933 and 5138016912, <http://zimas.lacity.org/>, accessed February 16, 2011

residential component. Therefore, the Project would not place housing within a 100 -year flood plain as mapped on a Federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map and no impact would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- h. Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact

As stated above in Response IX (g), the Project Site is not located within a FEMA or City of Los Angeles designated 100-year flood plain. Therefore, the project would not place structures within a 100-year flood plain and no impact would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- i. Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact

As stated above in Response IX (g), the Project Site is not located within a FEMA or City of Los Angeles designated 100- or 500-year flood plain. Additionally, according to the City of Los Angeles General Plan Safety Element, the Project Site is not mapped as a potential inundation area that may result from the failure of a levee or dam.²⁰ Therefore, the location of the Project would not expose people or structures to a significant risk of loss, injury or death involving flooding and no impact would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- j. Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes.

²⁰ City of Los Angeles General Plan Safety Element, Exhibit G, adopted November 26, 1996

Mudflows result from the downslope movement of soil and/or rock under the influence of gravity during periods of intense rainfall.

The Project Site is relatively distant from the ocean; is not in the vicinity of a reservoir, harbor, lake, or storage tank capable of creating a seiche; and is not positioned downslope from an area of potential mudflow. Accordingly, the Project Site is not mapped as an inundation or tsunami hazard area by the City of Los Angeles.²¹ Therefore, no impacts from these events would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

X. Land Use and Planning

- a. Would the project physically divide an established community?

Less Than Significant Impact

Development of the proposed Project would occur within the existing Convention Center grounds and adjacent parking lots, which are designated for public facilities uses; and the STAPLES Center property, which is designated for commercial uses. As described previously, the Project Site is bounded by the Harbor and Santa Monica Freeways, Figueroa Street, and L.A. LIVE. Though the West Hall would be relocated to span over Pico Boulevard and the Farmers Field event center would be constructed on the West Hall site, the Project design would facilitate connectivity within the Project Site and adjacent uses. As such, the Project would be compatible with existing land-use patterns and would not divide an established community. Nonetheless, further analysis of this issue in an EIR is recommended and will be included as part of the land use plan consistency analysis discussed below under Question X (b).

- b. Would the project conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the Project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact

The Project would subject to the land use regulations of the City's Central City Community Plan, the Central Business District Redevelopment Plan, and the City of Los Angeles Zoning Code as well as the regional Growth Vision Plan administered by the Southern California Association of Governments (SCAG). The City's General Plan Framework Element, the Downtown Strategic Plan, and the South Park Development

²¹ *Ibid.*

Strategies and Design Guidelines also provide guidance on land use issues relating to potential on-site development. The Project would continue to provide Convention Center uses on-site and would construct the Farmers Field event center, which could host a variety of event types and be used as a stadium for sporting events. As the Project would alter the existing buildings on-site and introduce new structures and land use elements including a Specific Plan, it could impact applicable land use plans and policies. Thus, further analysis of this issue is recommended. The EIR analysis will: (1) identify the existing land use plans, policies, and regulations that govern development on the Project Site; (2) describe the land use designations as well as the physical properties of the existing Project Site and adjacent uses; (3) describe the proposed Project's various components; and (4) evaluate the Project's consistency with applicable plans, policies, and regulations.

- c. Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact

As discussed in Response IV (a through f), the Project Site is in an urbanized location and is developed with urban land uses. The Project Site does not contain any natural features or protected biological resources and, thus, it would not conflict with any applicable habitat conservation plan or natural community conservation plan. As a result, Project development would have no impact with respect to this issue. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

XI. Mineral Resources

- a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact

The Project Site is not located within an area containing significant mineral deposits (i.e., Mineral Resource Zone 2 Areas – MRZ-2),²² nor is it located within a surface mining district.²³ The Project Site is zoned PF-4D-O and C2-4D-O, with the "O" qualification designating that the Project Site is located within the Downtown Los Angeles Oil Field. However, no oil wells are located on the Project Site and development of the Project would

²² *Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits, Los Angeles City Planning Department, Citywide Division.*

²³ *Ibid.*

not preclude future extraction of oil resources. Thus, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state and no impacts would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact

As stated above, the Project Site is not located within an area containing significant mineral deposits; however, it is located in the Downtown Los Angeles Oil Field. However, the Project Site does not contain any active or inactive oil wells and would not preclude future extraction of oil resources. Thus, the proposed Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan and no significant impacts would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

XII. Noise

- a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact

Existing on-site noise sources include visitors, various events, vehicles (parking, commercial loading/unloading, and ingress/egress), and building equipment (i.e., HVAC equipment). Vehicular traffic along adjacent roadways, including the Harbor and Santa Monica Freeways constitute major noise sources within the Project vicinity. Land uses that are considered more sensitive to noise than others (i.e., noise sensitive) generally include, but are not limited to, residential uses, hotels, hospitals, parks, and schools. Noise-sensitive uses that are adjacent to the Project area include the L.A. LIVE residential units and hotel rooms and the City Lights multi-family housing complex, which is located across the street from the Convention Center at the corner of Figueroa Street and Pico Boulevard. Several other multi-family residential uses are located along the Figueroa and Flower Street corridors in the Project area. As the proposed Project would increase the amount of development on-site and construct the Farmers Field event center with a potentially retractable roof to the Project Site, noise levels from on-site sources have the potential to be greater than under existing conditions. The traffic attributable to the proposed Project

also has the potential to cause operational noise levels to exceed City Noise Ordinance standards. Construction of the proposed Project would require the use of construction equipment during grading, excavation, hauling, and other construction activities. The concurrent use of construction equipment and machinery has the potential to increase noise levels above the applicable standards of the City Noise Ordinances. Therefore, further analysis of this issue in an EIR is recommended.

The EIR analysis will: (1) describe the City Noise Ordinances as they relate to construction noise and activities related to Project operation; (2) identify sensitive receptors in the Project area that may be impacted by Project construction and operational noise levels; (3) conduct a noise monitoring program at selected locations in the Project area that may be affected by Project noise sources; (4) analyze construction noise impacts by determining the noise levels generated by the different types of on-site construction activities, calculating the construction-related noise level at nearby sensitive receptor locations, and comparing these construction-related noise levels to ambient noise levels (i.e., noise levels without construction noise); (5) establish the noise levels from existing on-site sources and forecast future noise levels from on-site sources based on the noise characteristics of the proposed uses; and (6) analyze roadway noise impacts attributable to motor vehicle travel generated by on-site development.

- b. Would the project result in exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact

Construction of the proposed Project, as described above, would require the use of construction equipment during grading, excavation, hauling, and other construction activities. The use of concurrent earthmoving equipment and machinery could potentially cause groundborne vibration and noise. During Project operation, ground-borne vibration may also emanate from increased road traffic, parking structures or other on-site activities. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will take into consideration the effects of the Project's construction and operational activities on nearby sensitive buildings and receptors.

- c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact

As discussed under Question XII (a and b), traffic and human activity associated with the proposed Project has the potential to increase ambient noise levels above existing levels. Therefore, further analysis of this issue in an EIR is recommended. The EIR

analysis will develop and implement a noise monitoring program at selected locations to establish current conditions. Based on this data, and forecasts of noise levels from the proposed Project, future noise levels at off-site receptors will be forecasted. These forecasts will take into account all existing and future onsite noise sources.

- d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact

As previously discussed in Section XII (a and b), construction activity attributable to the proposed Project has the potential to temporarily or periodically increase ambient noise levels above existing levels. In addition, the increase in on-site uses may also result in periodic increases in noise levels. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will identify existing noise levels based on a noise monitoring program conducted at selected locations in the Project area, the identification of noise sensitive receptor locations and an analysis of the affect of the range of Project noise sources that occur on a periodic basis on existing noise levels.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact

The Project Site is not located within an area subject to an airport land use plan or is it located within two miles of an airport. Therefore, no impact with respect to the exposure of persons to excessive airport noise levels would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact

There are no private airstrips within at least five miles of the Project Site. As such, no impact would occur with respect to this issue. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

XIII. Population and Housing

- a. Would the project induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact

The Project is the expansion and modernization of the Los Angeles Convention Center including the construction of the Replacement Hall, so that is contiguous with the existing South Hall, the construction of the Farmers Field event center () and the construction of larger, more efficient parking facilities to accommodate the new development. As such, the proposed Project does not include the development of new housing. Given the local labor pool and current unemployment rates, it is anticipated that most, if not all, of the construction and permanent jobs at the Project Site would be filled by individuals already residing in the area. It is anticipated that the type of project that is being proposed is of the nature that would not cause individuals to relocate to the area at a sufficient level to induce substantial population growth. Further, the Project is located in a highly developed area with an established network of roads and other urban infrastructure; thus, it would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. As Project impacts would be less than significant, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- b. Would the project displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

No Impact

The Project Site is currently occupied by the Los Angeles Convention Center, STAPLES Center, and parking facilities. No housing would be displaced as there are no residential uses on the Project Site. Therefore, no impact with respect to housing displacement would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended.

- c. Would the project displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

No Impact

The Project Site is currently occupied by the Los Angeles Convention Center, STAPLES Center, and parking facilities. No replacement housing would be required as there are no residential uses on the Project Site. Therefore, no impact with respect to the

displacement of people would occur. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

XIV. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:

a. Fire protection?

Potentially Significant Impact

The proposed Project proposes the demolition and replacement of the Convention Center's West Hall and development of the Farmers Field event center. This additional development would attract more visitors and require hiring more staff at the Project Site than under existing conditions, which could increase the demand for services by the City of Los Angeles Fire Department (LAFD). If existing service capacities are exceeded, new facilities, personnel and/or equipment would be required to maintain acceptable response times and service levels. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) an identification of the locations, number of service personnel, equipment, and response times of the fire stations currently serving the Project Site; (2) a description of proposed fire suppression/fire safety design features incorporated into the Project; (3) analysis of the potential for increased demand on fire services due to construction activities, including emergency access; (4) an identification of the Fire Code requirements applicable to the proposed Project, including fire flow requirements; (5) an evaluation of the adequacy of existing fire stations and personnel to provide service to the Project during long-term Project operations; and (6) the potential for impacts with regard to emergency access during Project operations. Information regarding the handling of hazardous materials, an area of LAFD responsibility, will be addressed in the environmental safety section of the EIR.

b. Police Protection?

Potentially Significant Impact

As described above under the heading of fire protection facilities, the additional development under the proposed Project would attract more visitors to the Project Site than under existing conditions, which could increase the demand for Los Angeles Police Department (LAPD) services. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and

service levels. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) a description of the current LAPD stations serving the Project Site, including police service ratios and crime statistics; (2) a description of Project design features that would reduce the proposed Project's demand for police services (e.g., the use of private security personnel); (3) analysis of the potential for increased demand on police services due to construction activities, including emergency access; (4) an analysis of the increase in demand on LAPD services with a focus on security measures; and (5) a determination regarding the need for new or expanded police facilities, equipment and/or personnel due to Project implementation.

c. Schools?

Less Than Significant Impact

While the Project would not generate residents at the Project Site, the additional employment generated by the Project has the potential to generate new students that may attend Los Angeles Unified School District (LAUSD) schools. However, the potential for actual student generation is anticipated to be very limited because as discussed above in Section XIII(a), Population and Housing, it is anticipated that Project employees would come from the existing labor pool and would not relocate as a result of working at the Project Site. Moreover, any increase in LAUSD enrollment that may occur under the proposed Project would be dispersed across many LAUSD schools as school attendance is primarily a function of the employee's residence rather than their place of work and Project employees are anticipated to live in many different parts within LAUSD's jurisdiction.

The Leroy F. Greene School Facilities Act of 1998 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. The LAUSD collects the maximum new school construction facility fee at a rate of \$0.47 per square foot of commercial/industrial construction and \$0.09 per square foot of parking structure. Payment of these fees is required prior to issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less than significant levels. As the payment of these fees is mandatory, Project impacts with regard to school facilities would be less than significant. As such, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

d. Parks?

Less Than Significant Impact

Parks within the City's boundaries are operated and maintained by the Los Angeles City Recreation and Parks Department. While there are several parks in the greater Project area, there are no City parks located within convenient walking distance or adjacent to the Project Site. The proposed Project would involve the expansion and modernization of the Los Angeles Convention Center and the development of the Farmers Field event center; it would not include a residential component. The Project is not anticipated to generate a demand for parks over existing conditions as the type and amount of development would be similar under the Project. The proposed Farmers Field event center would constitute an urban commercial sports and entertainment venue that would be designed to host a variety of event types (e.g., concerts, sporting events, etc.). The Project would increase onsite employment; however, parks in the Project area are not likely to be utilized during a typical employee break period given the limited time available and the travel distances between the Project Site and local parks. Due to the periodic, largely event-driven nature of the uses proposed onsite, as well as the lack of adjacent City parkland, it is unlikely that visitors and employees would utilize off-site public recreation facilities. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered park facilities and this impact would be less than significant. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

e. Other governmental services (including roads)?

Less than Significant Impact

Library services within the Project area are provided by the City's Public Library (LAPL). The LAPL assesses service capacity based on the residential population within a specified distance of City libraries. There are no LAPL libraries located within proximity of the Project Site. As the proposed Project would involve the expansion and modernization of the Los Angeles Convention Center and the development of the Farmers Field event center, it does not include a residential component. Further, the construction of the Replacement Hall would not generate a demand for libraries over existing conditions as the type and amount of development would be similar under the Project. The Farmers Field event center would constitute an urban commercial sports and entertainment venue that would be designed to host events on a periodic basis. Due to the periodic, largely event-driven nature of the uses proposed onsite, as well as the lack of LAPL facilities in proximity to the Project Site, it is unlikely that the demand for LAPL facilities would increase as a result of Project-generated visitors and employees. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered LAPL facilities and this impact would be less than significant.

Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

XV. Recreation

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact

Refer to response to Section XIV(d), above.

- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant Impact

The proposed Project would involve the expansion and modernization of the Los Angeles Convention Center and the development of the Farmers Field event center. The proposed event center would constitute an urban sports and entertainment venue that would be designed to host events on a periodic basis. The construction of these facilities may have an adverse physical effect on the environment. Since these recreational uses are essential components of the proposed Project, the evaluation of the environmental effects of these uses will be incorporated into the analyses for each environmental issue area included in the EIR.

XVI. Transportation/Traffic

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact

Construction of the proposed Project would affect the transportation and circulation systems in the Project area through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials and travel by construction workers to and from the Project Site, as well as potential road segment

closures. Once construction is completed, the Project's employees as well as visitors associated with event and meeting attendance would generate vehicle and transit trips, and would likely utilize area bicycle and pedestrian facilities. Overall, the Project would result in an increase in usage of the existing transportation and circulation systems in the Project area. Therefore, the Project could conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system and further analysis of this issue in an EIR is recommended.

The EIR analysis will: (1) identify applicable plans, ordinances, and/or policies establishing measures of effectiveness for the performance of the circulation system; (2) describe existing vehicle, transit (e.g., bus and rail stops), bicycle, and pedestrian (i.e., sidewalks, crosswalks, etc.) circulation patterns in the Project area; (3) describe the likely routes that would be used by construction-related vehicles and vehicles during Project operations; (4) forecast the number vehicle trips during Project operations; and (5) analyze the Project's consistency with the applicable plans, ordinances, and/or policies applicable to this set of issues.

The surrounding roadway system is generally under the jurisdiction of the City's Department of Transportation (LADOT). During Project operations, the proposed Project's traffic forecasts will be based on a traffic model, developed in coordination with LADOT. The EIR analysis will address the proposed Project's potential impacts on the streets, intersections, freeways and transit systems serving the Proposed Project area in terms of volume-to-capacity (V/C) ratios and roadway levels of service (LOS) at study intersections in accordance with LADOT required methodologies. Forecasts of future baseline traffic conditions (i.e., future conditions without the Project) will include existing traffic volumes, ambient growth, and cumulative development traffic.

- b. Conflict with an applicable congestion management program including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Potentially Significant Impact

Implementation of the proposed Project would generate travel by employees and visitors, which would cause increases in traffic that could affect service levels at the County's Congestion Management Plan (CMP) monitoring locations. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will: (1) describe the CMP; (2) identify CMP intersections and freeway segment monitoring locations that may be affected by the proposed Project; and (3) analyze potential Project impacts on CMP facilities, in accordance with current CMP methodologies.

- c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact

The Project does not include an air transportation component and would not interfere with established flight paths, nor would it generate sufficient air travel to change air traffic patterns. As such, the Project would have no impact on air traffic patterns or air traffic safety. Accordingly, no mitigation measures are necessary and further evaluation of this issue in an EIR is not recommended or required.

- d. Would the project substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Potentially Significant Impact

The roadways adjacent to the Project Site are part of an established urban roadway network and contain no sharp curves or dangerous intersections. However, the proposed Project would alter the existing building configuration on-site, construct a new events center, expand parking facilities, and create new pedestrian paths and bridges. Additionally, the Project would result in an increase in traffic levels in the Project area as well. Considering these factors the potential for hazardous conditions may increase over existing conditions under the Project. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will evaluate the potential for hazards to occur at vehicle and pedestrian access points under the Project.

- e. Would the project result in inadequate emergency access?

Potentially Significant Impact

The proposed Project's construction activities may cause the closure of travel lanes on adjacent streets, including Pico Boulevard and LA Live Way, as the Replacement Hall and pedestrian bridges are constructed over the streets. Construction within these roadways has the potential to impede access to adjoining uses, as well as reduce the rate of flow of the affected roadways. Haul trucks and other construction vehicles and equipment may also affect the capacity of adjacent streets and highways. In addition, the increase in traffic generated by the proposed Project has the potential to impact street and intersection service levels in the area. Considering these factors, Project construction and operations could obstruct emergency access. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will: (1) describe existing emergency access points; (2) evaluate traffic conditions on the surrounding street system; (3) identify the location and phasing of construction staging areas and road closures; and (4) evaluate

emergency access with respect to roadway service levels due to Project-generated traffic. As discussed under Question VIII (g), the emergency access analysis will also take into consideration the effects of new development on the ability of emergency service providers to access on-site as well as off-site properties during the operation of the proposed Project.

- f. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially Significant Impact

Under the proposed Project, the increase in total development including the events that would be hosted on-site would increase the demand for alternative transportation, which may exceed adopted programs or plans for such alternative systems. Therefore, further analysis of this issue in an EIR is recommended. In evaluating transit impacts, the EIR analysis will: (1) follow CMP transit analysis guidelines in the identification of all existing bus, rail, and shuttle services within the Project area; (2) describe estimated current capacity levels of these systems and identify deficiencies, if any; (3) forecast Project trips according to CMP and LADOT methodologies; (4) assess impacts of the proposed Project with respect to bus and rail capacity; and (5) assess transit system performance and determine how any transportation improvements proposed for the Project meets applicable sub-regional requirements. The EIR analysis will also address impacts and opportunities with regard to pedestrian and bicycle facilities both on- and off-site.

XVII. Utilities and Service Systems

- a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Potentially Significant Impact

The Los Angeles Regional Water Quality Control Board (LARWQCB) implements programs to protect water quality in the Los Angeles Region. The LAWQCB's Water Quality Control Plan for the Los Angeles Region (Basin Plan) establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay. Wastewater reclamation and treatment in the City is provided by the Department of Public Works Bureau of Sanitation, which operates two treatment plants (Hyperion and Terminal Island). The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LAWQCB's discharge policies for Santa Monica Bay.

Although the proposed Project would not be able to connect to the City's wastewater system until capacity is available and, therefore, would not cause the Bureau of Sanitation to exceed LAWQCB treatment requirements, given the importance of this issue at a local and Citywide level, further analysis of this issue in an EIR is recommended. The EIR analysis will: (1) describe existing facilities at the HTP relative to wastewater treatment requirements; (2) calculate the proposed Project's wastewater rate; and (3) evaluate the Project's estimated contribution to HTP wastewater flows.

- b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact

Water and sewer systems consist of two components, the source of the water supply or place of sewage treatment and the conveyance systems (i.e., distribution lines and mains) that link the location of the regional facilities to an individual development site. As stated under Question XVII (a) above, wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the HTP. Refer to Response Question XVII (a) for a description of the proposed EIR analysis of potential impacts to wastewater treatment facilities.

The Project Site is served by the Los Angeles Aqueduct Filtration Plant, which is owned and operated by the Los Angeles Department of Water and Power (LADWP), which treats City water prior to distribution throughout the LADWP's Water Service Area. The proposed Project would increase the amount of development on-site, which would increase the demand for water over existing conditions. Therefore, upgraded or new water and wastewater conveyance systems may be required and further analysis of this issue in an EIR is recommended. The EIR analysis will: (1) describe the location and capacity of existing water and wastewater conveyance lines; (2) determine whether adequate fire flow and domestic water and wastewater service to the Project Site is available; and (3) evaluate the need to replace or expand existing water and wastewater conveyance systems. Should Project implementation necessitate the expansion of existing facilities and/or the construction of new facilities, the EIR analysis will describe the required construction activities, including any disruption of vehicular or pedestrian access, and evaluate potential impacts due to such activities.

- c. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact

As discussed above in Section IX (c), the existing Project Site drains via surface runoff into City storm drain systems. The Project would increase onsite development and potentially increase the amount of surface runoff that enters stormwater drainage facilities. The Project would prepare a Stormwater Mitigation Plan (SUSMP) to reduce the quantity of runoff that leaves the site Project during its operations. Nevertheless, as drainage patterns may be altered onsite due to Project implementation, the expansion of existing facilities and/or the construction of new facilities may be required and further analysis of this issue in an EIR is recommended. The EIR analysis will: (1) describe the locations and capacities of existing drainage systems; (2) evaluate the proposed Project's estimated runoff; and (3) determine the need to replace or expand existing stormwater drainage facilities. Should Project implementation necessitate the expansion of existing facilities and/or the construction of new facilities, the EIR analysis will describe the required construction activities, including any disruption of vehicular or pedestrian access, and evaluate potential impacts due to such activities.

- d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Potentially Significant Impact

The LADWP currently provides, and will continue to provide, water service to the Project Site. The Project's level of development would increase the overall demand for water supplies. Given the type and amount of development that is proposed, further analysis of this issue in an EIR is recommended. The EIR analysis will estimate the proposed Project's total water demand, and determine whether sufficient water supplies would be available to serve the Project from existing entitlements and resources.

- e. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Potentially Significant Impact

As stated under Question XVII (a) above, wastewater from the Project Site is conveyed to the HTP. Refer to Response Question XVII (a) for a description of the proposed EIR analysis of potential impacts to wastewater treatment facilities.

- f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Potentially Significant Impact

Solid waste services within the City of Los Angeles are provided by various public agencies and private companies. Site-generated solid waste would be disposed of at landfills located both within and outside Los Angeles County. The proposed Project would increase the amount of development on-site, which would result in an increase in the amount of waste to be disposed of at the landfills that serve the City. Solid waste would be generated during Project construction as well as long-term Project operations. Construction wastes would be generated by the demolition of existing on-site uses, the export of soil material, as well as from the byproducts of new construction. Once construction is complete, daily activities of the Project's developed land uses would generate solid waste on a daily basis. This increase in construction and operational solid waste has the potential to exceed permitted capacities and further analysis of this issue is recommended.

The EIR analysis will: (1) describe the types and estimate the quantity of debris that would be generated by demolition and construction; (2) describe the types and estimate the quantity of solid waste that would be generated on a daily and annual basis during Project operation; (3) estimate the quantity of wastes that would be recycled or diverted from landfill disposal; (4) identify the location, classification, and permitted capacity of landfills that may serve the Project Site during construction and operation; and (5) determine if the Project's solid waste disposal needs would be met by existing and planned landfill facilities.

- g. Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Potentially Significant Impact

As discussed under Response XVII (f), the proposed Project would increase the amount of development onsite, which would result in an increase in the amount of waste generated as compared to existing conditions. Though the proposed Project would be subject to, and comply with, the City's Solid Waste Management Policy Plan and Source Reduction and Recycling Element, further analysis of this issue in an EIR is recommended. The EIR solid waste analysis will include a discussion of the applicable solid waste statutes and regulations and evaluate the Project's consistency with the requirements contained therein.

- h. Would the project cause adverse impacts to other utilities and service systems?

Potentially Significant Impact

The proposed Project would increase the amount of development on-site, which would result in an increased demand for electricity and natural gas service as well as other utility systems that would serve the development. Therefore, further analysis of this issue in an EIR is recommended. The EIR analysis will include: (1) a description of the electricity and natural gas service and utility systems that would serve the Project; (2) an estimate of the proposed Project's demand for such resources; and (3) an evaluation of the Project's potential to adversely impact these systems.

XVIII. Mandatory Findings of Significance

- a. Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact

Based on the analysis contained in this Initial Study, the proposed Project has the potential to result in significant impacts with regard to the issues as identified herein (e.g., aesthetics; air quality; cultural resources; geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services; transportation and traffic; and utilities and service systems). Therefore, the proposed Project has the potential to degrade the quality of the environment. An EIR will be prepared to analyze and document these potentially significant impacts. Feasible mitigation measures will be recommended to reduce the identified significant impacts.

- b. Does the Project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

Potentially Significant Impact

The potential for cumulative impacts occurs when the impacts of a proposed project are combined with the impacts of related projects in proximity to a project site, thereby resulting in impacts that are greater than the impacts of the proposed project alone. Past, current and/or reasonably foreseeable projects, whose development, in conjunction with

that of the proposed Project, may contribute to potential cumulative impacts that are located within the vicinity of the Project Site. Impacts of the proposed Project on both an individual and cumulative basis will be addressed in an EIR. Therefore, the potential for cumulative impacts related to aesthetics; air quality; cultural resources; geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services; transportation and traffic; and utilities and service systems resulting from the proposed Project in conjunction with related projects will be analyzed and documented in the EIR.

Cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the proposed Project would have no contributory impact. Based on the analysis provided in this Initial Study, potential significant cumulative impacts related to agricultural resources, population and housing, and mineral resources will not be evaluated and documented in the EIR as the Project's contribution to these impacts would not be cumulatively significant. Therefore, only those aspects of the proposed Project to be analyzed and documented in an EIR are concluded to have the potential for significant cumulative impacts.

- c. Does the Project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact

As discussed throughout this Initial Study, construction and operation of the proposed Project may result in environmental impacts that could have substantial adverse effects on human beings, either directly or indirectly. As a result, these potential effects will be analyzed further in an EIR.

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
AND
6262 VAN NUYS BLVD., SUITE 351
VAN NUYS, CA 91401

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CITY OF LOS ANGELES
CALIFORNIA



ANTONIO R. VILLARAIGOSA
MAYOR

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March 17, 2011

NOTICE OF PREPARATION AND NOTICE OF PUBLIC SCOPING MEETING

EAF NO.: ENV 2011-0585-EIR

PROJECT NAME: Convention Center Modernization and Farmers Field Project

PROJECT LOCATION/ADDRESS: The Project Site is generally bounded by Chick Hearn Court on the north, Figueroa Street on the east, Venice Boulevard on the south, and the 110 Harbor Freeway on the west, in the downtown Los Angeles area

COMMUNITY PLANNING AREA: Central City

COUNCIL DISTRICT: 9

DUE DATE FOR PUBLIC COMMENTS: April 18, 2011

The City of Los Angeles, Department of City Planning, will be the Lead Agency and will require the preparation of an environmental impact report ("EIR") for the project identified herein (the "Project"). The Department of City Planning requests your comments as to the scope and content of the EIR. The purpose of the Scoping Meeting is to receive input from the public as to what areas the EIR should study. No decisions about the project are made at the scoping meeting. The Project description, location, and the potential environmental effects are set forth below. Also included below are the date, time, and location of the Scoping Meeting that will be held in order to solicit input regarding the content of the Draft EIR. The Scoping Meeting is in an open house format. **THIS IS NOT THE REQUIRED PUBLIC HEARING FOR MUNICIPAL CODE ENTITLEMENT REQUESTS, which will be scheduled after preparation of the EIR.** A copy of the Initial Study prepared for the Project is not attached but is available for public review at the Department of City Planning, 200 North Spring Street, Room 601, Los Angeles, CA 90012.

PROJECT DESCRIPTION: The Project Applicants, the City of Los Angeles and L.A. Event Center, LLC, proposes the expansion and modernization of the Los Angeles Convention Center and the development of Farmers Field which combined consist of 1,750,000 million square feet of net new gross floor area. The Project involves the following three major components: (1) the West Hall would be demolished and replaced with a new hall built in part over Pico Boulevard so as to be contiguous with the South Hall (the "Replacement Hall"); (2) Farmers Field, a new multi-use event center, that can be configured with 72,000 seats expandable to 76,250 seats for spectator events or as 169,650 square feet of useable exhibition space and 56,000 square feet of useable meeting room space for a combined total of 225,650 square feet of useable floor area, would be constructed on the former West Hall site; (3) and two parking structures would be constructed to replace the existing Bond Street surface parking lot and the Lot C (formerly Cherry Street) Garage to provide approximately 1,290 net additional parking spaces on the west side of LA LIVE Way to support the new development. With the implementation of the Project,

the Project Site would function as a unified center for convention, sports and entertainment uses.

The Project Applicants are seeking the following discretionary approvals from the City of Los Angeles as part of the proposed Project: approval of transactional agreements with respect to financing and development of the Replacement Hall and for the right to privately construct and operate Farmers Field, adoption of a Specific Plan to regulate development within the Project Site; General Plan Amendment to establish a Specific Plan land use designation for the Project Site; Vesting Zone Change or Zone Change to effectuate the new Specific Plan; Development Agreement; approval of signage pursuant to the new Specific Plan or Supplemental Use District; a Haul Route Permit; Creation/vacation of air space parcels over Pico Boulevard and LA LIVE Way; Cultural Affairs Commission approval of the design of the Replacement Hall and Farmers Field; bond financing for the Replacement Hall and any additional actions that may be determined necessary.

PROJECT LOCATION: The Project Site is comprised of approximately 68 acres located in the Downtown area of the City of Los Angeles. The Project Site includes all of the existing Los Angeles Convention Center property (Convention Center), STAPLES Center, as well as the Bond Street Parking Lot and the Lot C Garage (formerly the Cherry Street Parking Garage). The Project Site is generally bounded by the following major roadways: the I-110 Harbor Freeway to the west; Chick Hearn Court to the north; Figueroa Street to the east; and Venice Boulevard to the south.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: Aesthetics; Air Quality; Cultural Resources; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Public Services; Recreation; Transportation/Traffic/Parking/Pedestrian Circulation; Utilities/Service Systems; and Mandatory Findings of Significance.

PUBLIC SCOPING MEETING DATE AND LOCATION: The public scoping meeting will be held on March 30, 2011 from 4:00 p.m. to 8:00 p.m. at the Los Angeles Convention Center. The purpose of the scoping meeting is to solicit public comments regarding issues to be addressed in the Draft EIR. The scoping meeting will provide information regarding the Project and the anticipated scope of analyses to be contained in the Draft EIR. The Department of City Planning encourages all interested individuals and organizations to attend this meeting. There will be no verbal comments or public testimony taken at this open house meeting.

Date: March 30, 2011

Time: 4:00 p.m. to 8:00 p.m.

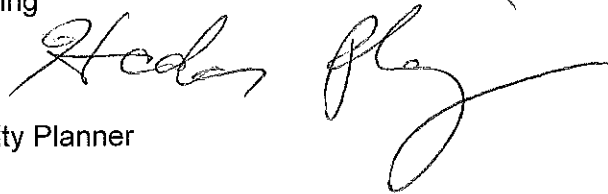
Location: Los Angeles Convention Center
West Hall
Meeting Room 501ABC
1201 South Figueroa Street
Los Angeles, CA 90015

An Environmental Impact Report (EIR) will be prepared and submitted to the Department of City Planning. The Department of City Planning welcomes all comments regarding the environmental impacts of the proposed Project and the issues to be addressed in the EIR. All comments will be considered in the preparation of the EIR. **Written comments** must be submitted to this office by April 18, 2011. Written comments will also be accepted at the scoping meeting described above.

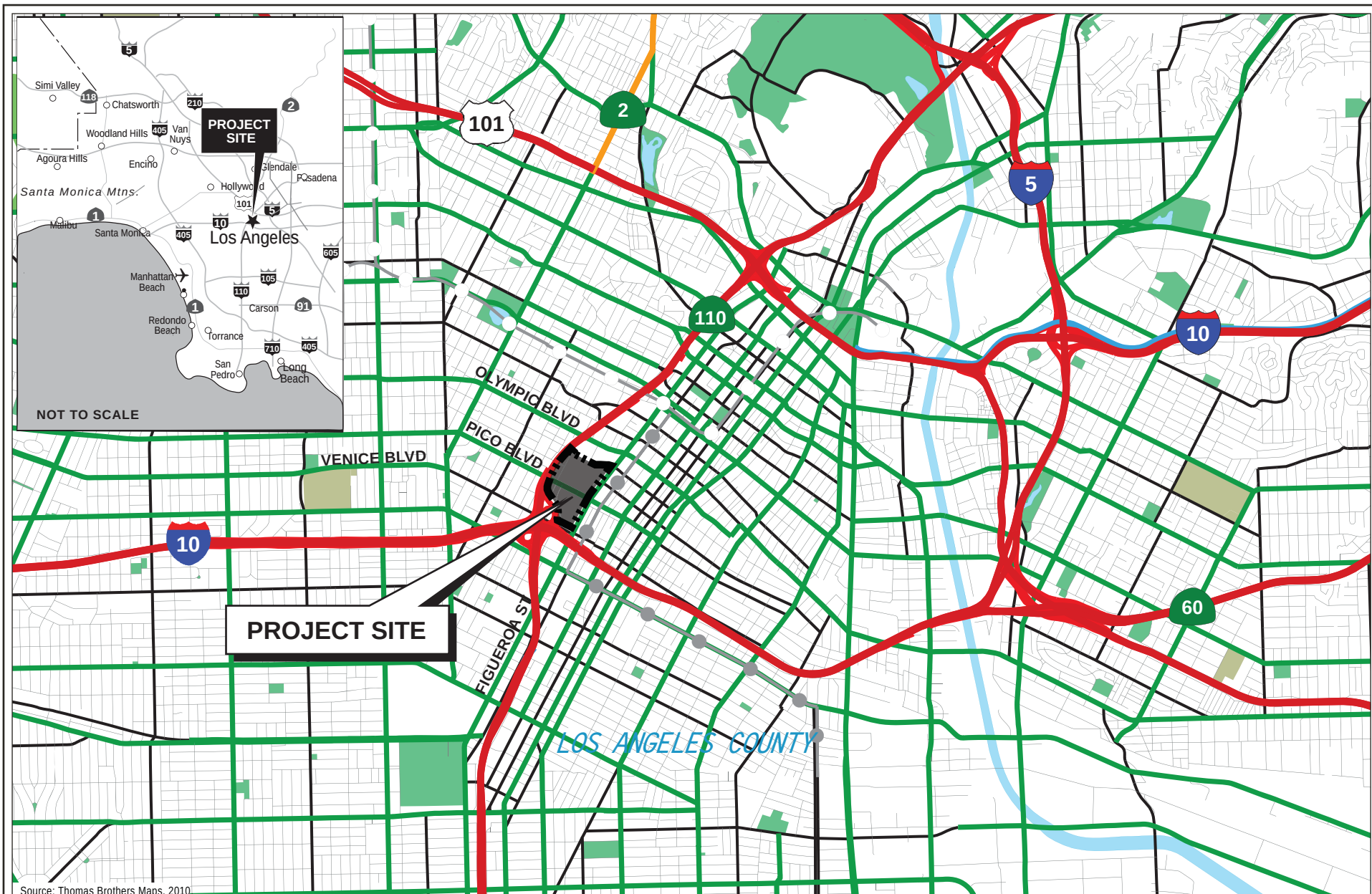
Please direct your comments to:

Hadar Plafkin, City Planner
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Fax: (213) 978-1343
Hadar.Plafkin@lacity.org

Michael J. Lo Grande
Director of Planning

Two handwritten signatures are present. The first signature, on the left, is written in cursive and appears to read 'Hadar Plafkin'. The second signature, on the right, is also in cursive and appears to read 'Michael J. Lo Grande'.

Hadar Plafkin, City Planner
Project Manager



Source: Thomas Brothers Maps, 2010.

LEGEND



Project Site Boundary



Source: Google Earth Pro 2011.



matrix
environmental

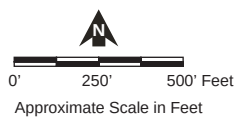


Figure 2
Aerial View of Project Site



NOTICE OF PREPARATION-500 FT RADIUS MAP



Quality Mapping Service

14549 Archwood St. Suite 301
Van Nuys, California 91405
Phone (818) 997-7849 - Fax (818) 997-0351
qmapping@qesqms.com

DRAWN BY:

THOMAS BROTHERS

Page: 634 Grid: D-5

LEGAL

LOT: SEE APPLICATIONS

TRACT:

CONTACT: ARMBRUSTER & GOLDSMITH

CD: 9

CT: 2077.10

PA: 110-CENTRAL CITY

USES: FIELD

CASE NO:

SCALE: 1"=200'

124.5A203, 124.5A205, 124.5A207
D.M., 126A203, 125A207, 126A207
127.5A203, 127.5A205, 127.5A207
129A203, 129A205, 129A207

PHONE: 310-254-9052

DATE: 03-02-11

Update:

NORTH

QMS:11-0334



JERRY BROWN
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



Notice of Preparation

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CITY OF LOS ANGELES

MAR 22 2011

ENVIRONMENTAL

March 17, 2011

To: Reviewing Agencies

Re: Convention Center Modernization and Farmers Field
SCH# 2011031049

Attached for your review and comment is the Notice of Preparation (NOP) for the Convention Center Modernization and Farmers Field draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Hadar Plafkin
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2011031049
Project Title Convention Center Modernization and Farmers Field
Lead Agency Los Angeles, City of

Type NOP Notice of Preparation
Description The Project proposes the expansion and modernization of the Los Angeles Convention Center with the development of Farmers Field. The Project, which combined consists of approximately 1,750,000 million square feet of net new gross floor area, includes the following three main components: (1) the West Hall would be demolished and replaced with a new hall built in part over Pico Boulevard such that it would be contiguous with the Convention Center's existing South Hall; (2) Farmers Field a new multi-use event center, that can be configured with 72,000 seats expandable to 76,250 seats for spectator events or as 169,650 square feet of usable exhibition space and 56,000 square feet of usable meeting room space for a combined total of 225,650 square feet of floor area, would be constructed on the former West Hall building site; (3) and two new parking structures in place of the existing Bond Street surface parking lot and Lot C Garage (formerly Cherry Street Garage) that would provide 1,290 net additional parking spaces located to the west of LA LIVE Way. The Project is proposed to be implemented via a new Specific Plan.

Lead Agency Contact

Name Hadar Plafkin
Agency City of Los Angeles
Phone 213 978-1357
email
Address 200 N. Spring Street, Room 750
City Los Angeles
Fax
State CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets Chick Hearn Ct. (North), Figueroa St. (east), Venice Blvd. (south), I-110 (west)
Lat / Long 34° 02' 36" N / 118° 16' 11" W
Parcel No. 5138016912/5138016913-4
Township **Range** **Section** **Base**

Proximity to:

Highways I-10 and I-110
Airports
Railways Metro Blue/Red/Purple
Waterways
Schools
Land Use Convention Center and STAPLES Center/PF-4D-0 and C2-4D-O/Public Facilities and Regional Commercial

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Water Resources; Department of Fish and Game, Region 5; Native American Heritage Commission; California Highway Patrol; Caltrans, District 7; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Note: Blanks in data fields result from insufficient information provided by lead agency.

**Document Details Report
State Clearinghouse Data Base**

Date Received 03/17/2011 **Start of Review** 03/17/2011 **End of Review** 04/15/2011

NOP Distribution List

County: LOS ANGELES

SCH# **2011081043**

☐ Resources Agency	☐ Fish & Game Region 1E Laurie Hamsberger	☒ Native American Heritage Comm. Debbie Treadway	☐ Caltrans, District 8 Dan Kopulsky	☐ Regional Water Quality Control Board (RWQCB)
☒ Resources Agency Nadell Gayou	☐ Fish & Game Region 2 Jeff Driorgesen	☐ Public Utilities Commission Leo Wong	☐ Caltrans, District 9 Gayle Rosander	
☐ Dept. of Boating & Waterways Mike Soleto	☐ Fish & Game Region 3 Charles Ammor	☐ Santa Monica Bay Restoration Guangyu Wang	☐ Caltrans, District 10 Tom Dumas	☐ RWQCB 1 Cathleen Hudson North Coast Region (1)
☐ California Coastal Commission Elizabeth A. Fuchs	☐ Fish & Game Region 4 Julie Vance	☐ State Lands Commission Marina Brand	☐ Caltrans, District 11 Jacob Armstrong	☐ RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
☐ Colorado River Board Gerald R. Zimmerman	☐ Fish & Game Region 5 Don Chadwick	☐ Tahoe Regional Planning Agency (TRPA) Cherry Jacques	☐ Caltrans, District 12 Chris Here	☐ RWQCB 3 Central Coast Region (3)
☐ Dept. of Conservation Jonathan Maritis	☐ Fish & Game Region 6 Gabriela Gatchel	☐ Business, Trans & Housing Caltrans - Division of Aeronautics Sandy Hesnard	☐ Air Resources Board Airport Projects Jim Lerner	☒ RWQCB 4 Teresa Rodgers Los Angeles Region (4)
☐ California Energy Commission Eric Knight	☐ Fish & Game Region 6 WM Brad Henderson	☐ Inyo/Mono, Habitat Conservation Program	☐ Transportation Projects Douglas Ito	☐ RWQCB 5S Central Valley Region (5)
☐ Cal Fire Allen Robertson	☐ Dept. of Fish & Game M George Isaac	☐ Caltrans - Planning Terri Pencovic	☐ Industrial Projects Mike Tollstrup	☐ RWQCB 5F Central Valley Region (5) Fresno Branch Office
☐ Central Valley Flood Protection Board James Herola	☐ Marine Region	☒ California Highway Patrol Scott Loetschler		☐ RWQCB 5R Central Valley Region (5) Redding Branch Office
☐ Office of Historic Preservation Ron Parsons	☐ Other Departments Food & Agriculture Steve Shaffer	☐ Housing & Community Development CEQA Coordinator Housing Policy Division	☐ State Water Resources Control Board Regional Programs Unit Division of Financial Assistance	☐ RWQCB 6 Lahontan Region (6)
☐ Dept. of Parks & Recreation Environmental Stewardship Section	☐ Dept. of Food and Agriculture Dept. of General Services Public School Construction		☐ State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality	☐ RWQCB 6V Lahontan Region (6) Victorville Branch Office
☒ California Department of Resources, Recycling & Recovery Sue O'Leary	☐ Dept. of General Services Anna Garbeff Environmental Services Section	☐ Dept. of Transportation Caltrans, District 1 Rex Jackman	☐ State Water Resources Control Board Phil Crader Division of Water Rights	☐ RWQCB 7 Colorado River Basin Region (7)
☐ S.F. Bay Conservation & Dev't Comm. Steve McAdain	☐ Dept. of Public Health Brigitte Blinning Dept. of Health/Drinking Water	☐ Caltrans, District 2 Marcelino Gonzalez	☐ Dept. of Toxic Substances Control CEQA Tracking Center	☐ RWQCB 8 Santa Ana Region (8)
☒ Dept. of Water Resources Resources Agency Nadell Gayou	☐ Independent Commissions, Boards Delta Protection Commission Linda Flack	☐ Caltrans, District 3 Bruce de Terra	☐ Department of Pesticide Regulation CEQA Coordinator	☐ RWQCB 9 San Diego Region (9)
☐ Conservancy	☐ Cal EMA (Emergency Management Agency) Dennis Castillo	☐ Caltrans, District 4 Lisa Carboni		☐ Other _____
☐ Fish and Game	☐ Governor's Office of Planning & Research State Cleanhouse	☐ Caltrans, District 5 David Murray		
☐ Depart. of Fish & Game Scott Flint		☐ Caltrans, District 6 Michael Navarro		
☐ Environmental Services Division		☒ Caltrans, District 7 Elmer Alvarez		
☐ Fish & Game Region 1 Donald Koch				

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-0409

FAX: (213) 897-1337

*Flex your power!
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May 19, 2011

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CITY OF LOS ANGELES

MAY 24 2011

ENVIRONMENTAL
IMPACT

Mr. Hadar Plafkin
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Convention Center Modernization and
Farmers Field Project, ENV 2011-0585-EIR
Notice of Preparation of a Draft EIR
SCH #2011031049, IGR No. 110328EA
Vic. LA-110 / PM 19.00 – 26.00

Dear Mr. Plafkin:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Convention Center and Farmers Field project. Based on the Notice of Preparation of an Environmental Impact Report (EIR), the proposed project would result in a net new gross floor area of 1.75 million square feet.

The project proposes the expansion and modernization of the Los Angeles Convention Center and the development of Farmers Field, which includes three main components: 1) Demolition of the West Hall, to be replaced with a new hall built in part over Pico Boulevard; 2) Construction of Farmers Field, a new multi-use event center, that can be configured with 72,000 seats expandable to 76,000 seats for special events; 3) Construction of two parking structures to replace the existing Bond Street surface parking lot and the Lot C garage, which would provide approximately 1300 net additional parking spaces.

As the State agency with jurisdiction over State highway transportation facilities, we are concerned with the expected increase in traffic volumes as it might exacerbate congestion at I-10, I-110 and US-101 freeways. To determine and evaluate potential transportation impacts this project may have on these facilities a traffic impact study is necessary.

To assist in our efforts to evaluate the impacts of this project on State Highway transportation facilities, the traffic consultant should follow the criteria outlined in the *Caltrans Guide for the Preparation of Traffic Impacts Studies* (see Traffic Study Elements attachment). The Guide contains best practices and gives insight into Caltrans' expectations when reviewing a traffic impact study. It can be accessed online at:

<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

To determine the scope of the freeway analysis, the following travel models should be run:

- a. Select zone for project, with network improvements
- b. Loaded 2035 network without project, with network improvements
- c. Loaded 2035 network with project and with network improvement

The parameters for analyzing the I-110 freeway should extend from Martin Luther King Blvd. to the south and I-5 freeway to the north. When analyzing the I-10 freeway the parameters should extend from Vermont Avenue to the west and Alameda Street to the east. US-101 should be analyzed from Alvarado Street to Alameda Street.

A queue analysis should be performed for the I-110 and I-10 freeway to freeway connectors, the US-101 to I-110 connectors and at those off-ramps that are expected to be utilized the most. Mitigation measures will be necessary at those off-ramps where the available storage is projected to exceed capacity.

Additionally, the following interchanges including on-and-off ramps expected to provide main access to the proposed event center should be analyzed, including:

- Northbound: I-110 - Exposition Blvd/37 Street, Adams Boulevard, Pico Blvd, 9th Street, 6th Street, 4th Street;
- Southbound: I-110 - Hill Street, 4th Street, 6th Street, Wilshire Blvd, 8th Street, 9th Street, Olympic Blvd, and Adams Blvd.
- Eastbound: I-10 - Vermont Avenue, Hoover Avenue, Grand Avenue, Maple Avenue, San Pedro Street, Central Avenue, and Alameda Street;
- Westbound: I-10 - Alameda Street, Central Avenue, Los Angeles Avenue, Hoover Avenue, Vermont Avenue

Listed below are some elements of what is generally expected in a traffic impact study:

- Presentations of assumptions and methods used to develop trip generation, trip distribution, trip assignments, and choice of travel mode. Travel modeling should be consistent with other regional and local modeling forecasts and with travel data.
- Inclusion of all appropriate traffic volumes. Analysis should include a) traffic from the project under consideration, b) cumulative traffic from all specific approved developments in the area, c) cumulative traffic from likely not-yet-approved developments in the area, and d) traffic growth other than from the project and developments. Scenarios involving different assumptions on development and growth may be considered.
- Analysis of AM, and PM peak-hour volumes for both existing and future conditions in the affected area. Level of Service should be specified (HCM2000 methodology is requested). Future conditions would include build-out of all projects and any plan-horizon years.
- Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including a description of transportation infrastructure improvements, financial costs, funding sources and financing, sequence and scheduling considerations, implementation responsibilities, controls and monitoring

- A plan of realistic mitigation measures under the control of the lead agency or project sponsors or specification percent shares of the costs for various mitigation actions undertaken by other agencies. Assessment fees for mitigation action should be in proportion of the additional traffic generated by the project to the amount of traffic benefiting from action (see Traffic Impact Study Guide).

Please be reminded that although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the Los Angeles County's CMP criteria alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. CMP requirements were developed by Los Angeles County in the context of CMP goals and objectives; it does not supersede the criteria from the responsible agency under CEQA. Caltrans' Guide directs preparers of traffic impact analysis to consult with the local District as early as possible to determine the appropriate requirements and criteria of significance to be used in the traffic impact analysis. Generally, when traffic is added to already deficient highway conditions (LOS "F"), it is considered a cumulatively significant impact, as it may contribute to the extension of the congestion period.

In the spirit of mutual cooperation Caltrans staff will continue to work with the traffic consultants to identify the parameters and the scope of work for the traffic study, as well as to determine the necessary mitigation on State Highway facilities. Listed below are suggested mitigation measures that should be considered:

Mitigation measures for Direct Impacts may include:

- Construction of On and Off-ramp improvements to/from I-10 and I-110
- Mainline operational improvements, e.g. Changeable Message signs, metering, etc.
- Synchronization of traffic signals
- Enhancements to Traffic Management Center
- Transportation Demand Management (TDM) Measures
- Satellite Park-Ride Shuttles (i.e. Union Station Buses to Stadium)
- Incentives to Public Transit (i.e. Shuttle to/from Red Line Stations)
- Incentives to Vanpooling and Carpooling (i.e. preferential parking)

Mitigation measures for Cumulative impacts may include:

- Fair Share contribution towards construction or funding of planning reports for future improvements such the I-110 Carpool Lanes extension to Figueroa Street.
- Contributions to Possible improvements to I-10

In situations where vehicle trips are reduced or shortened, less mitigation may be required to the surrounding roadway network. Transit commitments and other transportation strategies should be identified. Development of a Transportation Management Plan (TMP) is recommended to coordinate transit, vanpooling, carpooling, and other transportation options. The goal of the TMP would be to reduce overall trips and the impacts on transportation and air quality. Project-sponsored shuttles to closest subway, light-rail, and/or bus station should be considered. Improvements to public transit facilities (all modes) are encouraged.

Mr. Hadar Plafkin

May 19, 2011

Page 4 of 4

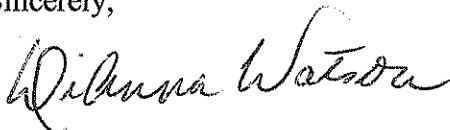
Due to the extensive construction activity that may be associated with this project, the applicant should consider preparation and implementation of a truck-management plan. In the event that it becomes necessary to transport material across a highway, please avoid disruption of traffic particularly during peak commuting periods. The applicant should make every effort to avoid excessive or poorly timed truck platooning, limiting large-size truck trips on State highways to off-peak commuting periods.

Please be reminded that the transportation of heavy construction equipment, materials, or other special equipment, which requires the use of oversized-transport vehicles on State highways, requires a Caltrans transportation permit.

It is also noted that the project site is located adjacent to I-110 and work may encroach onto State property. In all instances where the proposed work falls within or affects State right-of-way such as construction, grading, changes to hydraulic run-off, etc., a Caltrans encroachment permit is required.

We look forward to reviewing the traffic study and expect to receive a copy from the State Clearinghouse when the DEIR is completed. However, to expedite the review process, you may send a copy in advance to the undersigned. We are available for a consultation meeting at your earliest convenience. If you have any questions or concerns regarding the comments provided, please feel free to contact DiAnna Watson, IGR/CEQA Branch Chief at (213) 897-9140 and refer to IGR/CEQA #110328/EA.

Sincerely,



for DAVID SOSA, Office Chief
Office of Regional Planning and Public Transportation
Caltrans District 7

cc: James McCarthy, Deputy District Director, D7-Planning
Marco Ruano, Office Chief, D7- Traffic Operations

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: August 4, 2011

TO: Hadar Plafkin, City Planner
Department of City PlanningFROM: Ali Poosti, Acting Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation**RECEIVED**
CITY OF LOS ANGELES

AUG 17 2011

ENVIRONMENTAL
UNITSUBJECT: Convention Center Modernization and Farmers Field Project – Notice of Preparation EIR REVISED

This is in response to your request for review of your proposed project. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater system for the proposed project.

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the responsibility of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

The developer proposes two possible options for the Farmers Field facility.

Option 1: Farmer's Field as a Stadium

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Proposed			
Stadium	4 GPD/Seat	76,250 Seats	305,000
Total			305,000

Option 2: Farmer's Field as an Exhibit/Meeting Space

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Proposed			
Stadium			
Exposition Space	80 GPD/1000 SQ.FT	169,650 SQ.FT	13,572
Meeting Room Space	150 GPD/1000 SQ.FT	56,000 SQ.FT	8,400
Total			21,972

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project contains two sewer systems, Alternative 1 and 2, as shown on Figure 1. Both sewer systems were evaluated to determine sewer capacity availability.

To provide a worst-case scenario study, both alternatives used a combination of flow gauging data and projected MIKE Urban Model results. MIKE Urban is the City's hydrodynamic model that has the ability to project current and future impacts due to additional sewer discharge.

Alternative 1 – Connection at Cherry Street/ Pico Blvd

The sewer infrastructure in Alternative 1 is surrounding by an 8-inch on Pico Bl, and a 10-inch line on Cherry St. Those two lines then join up at Pico and Bond through a network of 12-inch sewer reaches that run along Bond St, Wright St, Venice Blvd, Cherry St, Washington Blvd, before discharging into a 20-inch sewer line on Union Ave. Figure 1 shows the details of the sewer system within the vicinity of the project.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Pico Blvd	12	265,000 GPD
10	Cherry St	14	500,000 GPD
12	Bond St	*	615,000 GPD
12	Wright St	22	427,000 GPD
12	Cherry St	*	675,000 GPD
12	Washington Blvd	45**	660,000 GPD
20	Union Blvd	33**	1.95 MGD

* No gauging available; ** Projected model flows

Based on your estimated flows, the initial hydraulic assessment indicates that the sewer system will not be able to accommodate your total proposed discharge along Alternative 1 route. The approximate maximum allowable discharge along this route is 129,000 GPD.

Alternative 2 - Connection at 12th Dr

This alternative proposes your project to make a connection at the existing 66-inch sewer line located on 12th Dr. The 66-inch line runs along a private street between the Staples Center and the existing Convention Center (West Hall), then along Figueroa St, Venice Blvd., and Grand Ave. Figure 1 shows the details of the sewer system within the vicinity of the project.

The analysis of this alternative evaluates the effect of discharges from the Staple Center and Farmers Field simultaneously since both discharges are along the same route. The current projected model flow level (d/D) using the combined discharge and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Projected Model d/D (%)	50% Design Capacity
66	12 th Dr	25	31 MGD
66	Figueroa St	22	60 MGD
66	Venice Blvd	22	63 MGD
66	Grand Ave	22	63 MGD

Based on the estimated flows, it appears the sewer system will be able to accommodate the total flow for your proposed project along Alternative 2. However, our guidelines do not permit a direct connection into a primary (16-inch or larger) line due to odor and other operation and maintenance problems. In such instances, the developer will be required to build and connect to a local sewer line that will feed into the existing 66-inch line. For more information on the design criteria, please contact the Bureau of Engineering at 213-482-7030.

Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division is charged with enforcement of the provisions of the National Pollutant Discharge Elimination System (NPDES) permit.

SUSMP AND STORM WATER INFILTRATION

The proposed project is subject to Standard Urban Stormwater Mitigation Plan (SUSMP) regulations and is required to incorporate measures to mitigate the impact of stormwater runoff as outlined in the guidance manuals titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". In addition the "*SUSMP Infiltration Requirements and Guidelines*" prioritizes the use of infiltration and bio-filtration systems as the preferred methods to comply with SUSMP requirements. These documents can be found at: www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm. It is advised that input regarding SUSMP requirements be received in the early phases of the project from SUSMP review staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. If the proposed project includes public right-of-way improvements and presents an opportunity to include Green Street elements as part of the project. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways. For more information regarding implementation of Green Street elements, please call Wing Tam at (213) 485-3985.

WET WEATHER EROSION CONTROL

A Wet Weather Erosion Control Plan is required for construction during the rainy season (between October 1 and April 15 per Los Angeles Building Code, Sec. 7002). For more information, please see attached Wet Weather Erosion Control Guidelines.

STORM WATER POLLUTION PREVENTION PLAN

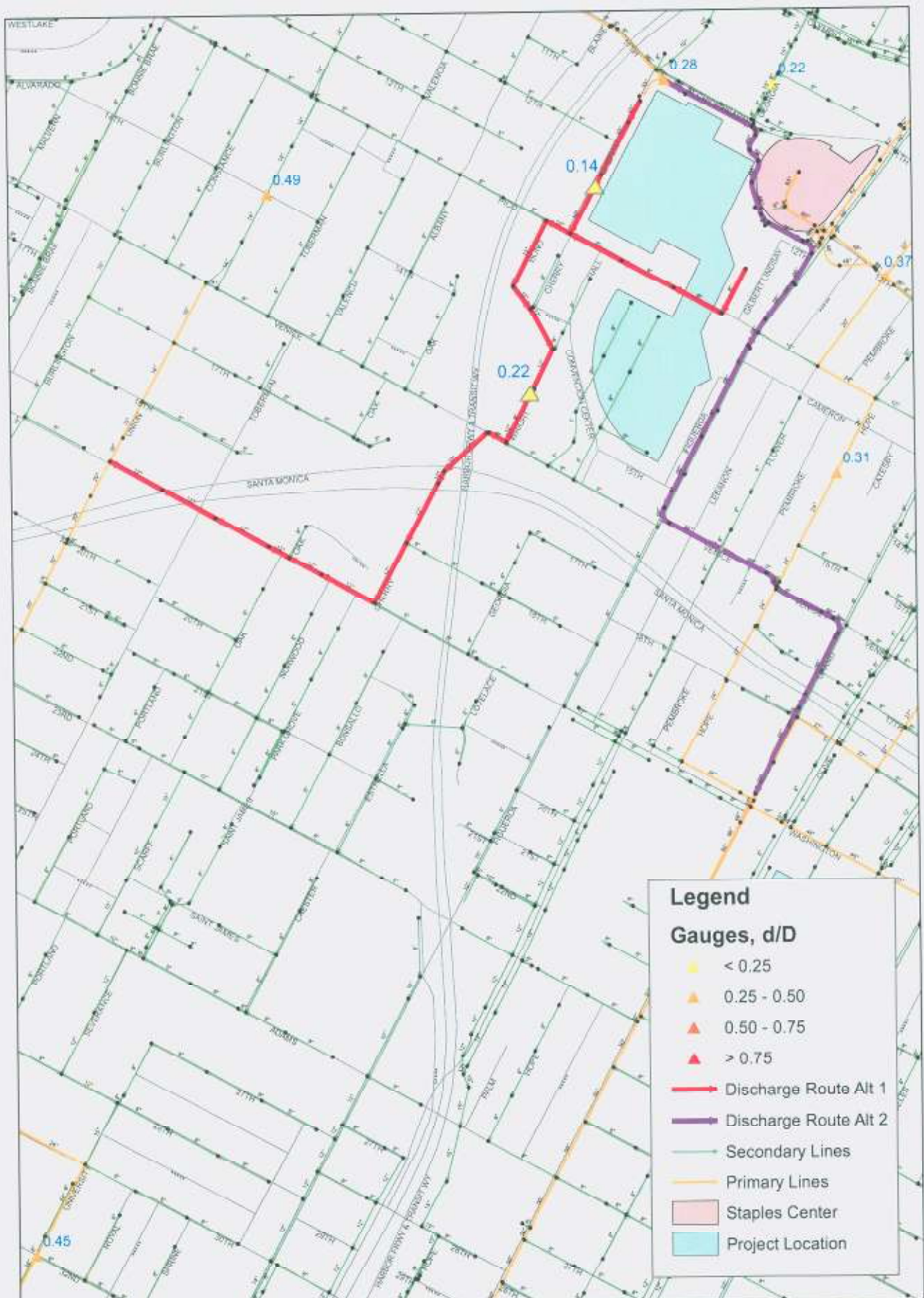
A Storm Water Pollution Prevention Plan (SWPPP) is required for land disturbance activities over one acre. The SWPPP must be maintained on-site for the duration of construction.

WPD staff is available at your request to provide guidance on stormwater issues. Should you have any questions, please contact Kosta Kaporis or my staff at (213) 485-0586.

Attachments:

Wet Weather Erosion Control
Figure 1 – Sewer Map

cc: Kosta Kaporis, BOS
Daniel Hackney, BOS
Rowena Lau, BOS
Eduardo Perez, BOS
Kwasi Berko, BOS



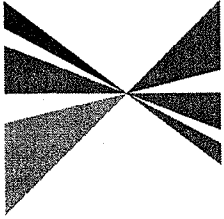
Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles



FIGURE 1
Convention Center Moderization
& Farmers Field Project
Sewer Map



0 460 920 1,380 1,840
Feet



**ASSOCIATION of
GOVERNMENTS**

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Larry McCallon, Highland

Policy Committee Chairs

Community, Economic and
Human Development
Bill Jahn, Big Bear Lake

Energy & Environment
Margaret Clark, Rosemead

Transportation
Greg Pettis, Cathedral City

April 15, 2011

Mr. Hadar Plafkin
City Planner
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Hadar.Plafkin@lacity.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Convention Center Modernization and Farmers Field Project [I20110024]

Dear Mr. Plafkin,

Thank you for submitting the **Notice of Preparation of a Draft Environmental Impact Report for the Convention Center Modernization and Farmers Field Project [I20110024]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impact Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Section 65080 and 65082.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act (CEQA) Guidelines, Sections 15125 and/or 15206. The proposed project is expansion and modernization of the Los Angeles Convention Center and the development of Farmers Field, a new multi-use event center.

Policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Visioning (CGV) that may be applicable to your project are outlined in the attachment. The RTP, CGV, and table of policies can be found on the SCAG web site at: <http://scag.ca.gov/igr>. For ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format (example attached).

The attached policies are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. **When available, please send environmental documentation ONLY to SCAG's main office in Los Angeles and provide a minimum of 45 days for SCAG to review.** If you have any questions regarding the attached comments, please contact Bernard Lee at (213) 236-1895 or leebe@scag.ca.gov. Thank you.

Sincerely,



Jacob Lieb, Manager
Environmental and Assessment Services

**COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL
IMPACT REPORT FOR THE CONVENTION CENTER MODERNIZATION AND
FARMERS FIELD PROJECT [I20110028]**

PROJECT LOCATION

The Project Site is comprised of approximately 68 acres located in the Downtown area of the City of Los Angeles. The Project Site includes all of the existing Los Angeles Convention Center property (Convention Center), STAPLES Center, as well as the Bond Street Parking Lot and the Lot C Garage (formerly the Cherry Street Parking Garage). The Project Site is generally bounded by the following major roadways: the I-110 Harbor Freeway to the west; Chick Hearn Court to the north; Figueroa Street to the east; and Venice Boulevard to the south.

PROJECT DESCRIPTION

The Project Applicants, the City of Los Angeles and L.A. Event Center, LLC, proposes the expansion and modernization of the Los Angeles Convention Center and the development of Farmers Field which combined consist of 1,750,000 million square feet of net new gross floor area. The Project involves the following three major components: (1) the West Hall would be demolished and replaced with a new hall built in part over Pico Boulevard so as to be contiguous with the South Hall (the "Replacement Hall"); (2) Farmers Field, a new multi-use event center, that can be configured with 72,000 seats expandable to 76,250 seats for spectator events or as 169,650 square feet of useable exhibition space and 56,000 square feet of useable meeting room space for a combined total of 225,650 square feet of useable floor area, would be constructed on the former West Hall site; (3) and two parking structures would be constructed to replace the existing Bond Street surface parking lot and the Lot C (formerly Cherry Street) Garage to provide approximately 1,290 net additional parking spaces on the west side of LA LIVE Way to support the new development. With the implementation of the Project, the Project Site would function as a unified center for convention, sports and entertainment uses.

CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

Regional Growth Forecasts

The DEIR should reflect the most current SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion and city are as follows:

Adopted SCAG Regionwide Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

Adopted City of Los Angeles Subregion Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	4,140,516	4,214,082	4,292,139	4,367,538	4,440,017	4,509,435
Households	1,386,658	1,445,177	1,506,564	1,554,478	1,600,754	1,638,823
Employment	1,860,672	1,905,337	1,933,860	1,967,393	2,003,196	2,037,472

Adopted City of Los Angeles Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	4,057,484	4,128,125	4,204,329	4,277,732	4,348,282	4,415,773
Households	1,366,985	1,424,701	1,485,519	1,532,998	1,578,850	1,616,578
Employment	1,820,092	1,864,061	1,892,139	1,925,148	1,960,393	1,994,134

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008. City totals are the sum of small area data and should be used for advisory purposes only.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that may be pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

- GV P1.1** *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2** *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3** *Encourage transit-oriented development.*
- GV P1.4** *Promote a variety of travel choices*

Principle 2: Foster livability in all communities.

- GV P2.1** *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2** *Promote developments, which provide a mix of uses.*
- GV P2.3** *Promote "people scaled," walkable communities.*
- GV P2.4** *Support the preservation of stable, single-family neighborhoods.*

Principle 3: Enable prosperity for all people.

- GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2 *Support educational opportunities that promote balanced growth.*
- GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5 *Encourage civic engagement.*

Principle 4: Promote sustainability for future generations.

- GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
- GV P4.2 *Focus development in urban centers and existing cities.*
- GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 *Utilize "green" development techniques*

CONCLUSION

As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here:
http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf

SUGGESTED SIDE BY SIDE FORMAT - COMPARISON TABLE OF SCAG POLICIES

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggested format is as follows:

The complete table can be found at: <http://www.scag.ca.gov/igr/>

- Click on "**Demonstrating Your Project's Consistency With SCAG Policies**"
- Scroll down to "**Table of SCAG Policies for IGR**"

SCAG Regional Transportation Plan Goals and Compass Growth Visioning Principles		
Regional Transportation Plan Goals		
Goal/ Principle Number	Policy Text	Statement of Consistency, Non-Consistency, or Not Applicable
RTP G1	Maximize mobility and accessibility for all people and goods in the region.	Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why
RTP G2	Ensure travel safety and reliability for all people and goods in the region.	Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why
RTP G3	Preserve and ensure a sustainable regional transportation system.	Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why
Etc.	Etc.	Etc.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

April 5, 2011

Hadar Planfkin, City Planner
Department of City Planning
City of Los Angeles
200 N. Springs Street, Room 750
Los Angeles, CA 90012

RECEIVED
CITY OF LOS ANGELES

APR 22 2011

ENVIRONMENTAL

Notice of Preparation of a CEQA Document for the Convention Center Modernization and Farmers Field Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft environmental impact report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2007 Model. This model is available on the SCAQMD Website at: www.urbemis.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM_{2.5} emissions from construction and operational activities and processes. In connection with developing PM_{2.5} calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM_{2.5} emissions and compare the results to the recommended PM_{2.5} significance thresholds. Guidance for calculating PM_{2.5} emissions and PM_{2.5} significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

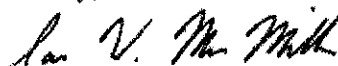
In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html. Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources



Metro

April 18, 2011

Mr. Hadar Plafkin, City Planner
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Plafkin:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) and Notice of Public Scoping Meeting for the Convention Center Modernization and Farmers Field Project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

A Traffic Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic);
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections;
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour; and
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

In addition to identifying the CMP requirements, Metro is responding in the capacity as a responsible agency with respect to the proposed project's potential impacts on Metro and municipal transit services. The following concerns should be addressed in the Draft Environmental Impact Report (EIR):

1. Continuity of Operations - Bus and Rail: Figueroa Street, Flower Street, Pico Boulevard, Olympic Boulevard and Venice Boulevard have significant levels of bus service in and around the Staples/Convention Center/LA Live/proposed Farmers Field venue. Specific detail must address planned use of the streets during pre-event, event and post-event periods. Accommodation for convenient continuance of system service, attendee traffic to and from the event site via the bus system and appropriate boarding locations will need to be addressed with appropriate solutions. Consider Bus Only lanes on the streets that are wide enough to allow it on event days (Figueroa Street, Olympic Boulevard, Flower Street).

In addition, the project should incorporate improved transit areas where patrons may wait for buses on southbound Figueroa Street, including benches and shelters, and improved and well-marked walkways directing patrons to the Pico Blue Line Station (located at Flower Street, south of 12th Street) and 7th St./Metro Center Station (Figueroa & 7th).

Among the most regionally significant bus services operating adjacent to the proposed project is the Metro Silver Line, which connects the South Bay and San Gabriel Valley to Downtown LA. Please be advised that the Metro Silver Line operates on southbound Figueroa Street and has stops at Pico Boulevard and Olympic Boulevard. The line operates seven days a week with frequencies as low as every five minutes during peak periods. Project design and potential mitigation measures should not only ensure that Silver Line service is not adversely impacted, but should improve bus stop access to accommodate additional passenger demand.

Service on the Blue and Expo Lines (including the Pico Station) will not be interrupted at any time by vehicle or pedestrian traffic flow into or out of the venue for any events related to Farmers Field. Accommodation for attendee traffic to and from the event site via the rail system without delaying service will need to be addressed with appropriate solutions.

2. Integration of Operations - Bus and Rail: Metro has limited additional capability to move event attendees into and out of the venue area. What percentage of spectators is estimated to use public transit, including Metro's bus and rail lines? As noted in the NOP, the proposed stadium will hold 72,000 to 76,250 spectators and add an additional 1,290 parking spaces adjacent to the development. Metro presumes there will be a system-wide impact on all Metro lines. As part of the analysis of the project provide detailed study of transit use to and from the venue. Additionally an analysis of pedestrian flow from the venue to Metro Stations/Stops including pedestrian impacts to/from Metro Stations/Stops is required. A separate analysis is required for impacts on Metro parking facilities connecting to the venue or expected as access points to the development. A venue transit service plan is required with

analysis of operating assumptions at a level to maintain an efficient base level of service.

3. Infrastructure Requirements for Increased Use of System - Bus and Rail: Metro will require venue staging terminals and bus boarding areas adjacent to the venue area. Olive Street and Grand Avenue potentially could be used for bus staging. Both are wide, one-way streets several blocks east of the venue. Likewise, with respect to Metro rail service, venue staging tracks, expansion of Pico Station and 7th St./Metro Center Station to accommodate large, sustained passenger traffic and pedestrian grade separations at the Blue/Expo Line are likely to be required to insure uninterrupted service and must be addressed appropriately.
4. Revenue Collection - Rail: Revenue collection transactions on the Metro rail system are handled via the Ticket Vending Machines (TVM) at each station, in conjunction with the TAP system. Evaluation of the use of the system and expanding the TVM equipment accordingly at rail stations such as Norwalk, Lakewood, Willow, North Hollywood, Universal City, Sierra Madre Villa, Del Mar, Redondo Beach, Imperial/Wilmington, Atlantic, 7th St./Metro Center, Union Station, La Cienega, Culver, the Expo Park/USC stations, etc. is required. Likewise, post-event ticketing will require a ticket selling location between the venue and rail stations at Pico and 7th St./Metro Center. Transit ticket sales should be integrated with event ticket sales, which would be helpful in mitigating delays due to fare collection (especially post-event). This integration would also provide some level of predictability as to the total number of extra riders and where their trips originate, allowing for more efficient service planning. Additionally, return tickets should be sold as arriving passengers get off the trains (as is the case with respect to Hollywood Bowl fare collection) or similar methods to insure efficient use of the stations/stops.
5. Passenger Safety - Bus and Rail: Passenger safety must be provided for at all times; not only on board buses, trains and in stations, but also between stations (Pico and 7th St./Metro Center) and the venue. The Draft EIR should include an appropriate study and implementation plan to accommodate this requirement, given the expected use of public transit to and from the venue.
6. Project Construction Impacts: Several transit corridors with Metro bus service could be impacted by project construction. The Draft EIR should include appropriate mitigations to service interruptions, mitigations from detours and/or services proposed. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Other Municipal Bus Service Operators including LADOT and Foothill Transit may also be impacted and therefore should be included in construction outreach efforts.

Metro looks forward to reviewing the Draft EIR. If you have any questions regarding this response, please call Scott Hartwell at 213-922-2836 or by email at hartwells@metro.net. Please send the Draft EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Scott Hartwell

Sincerely,

A handwritten signature in black ink, appearing to read "Martha Welborne".

Martha Welborne, FAIA
Executive Director, Countywide Planning

Attachment

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- ☐ Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- ☐ Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- ☐ Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- ☐ All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- ☐ If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- ☐ Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- ☐ Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- ☐ The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- ☐ The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- ☐ Evidence that affected transit operators received the Notice of Preparation.
- ☐ A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ☐ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ☐ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- ☐ Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- ☐ Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- ☐ Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- ☐ Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- ☐ Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- ☐ Any project contribution to the improvement, and
- ☐ The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

¡Comunidad Presente!

2707 W.Pico Blvd., Los Angeles CA, 90006 (323) 730-7266

Hadar Plafkin, City Planner
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Sent via email to: Hadar.Plafkin@lacity.org

Re: Convention Center Modernization and Farmers Field Project (EAF No. ENV 2011-0585-EIR)

Dear Mr. Plafkin,

Please accept this letter as a formal written comment regarding issues to be addressed in the Environmental Impact Report (EIR) for the Convention Center Modernization and Farmers Field Project.

¡Comunidad Presente! is a community based organization comprised of low income families, women, youth and elderly people of color who are dedicated to grassroots organizing as a weapon in the struggle to rebuild the social and physical infrastructure of our deteriorating Downtown and South Los Angeles neighborhoods. Our Mission is to utilize grassroots organizing as a tool with which to reclaim the dignity, voice and power of our community to gain and strengthen our basic human rights to affordable and healthy housing, dignified jobs, and immigrant justice.

Our members live very near the proposed project area (within 1-2 mile radius) and will be impacted by the construction and operating of the Project. As a matter of fact, we have members that live right across the street from you. This letter reflects the opinions of our members, particularly those who attended the “public scoping meeting” for the Project on March 30, 2011 at the Convention Center.

In addition to the scope laid out in other public documents, ¡Comunidad Presente! proposes the following issues and/or questions be addressed in the Draft EIR for the Project:

1. An expansive review and mitigation plan on noise pollution during construction period and through out event hours. The project is near many homes, some that house children, elderly and disabled people.
2. An extensive review and resolution on bright lighting. Once again, the project is near homes.
3. An analysis and a responsible plan for alcohol vending and consumption.
4. An analysis on the displacement of long-time low-income families from the local area (1 to 1.5 mile radius) along with the loss of rent control and affordable housing units. Displacement has been exacerbated due to land speculation. This project will continue to change the cultural identity and makeup of the community.
5. A broad review and plan for public restroom usage along with capacity of underground sewage drains, water systems, water purification and “disbursement”. This report and plan should contain how many restrooms will be available in a 1 mile radius along with the impacts to our City’s infrastructure.

6. A broad analysis and mitigation plan for disruptions, re-routes, or otherwise altered or delayed public transportation. The Project site is located near many major bus routes, relied upon particularly by low-income residents Los Angeles.
7. A comprehensive analysis and mitigation plan for increased smog along with traffic and other traffic delays during and after construction of the project. The area analyzed should include at least a one-mile radius from the Project, as traffic will spread to all major thoroughfares around the Project site. This is already a congested area, impacting air quality and overall quality of life.
8. The level and expected use of police and private security guards during and after construction. The impacts on public resources should be addressed, but the issue of access to public space for all residents must be analyzed and addressed, especially homeless, low-income residents and street vendors.
9. The impacts on existing affordable housing within a one mile radius of the Project site, and mitigation efforts to prevent demolition and other displacement. Although the Project doesn't directly impact affordable housing, it clearly will indirectly impact the surrounding neighborhoods, as demonstrated by the demolitions and other loss of affordable housing after both the Staples Center and LA Live developments.
10. Analysis of the affects of population growth due to the project and the impacts to the City's infrastructure (electrical, draining, water, heat, streets, smog, parks/green space etc.). This should also include a study and resolution on green space in the area.

Please contact either of us with any questions or further clarification.

Sincerely,

Davin Corona & Thelmy Perez
Co-Directors

DOWNTOWN LIVE, LLC

1248 S. Figueroa St., Suite # 200
Los Angeles, CA 90015

Tel (213) 387-2974

Fax (213) 744-9965

March 17, 2011

Via Email: Hadar.Plafkin@lacity.org

Hadar Plafkin, City Planner
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

**Re: EAF No: ENV 2011-0585-EIR
Convention Center Modernization and Farmer Field Project**

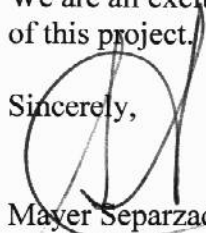
Dear Mr. Plafkin:

We are the Owner of the property on 1248 S. Figueroa St. which is located right across the street from the subject project.

This kind of project, not only will help the growth of the economy, but also it boost up the people's hope in the future.

We are all excited about this project and with this letter, we would like to show our full support of this project.

Sincerely,



Mayer Separzadeh



Jon Foreman <jon.foreman@lacity.org>

Fwd: AEG Stadium/Event Center Proposal

Nicholas Maricich <nicholas.maricich@lacity.org>

Wed, Apr 13, 2011 at 11:07 AM

To: Jon Foreman <Jon.Foreman@lacity.org>, Henry Chu <Henry.Chu@lacity.org>

FYI, in case you did not receive this directly.

-Nick

Nicholas P. Maricich
Los Angeles Department of City Planning
Policy Planning Division
200 N. Spring Street, Suite 667
Los Angeles, CA 90012
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p: 213.978.1240*
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**Please note my newphone number.*

----- Forwarded message -----

From: **Tangri, Shiraz** <Shiraz.Tangri@alston.com>

Date: Mon, Apr 11, 2011 at 11:56 AM

Subject: AEG Stadium/Event Center Proposal

To: "michael.logrande@lacity.org" <michael.logrande@lacity.org>

Cc: "Jan.Perry@lacity.org" <Jan.Perry@lacity.org>, Marie Rumsey <Marie.Rumsey@lacity.org>, Martha Saucedo <msaucedo@aegworldwide.com>, "ttanner@aegworldwide.com" <ttanner@aegworldwide.com>, Patricia Diefenderfer <Patricia.Diefenderfer@lacity.org>, Nicholas Maricich <Nicholas.Maricich@lacity.org>, "stephanie.magnien@lacity.org" <stephanie.magnien@lacity.org>, Patti Berman <patti.berman@dlanc.com>, James Doizaki <jdoizaki@yahoo.com>

Dear Director LoGrande -

Please find attached the Downtown LA Neighborhood Council's letter of support for the Downtown stadium and event center proposal by AEG. We would appreciate it if this letter can be included in the scoping comments for the project.

Thank you,

--SDT

Shiraz D. Tangri
Alston + Bird LLP
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PROJ - 2011-02-03 - AEG Stadium-Event Center - Support.pdf
154K



April 11, 2011

Mr. Michael Lo Grande
Director of City Planning
Los Angeles City Hall, Room 525
200 North Spring Street
Los Angeles, California 90012

RE: **Proposed AEG Downtown L.A. Event Center and Farmers Field**

Dear Planning Commissioners:

At our regularly held public meeting on March 8, 2011, the Board of Directors of the Downtown Los Angeles Neighborhood Council ("DLANC") voted to submit the following comments regarding the proposal by Anschutz Entertainment Group ("AEG") to develop a new Downtown sports stadium and redevelop the Los Angeles Convention Center, pursuant to the motion passed on February 22, 2011, by DLANC's Planning & Land Use Committee.

DLANC is strongly supportive of AEG's proposal for Farmers Field and the L.A. Event Center. The project will continue the re-activation of Downtown L.A. as a sports and entertainment destination, building upon the development of Staples Center and LA Live!. Those projects demonstrate AEG's proven track record in creating world-class entertainment facilities that also serve to enhance the surrounding commercial and residential districts. AEG has shown through those projects that it knows how to deliver high-quality facilities and significant community benefits. The new facilities will be critical to continuing the growth of Downtown L.A. as a world-renowned destination for millions of tourists and other visitors.

DLANC believes that the current project proposal will be a major catalyst for the continuing renaissance of Downtown L.A., which has benefitted from billions of dollars of public and private investment over the last decade. The project will add new construction and operational jobs in the region's largest employment center. In addition to the employment generated by the project itself, the stadium and revitalized convention center has the potential to stimulate other businesses in the project vicinity.

DLANC applauds AEG's approach to developing the project in a location that maximizes the synergy between the Convention Center and the new stadium. As with AEG's other Downtown projects, the stadium proposal will bring new iconic architecture to Downtown L.A. as well as good urban design. Further, these facilities will benefit from the region's investment in transit due to their proximity to the existing light rail station, as well as infrastructure projects currently under development like the Regional Connector, the Figueroa Corridor streetscape improvements, and the Downtown LA Streetcar.

DLANC applauds AEG's efforts to create an environmentally sustainable project that will enhance the pedestrian-oriented character of the South Park area. DLANC encourages the City to work with AEG to address parking and traffic circulation issues in a manner that is consistent with the urban environment and takes advantage of existing and future infrastructure improvements in and around Downtown L.A.

Thank you for your consideration of these comments.

Very truly yours,



Patricia Berman
DLANC President

Very truly yours,



Shiraz D. Tangri
DLANC Planning & Land Use Committee Co-Chair

CC: Hon. Jan Perry (Council District 9 c/o Marie Rumsey)
Nicholas Maricich/Patricia Diefenderfer (City Planning Department)
Ted Tanner/Martha Saucedo (AEG)

April 18, 2011

Via Electronic and U.S. Mail

Hadar Plafkin, City Planner
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, California 90012
Hadar.Plafkin@lacity.org

*Re: Scoping Comments on the proposed Convention Center Modernization and
Farmers Field Project*

Dear Mr. Plafkin:

Thank you for the opportunity to comment on scope of the Environmental Impact Report for the proposed Convention Center Modernization and Farmers Field Project ("Project"). We submit these comments on behalf of Community Development Technologies Center (CDTech), Los Angeles Community Action Network, Comunidad Presente, Physicians for Social Responsibility- Los Angeles, Strategic Action for a Just Economy, United Coalition East (UCEPP). Before any such project is built, the environmental impacts must be thoroughly and thoughtfully analyzed in a manner consistent with the California Environmental Quality Act (Public Resource Code, sections 21000, *et seq.* ("CEQA")) and its implementing regulations (California Code of Regulations, title 14, sections 15000, *et seq.* ("CEQA Guidelines")).¹

The "overriding purpose of CEQA is to ensure that agencies regulating activities that may affect the quality of the environment give primary consideration to preventing environmental damage." (*Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal. App. 4th 99, 117.) At the heart of CEQA is the environmental impact report (EIR). (*See Laurel Heights Improvement Association v. Regents of University of California* (1988) 47 Cal.3d 376, 392.) For the proposed Project, the lead agency is the City of

¹ In this letter we have tried to present a brief summary of those subjects currently dismissed or not discussed in the Initial Study, and recommend for exclusion from the scope of the EIR, but this list is by no means exhaustive. As we learn more about the Project and, later, review the Draft EIR we may seek additional information and further review of specific elements, including but not limited to specific impacts, mitigation measures, and alternatives, including those described in the Initial Study.

Los Angeles Department of City Planning (“Planning Department”). In that capacity, the Planning Department is entrusted with the responsibility of “provid[ing] public agencies and the public in general with detailed information about the effects which a proposed project is likely to have on the environment; [listing] ways in which significant effects of such a project might be minimized; and [indicating] alternatives to such a project.” (Pub. Res. Code § 21061; *see* CEQA Guidelines, § 15002, subd. (a).) To this end, the EIR must “set[] forth sufficient information to foster informed public participation and to enable decision makers to consider the environmental factors necessary to make a reasoned decision.” (*Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners of the City of Oakland* (2001) 91 Cal. App. 4th 1344, 1355 (*Berkeley Keep Jets Over the Bay*).)

To comply with CEQA and assist in creating an informed public, the EIR must include the elements set forth below.

A. Project Description

The project description of the proposed Project must include: the “precise location and boundaries of the proposed project shall be shown on a detailed map”; a “statement of the objectives sought by the proposed project”; a “general description of the project's technical, economic, and environmental characteristics”; and a “statement briefly describing the intended uses of the EIR.” (CEQA Guidelines, § 15124, subds. (a) – (d).) “An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 193.) Within this the EIR must include a discussion of the costs and return to the City of Los Angeles (“City”) for the proposed Project. This information is vital to facilitating an informed understanding of the proposed Project.

B. Project Description

The project description of the proposed Project must include: the “precise location and boundaries of the proposed project shall be shown on a detailed map”; a “statement of the objectives sought by the proposed project”; a “general description of the project's technical, economic, and environmental characteristics”; and a “statement briefly describing the intended uses of the EIR.” (CEQA Guidelines, § 15124, subds. (a) – (d).) “An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 193.) Within this the EIR must include a discussion of the costs and return to the City of Los Angeles (“City”) for the proposed Project. This information is vital to facilitating an informed understanding of the proposed Project.

C. Environmental Setting

The EIR must include,

“a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.”

(CEQA Guidelines, § 15125, subd. (a).) The environmental setting for the proposed Project extends north, south, east, and **west** of the 110-freeway. The Planning Department must consider the impacts of the Project on the surrounding communities who will be directly impacted by the proposed Project, including those on the west side of the 110-freeway.

D. Environmental Impacts and Mitigation

The EIR must “identify and focus on the significant environmental effects of the proposed project” and “describe feasible measures which could minimize significant adverse impacts.” (See CEQA Guidelines, § 15126.2, subd. (a); *id.*, § 15126.4, subd. (a)(1).)

Importantly,

“[i]n assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area ... Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects.”

(CEQA Guidelines, § 15126.2, subd. (a).) As with the environmental setting, the “affected area” includes a broad area in and around the Project site, and this broad area must be analyzed.

In addition, the EIR must also discuss:

“[T]he ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment ... Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

(*Id.*, subd (d).) These growth inducing impacts, including the number of jobs that the project will create, must be considered.

Complementing the discussion of impacts, the EIR must also consider feasible mitigation measures. Under CEQA, “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” (Pub. Res. Code § 21002; *see also Berkeley Keep Jets Over the Bay, supra*, 91 Cal. App. 4th at 1354.) The EIR must include all feasible mitigation measures as well as a discussion of mitigation measures that were considered and rejected.

Some of the specific impacts that the proposed Project must analyze³ and mitigate are impacts to: health; population and housing; environmental justice; air quality and greenhouse gas emissions; land use and planning; transportation and traffic; and public services.

1. Health

For the health impacts, the lead agency should analyze the following health related issues

- What will be the impact on health of increased noise during construction and operation phases of the project.
- Construction dust and increased toxic air emissions during the construction of the project
- How will the projected increased in traffic affect local air quality and by extension the health of local residents.
- The proposed site is approximately one mile from the J. Thomas McCarthy Center for Emergency Services at California Hospital the only 24 hour trauma facility in downtown Los Angeles. How will increased traffic congestion in and around the proposed facility impact response time for critical emergency health services.
- To better understand the potential health impacts a full health impact assessment of this project should be conducted.
- .

2. Population and Housing and Growth Inducing Impacts

For the population and housing impacts, the lead agency should analyze whether the proposed project will: “Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure))” and “[d]isplace substantial number of people necessitating the

³ This discussion is in addition to what is already recommended in the Initial Study.

construction of replacement housing elsewhere.” (CEQA Guidelines, Appendix G.) The proposed Project does both.

a. Growth Inducement

According to AEG, the proposed Project will result in the creation of “20,000 to 30,000 jobs.” (LA City Council, Committee Meeting, January 19, 2011, AEG President Tim Leiweke [internal quotations omitted] (*available at* <http://articles.latimes.com/2011/jan/19/sports/la-sp-la-nfl-stadium-20110120>).) This increase in jobs is enough of a growth inducing impact to require evaluation of growth inducing and population and housing impacts. The EIR on the Los Angeles Sports and Entertainment District, which is adjacent to the proposed Project, found that these “new employment opportunities may lead some people to relocate to the area to be nearer [sic] their jobs, thereby creating some demand for additional housing in the area.” (Los Angeles Sports and Entertainment District, Draft EIR, Growth Inducing Impacts, p. 492 (*available at* http://cityplanning.lacity.org/EIR/LA_Entertainment_District/draft/text/eir/VI-GrowthInducingImpacts.PDF).) Although it is assumed that “most, if not all, of the construction and permanent jobs at the Project Site would be filled by individuals already residing in the area,” it is unclear if all 20,000 to 30,000 jobs will be filled by the residents, or if this is even feasible. The impact of the population growth resulting from new jobs in the area must be analyzed and mitigated in the EIR.

Development such as the proposed project should also analyze how it will respond to local labor needs such as the need for workforce development and hiring programs targeting local residents with specific hiring requirements for hard-to-employ and the ex-offender population.

b. Indirect Displacement

Quite analogous to the project at hand, when evaluating the environmental impacts of developing Yankee Stadium in New York City, the agency specifically examined indirect displacement of residents, assessing if,

“the proposed project would make the surrounding area more attractive as a residential neighborhood, leading to higher rents, or create other conditions that could result in indirect displacement of the existing population base.”

(Yankee Stadium Project, Environmental Impact Statement Final Scope of Work, p. 15 (*available at* http://www.nycgovparks.org/sub_your_park/nyy_stadium/pdf/final_scope_of_work.pdf).) Downtown Los Angeles has some of the poorest residents in the county, with the median household income of \$15,003, renters comprising 93.4% of the residents, and 41% of people with no high school diploma. (See Los Angeles Times, Mapping Los Angeles, Central LA – Downtown LA (*available at* <http://projects.latimes.com/mapping->

la/neighborhoods/neighborhood/downtown/).) It is well understood that development such as the proposed Project results in economic pressure that result in displacement of low-income residents. This displacement must be evaluated in the EIR.

3. Environmental Justice

Many of the communities surrounding the proposed project are populated primarily by traditionally disadvantaged minority groups, and therefore the EIR must analyze and mitigate the impacts of the Project on these groups in comparison to the majority population. In considering these communities, the EIR must analyze federal, state, and local policies and laws related to environmental justice communities. The EIR should also analyze the mitigations that will take place due to the Proposed Project including local Brownfields redevelopment efforts and the creation of more open/park space equity with surrounding low-income neighborhoods.

The proposed Project should also be evaluated based on creation of green jobs for existing local low-income residents. The potential creation of green jobs by the proposed Project may generate a demand in a newly skilled workforce. Measures should be evaluated to include a local green job training program for existing low-income residents, including the hard-to-employ and ex-offender populations.

4. Air Quality and Greenhouse Gas Emissions

The proposed Project is located in an impacted air quality basin and the proposed Project will increase both air pollution and green house gas emissions. Beyond greenhouse gas emission initiatives undertaken by the State of California, the EIR should also analyze the other federal, state, regional, and local plans, policies, regulations, and laws related to climate change, and incorporate all feasible mitigation measures. (*See generally* Initial Study, p. 48.)

5. Land Use and Planning

In addition to identifying, describing, and evaluating the land use plans, policies, and regulations that govern development on the Project site, the EIR must also identify, evaluate, and describe the land use plans, policies, and regulations that govern the area that will be affected by the proposed Project. (*See* Initial Study, p. 57.) As discussed throughout this letter, the “affected area” extends well beyond the boundaries of the Project site, and includes areas governed by the South Los Angeles, Southeast Los Angeles, and Westlake Community Plans, as well as the Pico Union I and Pico Union II Redevelopment Plans. These plans and any other applicable policies and regulations must be discussed in the EIR and any impacts mitigated.

Land use plans should foster community economic development and consider infrastructure needs in relation to the existing population such as food quality and access; the preservation of the local small mom-and-pop business community; and community access to digital technology and other emerging technologies. Profits generated by the proposed Project should be in congruence with these needs.

6. Transportation and Traffic

The EIR must analyze the traffic flow measure that are current being implemented to facilitate the increase in traffic expected to occur from the proposed Project, including the ramp expansions to the 110-freeway. Furthermore, the EIR must also consider the impact of the proposed project with the planned implementation of the Metro Express Lanes on the 110- and 10-freeway.

In addition, the EIR must also analyze the cut through and parking impacts to the residential and small business communities surrounding the Project site. These communities will suffer significant and unwanted increases in traffic due to the proposed Project.

The Project will be located near the center of the region's public transportation networks, and adjacent to a light rail station. As such, it can be expected to have significant impacts on transit operations in the immediate area, and to a lesser extent, throughout the greater Los Angeles area. These impacts must be analyzed and mitigated in the EIR.

7. Public Services

The EIR must include a discussion of impacts to existing roadways. Many of the streets in, around, and serving the Project area are dotted with potholes. The deterioration of these roads will further accelerate as the Project goes forward. These impacts must be evaluated and mitigated.

The EIR must consider the proposed increase in alcohol outlet density within a relatively compact area that the California State Department of Alcoholic Beverage Control has already labeled over concentrated. There is extensive research showing that alcohol outlets pose a significant risk to the public, serving as attractors of crime, violence, and disorder, and result in increased demand on police and fire services. The EIR must analyze and mitigate these impacts.

E. Alternatives

Under CEQA, an EIR shall:

“describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives...[I]t must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation...”

“The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives...”

(CEQA Guidelines, § 15126.6, subds. (a) & (c).) The “EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” (*Id.*, subd. (d).) Importantly, the “discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (*Id.*, subd. (b).) The key issue is whether the EIR considers “a reasonable range of potentially feasible alternatives that will foster *informed decisionmaking and public participation*.” (See CEQA Guidelines, § 15126.6, subd. (a) [emphasis added]; see also *Laurel Heights Improvement Association v. Regents of Univ. of California* (1988) 47 Cal.3d 376, 403.) There are many viable alternatives to the proposed Project that would substantially lessen the significant impacts, including the impacts to health, population and housing, traffic, and air quality. These alternatives, which include locating the project elsewhere, must be considered in the EIR.

F. Cumulative Impacts

An EIR must analyze cumulative impacts. (CEQA Guidelines, § 15130.) These cumulative impacts are created “as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.” (*Id.*, subd. (a)(1).) The discussion of these cumulative impacts must “reflect the severity of the impacts and their likelihood of occurrence” and include the following elements:

“A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, ...” or

“A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect ...”

(*Id.*, subd (b)(1)(A) & (B). “The requirement for a cumulative impact analysis must be interpreted so as to afford the fullest possible protection of the environment within the reasonable scope of the statutory and regulatory language.” (*Citizens to Preserve the Ojai v. County of Ventura* (1985) 176 Cal. App. 3d 421, 431-432.)

Therefore, the EIR must consider the cumulative impacts of climate change, future downtown and other development, and mass displacement of existing residents. In addition, in the cumulative impact analysis, special attention must be paid to those projects that are outside the immediate Project area but utilize the exact same roadways and resources. Such projects would include the Palmer Project at 2300 Flower as well as the University of Southern California Master Plan project, which is currently under review. This would be in addition to existing traffic-generating venues such as the Coliseum to Dodger Stadium.

Thank you for considering our comments. If you have any question please contact Martha Dina Arguello at 213 689-9170.

Sincerely,



Martha Dina Arguello
Executive Director Physicians for Social
Responsibility- Los Angeles



Benjamin Torres
Community Development Technologies
Center (CDTech),

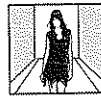
Paulina Gonzales
Strategic Action for a Just Economy

Becky Denmsion
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Zelenne L. Cárdenas
United Coalition East

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April 15, 2011

Hadar Plafkin, City Planner
Department of City Planning
200 N. Spring St., Room 750
Los Angeles, CA 90012

SUBJECT: Comments from the LA Fashion District Business Improvement District (BID) Regarding the Impact of Farmer's Field on the District and Businesses in the Fashion District.

Dear Mr. Plafkin:

The LA Fashion District Business Improvement District (BID) has a number of comments to help the Planning Department address issues in the Draft EIR on the above project.

1 The LA Fashion District is a wholesale buyer and retail shopper destination that depends on easy access from the 10 and 110 Freeways.
The LA Fashion District is a 115 block area that includes over 3000 small businesses, most of which are destination retail, that depend on wholesale buyers and shoppers travelling to them from throughout Los Angeles County and beyond. Most of these trips are made by automobile and the Fashion District depends on easy access from the #10 and #110 freeways. It also depends on easy parking at affordable rates.

2 Sunday is the second busiest day for our retail businesses that comprise over 20% of all businesses in the district.

Many of the retail stores are clustered all around Santee Alley that benefit from the high numbers of weekend shoppers. We are concerned that the 75,000 fans attending Farmer Field NFL games on Sunday afternoon could have an adverse impact on both traffic congestion and parking in and west of the district.

The NFL season coincides with the busy holiday shopping season and many of the Fashion District businesses depend on strong sales between October and the end of December for their profitability. We are also concerned that even if traffic and parking impacts can be minimized, destination shoppers will not visit the Fashion District on "Game Days" because of the perception that traffic will be congested and parking will be challenging. Even with appropriate mitigation measures, we believe a strong communication and marketing strategy may have to be put in place to address these perception issues.

3 Market Week wholesale apparel tradeshows are often scheduled over weekends.
These apparel tradeshows attract 52,000 wholesale buyers annually who contribute \$52 million revenue to the LA economy. Buyers and showroom reps have reported being discouraged away from attending LA Market Weeks because of street closures for demonstration marches and other events. We are concerned that additional high-density road conditions will further negatively impact attendance.

4 Parking, Tailgate Parties, Illegal Vending, and Security will negatively impact the BID budget.
According to 90% of survey responders there is not enough parking in the LA Fashion District. If stadium goers are diverted to outlying parking lots then shopper parking will be further reduced. Tailgate parties may attract more illegal vending, leave more trash, and require more security than our BID budget can effectively manage.

5 CRA/AECOM Fashion District Study to produce additional EIR information.
Fortunately the CRA has funded a comprehensive study of the Fashion District which will be finished by the end of December, 2011. The study is being done by AECOM with traffic consultants as part of the team. They are undertaking traffic and pedestrian counts as part of their work and this should be very useful information in helping the City prepare the EIR. Jenny Scanlin is the Project Manager at the CRA overseeing the project.

We look forward to helping to ensure that EIR for this project addresses traffic and parking concerns in the LA Fashion District. Please add us to the project status communication list. We want to stay informed and provide additional information.

Thank you.

Sincerely,



Kent Smith, Executive Director
LA Fashion District BID
110 E. 9th Street, Ste. A-1175
Los Angeles, CA 90079
213.488.1153 Ex. 712
kent@fashiondistrict.org
Facebook: [L.A. Fashion District](#)

Cc:

Matthew Simons, Senior Transportation Engineer, Mobility Group
The Honorable Jan Perry, District 9
Stephanie Magnien, Legislative Deputy, District 9
Martha Saucedo, VP Community Affairs, AEG
Board of Directors



Los Angeles Community Action Network

April 15, 2011

Hadar Plafkin, City Planner
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Sent via email to: Hadar.Plafkin@lacity.org

Re: Convention Center Modernization and Farmers Field Project (EAF No. ENV 2011-0585-EIR)

Dear Hadar:

We submit this letter as formal written comment regarding the issues to be addressed in the Environmental Impact Report (EIR) for the Convention Center Modernization and Farmers Field Project (the Project).

The Los Angeles Community Action Network (LA CAN) is a grassroots organization comprised of low-income and homeless residents of Downtown and South Los Angeles. Many of our members live very near to the proposed Project, and all live within a proximity in which they will be impacted by the construction and operating of the Project. This letter reflects the concerns and opinions of our members, particularly those who attended the "public scoping meeting" for the Project on March 30, 2011.

In addition to the scope laid out in other public documents, LA CAN proposes the following issues and/or questions be addressed in the Draft EIR for the Project:

1. A comprehensive analysis and mitigation plan for disruptions, re-routes, or otherwise altered or delayed public transportation. The Project site is located near many major bus routes, relied upon particularly by low-income residents of Downtown and South Los Angeles.
2. A comprehensive analysis and mitigation plan for increased traffic and other traffic delays during and after construction of the project. The area analyzed should include at least a one-mile radius from the Project, as traffic will spread to all major thoroughfares around the Project site. This is already a congested area, impacting air quality and overall quality of life.
3. The level and expected use of police and private security guards during and after construction. The impacts on public resources should be addressed, but the issue of

Los Angeles Community Action Network

530 S. Main Street, Ground Floor, Los Angeles, CA 90013

Phone # 213-228-0024 Fax # 213-228-0048 www.cangress.org

.....

access to public space for all residents must be analyzed and addressed, especially homeless or other low-income residents.

4. The impacts on existing affordable housing within a one mile radius of the Project site, and mitigation efforts to prevent demolition and other displacement. Although the Project doesn't directly impact affordable housing, it clearly will indirectly impact the surrounding neighborhoods, as demonstrated by the demolitions and other loss of affordable housing after both the Staples Center and LA Live developments. The Community Redevelopment Agency of the City of Los Angeles is obligated to replace any loss of affordable housing existing as of 2006, regardless of public investment in the project, so any loss of housing represents a financial resource issue for the City.

Please contact either of us with any questions or further clarification.

Sincerely,



Becky Dennison
Co-Directors

Pete White

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
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April 7, 2011

RECEIVED
CITY OF LOS ANGELES

APR 13 2011

ENVIRONMENT

Hadar Plafkin
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: SCH# 2011031049 Convention Center Modernization and Farmers Field; Los Angeles County.

Dear Mr. Plafkin:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check. **USGS 7.5 minute quadrangle name, township, range and section required.**
 - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached.**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez

Katy Sanchez
Program Analyst
(916) 653-4040

cc: State Clearinghouse

Native American Contact List
Los Angeles County
April 7, 2011

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
6515 E. Seaside Walk, #C Gabrielino
Long Beach , CA 90803
calvitre@yahoo.com
(714) 504-2468 Cell

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address Gabrielino Tongva

tattnlaw@gmail.com
310-570-6567

Gabrielino/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino Tongva Nation
Sam Dunlap, Chairperson
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net

(909) 262-9351 - cell

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dormae, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

Gabrielino-Tongva Tribe
Bernie Acuna
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
(310) 587-2203
(310) 428-7720 - cell
(310) 587-2281 - FAX

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman
1875 Century Park East, Suite 1500
Los Angeles , CA 90067 Gabrielino
lcandelaria1@gabrielinoTribe.org
310-428-5767- cell
(310) 587-2281 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed
SCH# 2011031049 Convention Center Modernization and Farmers Field; Los Angeles County.



4900 Rivergrade Road, Suite B130, Irwindale, CA 91706 | Phone (626) 856-3400 Fax (626) 856-5115

Your Connection to the Leadership & Resources of the Valley

April 11, 2011

RECEIVED
CITY OF LOS ANGELES

APR 22 2011

CITY PLANNING DE
EXECUTIVE OFFICE
ROOM 525

Mr. Michael Lo Grande
Director of City Planning
City Hall, Room 525, City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: Proposed Los Angeles Convention Center Football Stadium

Dear Mr. Lo Grande:

I am writing on behalf of the San Gabriel Valley Economic Partnership regarding the proposed football stadium planned for Downtown Los Angeles. We believe it is necessary to analyze several sites in the Environmental Impact Report (EIR) as alternatives for the project. The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines Section 15126.6).

Key provisions of the CEQA Guidelines on alternatives are summarized below to explain the foundation and legal requirements for the alternatives analysis in the Downtown Football Stadium EIR.

- "The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (15126.6[b]).
- "The specific alternative of 'no project' shall also be evaluated along with its impact" (15126.6[e][1]).
- "The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives" (15126.6[e][2]).
- "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project" (15126.6[f]).

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LAEDC

Anthony Tang

Cathay Bank

Lupe Valdez

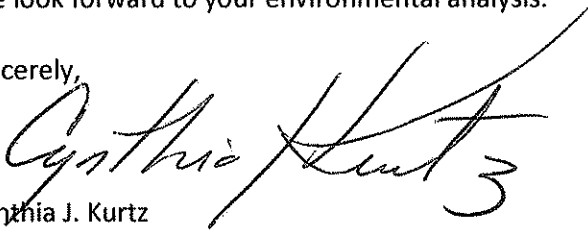
Union Pacific

- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).
- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (15126.6[f][2][A]).
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (15126.6[f][3]).

Based on these CEQA requirements, The Partnership believes it is imperative that the EIR studies the alternate sites including the Coliseum, Carson, Dodger Stadium and the proposed stadium in the City of Industry. All of these sites have been analyzed as sites for future NFL teams and may have lesser impacts on the environment and at significantly less fiscal and financial risk than a stadium in Downtown Los Angeles.

We look forward to your environmental analysis.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cynthia J. Kurtz' with a stylized flourish at the end.

Cynthia J. Kurtz
President & CEO
San Gabriel Valley Economic Partnership

2011-04-18 Flournoy - NOP Response.txt

To: Hadar Plafkin
Subject: RE: Farmers field Scoping comments

From: Hadar Plafkin [mailto:hadar.plafkin@lacity.org]
Sent: Monday, April 25, 2011 12:53 PM
To: Bruce Lackow
Subject: Fwd: Farmers field Scoping comments

----- Forwarded message -----
From: James Flournoy <saveourcommunityinc@live.com>
Date: Mon, Apr 18, 2011 at 3:01 PM
Subject: Farmers field Scoping comments
To: hadar.plafkin@lacity.org

Save Our Community
501c3 non profit public benefit corporation

Farmers field CEQA scoping

Gentlemen:
Please find our comments on the NFL stadium Scoping

Background

Save Our Community made extensive comments on the Industry stadium EIR. Unfortunately most were not adequately addressed resulting in incision of several SOC points, such as failure to comply with the Seismic Hazards Mapping Act, several transportation and geologic issues, light and glare, noise, etc. in the Walnut CEQA (and other causes such as SHMA) lawsuit. We are opposed to that project and wish to see your project succeed.

Therefore
Seismic Hazard Mapping Act MUST be Complied with PRIOR TO PROJECT APPROVAL by the lead agency (state law).

Duly adopted regulations in accordance with the Act by the Mining and Geology Board are found in California Geological Survey Special Publication 117 2008. These requirements are significantly more stringent than the California Building Code.

The regulations require the use of the latest data and methods.

Latest data for the stadium site may be found in two series of simulations by USGS and the Southern California earthquake Center (SCEC)
SCEC is conveniently located at nearby USC, USC is a test point with high quality data.
There are many reports which list the effects of earthquakes on USC which will be relevant to your project.
We suggest taht Tom Jordan and SCEC be added to your list of consultants.

The first series is an extension of the SCES PHASE III project c.a. 1999 discussing basin depth amplification and other site effects.
The current realization is called Cybershake.
Traditional magnitude/ distance attenuation relationships (as found in the current

CBC) are total inadequate to model ground shaking and ground motion over a deep basin site such as the Los Angeles basin. While all faults will have some basin depth amplification the Newport-Inglewood, Palos Verdes, Puente Hills thrust and San Andreas are especially critical. We recommend that the data for USC be used or a custom printout for your site be obtained from SCEC. A map showing the structural basement under the site must be included. Isobars showing the depths to commonly used seismic waves speed must be shown (depth to 500 m/sec, 1000m/sec, 150 m/sec, 2500 m/s). Historical depth to ground water must be shown as well as current.

The Second is the latest version of the Terrashake findings first published in 2005. These have morphed into the USGS "Shakeout" program of 2008 and subsequent refinements. Essentially long period long duration ground motions from large but distant seismic events are found to be much more hazardous than previously though or considered by the current CBC. The Structural engineers association has taken the position that as a matter of professional practice these findings must be considered. The EIR must investigate and discuss.

Shakeout also suggests widespread failures of transportation and utilities such as water (those constantly breaking Los Angeles water pipes). A secure water supply must be considered. Shakeout also suggests that Fire after a major earthquake will cause more damage than the shaking. so Urban firestorm MUST be considered. Dynamic ground deformation, lurching, heaving, ground waves must be shown as well as

permanent ground deformation. The effect of Multi minute long heavy ground shaking must be quantified and considered at each spectral period. Caltrans is restudying bridges and overpasses based on these latest finding, however this is a work in progress. Up to date references on nearby Caltrans structures must be included in any transpiration study, and emergency alternatives provided. Basin depth amplification is what caused the 10 freeway to collapse during the Northridge earthquake. Other events will focus their waves in other places, including the project site and surrounding infrastructure. Cybershake can help sort out these phenomena

IF common Seismic analysis programs are used Data MUST be custom developed and entered; as the databases used, while they may be shown for reference, are obsolete.

There must be a determination made: is this is a Critical structure for disaster relief. A determination must be made on the survivability of the structure (risk of collapse) and not just the life safety requirements of the building code. A new building code may soon have requirements for "risk of collapse" requirements,

we expect
the EIR to anticipate this requirement.
Note that a "risk of collapse" study has a longer "period of exceedence" for
earthquake analysis
Return to use times must be developed

The Los Angeles river very recently flowed West to Ballona Creek. Did the river
ever flow
through the site? Could it change course again?
What are the geotechnical and hydrological considerations implied?

USGS just released it's Multidisciplinary hazard study ARKSTORM report. Arkstorm
considers
heavy rainstorm for an extended period of days. Not only must flooding be
considered but the
failure of storm drains and nearby river channels and their levees.

Consideration of Alternatives for a new stadium must include other sites such as the
site of the
Memorial Coleseum.

We consider the risk of surface fault rupture to be low at the site but a thorough
discussion of not
only the Los Angeles segment of the underlying Puente Hills Thrust must be given and
also multi
segment events on the PHT must be investigated and discussed as well as the nearby
Upper and
lower Elysian Park Thrusts.

we have significant resources on these topics and will share with your consultants

Sincerely yours

James Flournoy
secretary
8655 Landsi view
Rosemead CA 91770

3435 Wilshire Boulevard
Suite 320
Los Angeles, CA 90010-1904



(213) 387-4287 phone
(213) 387-5383 fax
www.angeles.sierraclub.org

April 18, 2011

TO: Hadar Plafkin, City Planner
Department of City Planning
200 N. Spring Street, Room 200
Los Angeles, CA 90012
Hadar.plafkin@lacity.org

Re: Farmers Field event center scoping comments submission (with attached presentation)

The Sierra Club Angeles Chapter Transportation Committee recommends support of a wide array of alternative transportation modes and improvements around the Farmers Field event center such as:

- Improved streetscapes that encourage pedestrian mobility along Figueroa, Flower, Olympic, 11th, 12th, and Pico Boulevard for pedestrians to connect to and from transit facilities to Farmer's Field;
- The project shall provide capital and operating expenditures of the adjacent Pico Metro Rail Station for modernization and facility upgrades to handle the larger demand of patrons using transit to access Farmers Field;
- New parking facilities will contain charging ports for plug-in vehicles;
- The project shall fund bike parking, lockers and dedicated bike lane facility investment surrounding the event center;
- The project shall provide dedicated bus lanes and enhanced bus stops/shelters for local and regional bus services;
- "Parking Demand Management" utilizing nearby parking structures and AEG paying for the operation of bus shuttles to and from the parking structures to the Farmers Field at ALL events;
- The project shall fund and foster the development of Mobility Hubs near the Farmers Field, such as at 23rd Street or Grand Avenue Metro Rail stations that can integrate most of the above components to enable visitors' swift and reliable means to transfer from car/bike or pedestrians onto transit.

Sincerely,

Jerard Wright and Darrell Clarke
Sierra Club Angeles Chapter Transportation Committee Co-Chairs



Farmers Field and the Pico Metro Rail Station improvements

Sierra Club - Angeles Chapter Transportation Committee
April 18, 2011 Scoping comment submission



Objective

- For Sierra Club Angeles Chapter Transportation Committee (SCACTC) to advocate for transportation mitigations on the negative impacts of the Farmers Field around LA Live,
- Using the Farmers Field project as a means to develop and foster mutually exclusive coordination of Public Transportation, Land Use and Urban Design that benefits both **AEG, Metro and Los Angeles**,
- Enable the necessary Modernization and facility upgrades to the existing **Pico Blue Line station** in anticipation for the heavier loading of passenger and pedestrian traffic caused by the Farmers Field and Staples Center events,
- Provide an opportunity to incorporate additional transportation related items not limited to Bus-only lanes, Bike Parking, Streetscape, the upcoming Downtown LA Streetcar all means to create a project that is *in line with Sierra Club's National goals of reducing Vehicle Miles Traveled and dependency on fossil fueled powered personal vehicles.*

Pico Station currently

A 20 year old station that looks like it's 50 years old.



Pico Station currently after a Staples Center event

PROBLEM: “Elbow Room” Crowded passenger platform conditions as narrow at-grade platform holds passengers traveling in both directions from Staples Center. This condition will decline exponentially with upcoming expansion of the LA Transit network with adjacent related projects that will further increase the demand around LA Live, Staples Center and Farmers Field.

SOLUTION:

- Construct additional platforms of wider width to improve passenger loading and reduce passenger discomfort, thus speeding LRT operations.
- Include additional storage tracks within the station area to facilitate immediate introduction of rail service after an event.



Pico Station currently after a Staples Center event

PROBLEM: Pedestrian queuing at the station entrances due to passengers paying their fares at the ticket machines on the station platform will lead to passengers stuck on the at-grade LRT tracks. This poses safety risks and passenger discomfort to board the train platform and deters patrons for wanting to use transit to future events.

SOLUTION:

- Relocate ticket machines to areas closer to the LA Live Event centers and away from station entrances and platform .
- Control pedestrian movements via physical separation with a bridge or visual separation with a traffic officer.



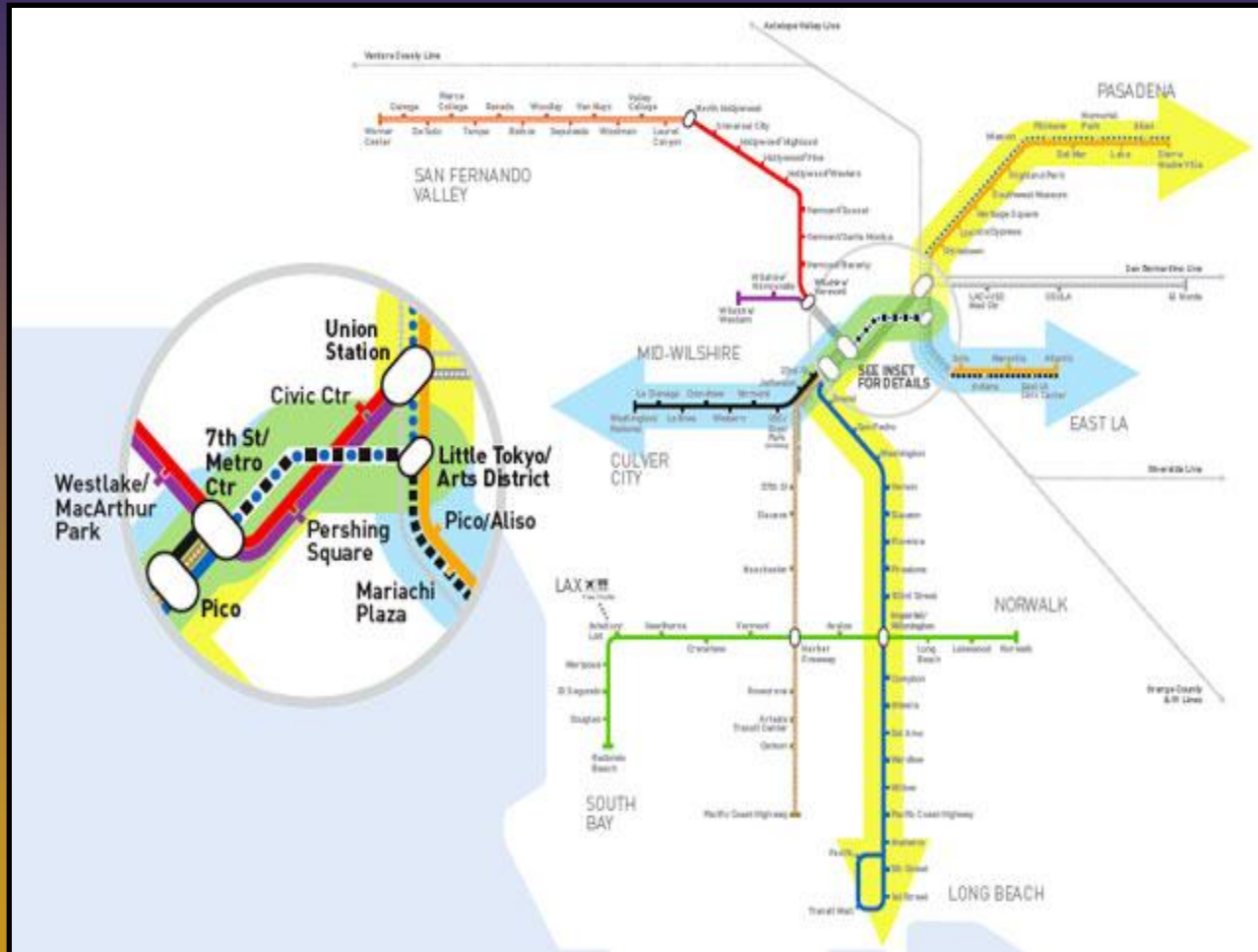
Example of an Overall vision for the Pico Station

Calgary - Stampede/Victoria Park



Calgary AB
17 May 2004
© 2009 Joni Bell

Transit Network : Downtown Regional Connector



- 1.5 mile corridor will thread the LA light rail system together, providing direct access from Inland to the Beaches.

- Increases downtown access to Metro Rail system through stations serving new locations and enhancing existing locations such as **Pico Station**.

Transit Network :

LA - Downtown Streetcar



- Can provide swift shuttle service within downtown before and after events.
- Maintenance Yard and Shops could be adjacent to the **Pico Station** improvements providing a location to store and maintain streetcars. Provides an historic context of Streetcars and the LA/Convention Center area.

Transit Network :

S. Figueroa Corridor Streetscape



- Opportunity to link bicycle, pedestrian and transit around the Farmers Field.

- Streetscape improvements are currently being suggested for Figueroa and 11th Sts can be expanded to 12th and Pico to cover more.

Examples in other cities:



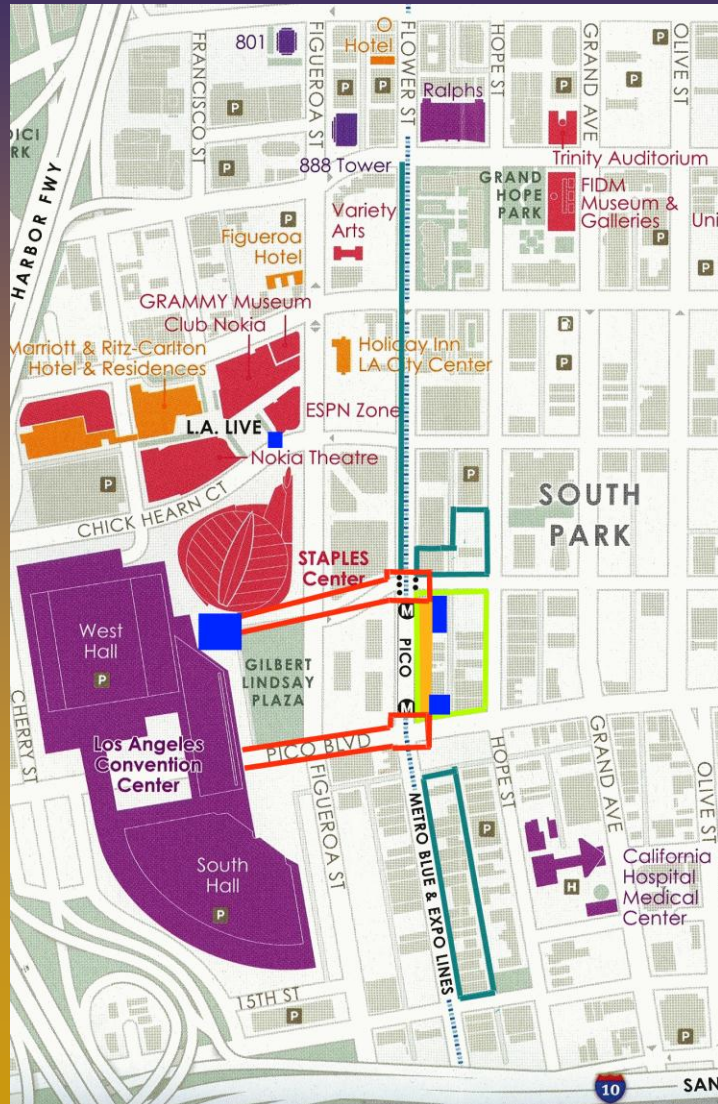
◀ San Francisco
AT&T Park



➤ San Diego
Qualcomm Stadium

Pico Station Concept #1:

“Split Side Platform layout”

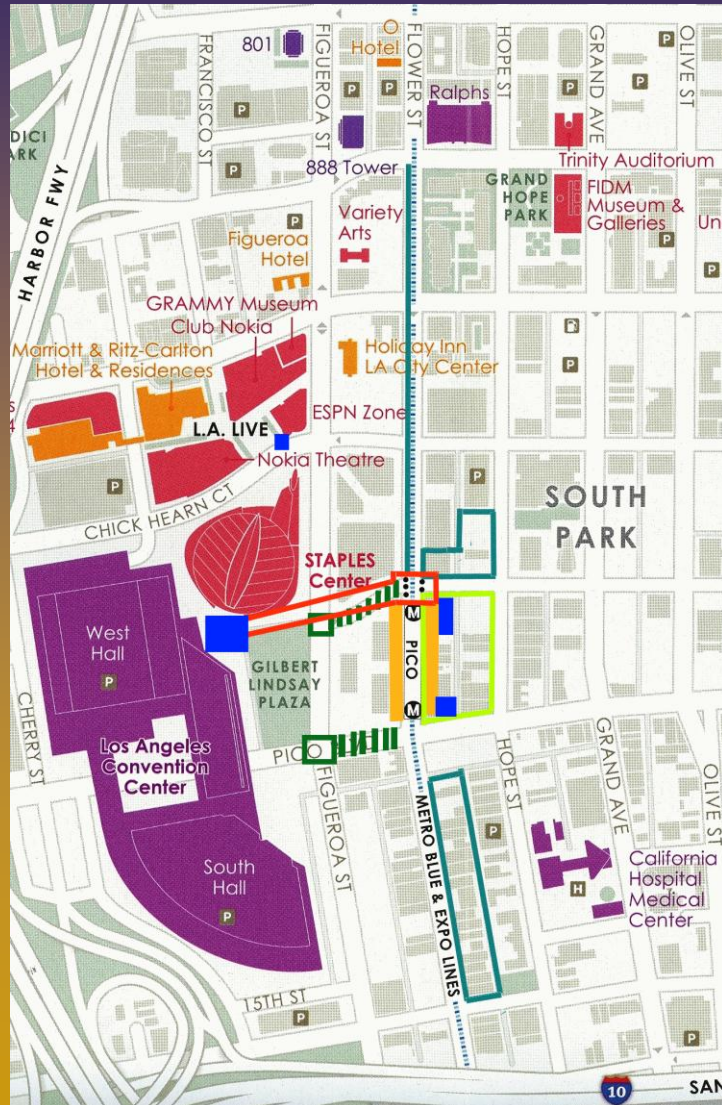


Each platform will represent a travel direction. Western most platform will be used for patrons heading south on Blue and Expo Lines, new eastern platform used for patrons heading north towards Downtown and the Gold Line when the Regional Connector opens.

- 1 ADDITIONAL PLATFORM : East side Flower Street
- PEDESTRIAN BRIDGES : 12th Streets and Pico Blvd
- FARE CONTROL / BIKE PARKING : Inside AEG/LA Live and Off adjacent platforms
- GRADE CROSSING CLOSURE: 12th Street
- EXTRA TRACK STORAGE:
 - NORTH: Temporary At-grade track on lane of Flower Street from 9th to 12th or NE 12th/Flower and;
 - SOUTH: Venice Blvd Storage area.

Pico Station Concept #2:

“Spanish Platform Design”

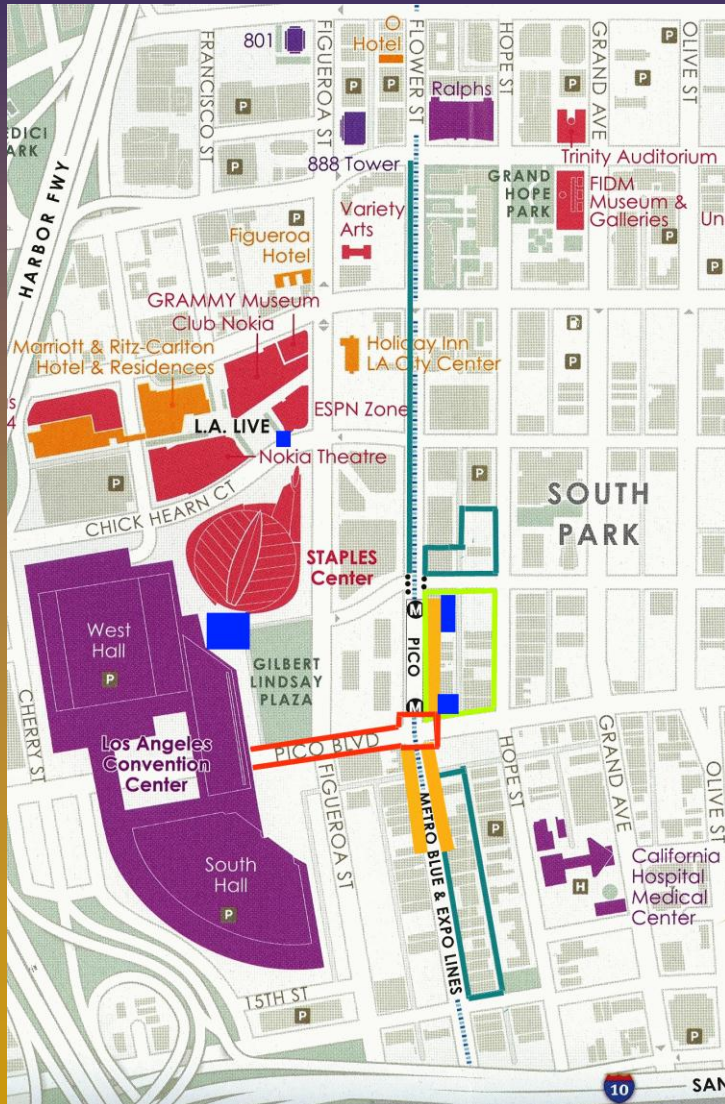


Creates Spanish Platform design, two outer platforms for boarding only, center platform for exiting only. Improving passenger flow.

- 2 ADDITIONAL PLATFORMS : West & East side of Flower Street
- PEDESTRIAN BRIDGE : 12th Street
- PEDESTRIAN STREETSCAPE : 12th Streets and Pico Blvd
- FARE CONTROL / BIKE PARKING : Inside AEG/LA Live and Off adjacent platforms
- GRADE CROSSING CLOSURE: 12th Street
- EXTRA TRACK STORAGE:
 - NORTH: Temporary At-grade track on lane of Flower Street from 9th to 12th or NE 12th/Flower and;
 - SOUTH: Venice Blvd Storage area.

Pico Station Concept #3:

“Platform by Destination”



Passengers board per the rail line/destination they want to go on. One platform will be designated for the Blue Line, one for Expo Line, *one for Foothill Gold Line and *one for ELA Gold Line (* when the Regional Connector project opens)

- **3 ADDITIONAL PLATFORMS :** East side Flower Street & South Pico Blvd.
- **PEDESTRIAN BRIDGE :**
Pico Boulevard
- **FARE CONTROL / BIKE PARKING :** Inside AEG/LA Live and Off adjacent platforms
- **GRADE CROSSING CLOSURE:**
12th Street
- **EXTRA TRACK STORAGE:**
 - **NORTH:** Temporary At-grade track on lane of Flower Street from 9th to 12th or NE 12th/Flower and;
 - **SOUTH:** Venice Blvd Storage area.

Pico Station Concept #4:

“Subway Station”



Extend the existing Flower Street subway tunnel 0.5 miles south from 11th Street and build one new subway station to relieve the passenger and capacity demands of the system using this station on Event days.

- **PEDESTRIAN STREETSCAPE :**

- 12th Streets and Pico Blvd

- **BIKE PARKING :**

- Inside AEG/LA Live and Off adjacent platforms

What SCACTC wants to see in the EIR:

- Integrate our suggestions into the Scoping Documents as it is within the 500' project radius to include but not limited to;
 - The project shall provide capital and operating expenditures of the adjacent Pico Metro Rail Station for modernization and facility upgrades to handle the larger demand of patrons using transit to access Farmers Field,
 - Improved streetscapes that encourage pedestrian mobility along Figueroa, Flower, Olympic, 11th, 12th, and Pico Boulevard for pedestrians to connect to and from transit facilities to Farmer's Field,
 - The project shall fund bike parking, lockers and dedicated bike lane facility investment surrounding the event center.



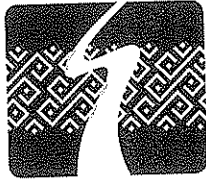
Farmers Field and the Pico Metro Rail Station improvements



Presentation created
and prepared by
Wright Concept.

Photos and Graphic
Images provided by
Nycsubway.org,
Darrell Clarke and
Jerard Wright





UNITED COALITION EAST PREVENTION PROJECT

UCEPP

a program of Social Model Recovery Systems, Inc.

804 East 6th Street
Los Angeles,
California 90021
213.622.1621
fax 213.622.1873
socialmodel.com

April 18, 2011

Hadar Plafkin, City Planner
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, California 90012
Hadar.Plafkin@lacity.org

Dear Mr. Plafkin:

I represent United Coalition East (UCEPP) a non-profit human services organization that is dedicated to reducing the impact of alcohol and other drugs in the *skid row* area of downtown Los Angeles. We are located less than 2 miles from the proposed Farmers Field project. I am writing to express concern about the failure of the initial study of the Convention Center Modernization and Farmers Field project to address the significant threat to the health and safety of this community posed by the substantial increased availability of alcohol that this project will produce.

In 2001, UCEPP became involved with the then proposed Los Angeles Sports and Entertainment District's (LASED) Specific Plan and worked with City staff and others on behalf of several community-based organizations including the Coalition for Safe Practices, and the Pico/Union Westlake Cluster Network. UCEPP crafted as well as negotiated the original operational conditions contained within the LASED Specific Plan for all alcohol-related uses. This effort was necessary to ensure that the impact of alcohol outlets here and in other parts of the City do not continue to threaten the health and safety of the people who live and work in those communities.

Because the proposed Convention Center/Farmers Field project seeks to be implemented through the adoption of a Specific Plan, UCEPP is again extremely concerned that the issue of alcohol permits will be handled in a manner that is not subject to public scrutiny or input, and does not take into account the health and safety risks associated with an over concentration of alcohol outlets. First, a Specific Plan offers a loophole to the standard Conditional Use Permit process in the form of a "substitute" process. This process allows an administrative approval of alcohol permits administered by the Zoning Administrator. The permit approval is subject to only boiler plate conditions set in advance as part of the approval of the Specific Plan. This process requires no public hearing to allow public input regarding the appropriateness of the alcohol permit request. Further, alcohol permits may be issued subject only to the generic conditions outlined in the Specific Plan document.

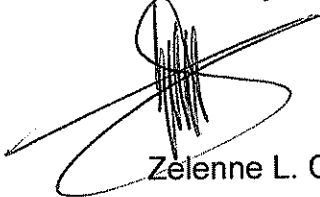
Furthermore, I am startled that the initial study of the Convention Center Modernization and Farmers Field project ignores the impact that an increase in alcohol outlet density within a relatively compact area perpetuates and exacerbates, especially in an area that the CA State Department of Alcoholic Beverage Control (ABC) has already deemed over concentrated. Logic and experience hold that larger numbers of people interacting with greater access to alcohol leads to an increased number of alcohol-related incidents and increased demand on LAPD and LAFD's emergency services. An extensive body of research has shown that the existence of alcohol outlets poses a significant risk as they may become magnets for crime, violence, and disorder, as well as increased consumption. The harm that can result from increases in alcohol density has been well studied and documented. Notably among these potential harms is the proliferation of alcohol outlets which indicates a higher level of alcohol outlet density and are geographically associated with higher rates of assaultive violence¹. In one of the most often cited ecological studies of the effects of alcohol availability on violence, Scribner, MacKinnon, and Dwyer (1995) found that in a typical LA County city, one additional alcohol outlet in a community was associated with 3.4 additional assaults per year. Currently, there are over 650 alcohol licenses in downtown Los Angeles within three square miles of the proposed project, plus numerous licenses pending (ABC, 2010).

Moreover, the initial study's failure to address the risk of violence in confined entertainment venues, saturated with alcohol is shocking given the recent deaths and injuries at LA arenas: specifically the death at a rave at the Coliseum and the brutal beating at Dodger Stadium. Alcohol was a factor in both instances, and the venues are similar to Farmers Field and the Convention Center.

It is imperative to document the public health and safety harms resulting from this proposed project. And it is imperative to provide residents of the affected community the opportunity to consider each alcohol outlet on a case by case basis, in order to determine whether the proposed use is desired or needed. Additionally, the Environmental Impact Report should incorporate a public hearing process for each alcohol CUP request. This ensures public scrutiny to offer their opinions regarding the appropriateness of each permit application.

These comments speak to the need to maintain an open process for residents and business owners to participate in the development of their community for which alcohol sales can be a tremendous impacting factor. Accordingly, we urge that the initial study be modified to respond to our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Zelenne L. Cardenas', with a large, sweeping flourish extending from the bottom left.

Zelenne L. Cardenas

¹ 1995 University of California

City of Los Angeles
Department of City Planning

**Scoping Meeting for the Environmental Impact Report
Regarding the Convention Center Modernization and Farmers Field Project
March 30, 2011**

Written Comment Form

The purpose of the public scoping meeting is to obtain input from the public regarding the scope and content of the Draft EIR for Convention Center Modernization and Farmers Field Project. The proposed Project which combined would consist of 1,750,000 million square feet of net new gross floor area. The Project involves the following three major components: (1) the West Hall would be demolished and replaced with a new hall built in part over Pico Boulevard so as to be contiguous with the South Hall (the "Replacement Hall"); (2) Farmers Field, a new multi-use event center, that can be configured with 72,000 seats expandable to 76,250 seats for spectator events or as 169,650 square feet of useable exhibition space and 56,000 square feet of useable meeting room space for a combined total of 225,650 square feet of useable floor area, would be constructed on the former West Hall site; (3) and two parking structures would be constructed to replace the existing Bond Street surface parking lot and the Lot C (formerly Cherry Street) Garage to provide approximately 1,290 net additional parking spaces on the west side of LA LIVE Way to support the new development. With the implementation of the Project, the Project Site would function as a unified center for convention, sports and entertainment uses.

Comments can be provided in writing at the scoping meeting or by mail. The deadline for submitting written comments to the City is **Friday, April 8**. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope and content of the Draft EIR for the proposed project. Your comments will then be considered during preparation of the Draft EIR.

WOULD THERE BE A PROBLEM IF AN EVENT WAS BEING HELD
AT THE CONVENTION CENTER OR STAPLES CENTER OR AT THE
L.A. LIVE THEATRES WHEN A N.F.L. FOOTBALL^{GAME} IS SCHEDULED WITH
A LOSS OF PARKING SPACES.

Name: PAUL BARKIGIA
Address: 1050 S. FLOWER ST. #313
LOS ANGELES, CA 90015

Please leave this form in the box provided or mail it to Hadar Plafkin, City Planner, Attn: ENV 2011-0585-EIR; Department of City Planning, 200 N. Spring Street, Room 750, Los Angeles, California 90012. This form can simply be folded and placed in a mailbox. Please remember to add postage.

City of Los Angeles
Department of City Planning

**Scoping Meeting for the Environmental Impact Report
Regarding the Convention Center Modernization and Farmers Field Project
March 30, 2011**

Written Comment Form

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DR. RICK C. RODRIGUEZ 213-739-8449
SECRETARY PICO UNION NEIGHBORHOOD COUNCIL
1225 S. UNION AVE STE #36, LA CA 90015
1. PARKING PROBLEM: BUILT 5 STORIES OF UNDERGROUND PARKING.
DO NOT CHARGE "TOO MUCH" FOR PARKING. OTHERWISE VISITORS WILL
PARK IN OUR PICO-UNION COMMUNITY & IT IS ALREADY PACKED IN.
2. JOB ISSUE: CREATE APPRENTICE TRAINING FOR UNION & NON-
UNION JOBS FOR THE PICO UNION COMMUNITY & SURROUNDING COMMUNITIES.
HOPEFULLY YOU WILL HIRE AN APPROPRIATE % OF WORKERS FROM THE
COMMUNITY & HIGH SCHOOLS
3. FREE FOOTBALL & EVENT TICKETS OF THE YOUTH OF OUR COMMUNITY
IN OUR SCHOOLS, ELEMENTARY, SECONDARY & HIGH SCHOOL & LOCAL ORGANIZATIONS
Name: DR. RICK C. RODRIGUEZ
Address: 1225 S. UNION AVE, STE #36
LA CA 90015
E-MAIL: RICK1938@SBCGLOBAL.NET

Please leave this form in the box provided or mail it to Hadar Plafkin, City Planner, Attn: ENV 2011-0585-EIR; Department of City Planning, 200 N. Spring Street, Room 750, Los Angeles, California 90012. This form can simply be folded and placed in a mailbox. Please remember to add postage.

City of Los Angeles
Department of City Planning

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Regarding the Convention Center Modernization and Farmers Field Project
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My initial concerns are the following:

- (1) An increase in the disrupt of traffic where the 10 and 110 Freeways intersect. In particular the 110 N and its impact that will trickle to other freeways - especially the 105.*
- (2) Displacement of residents in the surrounding neighborhoods. Additional parking structures will be needed. Where will they be placed? Probably where homes are currently located*
- (3) The lack of parking downtown is an issue - ^{multiple} additional parking garages will need to be built.*
- (4) Disrupt of Street Traffic in Downtown Los Angeles*

Name: *CHERYL M. CREYER*

Address: *6709 LATIJERA BLVD #165
LOS ANGELES, CA 90045*

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Bringing a football team to LA has been a desire of many people for many years now. Unfortunately, a new football stadium carries a negative impact on our communities of color. I find that rent around developed areas is shooting up and many of our community members are being displaced. Gentrification is a bad practice when the community residents don't benefit from it. I urge you to develop the stadium keeping in mind the impact it can potentially have on surrounding communities. Make sure that local labor forces are employed at great wages; make sure housing remains affordable; make sure that when all is done, the people of color and of poverty benefit the most, not the corporate entities that ~~have~~ money hungry. NO PUBLIC FUNDS, NO CEQUA EXEMPTION, NO SECRET DEALS, YES FAIR/GAME!!!!
CLEAN

Name: José Fernández

Address: 2460 The Mall St. Apt. 1
90023

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As a resident and Pastor of a local church that meets at LA LIVE I am in complete support of this project.

As a resident who lives on Hope and Olympic I would like to suggest creating incentives for people to park outside of densely populated areas of downtown by creating a dedicating lane for parking lot buses to transport people from lot to stadium and therefore decrease the amount of cars and exhaust near downtown residents.

Suggestion: dedicate a south bound lane on Olympic for parking lot shuttles to go north to the stadium without traffic.

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- 1) WOULD YOU CONSIDER NATURAL GAS AS A MAJOR SOURCE OF (TRANSPORTATION) ENERGY FOR PROJECT? AS WELL AS ALL NEW & CLEAN ENERGY POSSIBLE?
- 2) WILL STADIUM HAVE WHAT TYPE OF ROOF IF ANY?
- 3) WHEN WILL FINAL VOTE BE NEEDED TO DETERMINE OUTCOME OF PROJECT.

Name: RAY HERRERA
Address: 1789 SHENANDOAH
LA, CA 90035
HEURSTIC@YAHOO.COM

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Xo Floridalma Osorio Tengo pequeno Restaurant
de comida mexicana salvador Guatemala
Y americana Tengo ase 20 años
Y lo tengo pocos parkin Y cuando Y
evento exte plo center Convention Center
ay personas no quieren pagar parkin
usan nuestro parkin y en las calles X
aun son suficiente las calles
Y Quiero como va afectar con el
estadio que van a contruir. Gracias
@Floridalma Os.

Name: Floridalma Osorio
Address: 1400 W Pico Blvd
Los Angeles CA. 90015
(213) 749-0853

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Since there are few places to tailgate in this location, people will find any place that they can, to party with friends before the game. This means that they may set up parties in places like nearby residential neighborhoods, at the train station (since it is easy to tell friends to meet at the train station), and close to streets which would hurt the traffic flow. Without a good area to tailgate, opposing fans may taunt cars from the opposing team, and celebrations may get into the streets. It is not realistic to think that football fans will stay inside the stadium and stay orderly on sidewalks if they do not otherwise have a place to tailgate.

Name: _____

Address: _____

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CALIFORNIA HAS BEEN WORKING TO REDUCE VEHICLE EXHAUST EMISSIONS, BUT THE LOCATION OF THIS STADIUM WOULD CREATE GRIDLOCK IN A SENSITIVE AREA THAT CONNECTS MULTIPLE FREEWAYS ALREADY FILLED TO CAPACITY. STUDY THE EXCESS EMISSIONS ALSO AS A RESULT OF JAMMING OTHER FREEWAYS THAT TRANSITION ONTO THE 5, 10, 110, 101 FWY. HEALTH IMPACT?

AKG SAYS PEOPLE WILL TAKE THE TRAIN BUT THAT IS NOT GOING TO HAPPEN IN LARGE ENOUGH TO GET THE CARS FROM COMING BECAUSE THE TRAIN LINE DOES NOT HAVE ENDPOINT STATIONS NEAR MOST PEOPLE'S HOMES. THIS IS NOT A SHOPPING CENTER THAT ATTRACTS ONLY LOCALS - THIS WILL ATTRACT CERTAIN PEOPLE WHO WILL

Name: LIVE ALL OVER SOUTHERN CA (NOT NEAR STATIONS) AND THE
Address: VAST MAJORITY WILL DRIVE, WE ARE NOT LIKE NYC
WITH CONVENIENT ACCESS TO RESIDENTIAL TRAIN STATIONS.

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The Best Thing to happen downtown Since
California Hospital Located here in 1887.
AN ECONOMIC ENGINE like NO other. I applaud
The courage of AEG, they assumed the risk stepped
forward like NO other and will make it happen. You need
a Champion to pilot such a direction, its the resolve
we needed. I wish them every success. I try and
support them whenever I can, they've earned.

Name: CLIFF Hoffman
Address: 1213 - 18th ST
Manhattan Beach, CA
90266

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Signage -

size, numbers, place, moving what do they
advertise on, how many hours a day? Who said
what will they advertise?
How will they concerns affect the residents on
the west side of the freeway?
Air pollution increase due to increased #'s of autos.

Name:

Address:

Jane Scott
1314 S. Bonnie Brice St.

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*I take the Metrolinks and I am worried
about rowdy drunk fans on the train cars.
AEG should designate a parking lot somewhere
they can party instead of on the train.*

Name: Martha Livingston

Address: L.A., CA

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Please - PLEASE Give us a realistic analysis on the environmental impacts as they relate to Traffic Congestion and increased air & noise pollution.

Also concerned about increased crime related this project and the impact on Apt, house and Condo dwelling residents.

AIR pollution also includes light from billboards and the increased space advertisements are given - will this make life unbearable for the residents in this and surrounding areas.

Name: Lori Moore

Address: 8318 Flight Ave
Los Angeles, CA 90045

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First - Thank you for holding this scoping meeting and allowing us here in Los Angeles to have a voice.
Some concerns, & truth be told I am not a fan of this project.
I am deeply concerned about the impact on the local communities surrounding this area - how it will impact residents ability to ~~may~~ navigate the increased pollution, traffic congestion this project will bring.
I am concerned about the impact communities, freeways in the 10, 20 and 30 mile range. I don't understand how this project can help the City in becoming a more "green" place to live - It will "green" the pockets of some very wealthy men but is the City going to get the shaft?

Name: Lori Morze
Address: 8318 Flight Ave
Los Angeles, CA 90045

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THE NEIGHBORHOOD WEST OF THE PROJECT
WILL AGAIN BE NEGATIVELY AFFECTED
BY THIS PROJECT, AS IT WAS BY THE
STAPLES CENTER AND THE LA LIVE PROJECT.
THE MAPS IGNORE THE PICO-UNION
AREA- WHICH IS/HAS ALREADY LOST
HOMES AND BUILDINGS TO PARKING -
NOT "OFFICIAL" PARKING BUT CHEAPER
PARKING - IF THE EIR IGNORES (AGAIN)
REALITIES LIKE THAT, IT HAS FAILED -
AS IT HAS IN THE PAST. ONLY FREE
PARKING FOR EVENT-GOERS AND EMPLOYEES

Name: BEN DAVIS will improve this
Address: 1333 ALVARADO BRIDGE
Los Angeles, CA 90006
bendavis@jps.net

Please leave this form in the box provided or mail it to Hadar Plafkin, City Planner, Attn: ENV 2011-0585-EIR; Department of City Planning, 200 N. Spring Street, Room 750, Los Angeles, California 90012. This form can simply be folded and placed in a mailbox. Please remember to add postage.

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Traffic Concerns

1. Exit from Harbor freeway (5) onto Blaine - residents can't get to their homes.
2. 11th St. - closed 1 or 2 days before event - residents can't get to their homes
3. increase in traffic on Olyp, Pico, Venice, + Ash. W bound
4. loss of residents parking spaces. Spectators won't pay high parking rates.
5. increase in auto breakins.
6. increase in street vendors
7. increase in prostitution.

Name: Jane Scott

Address: 1314 S. Bonnie Brae St.

8. increase in "fender benders" and pedis. accidents
9. Limos parking in neighborhood.

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*IN ORDER FOR THIS PROJECT TO WORK OUT FOR THE COMMUNITY,
MANY EIR CONCERNS HAVE TO BE MITIGATED AND IF ANY
ONE OF THE MAJOR ISSUES CANNOT BE ADDRESSED, IT COULD
CAUSE BIG PROBLEMS FOR DOWNTOWN LA. CONSIDER THAT
POSSIBLY THE BEST MITIGATION WOULD BE TO KILL THIS
PLAN AND YIELD TO THE CITY OF INDUSTRY STADIUM
AND THEN LA WILL STILL HAVE THE NFL, AND NOT
HAVE TO WORRY ABOUT THESE COMPLEX ISSUES.
BEST OF BOTH WORLDS.*

Name: _____

Address: _____

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DOWNTOWN LA IS THE RIGHT LOCATION FOR
THIS STADIUM BASED ON ACCESS/TRANSIT AND
YEAR ROUND USE.

GROUND FLOOR SPACE NEEDS TO BE
USES THAT WILL ENCOURAGE 24 HOUR LIFE
ON STREETS (THINK LIKE BOSTON RED SOX) AND
WILL PROMOTE WALKING. PEDESTRIAN EXPERIENCES
MUST BE GIVEN PRIMARY CONSIDERATION.

- PROVIDE PUBLIC TOURISM ACCESS TO THE
FIELD YEAR ROUND. (PACER PARK SF) MAKE

Name: ESTHER MARGOLIES A TRUE PUBLIC
Address: 1131 SUPERBA AVE SERVING VENUE-
XENICE CA 90291

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THANK-YOU FOR THIS OPPORTUNITY: AS A LABOR LEADER WITH-IN
THE CITY OF LOS ANGELES & SURROUNDING AREA I STAND IN
RISE OF SUPPORT FOR THIS PROPOSED PROJECT
(ONE CONCERN OF MINE IS: THE DESIGN OF THE STADIUM
IT MUST BLEND IN. THE STADIUM W/ BE HIGHLY
FOCAL FROM THE FWY

SECONDLY: ANY OR ALL MATERIALS DURING CONSTRUCTION
(IF IT PASS'') THAT W/ BE GREEN FRIENDLY

THIRLY: HOPEFULLY FWY ACCESS: STREETS ACCESS
W/ BE USED TO THE FULLEST IN ANY WAY
ONCE AGAIN I SUPPORT THE PROJECT

Name: Rocky Pelliccino
Address: 2120 Auto Centre Dr.
Glendora, Calif. 91740

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YO JOEL VILLEGAS VIDO MAS DE 20 AÑOS EN ESTA AREA DEL 1326 W 11ST APT. 104 LA CA. 90015. TENGO 5 HIJOS UNO DE ELLOS EL MAS MAYOR TIENE 17 AÑOS Y ES ESPECIAL NO CAMINA NO MIRA NO ABIA ESTA EN SINA DE RUEDAS Y ESTA CONSTRUCTION NOS AFECTA POR EL TRAFICO POR EL PARKING. SIEMPRE DE CALLES Y EL TRAFICO PESADO NO AY PARKING PARA LOS QUE VIVIMOS EN ESTA AREA NOS GUSTAN LOS EVENTOS NOS MOTIVA SI PERO DES PUES DE LAS 10 PM NOS AFECTA. GRASIAS

A/E JOEL VILLEGAS

Name: JOEL VILLEGAS

Address: 1326 W 11ST APT. 104
LA CA - 90015

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*how will minority owned firms (MBE, CPUC)
firms be involved in the project? ~~going~~?*

Name: HUGO A. HERNANDEZ hugo.hernandez@
Address: 538 W. 22ND ST. cumbreinc.com
Los Angeles, CA 90007
(949) 230-7008

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*11TH & 12TH ST / 110 UNDERPASSES NEED TO BE IMPROVED -
LIGHTING, ETC*

Name:

ABRAHAM REYES

Address:

3208 ROYAL ST

LOS ANGELES, CA 90007

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- NEED PERMIT PARKING
- FREEWAY ON/OFF RAMPs
- BRING IN
- BRISTOL FARMS
- TRADER JOES
- HOME TOWN BUTTER

Name: DAVE Kelly
Address: 1119 ALBANY #232
LA CA 90015

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Great idea! Good Plan Plans! L.A. Needs a Major Football Team.

In the State of California ~~the~~ 1/3 of the population lives in L.A. County
2/3 population live in Southern California.

Rose Bowl Hold one hundred thousand (100,000) people

L.A. Coliseum holds nine five thousand (95,000) people

Farmers Field is to hold approx 76,000 people. Why not Larger Capacity

Subway line in other cities, run along major venues N.Y. Yankees
N.Y. Mets and others are we missing a big opportunity by not placing
Farmers Field across Figueroa Blvd. That way it will be next to
the Blue Line 1212?

Name: Victor Revalecaba

Address: 1425 So. Dunsmeir Ave

L.A. Ca. 90019

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I support this project. Transportation issues should not prevent this project from being approved (Please see the 8+ USC football games @ the Coliseum). More importantly, the MTA future rail plans & DLA being the center of mass transit, will provide transport. Options to DLA vs a suburb site such as the City of Industry Stadium proposal. Too many jobs, future development, and economic benefits are riding on a well-planned stadium project. I'm confident you will be able to mitigate transportation & parking issues to a satisfactory level. Thank You. Please keep the naysayers from delaying this worthwhile project.

Name: Andre Morimoto

Address: 1634 Molinala
Gardenay, CA 90248

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- Would like to see more information from the traffic study what intersections are currently rated (level of service) and what they will become with the project.
- Excited about potential job creation
- would like to learn more about additional connections planned with various means of public transportation in Downtown LA

Name: Samantha Foley

Address: Land Use Co-Chair

North Area Neighborhood Development Council

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I am in full agreement with this entire project and its goal of becoming a Convention Center favorite. I do have a concern & only 1. Stadiums NFL, tailgate parties, tailgate parties tailgate parties. When traveling to other stadiums the tailgating atmosphere is why a lot of people attend. Parking & tailgate parties would be my only negative aspect of this site.

I feel that the building of this project right now is a Good sign. Blessing! We need jobs & need them now. Private money Please move forward with this project.

Name: Rick Foss
Address: 2120 Auto Centre Dr.
Glendora, CA 91740

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**Scoping Meeting for the Environmental Impact Report
Regarding the Convention Center Modernization and Farmers Field Project
March 30, 2011**

Written Comment Form

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What low-income communities need:

- Public Statement by AEG stating and promising no CEQA exemption in the future!
- NO Use of Public Funds or Bonds w/out comparable Community Benefits

• NO secret Dealings - ^{Full} Access to all Blue Ribbon Commissioners

Local Communities are interested in long-term profit sharing mechanisms (such as partial team ownership or long-term share in revenues)

Mainly to address issues such as homelessness, healthcare needs, & job training & placement for ex-offenders.

Name: YOLON XCAHITL

Address: 1127 W 41st St
L.A. CA 90037

Share the Wealth ^{point}
We are in a Recession ^{forget}

Please leave this form in the box provided or mail it to Hadar Plafkin, City Planner, Attn: ENV 2011-0585-EIR; Department of City Planning, 200 N. Spring Street, Room 750, Los Angeles, California 90012. This form can simply be folded and placed in a mailbox. Please remember to add postage.

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As a life long resident of South Park/Pico-Union, I am very concerned about the proposed stadium, specifically around the California Environmental Quality Act, the public process around the proposed development, and the amount of public money going into the project.

I would ask that AEC make a formal announcement that it will not seek CEQA exemptions, ~~because~~ CEQA is one of the only mechanisms to ensure that citizens are not marginalized in this process. ~~to get~~ Getting a CEQA exemption would only further marginalize the community immediately surrounding the proposed stadium. I also hope that AEC/the city do all it can to take in community input surrounding the project.

Name: Eric Aves

Address: 1009 W. 22nd St
Los Angeles, CA 90007

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Parking will be a large problem for an event w/ 76,000+ people. The present transportation system will have a problem taking care of the people. This will force traffic into the area West of the 110 freeway to park, which is crowded with resident parking now.

Traffic on the streets (side streets) will be ~~on~~ a standstill.

The list of events at the proposed Field will cause problems for the near by communities w/ traffic, noise, crowds, drinking etc. Then the signs they will put on the walls of the bldg. along the Freeway + flashing lights, will distract drivers. The Field should be placed in East L.A. in the commercial area.

Name: Ray Scott
Address: 1314 So. Bonnie Brae ST.
L.A. 90006

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*NEED A PERMITTED PARKING ZONE FROM OLYMPIC TO PICO
AND BLAINE TO ALBANY.*

Name: ABRAHAM REYES
Address: 3208 ROYAL ST
LOS ANGELES, CA 90007

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A Possible mitigation measure for traffic generated by this project would be to drop the blue line/Expo line underground along ~~Figure 5~~ Flower street to Washington Junction. This would allow for faster service ~~on these rail lines~~ and closer headways on these rail lines, allowing more people to use them instead of driving. This would also allow for a larger Pico station ~~with~~ with capacity to handle the large number of rider generated by this project.

Name: Charles A Adelman
Address: 6146 Eleanor Ave #107
Los Angeles CA 90038

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I represent property owners & businesses in the LA Fashion District - boundaries are outlined on our website ~~to~~ www.fashiondistrict.org
We have a large # of destination businesses where Sunday is ~~the~~ the second busiest day of the week. Most importantly, the fall shopping season before the holidays is critical to their viability.
We would love the EIR to address traffic impacts in our district from the proposed stadium.
Most importantly, we also need to address the perception Angelenos will have that it will be too congested to come & shop downtown.
~~Others~~ We look forward to the draft EIR!

Name: Kent Smith

Address: LA Fashion District

110 East Ninth St Suite A1175

LA CA 90079

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One concern is bringing to light some previous histories of inner city stadiums domestic as well as international.

There has been some claim of job creation after construction. I would recommend further study and

Consider past projects successful and unsuccessful.

Eleazar Hernandez

267 Clinton St.

Pasadena, Ca 91103

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I'm a man of few words
Actions are louder than words. That's why we are
here.

NO USE OF PUBLIC FUNDS!!

Name: Salvador Hingasa
Address: 4063 Woodlawn Ave
Los Angeles CA, 90011

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I feel that the idea for the Convention Center Modernization (Project) is both ambitious as well as opportune. The area of down town L.A. has been rejuvenated with the building of the LA LIVE complex; Staples Center, and now with the tremendous venture, I believe that it will explode L.A. into the Premier Sports and Entertainment Meca, possibly in the U.S.

L.A. is already known for its stars, of all persuasions. With the building of this Farmers Field Project, this can skyrocket Los Angeles into unforeseen job + business opportunities. Personally,

Name: Gregory Stafford
Address: 424 W. Regent St. #6
Inglewood, CA 90301

LA LIVE has already employed ~~some~~ ^{many} of the residents in the immediate zip codes of the area. I appreciate that!

BRavo!!! LA LIVE

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I STRONGLY URGE THAT ALL MAJOR LIGHTING FOR THE STADIUM
(INCLUDING EVENT LIGHTING, SITE LIGHTING & LIGHT ADVERTISING) BE
CONSIDERED CUMULATIVELY WITH THE CURRENT LIGHTING
AT STAPLES CENTER & LA LIVE. ~~THE CURRENT LIGHTING~~ WHILE
STATIC LIGHTING ~~IS~~ IS TOLERABLE, FLASHING & FLICKERING
LED LIGHTING (ESPECIALLY THE SUPERGRAPHIC ADVERTISING @ LA LIVE)
IS A NUISANCE & LOOKS THROUGH A CLOSED, SOLID WINDOW CONDUKES
AT MY RESIDENCE, OUTSIDE OF THE SPORTS & ENTERTAINMENT DISTRICT.
ADDITIONAL LIGHTING FOR THE STADIUM MIGHT BE OVERWHELMING.
DIMMING LIGHTS & TURNING OFF FLICKERING LED LIGHTING AFTER
HOURS WOULD BE A WELCOME CHANGE.

Name: TOM STEIDL
Address: 1100 S. HOPE #1314
LOS ANGELES, CA 90015

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On the basis of misspent human resources: Los Angeles does not deserve,

More skyscrapers / New stadiums / or Subway to the Sea

Garment District businesses do not sweep their stinking plastic garbage out of the Gutters, and yet if the homeless oversleep – skip loaders are called. What Happened to the camp that was set up to show John-Paul II. As soon as the wheels of his plane left the ground – it was “Gone With The Wind”

You want, Subway To The Sea, but drivers slam doors in the faces of elders running for the bus, and subject them to verbal abuse if they complain.

One half block from Hollywood's ONLY four star hotel, the Little Country Church STILL lies in its ashes, as it has for over a year. Out of eighteen bar-rooms (count them, 18) stretching from Argyle to La Brea, we don't have enough caring people to re-build ONE church ?

P F C T E D 2 0 0 2 @ Y A H O O

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- ① The traffic impact will be severe since the stadium would be right in the middle of an old freeway interchange where it is difficult to add new lanes if there is a cascading ripple effect on other interdependent freeways. In other words the entire metro LA freeway system could be impacted, and the potential future cost to taxpayers should be calculated for having to add lanes (e.g. double-decker freeway such as the 110 fwy) and for improving surface streets to handle spill-over traffic.
- ② IF tens of thousands of fans take the train line, the trains may not be able to handle the simultaneous capacity. Fans will likely tailgate on the way to the stadium causing disturbances on the train cars and at the stations. This sometimes happens in other places where people take the train to stadiums - e.g. Soccer hooligans in Europe. Figure the taxpayer cost of expanding train capacity and trying to prevent excess tailgating, drunk behavior, etc. on the train system.

Dan Komaromi, 251 Altura Dr. Fullerton, CA 92835

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① WORRIED ABOUT PEOPLE EXITING THE 110 FREEWAY AT 9TH STREET
AND DOUBLING BACK TO GET TO THE STADIUM BECAUSE
RIVERDALE IS ONE WAY,

② WILL STADIUM CONSTRUCTION CAUSE PROBLEMS WHEN THERE ARE
BASKETBALL AND HOCKEY GAMES AT THE STAPLES CENTER?

③ THE AREA AROUND THE STADIUM AND CONVENTION SHOULD LOOK
LIVELY AND EXCITING LIKE CITYWALK. THERE SHOULD BE
EXCEPTIONS MADE TO CURRENT BILLBOARD RESTRICTIONS.

Name: MALCOLM KLUGMAN

Address: - Malcolm Klugman
109 N Screenland Dr Apt D
Burbank CA 91505-4310

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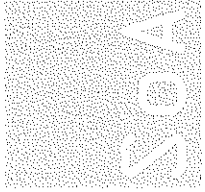
I think the Convention Center Moderization and Farmers Field Project will have Green House Gas (GHG) impacts, and I think that the residents and workers in the neighborhoods impacted by this project today are dis-proportionately short of parkland and greenspace when compared to other neighborhoods in Los Angeles. Because of these two things, the Environmental Review process should include characterization of GHG impacts, and if there are impacts needing mitigation, that increasing the amount of parkland available to these residents would be a good mitigation measure. The State Office of Planning and Research has identified that dedication of parkland is a useful mitigation to a GHG impact in the context of CEQA. However, today I don't know of a method of calculating the value of a park improvement or dedication for mitigation of GHG emissions. Therefore I am suggesting that The Project or its reviewers ought to develop and offer for approval to the Air Resources Board a calculator to quantify a mitigation of this type that everybody in California would then get to use. It would be good to develop a neighborhood park as a part of the mitigation of GHG impacts from this project if those impacts can't be avoided.

Glen Dake

714 W. Olympic Blvd, #629

Los Angeles, CA 90015

213-748-0084



1330 w 12th st
suite a
los angeles ca
90015 - 2009

March 30, 2011

Hadar Plafkin, City Planner
Department of City planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: EAF NO.: ENV 2011-0585-EIR
Convention Center Modernization & Farmers Field Project

Dear Mr. Plafkin,

Please tell us how the EIR will address the following two issues:

1. How will the EIR address the pending Pico Union Proposed Westlake Design Guidelines (workshop 4-7-2011)
Why are the project boundaries limited to areas east of the 110 freeway? Clearly there is a coming social responsibility overlap of the Pico Union Westlake Specific Plan and the Stadium boundaries.

Answer: The EIR needs to support the intensity of zoning for properties between Union Street and the 101 Freeway. Additional redevelopment and parking structures will eventually be built west of the freeway. We need to allow R-5 & RAS-5 zoning on the CM properties in this area so we can add housing over the parking structures to pay for the structures! Extend the Center City West zoning down to the 10 Freeway.

2. How can the boundaries of the Specific Plan be expanded to include the Gateway entrances at Olympic, Pico and 12th Street under the freeways! The EIR needs to address how the project will work with the Department of Transportation to once and for all remove the transients and homeless from these freeway tunnels. The Project needs to take responsibility for these gateway entrances to the Project from the West neighborhoods.

Answer: The EIR needs to require the Specific Plan Condition any approvals to: Provide full time staff Mitigation Monitoring of the homeless under the freeways and in the adjacent neighborhood. At present these gateways are just open bathrooms and an embarrassment to the City.

Please contact us as soon as possible,

Michael King AIA

Cell 1-310-991-6278

MKING @ SOALTD.COM

City of Los Angeles
Department of City Planning

**Scoping Meeting for the Environmental Impact Report
Regarding the Convention Center Modernization and Farmers Field Project
March 30, 2011**

Written Comment Form

The purpose of the public scoping meeting is to obtain input from the public regarding the scope and content of the Draft EIR for Convention Center Modernization and Farmers Field Project. The proposed Project which combined would consist of 1,750,000 million square feet of net new gross floor area. The Project involves the following three major components: (1) the West Hall would be demolished and replaced with a new hall built in part over Pico Boulevard so as to be contiguous with the South Hall (the "Replacement Hall"); (2) Farmers Field, a new multi-use event center, that can be configured with 72,000 seats expandable to 76,250 seats for spectator events or as 169,650 square feet of useable exhibition space and 56,000 square feet of useable meeting room space for a combined total of 225,650 square feet of useable floor area, would be constructed on the former West Hall site; (3) and two parking structures would be constructed to replace the existing Bond Street surface parking lot and the Lot C (formerly Cherry Street) Garage to provide approximately 1,290 net additional parking spaces on the west side of LA LIVE Way to support the new development. With the implementation of the Project, the Project Site would function as a unified center for convention, sports and entertainment uses.

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ON THE BASIS OF ITS MORAL PERFORMANCE;

LOS ANGELES DOES NOT DESERVE, SKY

SCRAPERS (MORE), NEW STADIUMS, OR

SUBWAY TO THE SEA // GARMENT DISTRICT

BUSINESSES DO NOT SWEEP THEIR

PLASTIC GARBAGE OUT OF THE GUTTERS,

Name: _____

Address: _____

Please leave this form in the box provided or mail it to Hadar Plafkin, City Planner, Attn: ENV 2011-0585-EIR; Department of City Planning, 200 N. Spring Street, Room 750, Los Angeles, California 90012. This form can simply be folded and placed in a mailbox. Please remember to add postage.

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YET, IF THE HOMELESS OVERSLEEP — SKIP
LOADERS ARE CALLED. / YOU WANT SUBWAY
TO THE SEA, BUT DRIVERS SLAM DOORS
IN THE FACES OF ELDERS RUNNING FOR THE
BUS, & SUBJECT THEM TO VERBAL ABUSE, IF
THEY COMPLAIN / 1/2 BLOCK AWAY FROM

Name: _____

Address: _____

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HOLLYWOOD'S ONLY 4 STAR HOTEL, THE
LITTLE COUNTRY CHURCH STILL LIES IN ITS
ASHES, AS IT HAS FOR OVER A YEAR //
KNOCK OFF THE GLITZ & PAY
SOME ATTENTION TO YOUR
HUMAN RESOURCES — — —

Name: (PFC) T. NEUBAUER

Address: PFC TED2002@YAHOO

Please leave this form in the box provided or mail it to Hadar Plafkin, City Planner, Attn: ENV 2011-0585-EIR; Department of City Planning, 200 N. Spring Street, Room 750, Los Angeles, California 90012. This form can simply be folded and placed in a mailbox. Please remember to add postage.

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The train line is not going to do much to mitigate the number of people that will drive. The reason is because fans will be randomly dispersed throughout greater Los Angeles, OC, Inland Empire etc. and many fans homes are not conveniently close to the train stations. So even though there ~~are~~ is a big station near the stadium, that doesn't matter if someone has to take a 1 hour bus ride just to get to the station nearest to their home. Many fans will want to drive with friends and bring picnic supplies in their car for tailgating. I urge you please don't over-estimate how many people would actually take the train.

Name: _____

Address: _____

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Scoping Meeting for the Environmental Impact Report Regarding the Convention Center Modernization and Farmers Field Project

Let all get on Board with
Farmers Field!

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(11th/Grand)

I live in the neighborhood and to the most part LA LIVE has been a great neighbor except for the two Laker championships. Hopefully there will be a more inclusive approach for the fans that want to be ~~more~~ near the action in the future. Building a wall (2) blocks into the surrounding neighborhood with no activities has been a recipe for disaster 2 years running. A more open approach with big screens in the open parking lots and a containment zone that can be released slowly would enhance the experience, and better control the outcome.

Don't bring the Raiders here.

Name: Scott Bytof

Address: 330 W 11th #309
Los Angeles, CA 90015

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SUSANA ARREGUIN
BOARD MEMBER



City of Los Angeles
Department of City Planning

or the Environment
Center Modernization
March 30, 2011



CARMEN VAUGHN
PICO UNION NEIGHBORHOOD COUNCIL
BOARD MEMBER

P.O. BOX 20311
LOS ANGELES, CA 90006
www.picounionnc.org

GEN. TEL.: (213) 738-0137
DIR. TEL.: (213) 389-5386
E-mail: susanaarreguin@sbcglobal.net

P.O. BOX 20311
LOS ANGELES, CA 90006
www.picounionnc.org

GEN. TEL.: (213) 738-0137
E-mail: carmenvaughn1149@gmail.com

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We need a right price for a parking space, because sometimes prices are very expensive, and people go into the community streets to park, we don't need to pay \$20.00 or \$30.00 for parking.

Name: Carmen Vaughn Susana Arreguin
Address: 1149 S. Burlington Ave
Los Angeles
90006

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I live in Orange County & am a charger season ticket holder, I would love to drive to LA as opposed to San Diego every Sunday in football season. A train to LA would be safer than driving to San Diego

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APR 07 2011

ENVIRONMENTAL

Name: Allan Legator
Address: 5 Rainer Irvine
CA 92602

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The proposed Replacement West Hall, by straddling Pico Blvd, will have the effect of turning that nearly 1 block long stretch of Pico into in effect, a tunnel. This brings up a number of public safety issues that need to be examined in this EIR:

- 1) The potential effects of high levels of pollutants from Auto/Truck exhaust accumulating in the confined space under this new structure, especially during peak congestion on a windless day, as well as the possibility of this pollution entering the building.
- 2) the potential effects of a vehicle fire on this stretch of Pico under the building, especially in the case of a large truck with flammable cargo. This could endanger not only other people under the building, but also building occupants
- 3) The possibility of a Terrorist attack on the building by means of a truck filled with explosives being detonated under the building during a high profile event.

Name: Charles A Adelman
Address: 6146 Eleanor Ave #107
Los Angeles CA 90038

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APR 22 2011

ENVIRONMENTAL

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Hi, my name is Scott Walker. I live in Irvine and have wanted a football team in Los Angeles for years! I can take the train from Irvine & be dropped off right at the entrance to the stadium.

PLEASE BRING A NFL TEAM TO DOWNTOWN!

Name: Scott Walker
Address: 31 Arbor wood
Irvine, CA 92620

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CITY OF LOS ANGELES

APR 14 2011

ENVIRONMENTAL

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Can't wait to take the train straight to the
Stadium from Orange County very excited about the
NFL coming back to L.A.!!!

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APR 07 2011

ENVIRONMENTAL

Name: Brian Singleton
Address: 38 Apache Drive
Coto De Caza, CA 92079

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Ag should have to provide a full Environmental Study of this project. I fully do not and it is acceptable by the City Planning department then I believe that the City should give the same protection as it did for the stadium in the City of Los Angeles.

Ag has been a blessing to the City of Los Angeles. It has changed downtown and then work should be commended.

Name:

Joey Sepersade

Address:

5155 Calhoun Ave

Torrance, CA 90505

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APR 13 2011

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As long as Aeg pays for the project and guarantees the repayment of the bonds then it fully support this project.

Aeg has done a great job with Staples and LA Live and for them to take on this huge development in this economy is perfect for Los Angeles.

If they are indeed paying for the project and guarantee the bonds it would be a huge mistake for the City not to approve them and expedite any and all permits.

Name: Annette Separadeh
Address: 5455 Culver Ave
Tarzana, CA 91356

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2011-04-18 Dillard - NOP Response.txt

To: Hadar Plafkin
Subject: RE: Comments to ENV 2011-0585-EIR Convention Center
Modernization and Farmers Field Project due 4.18.2011

From: Hadar Plafkin [mailto:hadar.plafkin@lacity.org]
Sent: Monday, April 25, 2011 12:52 PM
To: Bruce Lackow
Subject: Fwd: Comments to ENV 2011-0585-EIR Convention Center Modernization and
Farmers Field
Project due 4.18.2011

----- Forwarded message -----

From: Joyce Dillard <dillardjoyce@yahoo.com>
Date: Mon, Apr 18, 2011 at 4:40 PM
Subject: Comments to ENV 2011-0585-EIR Convention Center Modernization and Farmers
Field Project due 4.18.2011
To: Hadar Plafkin <Hadar.Plafkin@lacity.org>

Comments to ENV 2011-0585-EIR Convention Center Modernization and Farmers Field
Project
due 4.18.2011

Aesthetics need to be addressed for safety issues in regular day-to-day activities
in the area and
restricted activities that may occur due to increase in activity in the area.

Signage should be addressed to aesthetics, public health and safety and to energy
efficiency and
usage.

Transportation, especially on event days, should be studied and disclosed including
any expected
business closures. Public transportation should be analyzed with realistic
expectations of usage
backed by hard evidence.

Any increased energy and water needs should be addressed and the source of those
additional
needs should be identified along with any ownership issues of energy supply or
transmission.

Wetlands impacts, groundwater basin impacts and watershed impacts should be studied
and
addressed.

Methane and oil issues should be studied and addressed. Natural gas storage issues
should be
studied.

Earthquake and liquefaction issues should be studied.

Air quality and its aspects of compliance with EPA requirements should be studied
and
addressed as the EPA has disallowed the SCAQMD 2007 Plan in part.

All public services including police, fire, and emergency services should be studied
and disclosed
for feasibility in a worst case scenario. City budget restrictions should be
disclosed.

2011-04-18 Dillard - NOP Response.txt

All financial impacts should be disclosed including profit sharing aspects and existing development restrictions that may cap or limit the City's ability to incur additional revenue.

Disclosures as to the use of any State or Federal programs should be made or any potential programs that the project intends to use in the surrounding community.

Development Agreements and Specific Plans should be addressed to this specific project and any intended future projects.

Community Benefit projects should have full disclosure, including financial disclosure, as to public benefit and those private non-profit corporations who benefit.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

2011-04-18 Farris - NOP Response - .txt

To: Hadar Plafkin
Subject: RE: farmers field

From: Hadar Plafkin [mailto:hadar.plafkin@lacity.org]
Sent: Monday, April 25, 2011 12:55 PM
To: Bruce Lackow
Subject: Fwd: farmers field

----- Forwarded message -----
From: Farris, Brian E CIV <Brian.Farris@med.navy.mil>
Date: Mon, Apr 18, 2011 at 9:24 AM
Subject: farmers field
To: HADAR.PLAFKIN@lacity.org

Mr Plafkin,

I am writing to you to voice my opinion on the new proposed Farmers Field in Downtown Los Angeles.

As a homeowner in the immediate area (1429 Oak Street, Los Angeles), I am pleased with AEG's proposal to build the new stadium.

As my specific property is located just inside the blighted Pico Union neighborhood, I feel it would be enormously beneficial to the entire surrounding area. As this current economy forces other cities to become more restrictive with their tax dollar spending, and as the state pulls back all redevelopment funds, it is an incredible and rare opportunity for the City of Los Angeles to secure and allow this financial windfall to move ahead unimpeded.

With all the improvements AEG has done in the past for the downtown area, it would be totally senseless not to approve this last huge outstanding piece of their puzzle. And again, as a homeowner in the heavily blighted Pico Union area, I feel that the time for a massive change has finally come. Building the new stadium will do nothing but good for the entire surrounding area and everyone in Los Angeles.

Please recognize me as a homeowner in the immediate surrounding area, hear my voice on this wonderful proposal and accept and count my vote "FOR" the proposed stadium project, 100%...
And please keep me informed of all and any progress that hopefully will take place.

Brian Farris, homeowner, 1429 Oak Street
Los Angeles, Calif.

Current residence: 1003 San Juan Street
Oceanside, California, 92058

Work Phone: 619-524-4047
Home Phone: 760-439-3437

2011-04-25 GarageHero - NOP Response.txt

To: Hadar Plafkin
Subject: RE: New football stadium

From: Hadar Plafkin [mailto:hadar.plafkin@lacity.org]
Sent: Monday, April 25, 2011 12:56 PM
To: Bruce Lackow
Subject: Fwd: New football stadium

----- Forwarded message -----
From: GarageHero <garagehero@yahoo.com>
Date: Tue, Apr 5, 2011 at 5:45 PM
Subject: New football stadium
To: Hadar.Plafkin@lacity.org

One only has to look at the Raiders last season in L.A. to realise what a big mistake it would be to build a football stadium , or bring an NFL football team to Los Angeles. Remember the poor Steeler fan who had bought a ticket in a sea of Raiders fans? All through the game he was the subject of insults and taunts, which, he good-naturely, and in the spirit of the game, returned in kind. But as the game progressed and the Raider fans became nastier and more inebriated, the taunts turned to threats. When the game ended, about 30 Raider fans stomped this Steeler fan to death. No LAPD or security came to his aid, even though there were dozens in the area. This is the reason that there should NEVER be another NFL team, or stadium here in L.A., and certainly not one funded by the citizens. Remember, football fans are ten times rowdier than baseball fans, just look at what happened at Dodger Stadium recently.
Rudy Zappa Martinez

2011-04-25 Moshfeghi NOP Response .txt

To: Hadar Plafkin
Subject: RE:

From: Hadar Plafkin [mailto:hadar.plafkin@lacity.org]
Sent: Monday, April 25, 2011 12:57 PM
To: Bruce Lackow
Subject: Fwd:

----- Forwarded message -----
From: Mehran Moshfeghi <m_moshfeghi@yahoo.com>
Date: Thu, Mar 17, 2011 at 7:03 PM
Subject:
To: Hadar.Plafkin@lacity.org

Dear Mr. Plafkin

I would like to urge you to support the Convention Center Modernization Project.
This project
will benefit the whole downtown area and LA county.

Regards
Mehran Moshfeghi
67 Marguerite Drive
Rancho Palos Verdes, CA 90275



Jon Foreman <jon.foreman@lacity.org>

Fwd: Comment for Planning Commission hearing on football stadium proposal 3/30/2011

1 message

Planning Info <planning@lacity.org>

Wed, Apr 13, 2011 at 10:18 AM

To: Dan Scott <dan.scott@lacity.org>, Jon Foreman <jon.foreman@lacity.org>

Please see below.

Claudia Rodriguez | Neighborhood Liaison

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
200 N. Spring Street, Suite 525
Los Angeles, CA 90012

T: (213) 978-1283
F: (213) 978-0595
E: claudia.rodriguez@lacity.org
W: <http://cityplanning.lacity.org/>

----- Forwarded message -----

From: runrabbit@lycos.com <runrabbit@lycos.com>

Date: Wed, Mar 30, 2011 at 3:26 PM

Subject: Comment for Planning Commission hearing on football stadium proposal 3/30/2011

To: Planning@lacity.org

Cc: councilmember.garcetti@lacity.org

Please forward my comments to the Planning Commission to include in their hearing 3/30/2011 on the football stadium proposal. No reply to me is necessary.

I request that the Planning Commission or the City Council's new review committee utilize the skill of the Canadian scholar who has analyzed the proposed benefits and proposed costs and impacts of municipal projects for professional football and other sports venues.

I hope you will utilize his findings and insights to appropriately deflate the claimed benefits and realistically inflate the proposed costs and environmental and other impacts.

For example, within the benefit of jobs created, I hope you will apply his finding that jobs are often decreased in near by council districts and neighborhoods. So that you will display by council district and neighborhood the jobs lost.

I also hope you will hold the developer to a re-imbursement to the city for all bonds and all costs for the city, county, state and special zones over the life of the proposed facility. For example, the costs of mitigation undertaken by the jurisdictions involved.

I am a vote in Mr. Garcetti's district of Los Angeles City. No reply is necessary.

NN

(310) 967-5785

email: runrabbit@lycos.com



Hadar Plafkin <hadar.plafkin@lacity.org>

EIR for Farmers Field

1 message

Piotr Parlej <piotrparlej@hotmail.com>

Mon, Mar 12, 2012 at 9:21 AM

To: hadar.plafkin@lacity.org

Mr. Plafkin,

I am writing with a brief inquiry regarding the EIR process for Farmers Field.

The information package from March 2011 speaks of two parking garages to replace two parking lots, for a net gain of 1290 spaces.

I am trying to confirm how many spaces the garages will have (separately and total) and when the EIR might be completed and certified.

We are also trying to confirm who is the contact with ICON for project management.

We appreciate your assistance in this matter.

Sincerely,

Peter Parlej

Research Analyst
Parking Market Research Company (R)
1311 Dolley Madison Blvd.
McLean, VA 22101
Phone: (703) 761-1680
Fax: (703) 761-1683

2011-4-05 Kate hifivalentine - NOP Response.txt

To: Hadar Plafkin
Subject: RE: Stadium environmental impact

From: Hadar Plafkin [mailto:hadar.plafkin@lacity.org]
Sent: Monday, April 25, 2011 12:57 PM
To: Bruce Lackow
Subject: Fwd: Stadium environmental impact

----- Forwarded message -----

From: Kate <hifivalentine@yahoo.com>
Date: Tue, Apr 5, 2011 at 3:38 PM
Subject: Stadium environmental impact
To: Hadar.Plafkin@lacity.org

Hi there,

In assessing the impact yet another stadium will have on Los Angeles, i'd like to share my experience as someone who lives near Dodger Stadium. I have lived in Echo Park my whole life, but only in recent years have I lived closer to the stadium. I live on Morton and starting on Dodgers Opening Day, my life becomes much more difficult. I have to wait until after games to park near my house, because fans take up all our residential parking, the intersection of Morton and Academy becomes covered with grafitti, and the sight of fans leaving the game and tossing beer bottles into our street and yard becomes a weekly occurrence. I think another stadium will increase crime, drunk driving and traffic. Please consider the horrible effect Dodger Stadium has had on Echo Park. The ideal situation would be to have no stadiums anywhere in central Los Angeles.

Thank you,
Kate Steffens
323 456-6593

2011-04-28 Trinh -NOP Response.txt

To: Hadar Plafkin
Subject: RE: NFL Stadium

From: Hadar Plafkin [mailto:hadar.plafkin@lacity.org]
Sent: Monday, April 25, 2011 12:57 PM
To: Bruce Lackow
Subject: Fwd: NFL Stadium

----- Forwarded message -----
From: Jackellyn Trinh <jackellyn.trinh@gmail.com>
Date: Wed, Mar 30, 2011 at 11:08 AM
Subject: NFL Stadium
To: hadar.plafkin@lacity.org

Since I am unable to attend the public hearing, I wanted write in my thoughts about it. The NFL stadium idea is fantastic for Southern California, but a horrible idea for the downtown LA area. The area is already SO CONGESTED - that to add another venue would be absolutely ludicrous!!! The stadium needs to be somewhere else that can handle the flow of traffic. As a resident of Southern California - I am SICK and TIRED of always having to drive to that area for sports entertainment. We need to get away from Los Angeles, and find another City/County all together! This is only going to cause more road rage, accidents, congestion, and it will only attract the horrible rowdy fans that we all fear in that area!! SAY NO TO THE STADIUM in that proposed location!