V. Alternatives

V. Alternatives

A. Introduction/Methodology

1. Introduction

The State CEQA Guidelines require an EIR to 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 to "evaluate the comparative merits of the alternatives."[1] The analysis of alternatives shall focus on alternatives "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 project objectives, or would be more costly."[2]

The selection and discussion of alternatives is intended to foster meaningful public participation and informed decision-making. An Environmental Impact Report need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. The State CEQA Guidelines also require the analysis of a no project alternative, and the identification of the environmental superior alternative. Where the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." [3]

In addition, the State CEQA Guidelines require an Environmental Impact Report to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination.[4]

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[1] *State CEQA Guidelines Section 15126.6 (a).*

[2] *State CEQA Guidelines Section 15126.6 (b).*

[3] *State CEQA Guidelines Section 15126.6 (e)(2).*

[4] *State CEQA Guidelines Section 15126.6 (c).*

Accordingly, numerous alternatives that might avoid or substantially lessen Project impacts were considered. Some alternatives were initially considered but rejected as infeasible. These are briefly discussed in Section V.4 on page V-13. A total of seven alternatives have been selected for further analysis, as detailed below. These are collectively referred to as the Alternatives.

2. Basic Objectives of the Proposed Project

The underlying purpose of the Proposed Project is to enhance the marketability of the Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue, which builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District. See Section II.B, Project Description, of this Draft EIR, for a comprehensive list of the objectives that have been identified for the Project. These Project Objectives are restated below and also serve as the Project's basic objectives.

1. Modernize and enhance the marketability of the Convention Center.

    a. Replace the outmoded West Hall with a modern New Hall contiguous to the existing South Hall.

    b. Enhance the marketability of the Convention Center by creating a more efficient exhibit hall contiguous to the existing South Hall that would substantially improve the rank of the Convention Center and make it more competitive nationally.

    c. Increase the number of trade shows and conventions attracting largely out-of-town visitors.

    d. Provide a new multi-purpose room of a size that can function as exhibit hall space, meeting rooms or a ballroom, a new amenity that the Convention Center cannot offer today.

    e. Through joint booking with the Event Center, provide Convention Center expansion capabilities for Exhibition Events through the use of the event floor, premium suites and club spaces for exhibit and meeting use.

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

    a. Construct a state-of-the-art venue capable of attracting and maintaining up to two NFL teams, with a seating capacity that is competitive with venues in

other major media markets, NFL stadia, and with other stadia proposals in the region.

b. Develop an Event Center that would also be used for event floor exhibit hall space and premium meeting rooms, with direct physical connections to the Convention Center.

c. Develop an Event Center that would accommodate a variety of other spectator events beyond NFL games, including, but not limited to, college football championship and bowl games, MLS and international soccer matches and championship games, music concerts or festivals, and religious gatherings.

d. Develop an Event Center that would be expandable to host occasional major sporting events such as an NFL Super Bowl or NCAA Final Four Tournament.

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

   a. Promote the development of major sports, entertainment and Convention Center facilities in the Downtown Center and in close proximity to transportation corridors and transit stations.

   b. Create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area.

   c. Synergistically build upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level.

   d. Create a catalyst to enhance further the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another.

4. Design a Project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events and is consistent with smart growth and urban design principles.

   a. Through appropriate design, location and massing, seamlessly integrate the additional exhibition space with the existing South Hall and Concourse Building to create an overall complex that is efficient, architecturally

compatible, and maximizes opportunities for contiguous event and meeting space.

b. Design the Event Center to take advantage of Southern California's climate, and meet fans' expectations, through an open-air stadium design for NFL and other spectator events.

c. Design the Event Center to include deployable roof to enable a broad range of uses, including exhibition use by the Convention Center.

d. Design the Event Center to allow for a visitor experience both within and outside the Event Center comparable to, and competitive with, other major new spectator event venues across the Unites States, including, but not limited to, state-of-the-art sound and lighting systems, and other features.

e. Implement a sustainability program as one of the key design and operational criteria for the Proposed Project.

f. Create additional open space assembly areas for fans and visitors that can serve as pre-event and post-event gathering places to enhance the fan and visitor experience, including a reconfigured Gilbert Lindsay Plaza with open space that can be used by the community on non-event days.

g. Incorporate signage into the design of the Project in a manner that is compatible with the signage program of the neighboring Los Angeles Sports and Entertainment District, is capable of attracting sponsorship revenues to assist in the private financing of the Event Center, and reinforces the site's sense of place as a major urban sports and entertainment destination venue.

5. Take maximum advantage of existing and planned transportation infrastructure and efficiently utilize existing parking resources to conserve resources, reduce environmental impacts and improve access.

a. Locate the Project at an existing and expanding regional transit hub currently served by multiple local and regional rail and bus lines that would offer visitors and employees a viable alternative to the automobile.

b. While encouraging transit, nonetheless locate the Project at the regional freeway hub that is well served by multiple freeway ramps to decentralize automobile travel and parking opportunities to balance demands on the regional and local system.

c. Conserve resources and avoid environmental impacts by taking advantage of the existing parking supply, and distribute parking consistent with arrival and

departure directions to disperse Project traffic, facilitate automobile access to and from the Project site, and reduce traffic in the immediate Project vicinity to avoid potential pedestrian/vehicular conflicts.

d. Avoid the need for new infrastructure through a transportation management plan, including information systems to advise patrons of transportation options and preferred alternatives, to maximize use of existing facilities and ensure flexibility to be responsive to changing conditions.

e. Implement the provisions of SB 292 to reduce traffic congestion and global climate change impacts that may result from private automobile trips to the Event Center by undertaking a range of measures in the effort to achieve a vehicle trip ratio that is no more than 90 percent of the trip ratio of the next best NFL stadium.

f. Foster job growth in an area served by mass transit.

g. Create inviting and appropriately scaled pedestrian environments to facilitate the safe movement of pedestrians and to encourage transit use.

6. Construct the Proposed Project in a manner that limits disturbance to ongoing Convention Center operations, while still completing the Event Center prior to the 2016 NFL season.

7. Promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism.

   a. Finance construction of the New Hall at no risk to the City's General Fund.

   b. Construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship.

   c. Develop entertainment and sports facilities on public lands that provide a return to the City's General Fund and/or provide civic, cultural, and sporting amenities that serve a wide range of public interests in the City and the region.

   d. Generate substantial additional revenues for the City government, stimulate economic activity in the greater Los Angeles area, and create thousands of good paying construction and permanent jobs as soon as possible.

e. Provide economic development opportunities in Pico Union and South Los Angeles by attracting out of town visitors to additional exhibition events and local and out of town fans to additional Spectator Events.

3. Alternatives to the Project

The Alternatives selected for further analysis are summarized in Table V-1 on page V-7. Brief descriptions of the Alternatives are provided in this section while detailed descriptions are presented at the beginning of the analysis of each Alternative. Table V-2 on page V-9 provides a summary comparison of the impacts of the Alternatives to the impacts of the Project and states whether the impact is significant or not.

- **Alternative 1: No Project—Status Quo**

The No Project—Status Quo Alternative assumes that the Project would not be implemented and that on-site activities would be limited to the maintenance of the existing on-site structures (e.g., paint and carpeting), with no increase in floor area.

- **Alternative 2: No Project—Buildout Per Existing Approvals**

The No Project—Buildout Per Existing Approvals Alternative consists of constructing additional Convention Center Floor Area permitted by the City's October 29, 1987, Conditional Use Permit[5] and Convention Center related uses on a portion of the Los Angeles Sports and Entertainment District (LASED) Specific Plan designated for this purpose. A total of 323,329 square feet of Floor Area would be constructed within two new structures under this Alternative. Including the South Hall, Kentia Hall, Concourse Building and West Hall (which would remain under this alternative) the total Convention Center square footage under the No Project—Existing Approvals Alternative would be 1,862,000 square feet of Floor Area. The Event Center would not be developed under this Alternative.

- **Alternative 3: Reduced Intensity**

The Reduced Intensity Alternative includes the same land uses and structures as the Proposed Project. However, the overall Floor Area within the Project Site would be reduced by approximately 293,299 square feet and the overall Rentable Area would be reduced by approximately 36,623 square feet when compared with the Proposed Project. When accounting for existing buildings to remain, the total Floor Area within the Project

[5] *CPC-1987-0595-CU.*

Table V-1
Comparison of Alternatives to the Proposed Project (Net New Development)

	Proposed Project	Alternative 1: No Project: Status Quo (No Additional Floor Area)[b]	Alternative 2: No Project: Existing Approvals[b]	Alternative 3: Reduced Intensity	Alternative 4: Enclosed Stadium	Alternative 5: New Hotel and Convention Center Expansion	Alternative 6: Maximum Convention Center Expansion	Alternative 7: Rehabilitation of West Hall and Limited Convention Center Expansion
Seats								
Event Center	72,000	0	0	61,500	72,000	0	0	0
Total Floor Area								
Event Center	1,750,000	0	0	1,494,500	1,750,000	0	0	0
Convention Center								
Proposed Project or Alternative	500,000	462,201	785,530	462,201	500,000	1,035,600	1,686,916	678,201
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	1,076,470	1,076,470	1,076,470	1,076,470	1,076,470	1,076,470
Total Convention Center	1,576,470	1,538,671	1,862,000	1,538,671	1,576,470	2,112,070	2,763,386	1,754,671
Hotel (1,000 rooms)	0	0	0	0	0	900,000	0	0
Totals								
Proposed Project or Alternative (Event Center + Convention Center)	2,250,000	462,201	785,530	1,956,701	2,250,000	1,935,600	1,686,916	678,201
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	1,076,470	1,076,470	1,076,470	1,076,470	1,076,470	1,076,470
Total Project Site	3,326,470	1,538,671	1,862,000	3,033,171	3,326,470	3,012,070	2,763,386	1,754,671
Net Floor Area (Change from Existing Conditions)								
Event Center	1,750,000	0	0	1,494,500	1,750,000	0	0	0
Convention Center								
Proposed Project or Alternative	37,799	0	323,329	0	37,799	573,399	1,224,715	216,000
Not a Part of Proposed Project or Alternative	0	0	0	0	0	0	0	0
Total Convention Center	37,799	0	323,329	0	37,799	573,399	1,224,715	216,000
Hotel (1,000 rooms)						900,000		
Totals								
Proposed Project or Alternative (Event Center + Convention Center)	1,787,799	0	323,329	1,494,500	1,787,799	1,473,399	1,224,715	216,000
Not a Part of Proposed Project or Alternative	0	0	0	0	0	0	0	0
Total Project Site	1,787,799	0	323,329	1,494,500	1,787,799	1,473,399	1,224,715	216,000
Rentable Area								
Event Center (When Used for Exhibition Use Only)	245,650	0	0	209,785	245,650	0	0	0
Convention Center								
Proposed Project or Alternative	286,310	285,552	473,083	285,552	286,310	596,958	974,721	410,832
Not a Part of Proposed Project or Alternative	600,541	600,541	600,541	600,541	600,541	600,541	600,541	600,541
Total Convention Center	886,851	886,093	1,073,624	886,093	886,851	1,197,499	1,575,262	1,011,373
Totals								
Proposed Project or Alternative (Event Center + Convention Center)	531,960	285,552	473,083	495,337	531,960	596,958	974,721	410,832
Not a Part of Proposed Project or Alternative	600,541	600,541	600,541	600,541	600,541	600,541	600,541	600,541
Total Project Site	1,132,501	886,093	1,073,624	1,095,878	1,132,501	1,197,499	1,575,262	1,011,373

Table V-1 (Continued)
Summary of Comparative Impacts: Proposed Project and Alternatives

	Proposed Project	Alternative 1: No Project: Status Quo (No Additional Floor Area)[b]	Alternative 2: No Project: Existing Approvals[b]	Alternative 3: Reduced Intensity	Alternative 4: Enclosed Stadium	Alternative 5: New Hotel and Convention Center Expansion	Alternative 6: Maximum Convention Center Expansion	Alternative 7: Rehabilitation of West Hall and Limited Convention Center Expansion
Parking								
Proposed Project or Alternative								
L.A. Live Way Garage	2,950	858	1,949	2,611	2,950	2,950	2,950	1,600
Bond Street Garage	928	283	928	928	928	283	928	283
West Hall/West Hall Replacement Building/Hotel	0	1,625	1,625	0	0	1,100	2,230	1,625
Hotel (1,000 rooms)	0	0	0	0	0	419	0	0
Total Proposed Project or Alternative	3,878	2,766	4,502	3,539	3,878	4,752	6,108	3,508
Not a Part of Proposed Project or Alternative	2,792	2,792	2,792	2,792	2,792	2,792	2,792	2,792
Total Project Site	6,670	5,558	7,294	6,331	6,670	7,544	8,900	6,300

Table V-2
Summary of Comparative Impacts: Proposed Project and Alternatives

Impact Area	Proposed Project	Alternative 1: No Project: Status Quo (No Additional Floor Area)	Alternative 2: No Project: Existing Approvals	Alternative 3: Reduced Intensity	Alternative 4: Enclosed Stadium	Alternative 5: New Hotel and Convention Center Expansion	Alternative 6: Maximum Convention Center Expansion	Alternative 7: Rehabilitation of West Hall and Limited Convention Center Expansion
Land Use								
Land Use Plans	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Greater	Greater	Similar	Similar	Similar	Greater	Greater
Land Use Compatibility	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Similar	Similar	Similar	Similar	Similar
Urban Decay	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Less	Similar	Similar	Greater	Less
Traffic								
Construction	Significant	Less Than Significant	Significant	Significant	Significant	Significant	Significant	Less Than Significant
		Less	Less	Less	Greater	Less	Greater	Less
Operations	Significant	Less Than Significant	Significant	Significant	Significant	Significant	Significant	Significant
		Less	Less	Less	Similar	Less	Less	Less
Parking	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Less	Similar	Less	Similar	Less
Pedestrian Safety	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Less	Similar	Less	Less	Less
Visual Resources								
Visual Quality	Significant	No Impact	Less Than Significant	Significant	Significant	Significant	Significant	Less Than Significant
		Less	Less	Less	Similar	Similar	Similar	Less
Views	Significant	No Impact	Less Than Significant	Significant	Significant	Significant	Significant	Less Than Significant
		Less	Less	Less	Similar	Similar	Similar	Less
Light & Glare								
Natural Light	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Less	Similar	Greater	Similar	Less
Artificial Light & Glare								
Construction	Significant	Less Than Significant	Less Than Significant	Significant	Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Less	Greater	Less	Less	Less
Operations	Significant	Less Than Significant	Less Than Significant	Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Less	Less	Less	Less	Less
Noise								
Construction	Significant	Less Than Significant	Significant	Significant	Significant	Significant	Significant	Significant
		Less	Less	Less	Greater	Less	Less	Less
Operations	Significant	Less Than Significant	Significant	Significant	Significant	Significant	Significant	Less Than Significant
		Less	Less	Less	Less	Less	Less	Less

Table V-2 (Continued)
Summary of Comparative Impacts: Proposed Project and Alternatives

Impact Area	Proposed Project	Alternative 1: No Project: Status Quo (No Additional Floor Area)	Alternative 2: No Project: Existing Approvals	Alternative 3: Reduced Intensity	Alternative 4: Enclosed Stadium	Alternative 5: New Hotel and Convention Center Expansion	Alternative 6: Maximum Convention Center Expansion	Alternative 7: Rehabilitation of West Hall and Limited Convention Center Expansion
Air Quality								
Construction	Significant	Less Than Significant	Significant	Significant	Significant	Significant	Significant	Significant
		Less	Less	Less	Greater	Less	Less	Less
Operations	Significant	Less Than Significant	Significant	Significant	Significant	Significant	Significant	Significant
		Less	Less	Less	Greater	Less	Less	Less
Climate Change	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Less	Greater	Less	Less	Less
Geology & Soils	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Greater	Greater	Similar	Similar	Similar	Similar	Greater
Hydrology								
Surface Water Hydrology	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Greater	Construction: Less Operations: Greater	Similar	Similar	Similar	Similar	Construction: Less Operations: Greater
Surface Water Quality	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Greater	Similar	Similar	Similar	Similar	Similar	Similar
Groundwater Levels	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Greater	Similar	Similar	Similar	Similar	Similar	Similar
Groundwater Quality	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Greater	Similar	Similar	Similar	Similar	Similar	Similar
Cultural Resources								
Historical Resources	Significant	Less Than Significant	Less Than Significant	Significant	Significant	Significant	Significant	Less Than Significant
		Less	Less	Similar	Similar	Similar	Similar	Less
Archaeological Resources	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		No Impact	Similar	Less	Similar	Similar	Similar	Similar
Public Services								
Police	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		No Impact	Less	Less	Similar	Less	Less	Less
Fire	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		No Impact	Less	Less	Similar	Less	Less	Less
Utilities								
Water	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		No Impact	Less	Less	Similar	Greater	Less	Less
Sewer	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		No Impact	Less	Less	Similar	Less	Less	Less

Table V-2 (Continued)
Summary of Comparative Impacts: Proposed Project and Alternatives

Impact Area	Proposed Project	Alternative 1: No Project: Status Quo (No Additional Floor Area)	Alternative 2: No Project: Existing Approvals	Alternative 3: Reduced Intensity	Alternative 4: Enclosed Stadium	Alternative 5: New Hotel and Convention Center Expansion	Alternative 6: Maximum Convention Center Expansion	Alternative 7: Rehabilitation of West Hall and Limited Convention Center Expansion
Solid Waste								
Construction	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Less	Similar	Less	Less	Less
Operations	Significant	Less Than Significant	Significant	Significant	Significant	Significant	Significant	Significant
		No Impact	Less	Less	Similar	Less	Less	Less
Electricity	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Less	Greater	Less	Greater	Less
Natural Gas	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		No Impact	Less	Less	Similar	Greater	Less	Less
Environmental Safety								
Construction	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less	Less	Less	Similar	Less	Less	Less
Operations	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
		Less (Greater relative to methane)	Less (Greater relative to methane)	Less	Greater	Less	Less	Less (Greater relative to methane)

Site would be approximately 3.0 million square feet. The height of the Event Center would be reduced from 220 feet to 200 feet, and the number of seats would be reduced from 72,000 to 61,500 seats.

- **Alternative 4: Enclosed Stadium**

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

- **Alternative 5: New Hotel and Expansion Alternative**

The New Hotel and Expansion Alternative includes the development of a 1,000-room convention hotel at the north end of the Project Site adjacent to Chick Hearn Court in close proximity to the JW Marriott and the Ritz Carlton hotels at L.A. LIVE. It would also increase the size of the Convention Center through the development of the New Hall, as proposed under the Project, and additional convention center Floor Area to the north of the New Hall. Under this Alternative the total Rentable Area within the Convention Center would be increased to approximately 1.20 million square feet. The Event Center would not be developed under this Alternative and therefore would not include spectator uses. When accounting for existing buildings to remain, the total Floor Area under Alternative 5 would be approximately 3.0 million square feet.

- **Alternative 6: Maximum Convention Center Expansion**

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

- **Alternative 7: Rehabilitation of West Hall and Limited Expansion Alternative**

As discussed in Section IV.I.1, Cultural Resources—Historical Resources, of this Draft EIR, the West Hall and other buildings within the Project Site do not appear eligible for inclusion in the National Register, California Register, or as a local Historic Cultural

Monument (HCM). However, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall. The Rehabilitation of West Hall and Limited Expansion Alternative would include retention of the West Hall to avoid this potential impact. No new convention center facilities would be constructed on the Project Site other than a pedestrian bridge to connect the West Hall to a new two-level Event Deck Hall on the Convention Center Expansion Parcel within the LASED Specific Plan Area. The Event Deck Hall would consist of 216,000 square feet of Floor Area with one level of meeting rooms on top of one level for exhibit use. When combined with the existing South Hall and Concourse Building, this Alternative would result in a Convention Center comprised of 1.75 million square feet of Floor Area and approximately 1.01 million square feet of Rentable Area. The Event Center would not be developed under this Alternative.

4. Alternatives Considered but Rejected as Infeasible

The State CEQA Guidelines require Environmental Impact Reports to identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons underlying the lead agency's determination. Section 15126.6 (c) of the State CEQA Guidelines states the following:

> *"The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination.… Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."*

The analysis of alternatives started with an identification of a number of potential alternatives to the Proposed Project that had the potential to reduce or eliminate the Project's significant environmental impacts.[6] The alternatives that were considered and rejected as infeasible are as follows and are discussed below:

a. Event Center of 54,000 seats;

[6] *State CEQA Guidelines Section 15126.6 (c).*

b. New Hall with 400,000 square feet of Floor Area; and

c. Alternate Sites:

(1) Los Angeles County Memorial Coliseum;

(2) Pasadena Rose Bowl;

(3) City of Industry; and

(4) Dodger Stadium

a. Event Center with 54,000 Seats

With this alternative the New Hall would remain the same as under the Proposed Project, whereas the size and capacity of the Event Center would be reduced by 25 percent. The Event Center would have 54,000 seats, instead of the 72,000 seats as with the Proposed Project. This alternative further reduces the number of seats analyzed in the Reduced Intensity Alternative (Alternative 3), which would provide a maximum of 61,500 seats in the Event Center. In addition, meeting room space at the Event Center when used for exhibition events would be proportionally reduced.

A 25 percent reduction in seating at the proposed Event Center would have the potential to reduce impacts of the Proposed Project related to air quality, noise, traffic, and views by an approximately commensurate amount. However, these effects would largely remain significant after mitigation, which is similar to the Proposed Project. NFL stadium capacity seating and suite capacity is primarily driven by market demand and has the greatest impact on overall stadium program and design. Special events, such as the Super Bowl, are other factors that further define the stadium design and capacity.

In order to attract the NFL, the development and design of the Event Center must be competitive with professional football stadiums recently constructed or under construction. In terms of other NFL stadiums, the average capacity across all stadiums is approximately 71,000 seats, with the 10 most recent stadiums and the stadiums in the NFL's 10 largest cities providing an average capacity of approximately 70,000 seats. Recent NFL stadiums in major metropolitan markets, such as FedEx Field in Washington DC, New Meadowlands MetLife Stadium in the New York area, and Cowboys Stadium in Dallas have total seating capacities of 82,000, 82,566 and 80,000 seats, respectively, for regular season events. Even the smaller market-size stadiums, such as Seattle[7], Denver, and Green Bay, have

[7] *Regular capacity is 67,000 but is expandable to 72.000 for special events.*

been designed to host crowds of between 72,000 and 76,125 fans. The smallest stadium in the NFL is Soldier Field in Chicago with a seating capacity of 61,500 seats.[8]

Flexibility to expand seating to accommodate special events such as the Super Bowl is a core programming element of new stadium design. Typically stadiums, including those in Dallas, Phoenix, and New Orleans, are all expandable for the Super Bowl. For example, Cowboys Stadium has a regular capacity of 80,000 seats, but can expand to 103,000 seats for a Super Bowl. A recent host of the Super Bowl, Arizona, has the ability to expand from 63,500 seats to 72,800 seats to host the event.

The Proposed Project's Event Center would seat 72,000 patrons, which is in line with expected market demand and programmatic requirements for an NFL stadium. Substantially reducing the number of seats of the stadium would make it far less attractive to the NFL and substantially reduce the possibility of gaining the NFL's approval. In addition, this alternative would not meet the project objective of creating an Event Center that would be expandable to 76,250 seats to host periodically major sporting events like an NFL Super Bowl or an NCAA Final Four Tournament.

A stadium built to provide a venue for NFL games would be infeasible without the NFL's approval and a stadium with a maximum of 54,000 seats would not meet the NFL's standards. This alternative would not meet the basic project objectives of constructing an Event Center that would primarily operate as a stadium hosting NFL games for up to two local NFL teams, nor would it meet the project objective to create a stadium design that allows for a visitor experience comparable to those available at competing venues across the Unites States. A key issue is that a smaller stadium would put the Proposed Project at a distinct competitive advantage with City of Industry stadium proposal which is already approved for 75,000 seats expandable up to 80,000 seats. Further, without an NFL stadium use, the Convention Center modernization would not be feasible given the current and foreseeable economic circumstances and the City's inability to finance a project with public funds.

Of the seven project objectives, this alternative would not meet the underlying purpose of the Proposed Project to enhance the marketability of the Los Angeles Convention Center through modernized facilities and the prime Project Objective related to the Event Center would likely not be achieved at all. This alternative would not replace the outmoded West Hall with a modern New Hall thereby creating a more efficient exhibit hall

[8] *Soldier Field is an existing facility that was originally built in 1926 and is therefore not directly comparable to the Event Center and other recently constructed stadiums.*

contiguous to the existing South Hall. In addition, this alternative would not provide a new multi-purpose room of a size that can function as exhibit hall space, meeting rooms or a ballroom, which is a new amenity that the Convention Center cannot provide today.

With regard to constructing a multi-purpose Event Center, the reduced seating capacity under this alternative would be less attractive to NFL teams since ticket sales are an important revenue source for a team and fewer seats means less revenues to the team. Moreover, the Event Center under this alternative would not be expandable to host occasional major sporting events (e.g., an NFL Super Bowl). Because this alternative would be much less attractive to NFL teams and unable to host occasional major sporting events, it is much less likely to generate a sufficient revenue stream to support state-of-the-art sound and lighting systems or a deployable roof.

This alternative would also not realize the Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles. Further, due to the reduced seating capacity at the Event Center and the lack of improvements to the Convention Center, this alternative would not achieve the Project Objective to promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism to the same degree as the Proposed Project.

As a result, this alternative was rejected from further review in this Draft EIR.

b. New Hall with 375,000 Square Feet of Floor Area

With this alternative, all Project components would remain the same, except that the Floor Area of the proposed New Hall would be reduced from 500,000 square feet to 375,000 square feet, which results in a 25 percent reduction. This alternative would reduce the mass and scale of the New Hall, result in less overall construction and correspondingly less noise, emissions and traffic during construction, and potentially reduce Project impacts that are associated with increased square footage, such as traffic and solid waste.

The Convention Center currently consists of three main structures: the West Hall, the South Hall, and the Concourse Building. In terms of Rentable Area, the Convention Center has a collective total of 886,093 square feet. With the New Hall at the size proposed under the Project, the available Rentable Area would increase by 246,408 square feet to a total of 1.13 million square feet or a 28 percent increase. This includes exhibit and meeting space that would be available at the Event Center when it is not being used for spectator events. The New Hall is intended to provide an approximate equivalent replacement for the floor area and functions housed in the West Hall, which would be demolished by the Proposed Project. Under the alternative, the available Rentable Area

would total 815,274 square feet, including use of the Event Center for meeting and exhibit uses. As a result the available Rentable Area would be 8 percent smaller than the existing Convention Center.

This alternative would fail to meet the underlying purpose of the Proposed Project to enhance the marketability of the Los Angeles Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District. The reduction in square footage under this alternative as compared to the Proposed Project would result in less contiguous rentable square footage and would impair the Convention Center's ability to substantially improve its national ranking. Moreover, the reduced New Hall would not meet the program requirements for areas lost when the West Hall is removed. Thus, this alternative would not meet the Project objectives of increasing the economic development and competitiveness of the Convention Center in attracting annual events. Also, this alternative would not generate sufficient revenues to meet the financial obligations required to create the Proposed Project.

As such, this alternative was considered infeasible and rejected from further consideration and is not examined in detail in this Draft EIR.

c. Event Center Alternative Sites

(1) Introduction

In accordance with the State CEQA Guidelines,[9] consideration was given to locating all elements of the Proposed Project at alternative locations. As the Convention Center is in a fixed location, and the City would not be able to fund a new Convention Center at a different location, the analysis of alternative locations for the Proposed Project focuses only on the relocation of the Event Center. As such, a review of the viability of locating the Proposed Project at four of the most commonly discussed venues and locations was undertaken. These sites are the Los Angeles Memorial Coliseum, the Pasadena Rose Bowl, the City of Industry and Dodger Stadium. In addition to these four locations, consideration was also given to locating the Event Center at other locations that have previously been considered as candidate stadium locations, specifically the cities of Carson and Irwindale. As no one has pursued these two sites in a number of years their viability as a location for a stadium has diminished to such an extent as to no longer warrant consideration.

[9] *State CEQA Guidelines Section 15126.6(f)(2).*

The Proposed Project is intended to attract an NFL franchise to Los Angeles. To date, none of the existing or proposed stadiums in the region have been able to secure an NFL team. Since the departure of the Raiders prior to the start of the 1995 NFL season and before that the departure of Rams, the NFL has entertained several detailed proposals to locate a franchise in Los Angeles County. Through this process, the NFL has analyzed the potential for operating at an existing stadium facility in the County and considered other sites for a new stadium.

The two existing facilities that would be able to accommodate the NFL are the Los Angeles Memorial Coliseum located in Exposition Park in the City of Los Angeles, and the Rose Bowl located in the City of Pasadena. Both the Los Angeles Raiders and the Los Angeles Rams played at the Los Angeles Memorial Coliseum. In addition to these existing facilities, there have been a broad variety of speculative proposals to build new stadium facilities that could accommodate an NFL franchise in the Los Angeles market. However, none of those proposals moved beyond a preliminary planning stage nor have any of those proposals been able to secure an NFL tenant.

The intent of the Proposed Event Center is to primarily function as the home venue for one or two NFL franchises to locate to Los Angeles, as well as a venue to host a variety of other events, such as concerts and international soccer matches. However, its location was chosen to carry out the basic objective of revitalizing the Convention Center and to locate it adjacent to mass transit. To support use for exhibition and meeting room purposes, as well as for certain other events, the Event Center must have a deployable roof, which would allow it to be open during most events.

Under each of the four different alternative site scenarios, the Event Center would be constructed on an alternate site within the Southern California region. However, they were rejected from further analysis for the reasons discussed below under each site.

(2) Los Angeles Memorial Coliseum

The Los Angeles Memorial Coliseum (Coliseum) is located at 3911 S. Figueroa Street within the Exposition Park Master Plan Area, approximately two miles southwest of downtown Los Angeles. It is bounded by Exposition Boulevard on the north, Martin Luther King Jr. Boulevard on the south, Vermont Avenue on the west, and Figueroa Street on the east. The Coliseum is under the authority of and currently operated by the Los Angeles Memorial Coliseum Commission (the Commission), a joint powers authority of the City of Los Angeles, Los Angeles County, and the State of California.

There has previously been much debate about the Coliseum's potential to serve as a modern NFL venue. Because of the difficulties involved in financing a renovated

Coliseum, no agreement was ever finalized with an NFL franchise. In November 2007, Los Angeles Mayor Antonio Villaraigosa declared that the policy of requiring the NFL to relocate to the Coliseum had changed and other options would be explored. In 2008, the Commission reached an agreement with the University of Southern California (USC) that effectively reserves USC as the key football user of the Coliseum for another 47 years. The agreement calls for revenue sharing between the parties and capital improvements by the Commission in exchange for USC assuming operations and management responsibilities. Thus, the Coliseum is not available to the Event Center Applicant as an alternative to the proposed Event Center.

In addition to the reasons cited above, the Coliseum would not meet the Project objectives to modernize the Convention Center, including revitalizing the Convention Center by creating a larger and more efficient contiguous exhibit and meeting space, substantially improve the Convention Center's national ranking among convention centers in terms of Rentable Area and modern facilities, and increase the number of annual events, the majority of which would be trade shows and conventions (attracting largely out-of-town visitors). Nor would the Coliseum achieve the Project objectives to (a) construct a multi-purpose Event Center consistent with adjacent convention and sports and entertainment uses, (b) develop a project that is consistent with the ongoing revitalization of the nearby area and downtown, (c) locate the Event Center at an existing and expanding regional transit hub currently served by multiple local and regional rail and bus lines that would offer visitors a viable alternative to the automobile, or (d) financial and economic objectives, including to finance construction of the New Hall at no risk to the City's General Fund.

For all of these reasons, the Coliseum was deemed an infeasible alternative location for the Proposed Project.

(3) Rose Bowl

The Rose Bowl is located in the City of Pasadena, on the south side of the I-210 and west of SR-134. The City of Pasadena is located approximately 10 miles northeast of downtown Los Angeles. Surrounding land uses include the Brookside Golf Course to the north, Brookside Park to the south, and residential units located near the stadium on the slopes of the Arroyo Seco.

Originally completed in 1922, the Rose Bowl became a National Historical Landmark in 1987. The most recent improvements to provide additional amenities at the Rose Bowl have resulted in a reduction in seating capacity to its current 92,500 seats. Of its 92,500 seats, 42,000 are theater style sideline seats, and the remaining are aluminum bench seating located in the end zones. The sideline seats, as well as new scoreboards, a

video board, and video control room, were part of the 1996 Rose Bowl Improvement Project. While hosting five NFL Super Bowls, the Rose Bowl has never been a regular season home for an NFL franchise. The Rose Bowl's location in a park surrounded by single-family residential neighborhoods has led to severe constraints on the facility's use as a sporting venue. Opposition to increased usage of the Rose Bowl extends beyond local homeowner opposition as evidenced by the 2006 ballot measure that would have accepted an NFL bid that was rejected by voters in a Citywide election.

A proposed Rose Bowl Stadium Renovation Project, which proposed to allow use by an NFL team, was analyzed in an EIR in the mid-1990s. After the community's opposition to NFL operations at the facility, discussions with the NFL and the City were terminated. In October 2010 lease extensions were signed that call for UCLA to remain as the football tenant at the Rose Bowl Stadium through 2042. The current lease with UCLA does not anticipate the presence of NFL football at the Rose Bowl nor are the capital improvements currently being undertaken designed to accommodate an NFL tenant on a permanent basis. Thus, the Rose Bowl is not available to the Event Center Applicant as an alternative to the proposed Event Center.

Elected officials from the City of Pasadena have indicated as recently as August 2011, that under carefully negotiated conditions, the Rose Bowl might be made available as an interim site for NFL games. These conditions include agreement by its master tenant, UCLA, and a requirement that the City of Pasadena and the Rose Bowl Operating Company retain full operational control. Any future modifications to the existing Rose Bowl operating agreements would also require approval from the Pasadena City Council. The City of Pasadena is currently conducting a CEQA review of potential modifications to the use of Rose Bowl. For all of these reasons, the Rose Bowl was deemed an infeasible alternative location for the Proposed Project.

(4) City of Industry

On October 28, 2004, the City Council of the City of Industry certified a Final Environmental Impact Report for the Industry Business Center project which proposed up to nearly 4.8 million square feet of built space. The 592 acre site is located on the eastern edge of the City of Industry (approximately 22 miles east of downtown Los Angeles) north of the interchange of the Pomona Freeway (State Route 60) and the Orange Freeway (State Route 57).

In 2008, an applicant proposed to construct a stadium on the site suitable for NFL use and a wide variety of events, such as concerts and other sporting events. The stadium would be centrally located within the Project Site and contain up to 75,000 seats and be expandable to 80,000 for Super Bowl games. A Supplemental EIR (SEIR) was prepared to

address the revised plan. The SEIR is based on 45 events at the stadium per year; 30 sell-out events and 15 minor events with attendance of 25,000 people or fewer. Public concerns, including those of the neighboring cities of Diamond Bar and Walnut, focused on noise, traffic, and other environmental issues. Both Diamond Bar and Walnut reached monetary agreements with stadium developers in order to drop their objections to the stadium. However, a lawsuit was filed by others challenging the SEIR. In October 2009, the Governor signed legislation that provided a CEQA exemption for the project. Currently, the project's developer has stated that construction will not begin until a team commits to moving to Los Angeles. To date, no commitment or agreement with the NFL has been reached.

The Industry site is not available to the Event Center Applicant as an alternative site for the Event Center. In addition, although this site would achieve the Project objective of constructing an NFL stadium, it would not meet many of the other basic Project objectives. The Industry site would not revitalize the Convention Center by creating a larger and more efficient contiguous exhibit and meeting space that would make the Convention Center more competitive nationally.

Further, the Industry site would not achieve the Project objectives related to locating the Proposed Project at an existing and expanding regional transit hub currently served by multiple local and regional rail and bus lines that would offer visitors a viable alternative to the automobile. Thus, the site would not encourage use of public transit to the same extent as the Proposed Project and would require an extensive amount of parking lots, which would further encourage use of the private automobile.

For all of the reasons cited above, the Industry site was deemed an infeasible alternative location for the Proposed Project.

(5) Dodger Stadium

Another location that has occasionally been discussed as a potential site for a football stadium is the Dodger Stadium site at Chavez Ravine. Dodger Stadium is located in Northeast Los Angeles, north and west of Chinatown, as well as north and east of the Echo Park neighborhood. Elysian Park is located adjacent to large parts of Dodger Stadium with the stadium being located east and south of the park. Barlow Respiratory Hospital is located adjacent to the main entry to the stadium near the intersection of Stadium Way and Elysian Park Avenue.

In terms of viability as a location for the Event Center, substantial street and freeway access constraints exist at this site. Specifically, direct freeway access is limited to one ramp to the SR-110 freeway. To reach the I-5 freeway, motorists must either use the SR-110

freeway or travel the length of Elysian Park. Arterial street access to Dodger Stadium is also limited to a few streets which further constrains access to and from the stadium. Transit access is limited to a single Metro bus line operated from Union Station that only runs in conjunction with events at the stadium. Additional access constraints occur as one of the main exits from the stadium routes motorists through residential neighborhoods, and given the limited egress points, high levels of congestion often occur immediately following the end of a game.

With regard to the site itself, a large portion of the existing surface parking lot would need to be used as the site of the Proposed Project. As this would displace a large number of existing parking spaces, constructing the Proposed Project at this site would also require the construction of large parking structures.

While sale of the team is pending, the Event Center Applicant is not one of the bidders. Moreover, the current owner has stated that he intends to retain ownership and control of the Dodger Stadium parking lots even after the sale of the team. Therefore, Dodger Stadium is not available to the Event Center Applicant as an alternative site for the Event Center.

As a result, this particular site was deemed infeasible as an alternate site for the Proposed Project due to substantial street and freeway access constraints, the site is not located at an existing and expanding regional transit hub, and the loss of the potential to modernize the Convention Center at no risk to the City's General Fund.

(6) Alternative Site Conclusion

None of the four alternate sites analyzed above would meet the underlying purpose of the Proposed Project to enhance the marketability of the Los Angeles Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue, which builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District. None of the alternate sites would meet the Project Objective to modernize and enhance the marketability of the Convention Center. In addition, none of the alternate sites is located near convention, sports or entertainment uses, and therefore, would not meet the Project Objective to construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses. Nor would any of them meet the Project Objectives to promote General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles, or design a Project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events and is consistent with smart growth and urban design principles.

Unlike the Proposed Project, none of the alternate sites is located at an existing and expanding regional transit hub currently served by multiple local and regional rail and bus lines that would offer visitors a viable alternative to the automobile. In addition, the four alternate locations would also not be as well located as the Project Site in terms of its location at the regional freeway hub for the Metropolitan Los Angeles Area, served by seven freeways and 45 freeway ramps to decentralize automobile travel and parking opportunities to balance demands on the regional and local transportation system. Therefore, the alternate sites would not meet the Project Objective to take maximum advantage of existing and planned transportation infrastructure and efficiently utilize existing parking resources to conserve resources, reduce environmental impacts and improve access.

The Rose Bowl and City of Industry sites are located outside the City of Los Angeles. The Rose Bowl and Coliseum are existing venues and, therefore, would generate only a fraction of the construction jobs as the Proposed Project. None of the alternate sites would modernize the Convention Center and attract additional trade shows and conventions attracting out-of-town visitors. Therefore, the alternate sites would not meet the Project Objectives to promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism. Moreover, the Event Center Applicant does not own or control any of the alternative site, and, for the reasons set forth above, could not feasibly obtain such ownership or control for the purpose of bringing one or two NFL franchises to Los Angeles. Thus, alternative locations for the proposed development were rejected from further analysis.

5. Analysis Methodology

Each of the seven Alternatives selected for analysis is evaluated in sufficient detail to determine whether it's overall environmental impacts would be less, similar, or greater in comparison to the impacts of the Proposed Project. The impact analyses sections for the Proposed Project set forth in Section IV of this Draft EIR include project design features and mitigation measures that reduce the environmental impacts of the Proposed Project. The analysis assumes that equally effective project design features and mitigation measures proposed for the Proposed Project would apply to Alternatives 2 through 7, with the following two exceptions: (1) the improvements to Gilbert Lindsay Plaza are only assumed for those alternatives which include the Event Center (Alternatives 3 and 4), as this area is planned as a pre- and post-event gathering space for Event Center functions; and (2) streetscape improvements are assumed only under Alternatives 3, 4, 5, and 6 as these alternatives generate the pedestrian volumes that warrant these types of improvements. As Alternative 1 includes only the maintenance of existing buildings, no project design features or mitigation measures are assumed.

The analysis under each Alternative includes the following:

- An evaluation of the environmental impacts anticipated to occur for each environmental issue analyzed in Section IV of this Draft EIR and a determination as to the significance of these impacts. This discussion also includes an analysis of whether the Alternatives would avoid or substantially lessen any of the significant environmental impacts associated with the Proposed Project. Where the impacts of the alternative and the Proposed Project were roughly equivalent, the comparative impact is said to be similar;

- A summary of the comparative impacts across all of the environmental issues; and

- A discussion as to the extent to which the Alternative meets the basic objectives of the Proposed Project.

B. Alternative 1: No Project (Status Quo)

1. Description of the Alternative

The No Project (Status Quo) Alternative (Alternative 1) assumes that status quo conditions would continue and that the Project would not be implemented. Thus, on-site construction activities occurring under Alternative 1 would be limited to the maintenance of the existing on-site structures (i.e., paint and carpeting), with no increase in on-site floor area. The Convention Center would continue to host exhibitions, but the frequency and size would be reduced over time as the Convention Center becomes less and less competitive with other venues due to lack of modern amenities. A comparison of Alternative 1 and the Proposed Project is provided in Table V-3 on page V-26.

2. Environmental Impacts

A. Land Use

Alternative 1 would not alter the existing uses on the Project Site or introduce new uses or activities. Therefore, the Alternative 1 would not require any new land use approvals.

1. Land Use Consistency

Existing on-site development under Alternative 1 would be consistent with the public investment in the transportation system by virtue of its location in proximity to transit in downtown Los Angeles, which is the hub of the rail and bus transit system for the metropolitan Los Angeles area. However, Alternative 1 would not introduce new, transit-oriented development or design features to the Project Site to facilitate connections with nearby transit and support and encourage the use of alternative modes of transportation, consistent with SCAG Policy GV P1.3 to, "Encourage transit-oriented development," Additionally, because Alternative 1 would not change the number or types of events held at the Project Site, it would not attract new visitors from across the region or the immediate Downtown area, nor take full advantage of the location as an infill development adjacent to L.A. LIVE, and thus not advance SCAG Policy GV P2.1 to, "Promote infill development and redevelopment to revitalize existing communities" or the City's Economic Development Policy 7.2.3 to, "Encourage new commercial development in proximity to rail and bus transit corridors and stations." Alternative 1 would also not implement streetscape improvements or provide pedestrian-oriented improvements to promote an active pedestrian realm along the perimeter of the Project Site and under the SR-110 Freeway at Pico Boulevard, 11th Street, and 12th Street. As such, Alternative 1 would not advance SCAG Policy GV P1.4

Table V-3
Comparison of Proposed Project and Alternative 1—No Project: Status Quo

	Proposed Project	Alternative 1	Change from Proposed Project	
			Number	Percent
Seats				
Event Center	72,000	0	(72,000)	-100.0%
Total Floor Area				
Event Center	1,750,000	0	(1,750,000)	-100.0%
Convention Center				
Proposed Project or Alternative	500,000	462,201	(37,799)	-7.6%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Convention Center	1,576,470	1,538,671	(37,799)	-2.4%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	2,250,000	462,201	(1,787,799)	-79.5%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Project Site	3,326,470	1,538,671	(1,787,799)	-53.7%
Net Floor Area (Change from Existing Conditions)				
Event Center	1,750,000	0	(1,750,000)	-100.0%
Convention Center				
Proposed Project or Alternative	37,799	0	(37,799)	-100.0%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Convention Center	37,799	0	(37,799)	-100.0%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	1,787,799	0	(1,787,799)	-100.0%
Not a Part of Proposed Project or Alternative	0	0	—	0.0%
Total Project Site	1,787,799	0	(1,787,799)	-100.0%
Rentable Area				
Event Center (When Used for Exhibition Use Only)	245,650	0	(245,650)	-100.0%
Convention Center				
Proposed Project or Alternative	286,310	285,552	(758)	-0.3%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Convention Center	886,851	886,093	(758)	-0.1%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	531,960	285,552	(246,408)	-46.3%
Not a Part of Proposed Project or Alternative	600,541	600,541	—	0.0%
Total Project Site	1,132,501	886,093	(246,408)	-21.8%

Table V-3 (Continued)
Comparison of Proposed Project and Alternative 1—No Project: Status Quo

	Proposed Project	Alternative 1	Change from Proposed Project	
			Number	Percent
Parking				
Proposed Project or Alternative				
L.A. Live Way Garage	2,950	858	(2,092)	-70.9%
Bond Street Garage	928	283	(645)	-69.5%
West Hall/West Hall Replacement Building/Hotel	0	1,625	1,625	100.0%
Total Proposed Project or Alternative	3,878	2,766	(1,112)	-28.7%
Not a Part of Proposed Project or Alternative	2,374	2,374	0	0.0%
Total Project Site	6,252	5,140	(1,112)	17.8%

Source: Matrix Environmental, 2012.

to, "Promote a variety of travel choices" or SCAG Policy GV P2.3 to, "Promote 'people-scaled' pedestrian-friendly communities."

Alternative 1 would not replace the aging West Hall with a modern building featuring state-of-the-art sustainability features, and thus not further the Downtown Design Guide's sustainability goals and policies, nor further Policy 9.29.3 of the Framework Element Infrastructure and Public Services Chapter to, "Promote conservation and energy efficiency to the maximum extent…including potential retrofitting…." Alternative 1 would not create any new jobs on the Project Site and, as such, would not promote the location of new jobs near existing housing. Therefore, Alternative 1 would not conflict with, but would not support, SCAG's Compass Blueprint Growth Vision or Regional Transportation Plan.

The existing Convention Center uses under Alternative 1 would continue to be consistent with the General Plan Framework Element's vision of the Downtown Center as an international center for finance and trade that serves the population of the metropolitan region. However, Alternative 1 would not support many of the goals, objectives, and policies of the General Plan Framework Element that are aimed toward promoting continued development of the Downtown Center with entertainment, visitor-serving, cultural and similar uses, and creating walkable, pedestrian environments; and promoting nighttime activity. Therefore, Alternative 1 would not conflict with, but would not support the City's General Plan Framework Element.

Alternative 1 would not require a General Plan Amendment. However, it would not support ongoing development in the Convention Center/Arena area. This area is

recognized in the Central City Community Plan as a place with the potential to "evolve into an economically and physically prominent area based on the cumulative impact of existing assets such as the Convention Center and the Staples Arena" and further investments in the area such as the LASED area. Unlike the Proposed Project, Alternative 1 would not serve to further complement and benefit the tourism, hotel, and entertainment uses in the immediate Project vicinity, throughout Downtown, or the City as a whole. Therefore, Alternative 1 would not conflict with, but would not support the Central City Community Plan.

While the Proposed Project would be consistent with most of the standards and guidelines in the Downtown Design Guide (which is an Appendix to the Central City Community Plan), it would be potentially inconsistent with the guidelines that no building be more than 300 feet in length and with the signage guidelines that prohibit animated signs, wall murals covering windows, and that regulate hours of signage illumination. As discussed in Section IV.A, Land Use, of this Draft EIR, a football stadium is required to be greater than 300 feet in length and the proposed Event Center would provide substantial building articulation and activity at the street level and thus be consistent with the intent of the guidelines. Section IV.A further discusses how this type of signage is considered an important visual component of the Proposed Project given the event- and entertainment-oriented nature of the uses. Nonetheless, these potential design guideline inconsistencies would not occur with Alternative 1.

The Downtown Strategic Plan specifically identifies the need to both expand the Convention Center and develop the area surrounding it with complementary uses including entertainment, shopping and hotel uses, outdoor activities and other tourist attractions. Alternative 1 would result in no changes to existing Convention Center uses. Therefore, Alternative 1 would be inconsistent with the Downtown Strategic Plan.

The Figueroa Corridor Economic Development Strategy specifically calls for the improvement of the Figueroa Street Corridor both economically and physically to reinforce its regional importance. Alternative 1 would not introduce new uses or design elements along Figueroa Street such as improvements to Gilbert Lindsay Plaza proposed by the Project. Therefore, Alternative 1 would be inconsistent with the Figueroa Corridor Economic Development Strategy. The proposed Figueroa Corridor Streetscape Project is studying and will eventually provide a design for a coordinated streetscape that will complement the existing buildings and businesses in the area while promoting pedestrian and bike activity. Based on public input to date in community workshops, it is anticipated that Alternative 1 may be inconsistent with the Figueroa Corridor Streetscape Project.

The City of Los Angeles Walkability Checklist provides design guidelines for new development. Alternative 1 would not introduce any new uses to the Project Site.

Therefore, the City of Los Angeles Walkability Checklist is not applicable to Alternative 1. Nonetheless, as stated above, much of the existing Project Site, most notably the West Hall, appears monolithic and less pedestrian-friendly in comparison to more recent nearby development such as STAPLES Center and L.A. LIVE. Additionally, Gilbert Lindsay Plaza, as currently configured, appears to serve more as a component of the Convention Center's transportation infrastructure system rather than as a welcoming open space and public entry to the Convention Center. Thus, the existing Project Site is not representative of the overall design vision promoted by the City of Los Angeles Walkability Checklist.

Based on the above, Alternative 1 would not conflict with, but would not support regional and local plans and policies that govern the Project Site. It also would not conflict with, but would not support some local plans and policies that govern the Project Site, and would be inconsistent with the Downtown Strategic Plan, Figueroa Corridor Economic Development Strategy, and anticipated provisions of the Figueroa Corridor Streetscape Project. As Alternative 1 does not propose any new development, impacts with respect to land use consistency would be less than significant. However, impacts would be greater than the Proposed Project due to Alternative 1's failure to implement local plans and policies that specifically call for the expansion of the Convention Center and surrounding area and the revitalization of the Figueroa Street corridor. For example, as discussed further in Section IV.A, Land Use, of this Draft EIR, the Proposed Project would promote land uses in the Central City area that address the needs of visitors to Downtown for conventions, trade shows and tourism, consistent with Objective 2.4 of the Central City Community Plan. The Downtown Strategic Plan contains objectives specific to the Convention Center District which would not be realized with Alternative 1. These objectives include: maintaining the Convention Center as the region's preeminent, state-of-the-art facility; linking the Convention Center District with surrounding neighborhoods and districts and providing access to the retail and community activities of the Financial Core and South Park; fully developing all streets and parks to accommodate outdoor activities and provide pedestrian linkages between the Convention Center District and the rest of Downtown; providing Convention Center visitors with convenient transit access to all of Downtown's noteworthy retail and tourist attractions; provision of convention-supported activities adjacent to the Convention Center including entertainment, shopping, and other tourist attractions nearby to ensure a supportive environment for the facility; and, increasing pedestrian activity between the Convention Center and the Financial Core via a well-developed, tree-lined, pedestrian-friendly Figueroa Street, thus eliminating the perception that the facility is isolated.

2. Land Use Compatibility

Alternative 1 would not alter the existing land uses on the Project Site, nor would it introduce new uses or activities. Therefore, it would be compatible with the existing uses that currently occur on the Project Site and in the surrounding area, and existing

relationships between on- and off-site land uses would be maintained. No impacts with respect to land use compatibility would occur, and impacts would be less than those that would occur the Proposed Project.

3. Urban Decay

Alternative 1 would not alter the existing land uses on the Project Site, nor would it introduce new uses or activities. Therefore, no new spectator events or public assemblies that could have the potential to result in the closure or disinvestment in competing facilities would be developed. No impacts with respect to urban decay would occur, and impacts would be less than those that would occur under the Proposed Project.

B. Transportation, Parking, and Pedestrian Safety

Under Alternative 1, all transportation conditions would remain the same as current conditions. As construction activities under Alternative 1 would be limited to maintenance activities there would be no significant construction traffic impacts with this Alternative. As there would be no new development, there would be no additional trips generated by this Alternative, and no difference in overall transportation conditions from current conditions. Thus, impacts would be less than those of the Proposed Project, and there would be no significant transportation, parking, or pedestrian impacts under Alternative 1.

C. Visual Resources

1. Visual Quality

As discussed in Section IV.I.1, Cultural Resources—Historical Resources, of this Draft EIR, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall because under the *City of Los Angeles CEQA Thresholds Guide* historical resources are considered to be visual resources. Therefore, for purposes of a conservative analysis, demolition of the West Hall is considered to represent the loss of a visual resource in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. Under Alternative 1, no construction other than routine maintenance would occur under the Alternative 1. Therefore, the potentially significant impact associated with removal of the West Hall would be avoided. In addition, there would be no potential for construction activities that would temporarily alter the visual appearance of the Project Site in any meaningful way. Therefore, no visual quality impacts associated with construction would occur, and impacts would be less than those that would occur under the Proposed Project.

Alternative 1 would not alter the existing uses on the Project Site, introduce new uses or activities, or change the appearance of the Project Site. Therefore, it would have no potential to degrade the general visual character of the Project Site, substantially alter visual resources on-site, or introduce elements that may contrast with the current aesthetic image of the Project Site or the surroundings. In addition, the potentially significant impact associated with the removal of the West Hall in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM would be avoided under Alternative 1. No visual quality impacts associated with operation of Alternative 1 would occur, and impacts would be less than those that would occur under the Proposed Project.

Unlike the Proposed Project, Alternative 1 would not introduce new visual resources, such as distinctive architectural features, new and improved public plazas, or public art that would positively influence the visual environment and build on many of the existing visual character-defining elements within and near the Project Site.

2. Views

Alternative 1 would not increase the height or massing of on-site structures. Therefore, it would have no potential to obstruct an existing, publicly available, recognized view resource. Alternative 1 would avoid the Proposed Project's significant impacts related to the obstruction of views of the Downtown skyline along SR-110, designated a scenic freeway within the Central City Community Plan, and the removal of the West Hall, which, is conservatively considered to be a visual resource. No impacts related to views would occur under Alternative 1, and impacts would be less than those that would occur under the Proposed Project.

D. Light and Glare

1. Natural Light

Alternative 1 would not alter the existing uses on the Project Site or introduce new uses or activities. Therefore, it would not change the existing shadows that are cast from the Project Site, and would have no incremental effect on the shading environments at any of the identified sensitive uses during the winter solstice, summer solstice, fall equinox, or spring equinox. As stated in Section IV.D.1, Natural Light (Shadows), of this Draft EIR, the Proposed Project also would not increase shade or shadows at any of the identified sensitive uses during the winter solstice, summer solstice, fall equinox, or spring equinox. Therefore, no impacts related to natural light (shading) would occur under Alternative 1, and impacts would be less than significant, similar to the Proposed Project.

2. Artificial Light and Glare

Alternative 1 would not alter the existing uses on the Project Site, or introduce new uses or activities. Therefore, it would not change the existing lighting environment on the Project Site. As no construction would occur, Alternative 1 would avoid the Proposed Project's significant construction lighting impacts. Alternative 1 would have no impact with regard to construction glare; therefore, this impact would be reduced as compared to the Proposed Project's, less than significant impact with regard to construction glare.

The Proposed Project's impacts would be less than significant or less than significant with mitigation on: light trespass; lighting levels at the analyzed receptors; the use of skytrackers; signage; driver visibility/distraction; building/façade lighting; plaza lighting; headlights within the parking garages; daytime glare; and sky glow. However, Alternative 1 would result in no impacts. Therefore, impacts would be reduced in each of these categories as compared to the Proposed Project.

Alternative 1 would not result in new sources of temporary lighting for productions, special events, and fireworks displays and, therefore, would avoid the Proposed Project's significant lighting and glare impacts during operation.

Event Center lighting used to light the playing field is conservatively considered to result in significant impacts at some sensitive receptors. Such lighting would also cause spill light impacts at Receptor Location 8 with sports lighting on at times when low cloud ceilings with high albedo (+50 percent) are present. Alternative 1 would avoid these significant operational lighting impacts.

E. Noise

Alternative 1 assumes the site continues in current condition and ongoing maintenance occurs (e.g., paint and carpet). On-site construction activities would be limited to maintenance activities that would generate limited additional noise and vibration in the vicinity of the Project Site. As such, noise impacts from on-site construction activities and off-site construction truck traffic would be minimal under Alternative 1. In addition, the potential significant vibration impacts from construction activities would also be avoided under Alternative 1.

Alternative 1 would not result in an increase in off-site auto traffic (except for general ambient growth and other related projects), public transit usage or media helicopters, and would not introduce new on-site noise sources, as the operation of existing facilities would continue as they do currently. As such, Alternative 1 would avoid the long-term operational noise impacts from on-site noise sources (e.g., crowd cheering noise, stadium sound

system, firework display shows, and outdoor plazas). In addition, the significant noise impacts associated with off-site noise sources (auto traffic, public transit, and media helicopters) would also be avoided under Alternative 1.

In summary, noise and vibration impacts for both short-term construction and long-term operation under Alternative 1 would be less than significant. As compared to the Proposed Project, noise and vibration impacts are less than the Project.

F. Air Quality and Climate Change

1. Air Quality

Under Alternative 1, the Project Site would continue to operate with existing Convention Center facilities and, therefore, would not generate additional air pollutant emissions beyond those associated with the existing uses. As Alternative 1 would not result in construction activities, beyond routine maintenance, it would avoid the significant regional and localized impacts to air quality that would be caused by the Project. Therefore, construction impacts under Alternative 1 would be less than the Project.

Alternative 1 would also not result in any increase in operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond those currently generated by existing on-site uses. As compared to the Proposed Project, this Alternative would not result in a significant and unavoidable impact associated with regional (NO_X, VOC, CO, PM_{10}, and $PM_{2.5}$) and localized NO_2 and PM_{10} operational emissions. Therefore, operational impacts would be less than those attributable to the Proposed Project.

2. Climate Change

Since there would be no new development or operations on-site, no increase in greenhouse gas (GHG) emissions would occur. As such, impacts associated with global climate change would not occur, and the Alternative's impacts would be reduced as compared with the Project's less than significant impact.

G. Geology and Soils

The Project Site is located within the seismically active region of Southern California; thus, Alternative 1 and the Proposed Project would be exposed to certain geologic hazards (e.g., ground shaking, liquefaction, soil instability). In terms of seismic hazards, impacts would be less than significant but greater under Alternative 1 as the Proposed Project would be constructed in accordance with current seismic safety requirements which are more stringent (i.e., more protective) than those in effect when the existing West Hall was

constructed. As the Project would involve grading, excavation, and other earth-moving activities during construction; these activities could potentially result in sedimentation and erosion. Alternative 1 would not alter the existing uses on the Project Site, nor would it introduce new uses or development. Existing structures on the site would remain and as such, the potential for impacts related to slope instability, sedimentation, and erosion during construction activities would not occur. Thus, both Alternative 1 and the Project would have less than significant impacts. However, because no new development or excavation would occur under Alternative 1, the impacts of this Alternative would be less than the less than significant impacts of the Project.

H. Hydrology and Soils

1. Surface Water

(a) Surface Water Hydrology

Under Alternative 1 no new development would occur and the Project Site would remain in its existing condition. However, the Proposed Project would slightly reduce flow volumes from the Project Site as compared to existing conditions due to an increase in the amount of landscaped area. Therefore, impacts to hydrology would be greater under Alternative 1 than the Proposed Project, although still less than significant.

(b) Surface Water Quality

Since no new development would occur under Alternative 1, no new pollutants from stormwater runoff would be introduced into the stormwater system. However, Alternative 1 would not implement the Proposed Project's source control and treatment best management practices (BMPs) that would result in improved water quality for on-site stormwater runoff. Therefore, impacts to water quality would be greater under Alternative 1 than the Proposed Project, although still less than significant.

2. Groundwater

Routine maintenance such as painting under Alternative 1, as with the Project, may involve the use of hazardous materials. The handling, storage, and disposal of hazardous waste would be in compliance with all applicable federal, state, and local requirements, limiting the potential for groundwater contamination impacts attributable to construction. Therefore Alternative 1 would not significantly impact groundwater level or groundwater quality. As with the Project, this alternative would have less than significant impacts on groundwater. However, the potential for impacts to occur under this alternative would be less than the less than significant impacts under the Proposed Project due to the limited amount of on-site activity that could occur under Alternative 1.

Since no new development would occur under Alternative 1, no new pollutants from storm water runoff would be introduced into the groundwater through infiltration from available landscape areas. However, Alternative 1 would not implement the Proposed Project's source control and treatment control Best Management Practices (BMPs). By implementing BMPs in accordance with NPDES, SUSMP, and LID requirements during operations, ground water quality would be improved under the Proposed Project. Therefore, impacts to ground water quality would be greater under Alternative 1 than the Proposed Project, although still less than significant.

Under Alternative 1 no new development would occur, and the Project Site would remain in its existing condition. Therefore, unlike the Proposed Project changes to groundwater levels would not occur from conversion of impervious to pervious surfaces that would have the potential to change ground water levels through infiltration of surface runoff within available landscape areas. Therefore, the impacts to groundwater levels would be less than those that would occur under the Proposed Project, and similarly less than significant.

I. Cultural Resources

1. Historical Resources

As discussed in detail in the Historical Assessment provided in Appendix S of this Draft EIR, the Project Site does not include any buildings that appear eligible for inclusion in the National Register, California Register, or as a local HCM. Nonetheless, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall.

Under Alternative 1, no demolition or construction would occur within the Project Site, and the existing West Hall would remain. Thus, impacts would be less than significant and this Alternative would avoid the potentially significant historic impact associated with removal of the West Hall in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM.

2. Archaeological Resources

Under Alternative 1, no grading or other earthwork activities would occur. While ongoing maintenance of existing uses would occur, these activities would not disturb soil in the Project area. Thus, this Alternative would not have the potential to disturb

archaeological resources. Therefore, no impacts to archaeological resources would result under Alternative 1 and impacts would be less than the impacts under the Proposed Project.

J. Public Services (Police and Fire)

As construction would be limited to routine maintenance under Alternative 1, construction activities would be sufficiently limited so as to not require the types of security measures that would be implemented under the Proposed Project. As such, impacts of Alternative 1 would be less than those of the Proposed Project and be similarly less than significant.

As Alternative 1 would not result in increased floor area, it would not create any new demands upon LAPD or LAFD resources. Additionally, as there is no additional operational traffic, there would be no impact to emergency response times. Thus, Alternative 1 would result in no impact to LAPD's police protection services and LAFD's fire protection services, whereas the Proposed Project would result in a less than significant impact to these services. Therefore, potential impacts to police protection services would be less than the less significant impacts under the Proposed Project.

K. Utilities

1. Water

Under Alternative 1, no construction activities would occur and no new uses would be introduced at the Project Site. As such, Alternative 1 would not result in a change in water consumption at the Project Site over existing conditions. Thus, no impacts on water supply and water infrastructure would result. Such impacts would be less than those of the Proposed Project, which are concluded to be less than significant with the implementation of the identified project design features and mitigation measures.

2. Sewer

Under Alternative 1, the Project Site would continue to operate under the existing Convention Center uses. While ongoing maintenance of existing uses would occur, these activities would not result in an increase in wastewater generation on the Project Site. Thus, Alternative 1 would not result in significant impacts to wastewater. Therefore, impacts to wastewater would be less than significant under Alternative 1 and less than the impacts under the Proposed Project, which are concluded to be less than significant with the implementation of the identified project design features and mitigation measures.

3. Solid Waste

Regarding construction, under Alternative 1, no demolition or construction would take place under Alternative 1, although on-site maintenance would generate limited quantities of construction solid waste. Although some construction solid waste would be generated under Alternative 1, impacts would be less than significant. The Proposed Project would generate large quantities of solid waste during demolition and construction that would need to be landfilled. Therefore, construction impacts under Alternative 1 would be less than those that would occur under the Proposed Project.

Regarding operation, Alternative 1 would include no new development and therefore, would not increase on-site solid waste generation over existing conditions. Therefore, since this Alternative would not increase solid waste generation and disposal needs as compared to existing conditions, operational impacts on solid waste disposal facilities would not occur. Thus, this Alternative would avoid the Proposed Project's significant and unavoidable operational impact on landfill capacity.

4. Electricity

Since no new development would occur and existing on-site uses would remain under Alternative 1, electricity demand would not be increased. As such, electricity consumption levels would remain consistent with existing levels. Therefore, no impacts on electricity would occur under Alternative 1. Such impacts would be less than those of the Proposed Project.

5. Natural Gas

Since no new development would occur and existing on-site uses would remain under Alternative 1, natural gas demand would not be increased. As such, natural gas consumption levels would remain consistent with existing levels. Therefore, no impacts on natural gas would occur under Alternative 1 and impacts would be less than those of the Proposed Project.

L. Environmental Safety

Alternative 1 would not alter the existing uses on the Project Site, nor would it introduce new uses or activities. Hazardous substances would continue to be used in similar quantities and would consist of the same types of materials currently used on-site including materials related to the maintenance of the Convention Center and STAPLES Center and fuel storage for vehicles and emergency equipment, as well as cleaning agents, paints, pesticides, and other materials used for landscaping. All hazardous substances would continue to be contained, stored, and used in accordance with manufacturers'

instructions and applicable standards and regulations. Thus, Alternative 1 would not result in an increase in hazards relative to the routine transport, use, or disposal of hazardous materials. Impacts related to hazardous substances would be less than significant and would be less than those that would occur under the Proposed Project.

Under Alternative 1, the existing structures on the site would remain intact and as such, the potential for release of asbestos fibers (asbestos-containing materials or ACMs) and uncovering of lead-based paints and polychlorinated biphenyls due to building modification or demolition activities would not occur. In addition, the potential for encountering contaminated soil or underground features such as USTs and a previously abandoned oil well below the Project Site would also not occur. Thus, this Alternative's impacts associated with historic uses of the site, hazardous site listings, asbestos, lead-based paints and polychlorinated biphenyls would be avoided with this alternative and impacts would be less than significant and less than under the Proposed Project.

Construction of the Proposed Project, due to its location within a City designated Methane Zone, would require the implementation of mitigation measures that would reduce potential methane impacts to a less than significant level. As the West Hall was constructed decades before the City methane ordinance was adopted, it was not constructed with the additional protections required by the City's current methane ordinance. As a result, the West Hall would not benefit from these additional protections and methane impacts under Alternative 1 would be greater than those of the Proposed Project.

3. Summary of Comparative Impacts

Alternative 1 would avoid the following significant impacts that would occur with the Proposed Project: transportation, visual resources/views, artificial light, air quality, noise, historical resources, and solid waste. Alternative 1 would also result in the avoidance of most of the adverse, less than significant impacts anticipated to occur with the development of the Proposed Project, including among other things: parking, pedestrian safety, natural light, public services; and utilities. On the other hand, impacts with regard to seismic, methane hazards, hydrology, groundwater, and land use plans are greater under Alternative 1. Further, Alternative 1 would eliminate the net beneficial effects that would otherwise occur with implementation of the Proposed Project, including: advancing key regional, City, and County land use policies; and creating new employment opportunities. A tabular summary comparing the impacts of Alternative 1 to those of the Proposed Project is presented in Table V-2 on page V-9.

4. Relationship of this Alternative to Project Objectives

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

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

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

The Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles would also not be realized under Alternative 1. Specifically, without an Event Center it would not promote the development of major sports, entertainment and Convention Center facilities in the Downtown Center and in close proximity to transportation corridors and transit stations, or create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area. Nor would it synergistically build upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level, or create a catalyst to enhance further the downtown Los Angeles area

in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another.

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

Finally, under this Alternative no new development would occur and without modernization, the existing Convention Center would lose its current market share. Therefore, Alternative 1 would not achieve the Project Objective to promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism. Specifically, the Alternative would not construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship. In addition, it would not develop entertainment and sports facilities on public lands that provide a return to the City's General Fund and/or provides civic, cultural and sporting amenities that serve a wide range of public interests in the City and region, or generate substantial additional revenues for the City government, stimulate economic activity in the greater Los Angeles area, and create thousands of good paying construction and permanent jobs as soon as possible. Nor would it provide economic development opportunities in Pico-Union and South Los Angeles by attracting out of town visitors to additional exhibition events, and local and out of town fans to additional spectator events.

C. Alternative 2: No Project—Buildout Per Existing Approvals

1. Description of the Alternative

The No Project—Buildout Per Existing Approvals Alternative (Alternative 2) consists of constructing additional Convention Center Floor Area permitted by the City's October 29, 1987, Conditional Use Permit (CPC-1987-0595-CU), and Convention Center related uses on a portion of the Los Angeles Sports and Entertainment District (LASED) Specific Plan designated for this purpose. The Convention Center under Alternative 2 would consist of a total of 1,862,000 square feet of Floor Area, which would be an increase of 323,329 square feet of Floor Area over existing conditions. This additional Floor Area would be developed in two new buildings. A total of 250,000 square feet of Floor Area of Convention Center related uses would be developed in a new Event Deck Hall on Development Site 1a, an airspace parcel, in the Olympic West Subarea of the LASED Specific Plan (see Section 5.C. and Map 2 of the LASED Specific Plan). Development Site 1a is located on the north side of Chick Hearn Court, between Georgia Street and L.A. Live Way, opposite from the Convention Center's West Hall. The balance of new development under this Alternative 2, a total of 73,329 square feet of Floor Area, would be constructed within a new West Hall Annex, located north of the West Hall, and south of Chick Hearn Court. Alternative 2 would add 187,531 square feet of Rentable Area, thereby increasing the total available Rentable Area at the Convention Center from 886,093 square feet to 1,073,624 square feet, a 21 percent increase in Rentable Area.

The West Hall Annex would be the same height as the existing West Hall. The Event Deck Hall would be 60 feet in height above the existing Event Deck and connect to the West Hall Annex via a bridge over Chick Hearn Court which would be 36 feet in height above a roadway clearance of 24 feet (i.e., overall height of 60 feet), that would also include meeting room space. The West Hall Annex would connect to the existing West Hall via a pedestrian bridge (i.e., this bridge does not include convention center uses). This Alternative would provide a total of 7,294 parking spaces, an increase of 1,736 spaces over the existing supply. Under Alternative 2, the existing West Hall, South Hall and Venice Garages would remain, the Bond Street Garage would be built (928 spaces as per the Proposed Project), and the L.A. Live Way Garage would be built but only to six levels above grade and 1,949 spaces (compared to 2,950 spaces with the Proposed Project. The Event Center would not be developed under Alternative 2. A comparison of this Alternative and the Proposed Project is provided in Table V-4 on page V-42.

Table V-4
Comparison of Proposed Project and Alternative 2—No Project: Buildout Per Existing Approvals

	Proposed Project	Alternative 2	Change from Proposed Project	
			Number	Percent
Seats				
Event Center	72,000	0	(72,000)	-100.0%
Total Floor Area				
Event Center	1,750,000	0	(1,750,000)	-100.0%
Convention Center				
Proposed Project or Alternative	500,000	785,530	285,530	57.1%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Convention Center	1,576,470	1,862,000	285,530	18.1%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	2,250,000	785,530	(1,464,470)	-65.1%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Project Site	3,326,470	1,862,000	(1,464,470)	-44.0%
Net Floor Area (Change from Existing Conditions)				
Event Center	1,750,000	0	(1,750,000)	-100.0%
Convention Center				
Proposed Project or Alternative	37,799	323,329	285,530	755.4%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Convention Center	37,799	323,329	285,530	755.4%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	1,787,799	323,329	(1,464,470)	-81.9%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Project Site	1,787,799	323,329	(1,464,470)	-81.9%
Rentable Area				
Event Center (When Used for Exhibition Use Only)	245,650	0	(245,650)	-100.0%
Convention Center				
Proposed Project or Alternative	286,310	473,083	186,773	65.2%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Convention Center	886,851	1,073,624	186,773	21.1%
Totals				
Proposed Project or Alternative(Event Center + Convention Center)	531,960	473,083	(58,877)	-11.1%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Project Site	1,132,501	1,073,624	(58,877)	-5.2%

Table V-4 (Continued)
Comparison of Proposed Project and Alternative 2—No Project: Buildout Per Existing Approvals

	Proposed Project	Alternative 2	Change from Proposed Project	
			Number	Percent
Parking				
Proposed Project or Alternative				
L.A. Live Way Garage	2,950	1,949	(1,001)	-33.9%
Bond Street Garage	928	928	0	0.0%
West Hall/West Hall Replacement Building	0	1,625	1,625	100.0%
Total Proposed Project or Alternative	3,878	4,502	624	16.1%
Not a Part of Proposed Project or Alternative	2,792	2,792	0	0.0%
Total Project Site	6,670	7,294	624	10.0%

Source: Matrix Environmental, 2012.

2. Environmental Impacts

A. Land Use

Development of the land uses contemplated under Alternative 2 is currently allowed under existing entitlements for the previously approved LASED and Convention Center projects. Therefore, Alternative 2 would not require any new land use approvals and would not implement the Convention and Event Center Specific Plan that is proposed by the Proposed Project.

1. Land Use Consistency

Alternative 2 would be consistent with public investment in the transportation system to some extent by virtue of its location in close proximity to transit in downtown Los Angeles, which is the hub of the rail and bus transit system for the metropolitan Los Angeles area. Also, like the Proposed Project, Alternative 2 would be an infill development on a previously developed site that would complement existing convention uses at the Project Site. However, the extent to which Alternative 2 would promote transit usage and pedestrian activity would be substantially less than the Proposed Project because the attendance growth forecasted under Alternative 2 compared to the Proposed Project would be substantially reduced. The increased transit usage that would result from the Proposed Project would be largely associated with the Event Center. The New Hall under the Proposed Project would also contribute to the attendance growth forecasted under the Proposed Project because it would enhance the functionality of the Convention Center due

to its contiguous configuration. Alternative 2, while increasing Convention Center square footage, would not develop the Event Center or develop contiguous floor area that could accommodate larger exhibitions. As a result, this Alternative would not function as a transit-oriented development to the same degree as the Proposed Project since it would not attract the same level and density of patronage at a location that is in close proximity to multiple transit opportunities. Therefore, because Alternative 2 would not introduce new, transit-oriented development or design features to the Project Site or facilitate connections with nearby transit and support and encourage the use of alternative modes of transportation to the extent of the Proposed Project, Alternative 2 would not advance SCAG Policy GV P1.3 to, "Encourage transit-oriented development" to the extent that would occur under the Proposed Project. Additionally, because Alternative 2 would not include the Event Center, it would not attract new visitors from across the region or the immediate Downtown area, nor take full advantage of the location as an infill development adjacent to L.A. LIVE, and thus not advance SCAG Policy GV P2.1 to, "Promote infill development and redevelopment to revitalize existing communities" to the extent as the Proposed Project. Alternative 2 would also not implement streetscape improvements or provide pedestrian-oriented improvements to promote an active pedestrian realm along the perimeter of the Project Site and under the SR-110 Freeway at Olympic Boulevard, Pico Boulevard, 11th Street, and 12th Street. As such, Alternative 2 would not advance SCAG Policy GV P1.4 to, "Promote a variety of travel choices" or SCAG Policy GV P2.3 to, "Promote 'people-scaled' pedestrian-friendly communities."

With fewer new structures and a limited expansion proposed for the West Hall, Alternative 2 would provide less of an opportunity to implement sustainability features intended to reduce the potential for impacts related to climate change by minimizing air and GHG emissions, water and energy usage, and solid waste generation and disposal. Alternative 2 would create some additional temporary and permanent jobs during construction and operation; however, since job creation is a function of development size, Alternative 2 would create substantially fewer new jobs than the Proposed Project. As such, Alternative 2 would locate new jobs near existing housing, but to a substantially lesser extent than the Proposed Project. Overall, as an infill development in proximity to numerous public transportation options, Alternative 2 would not conflict with SCAG's Compass Blueprint Growth Vision or Regional Transportation Plan, but the extent to which Alternative 2 would support the relevant goals and policies in these plans would be substantially less than the Proposed Project.

Like the Proposed Project, Alternative 2 would be consistent with the Project Site's designation in the City of Los Angeles General Plan Framework Element as part of the Downtown Center. Alternative 2's FAR and maximum building height would be less than the Proposed Project, and as such would be well within what is permitted at the Project Site. Therefore, similar to the Proposed Project, Alternative 2 would be consistent with the

density and height provisions of the Municipal Code. Although Alternative 2 would provide less new development than the Proposed Project, it would remain consistent with the General Plan Framework Element's vision of the Downtown Center as an international center for finance and trade that serves the population of the metropolitan region. It is anticipated that the building and site design of Alternative 2 would complement the types of uses found both on-site and within the immediate Project area. However, unlike the Proposed Project, Alternative 2 would not include design features to promote transit use and pedestrian activity. Also, as stated above, Alternative 2 would create substantially fewer new jobs than the Proposed Project. Overall, Alternative 2 would not substantially conflict with the City's General Plan Framework Element, but the extent to which Alternative 2 would support the relevant goals and policies in this plan would be substantially less than the Proposed Project, similar to that described above for Alternative 1.

Development of the land uses contemplated under Alternative 2 is currently allowed under existing entitlements for the previously approved LASED and Convention Center projects. Therefore, Alternative 2 would not require a General Plan Amendment or zone change and would be consistent with existing General Plan designations and the LAMC. The modernized convention center use that would result from implementation of Alternative 2 would serve to further complement and benefit the tourism, hotel and entertainment uses in the immediate Project vicinity, but to a much lesser extent than the Proposed Project due to the elimination of the Event Center.

With respect to the Downtown Design Guide, it is anticipated that the building and site design of Alternative 2 would complement the types of uses found both on-site and within the immediate Project area, and would not conflict with the Downtown Design Guide. As discussed above, the attendance growth and related increase in transit usage and on-site pedestrian activity that are forecasted under the Proposed Project are largely associated with the Event Center and the New Hall. Alternative 2 would not develop the Event Center or develop contiguous Convention Center floor area that could accommodate larger exhibitions. As a result, Alternative 2 would not warrant the design features to promote transit use and pedestrian activity that are proposed by the Proposed Project. Overall, Alternative 2 would not substantially conflict with the Central City Community Plan or the associated Downtown Design Guide, but the extent to which Alternative 2 would support the relevant goals and policies in these plans would be less than the support for these goals and polices provided by the Proposed Project.

While the Proposed Project would be consistent with most of the standards and guidelines in the Downtown Design Guide it would be potentially inconsistent with the guidelines that no building be more than 300 feet in length and with the signage guidelines that prohibit animated signs, wall murals covering windows, and that regulate hours of

signage illumination. As discussed in Section IV.A, Land Use, of this Draft EIR, a football stadium is required to be greater than 300 feet in length and the proposed Event Center would provide substantial building articulation and activity at the street and thus be consistent with the intent of the guidelines. Section IV.A further discussed how this type of signage is considered an important visual component of the Proposed Project given the event- and entertainment-oriented nature of the uses. Nonetheless, these potential design guideline inconsistencies would not occur with Alternative 2.

The Downtown Strategic Plan identifies the need to both expand the Convention Center and develop the area surrounding it with complementary uses including entertainment, shopping and hotel uses, outdoor activities and other tourist attractions. Alternative 2 would support the objectives of the Downtown Strategic Plan by renovating and modernizing the usable space within the Convention Center. However, the extent to which Alternative 2 would support these objectives would be much less than the Proposed Project due to the elimination of the Event Center. Therefore, Alternative 2 would be consistent with and would not be in substantial conflict with the Downtown Strategic Plan, but the extent to which Alternative 2 would support the relevant goals and policies in this plan would be less than the support for such goals and policies that would be provided by the Proposed Project.

As discussed above, the degree of transit usage and intensity of on-site pedestrian activity under Alternative 2 would be substantially less than that of the Proposed Project. Therefore, this Alternative would not include the streetscape, landscape, or pedestrian amenities proposed by the Proposed Project. Alternative 2 would not introduce new uses or design elements along Figueroa Street, such as improvements to Gilbert Lindsay Plaza, that are proposed by the Proposed Project. Therefore, it is anticipated that Alternative 2 would be inconsistent with the Figueroa Corridor Streetscape Project. The Figueroa Corridor Economic Development Strategy specifically calls for the improvement of the Figueroa Street Corridor both economically and physically to reinforce its regional importance. The proposed Figueroa Corridor Streetscape Project is studying and will eventually provide a design for a coordinated streetscape that will complement the existing buildings and businesses in the area while promoting pedestrian and bike activity. Based on public input to date in community workshops, it is anticipated that Alternative 2 may be inconsistent with the Figueroa Corridor Streetscape Project, as it would not provide the improvements to Gilbert Lindsay Plaza that are part of the Proposed Project. For these same reasons, Alternative 2 would also be inconsistent with the City's Walkability Checklist.

Based on the above, Alternative 2 would not conflict with SCAG's regional plans, the General Plan Framework Element, the Central City Community Plan, or the Downtown Strategic Plan, but the extent to which Alternative 2 would support these plans and policies

would be substantially less than the Proposed Project due to the reduced expansion of the Convention Center and the elimination of the Event Center. Additionally, Alternative 2 would be inconsistent with the Figueroa Corridor Streetscape Project, the Figueroa Corridor Economic Development Strategy, and the City's Walkability Checklist. Overall, impacts with respect to land use consistency would be less than significant but greater than the Proposed Project.

2. Land Use Compatibility

Alternative 2 would increase the size of the Convention Center, an existing use on the Project Site. Therefore, like the Proposed Project, Alternative 2 would be consistent with and would build on the existing uses on the Project Site and in the immediate area. Alternative 2 would not introduce new types of uses that do not already occur within the Project Site. Rather, the proposed uses would reinforce Downtown and the immediate Project area in particular as a world-class destination for tourist attractions including conventions, trade shows, sporting events and entertainment, serving the general population with convenient access from throughout the Los Angeles region via transit as well as freeways, but to a lesser extent than the Proposed Project. The Proposed Project's increase in building height, density and mass on the Project Site would not be atypical in the area given the relatively recent (and planned future) development of dense entertainment and high-rise uses at the adjacent L.A. LIVE and numerous mid-rise hotel and residential lofts to the east. Alternative 2 would involve reductions in building height, density and mass as compared to the Proposed Project, and as such would also be compatible with the surrounding vicinity. Furthermore, given the location of the Project Site, the nature of the nearby surrounding uses, and the adjacent freeways that separate the Project Site from neighboring lower density residential areas, no existing neighborhood or community would be physically disrupted, divided, or isolated. Therefore, impacts with respect to the compatibility of the proposed land uses with surrounding uses would be less than significant under Alternative 2 and similar to the Proposed Project.

3. Urban Decay

Alternative 2 would not include development of the Event Center. Therefore, there is no potential that this Alternative would result in disinvestment in, or closure of, stadia in the region. Although Alternative 2 would result in additional exhibition space, the total new space would be less than that provided by the Proposed Project when the Event Center is used as exhibition space. In addition, the new space under Alternative 2 would not enable the Convention Center to be as competitive as under the Proposed Project because it would not be contiguous space that could accommodate larger exhibitions, it would be less accessible, and offer fewer amenities such as a multi-purpose room. Based on the characteristics of the existing convention facilities in the region, recent and ongoing investments in these facilities, and the lack of potential for the Proposed Project to result in

displacement at these facilities, leading to their abandonment or decay, this Alternative would not result in disinvestment in, or closure of, convention facilities in the region. The additional Convention Center space that would be developed under Alternative 2 is anticipated to result in similar conditions as compared to the Proposed Project. Therefore, impacts with respect to urban decay would also be less than significant under Alternative 2 and less than the Proposed Project.

B. Transportation, Parking, and Pedestrian Safety

1. Transportation

Alternative 2 would have lower overall levels of construction activity than the Proposed Project in all respects, with fewer haul and delivery trucks, fewer construction workers, and fewer roadway lane closures (Pico Boulevard lanes would not need to be closed during construction and lane closures would be limited to L.A. Live Way and Chick Hearn Court). While there may be impacts from truck trips and construction worker trips, these would be temporary in nature and with mitigation measures would be expected to be less than significant. It is unlikely that there would be significant traffic impacts from roadway lane closures on L.A. Live Way as it not an arterial roadway and carries less traffic than major streets in the area. However, construction of the building bridging over Chick Hearn Court under this Alternative could require lane closures on Chick Hearn Court, unlike the Proposed Project, and could lead to temporary significant impacts. Like the Proposed Project, significant construction impacts would occur under Alternative 2. However, construction impacts under this Alternative would be less than for the Proposed Project, and there would be fewer significant impacts.

During operation, Alternative 2 would generate between approximately 190 and 380 additional vehicle trips in five of the six hours analyzed for the Proposed Project, with zero trips occurring in the Weekday Evening Post-Event Hour (due to no Convention Center activity). These additional trips would occur only from the expansion of the Convention Center, and would be substantially lower than the additional trip totals for the Proposed Project (9,840 to 15,400 trips per hour).

There would be substantially fewer significant impacts at intersections and freeway mainline locations from Alternative 2 than with the Proposed Project, and it is estimated that most but not all of the Proposed Project's significant impacts in these categories (and particularly a substantial number of LOS E and LOS F intersection impacts) would be avoided under this Alternative. The few impacts under this Alternative would be at locations in close proximity to or on corridors leading directly to the Project Site. This Alternative would likely avoid most if not all of the freeway ramp impacts identified for the Proposed Project. There would be no significant Congestion Management Plan (CMP)

intersection impacts, as for the Proposed Project. This Alternative would avoid most if not all of the CMP freeway mainline impacts identified for the Proposed Project, with any remaining impacts being located in close proximity to the Project Site. Alternative 2 would lead to a negligible increase in transit trips, and no additional transit service would be needed. There would be no significant transit impacts, and the Pico Station improvements that would occur with the Proposed Project would not occur under this Alternative as they would not be needed. Access provisions for this Alternative would be very similar to the Proposed Project. Access to the West Hall would be maintained unlike with the Proposed Project, but there would be no significant access impacts, as with the Proposed Project. With the substantially lower trip volumes for this Alternative, there would be no significant neighborhood intrusion impacts, unlike the Proposed Project which could cause potentially significant impacts.

2. Parking

Alternative 2 would require a total of 6,622 parking spaces based on the parking ratio under the existing zone variance, or 1,157 more than today for the current Convention Center. The increase would be solely attributable to the increase in size of the Convention Center. The spaces required would be substantially less than the 12,503 spaces required by the Proposed Project. This Alternative would provide a total of 7,294 parking spaces, an increase of 1,736 spaces over the existing supply.

The existing West Hall, South Hall and Venice Garages would remain, the Bond Street Garage would be built (928 spaces as per the Proposed Project), and the L.A. Live Way Garage would be built but only to 6 levels and 1,949 spaces (compared to 2,950 spaces with the Proposed Project). The parking supply for this Alternative would be sufficient to meet the parking needs, so there would be no significant parking impacts (as was also concluded for the Proposed Project with the proposed parking supply and management plan). Parking impacts would be less than those of the Proposed Project due to the lower level of parking demand and a greater parking supply relative to the parking demand under this Alternative.

3. Pedestrian Safety

Additional pedestrian volumes would be substantially lower for Alternative 2 than for the Proposed Project. Pedestrian facilities would remain largely as today. The temporary street closures and the streetscape and sidewalk enhancements that would occur with the Proposed Project would not occur with this Alternative. Impacts for pedestrian circulation and safety and for bicycle circulation and safety would be less than for the Proposed Project and would similarly be less than significant.

C. Visual Resources

1. Visual Quality

During construction activities for Alternative 2, the visual appearance of portions of the Project Site would be altered due to grading and construction activities. Construction of Alternative 2 would require approximately 18 to 24 months (similar to the construction duration of the Proposed Project's New Hall component). Construction activities associated with development of Alternative 2 would be reduced in scale compared to the Proposed Project and would occur within a smaller area. Like the Proposed Project, Alternative 2 would use construction fencing to reduce visual impacts and would promptly remove graffiti when necessary. Given the temporary nature of construction activities, construction of Alternative 2 would not substantially and adversely alter or degrade the existing visual character of the Project Site. In addition, under Alternative 2, the West Hall would remain. As discussed above under Alternative 1, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall because under the *City of Los Angeles CEQA Thresholds Guide* historical resources are considered to be visual resources. Thus, this potentially significant impact that would occur under the Proposed Project would be avoided under Alternative 2. Overall, visual quality impacts associated with construction of Alternative 2 would be less than significant and less than the Proposed Project due to the reduced extent and duration of construction.

Alternative 2 would increase the building density and mass on the northern portion of the Project Site, over Chick Hearn Court, and on the L.A. LIVE site. The West Hall Annex would be the same height as the existing West Hall. The height of the Event Deck Hall would be 60 feet, and the height of the bridge over Chick Hearn Court would be 36 feet. The increases in building density and mass that would occur under Alternative 2, and the height of the new structures, would be consistent and compatible with the existing and planned development of dense entertainment and high-rise uses at the adjacent L.A. LIVE and numerous mid-rise hotel and residential lofts to the east. As compared to the Proposed Project, the amount of signage would be reduced. In addition, the bridge over Chick Hearn Court would introduce a new element to the visual environment that would physically connect the L.A. LIVE development to the Convention Center and would mirror the functionality, and to some degree the look, of the Convention Center's existing Concourse Building, which connects the existing West Hall to the South Hall. The introduction of this architectural element would define the western boundary of the Convention Center/L.A. LIVE/STAPLES Center District and further contribute to the unique visual character that currently exists along Chick Hearn Court. As SR-110 is elevated through the Downtown area, the bridge would have, at most, limited visibility for locations

west of the freeway. Based on the above, Alternative 2 would not degrade the general visual character of the Project Site. However, while it is anticipated that the building and site design of Alternative 2 would complement the types of uses found both on-site and within the immediate Project area, Alternative 2 would not include the design features proposed by the Proposed Project to enhance the quality of the public realm and promote an active, pedestrian-friendly environment. Notwithstanding, Alternative 2 would avoid the Proposed Project's potential impact on visual resources resulting from removal of the West Hall in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. Therefore, visual quality impacts associated with operation of Alternative 2 would be less than significant and less than the Proposed Project.

2. Views

Building heights and envelopes of new construction under Alternative 2 would be substantially reduced as compared to the Proposed Project, and would be concentrated within a smaller area. Therefore, Alternative 2's potential to obstruct an existing; publicly available, recognized view resource would be reduced as compared to the Proposed Project. By eliminating the Event Center and reducing the height of the L.A. Live Way Garage by three levels compared to the Proposed Project, it is anticipated that Alternative 2 would eliminate the Proposed Project's significant impact related to the blockage of views of the Downtown skyline that would occur along SR-110 under the Proposed Project. Additionally, Alternative 2 would not remove the West Hall, and thus, would avoid the potential impact that would occur in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. Therefore, Alternative 2 would avoid the Proposed Project's significant impacts related to valued views. Overall, impacts to views under Alternative 2 would be less than significant and less than the Proposed Project.

D. Light and Glare

1. Natural Light

Under Alternative 2, the shadow sensitive receptors that could be affected would be the Nokia Plaza (Sensitive Use No. 1) and the Ritz-Carlton Residences at L.A. LIVE (Sensitive Use No. 2). Instead of building the Event Center, the existing West Hall would be retained and the West Hall Annex, an approximately 73,329-square-foot extension to the West Hall, would be constructed on the north side of the West Hall. The West Hall Annex would be the same height as the existing West Hall. Shadows from the existing West Hall are minimal and do not reach any of the identified sensitive receptors during the threshold hours of any season. In fact, during most of the analyzed hours, shadows do not extend beyond Chick Hearn Court. Based on the limited extent of existing shadows from

the West Hall and the height of the intervening buildings, it is not anticipated that the addition of the West Hall Annex would create shadows that would be capable of reaching the Ritz-Carlton Residences at L.A. LIVE or Nokia Plaza. Furthermore, the area that would be occupied by the West Hall Annex under Alternative 2 would generally be occupied by the Event Center under the Proposed Project. At 220 feet, the Proposed Project's Event Center would be substantially taller than Alternative 2's West Hall and West Hall Annex. As the proposed Event Center would not result in significant shade and shadow impacts on the Ritz-Carlton Residences at L.A. LIVE or Nokia Plaza, it is anticipated that shadows from the shorter West Hall Annex also would not significantly impact these uses.

Under Alternative 2, new shadows would also be introduced by the Event Deck Hall and the bridge over Chick Hearn Court. A building with a greater height than the Event Deck Hall was analyzed in the Draft EIR for the LASED, which includes an analysis of the potential shading impacts of that project.[10] This analysis concludes that the Event Deck would not shade sensitive uses for more than three hours during the winter or more than four hours during the summer.[11] Furthermore, the sensitive uses within the Ritz-Carlton Residences at L.A. LIVE are the residential uses located on the 27th floor and above. Shadows from the proposed 60-foot Event Deck Hall and 36-foot bridge over Chick Hearn Court would not reach the 27th floor of the Ritz-Carlton tower. In order to reach Nokia Plaza, shadows from the Event Deck Hall and bridge over Chick Hearn Court would need to extend over Nokia Theater, which is located to the east of the Event Deck. Based on the height of the intervening building and the location of Nokia Plaza in relation to the Event Deck Hall and bridge, it is not anticipated that these uses would create shadows that would be capable of reaching Nokia Plaza during the time periods identified in the threshold of significance for any season. Therefore, it is anticipated that the Event Deck Hall and bridge over Chick Hearn Court would have no effect on shade-sensitive uses.

The New Hall and Bond Street Garage would not be developed under Alternative 2. The height of the L.A. Live Way Garage would be reduced from eight above-grade levels to six above-grade levels. Thus, shadows emanating from the western portion of the Project Site, which were concluded to be less than significant under the Proposed Project, would generally be reduced under this Alternative and would also be less than significant.

Based on the above analysis, shadow impacts of Alternative 2 would be less than those of the Proposed Project, and also less than significant.

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[10] *City of Los Angeles Planning Department, Draft EIR for the Los Angeles Sports and Entertainment District, SCH No. 2000091046/EIR No. 2000-3577, January 11, 2001. See Section IV.B.3, Shade/Shadow.*

[11] *Ibid, pg. 172.*

2. Artificial Light and Glare

Under Alternative 2, the West Hall Annex would be the same height as the existing West Hall and would have similar lighting characteristics. The Event Deck Hall and bridge over Chick Hearn Court would have similar lighting characteristics as the existing Convention Center.

The Proposed Project would require nighttime construction to complete the Event Center within the timeframe identified in the Project Objectives. Without the Event Center, nighttime construction would not be required. Furthermore, the Proposed Project's significant construction lighting impacts would only occur from Event Center construction lighting. Therefore, Alternative 2 would avoid the Proposed Project's significant nighttime construction lighting impacts. Impacts related to construction glare would be similar to the Proposed Project and less than significant, as Alternative 2 would not be anticipated to introduce significant sources of glare during construction activities.

The Proposed Project impacts are less than significant or less than significant with mitigation on: light trespass; lighting levels at the analyzed receptors;; the use of skytrackers; signage; driver visibility/distraction; building/façade lighting; plaza lighting; headlights within the parking garages; daytime glare; and sky glow. For each of these categories except plaza lighting, headlights within the parking garages, and daytime glare, the Event Center would be the greatest contributor to future lighting levels under the Proposed Project. While the new West Hall Annex, Event Deck Hall, and bridge over Chick Hearn Court under Alternative 2 would produce new lighting sources, the intensity of light generated by these sources would be substantially less than that of the Event Center and would not be anticipated to result in new or increased artificial lighting impacts. These new lighting sources would also be similar to those that currently exist on-site at the Convention Center. Thus, while some new lighting sources, such as the New Event Deck, would be closer to sensitive uses in L.A. LIVE, it is not anticipated that this would result in new significant impacts to these uses. Therefore, impacts associated with light trespass; lighting levels at the analyzed receptors; Event Center lighting used to light the playing field; the use of skytrackers; signage; driver visibility/distraction; building/façade lighting; and sky glow would be less than significant under Alternative 2 and less than the Proposed Project. Impacts associated with headlights within the parking garages and plaza lighting would also be less than significant under Alternative 2 and less than the Proposed Project due to the reduced scale of parking structure development and the maintenance of existing plaza lighting, respectively. It is anticipated that impacts associated with daytime glare would be less than significant and similar to the Proposed Project as under Alternative 2, as is the case with the Proposed Project, building façades would be anti-reflective or treated with an anti-reflective coating in order to minimize glare.

Alternative 2 would not involve construction of the Event Center. Therefore, this Alternative would not result in new sources of temporary lighting for productions and special events, including fireworks displays, as such lighting would only be associated with the Event Center. Therefore, Alternative 2 would avoid the Proposed Project's significant lighting impacts during operation.

Because Alternative 2 would not involve construction of the Event Center, this Alternative would not result in significant impacts on some sensitive receptors due to new sources of sports lighting associated with the Event Center or spill light impacts at Receptor Location 8 with sports lighting on at times when low cloud ceilings with high albedo (+50 percent) are present. Therefore, Alternative 2 would avoid these significant operational lighting impacts.

E. Noise

Construction of Alternative 2 would require approximately 18 to 24 months (similar construction duration as the Proposed Project's New Hall component). Construction of the New West Hall Annex would require less excavation than the Event Center which, in turn, would require less on-site heavy construction equipment, as well as number of hauling trucks during the site preparation and other construction phases. The reduction in construction activity is sufficient to reduce but not eliminate the Proposed Project's significant impacts at Receptors R1 and R6, and possibly at Receptors R5 and R7. In addition, Alternative 2 would avoid the significant noise impacts that would occur during the nighttime hours, as nighttime construction activities are not anticipated under Alternative 2. Furthermore, the construction vibration impacts to nearby building structures (i.e., potential building damage) associated with Alternative 2 would be less than significant like the Proposed Project, as similar types of construction equipment as under the Proposed Project would be used. However, the significant vibration impacts (i.e., annoyance on sensitive use) at the Nokia Theatre at L.A. LIVE, that are mitigated to a less than significant level under the Proposed Project, would not be expected to occur under Alternative 2 as the construction equipment that generates the Proposed Project's impacts would not be used during Alternative 2 construction (i.e., vibratory rollers and driven piles).

The new parking facility under Alternative 2 would be located at the same location as the Proposed Project L.A. Live Way Garage and would utilize similar construction procedures (i.e., including similar construction equipment and schedule). Therefore, noise impacts (from both on-site construction activities and off-site construction truck traffic) associated with the new parking facility under Alternative 2 would be similar to the Proposed Project L.A. Live Way Garage and would be less than significant.

Alternative 2 would not involve construction of the Event Center, therefore, it would avoid the significant operational noise impacts associated with the on-site noise sources. including crowd cheering and the use of the sound system at the Event Center, firework display shows, and the pre- and post-event activity in the outdoor plazas.

Noise associated with other on-site operational noise sources, such as building mechanical/electrical equipment, and loading dock, would be designed per the 1987 Convention Center CUP Approval and the LASED Specific Plan, as well as the requirements of the LAMC. Therefore, operational stationary noise impacts under Alternative 2 would be less than those that would occur under the Proposed Project and less than significant. However, parking garage impacts would be significant as is the case with the Proposed Project. The off-site daily traffic volumes would be significantly less under Alternative 2. Therefore, it is anticipated that the off-site traffic noise impacts would be less than significant. In addition, the forecasted increase in public transit (bus and rail) usage under Alternative 2 would be significantly less than Proposed Project. As such, Alternative 2 would avoid the Proposed Project's noise impacts associated with the public transit usage are anticipated to be less than the Proposed Project and significant under Alternative 2.

In summary, short-term construction noise impacts under Alternative 2 would be less than those that would occur under the Proposed Project but still significant. Long-term operational impacts, however, would be less than significant, except for parking garage noise. Therefore, this Alternative would avoid most of the Proposed Project's significant operational noise impacts.

F. Air Quality and Climate Change

1. Air Quality

(a) Construction

Under Alternative 2, construction activities associated with development would be substantially reduced in scale compared to the Proposed Project, particularly the large excavation required for the Event Center would not occur under this Alternative. As with the Proposed Project, construction of the Alternative 2 Alternative would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. Construction of the New West Hall Annex would require less excavation than the Proposed Project Event Center, which would require less heavy construction equipment, as well as fewer haul trucks. Pollutant emissions from construction of the New West Hall Annex, the Event Deck Hall, and the Chick Hearn Court bridge under the Alternative 2 Alternative would be less than those that would occur under the Proposed Project Event Center, but would nonetheless result in significant regional

NO_X and localized NO_X impacts. The new parking facility under the Alternative 2 Alternative would be located at the same location as the Proposed Project L.A. Live Way Garage and would utilize similar construction equipment procedures (i.e., including similar construction equipment and schedule). However, the overall amount of grading activities would decrease since the below grade level at L.A. Live Way Garage would be eliminated. Construction activities associated with the new parking facility under the Alternative 2 Alternative would be similar to the Proposed Project L.A. Live Way Garage and would be significant for regional and localized NO_X impacts.

With respect to construction air toxics, diesel particulate emissions represent the greatest potential for TAC emissions. As mentioned previously, the construction intensity of Alternative 2 would be reduced in comparison to the Proposed Project resulting in reduced diesel particulate emissions. As with the Proposed Project, construction-related air toxic emission impacts during construction of Alternative 2 would be less than significant.

(b) Operation

The number of daily trips generated by the Convention Center under Alternative 2 would decrease in comparison to the trips attributable to the Convention Center under the Proposed Project. This Alternative would not include the Event Center, and, therefore, overall the daily trips during a peak event day would be reduced by approximately 80 percent in comparison to the Proposed Project. As vehicular emissions are dependent on the number of trips, vehicular sources associated with this Alternative would have a proportional decrease in pollutant emissions compared to the Proposed Project. The same is true with regard to both area sources and stationary sources. Regional operational emissions under Alternative 2 would likely be reduced in comparison to the Proposed Project, such that VOC and $PM_{2.5}$ impacts would be less than significant. However, as with the Proposed Project, this Alternative would still result in significant regional NO_X, PM_{10}, and CO air quality impacts.

From a localized operational standpoint, the reduction in on-site area and stationary source emissions for this Alternative under peak day conditions would likely reduce potential incremental localized NO_2 and PM_{10} impacts associated with the Proposed Project to less than significant.

Alternative 2 is forecasted to generate fewer total (inbound + outbound) operational trips during peak hours on peak event days. The local CO hotspot analysis conducted for the Proposed Project showed a maximum CO concentration of 6.7 parts per million (ppm) for the 1-hour CO concentration (approximately 66 percent below the 20 ppm standard) and 5.5 ppm for the 8-hour concentration (approximately 39 percent below the 9.0 ppm

standard), of which the Project contribution was 0.4 ppm for the 1-hour and 0.2 ppm for the 8-hour pollutant averaging times. Since the localized CO hotspot analysis for the Proposed Project on peak event days did not result in any significant impacts, Alternative 2 would likewise not have any localized CO impacts.

With respect to potential air toxic impacts, the reduction in onsite area and stationary source emissions on peak event days for this Alternative would further reduce potential air toxic emissions in comparison to the Proposed Project. Thus, similar to the Proposed Project, Alternative 2 would result in a less than significant air quality impact related to air toxics.

The Alternative 2 would not include any uses identified by the SCAQMD as being associated with odors. As with the Proposed Project, the proposed uses under Alternative 2 would not be a source of odors and odor impacts would be less than significant.

2. Climate Change

The number of annual trips generated by the Convention Center under Alternative 2 would decrease in comparison to the Proposed Project since the increase in attendance due to contiguous floor area under the Proposed Project would be greater than the incremental increase in trips due to the greater amount of non-contiguous convention center floor area under Alternative 2. With the reduction in overall attendance, a corresponding reduction in GHG emissions associated with water usage, wastewater generation, electricity usage, natural gas usage, and solid waste generation and disposal would also be anticipated. In addition, this Alternative would not include the Event Center, and, therefore, overall the total annual trips and resultant GHG emissions would be reduced in comparison to the Proposed Project. It should be noted that the provisions of SB 292 would not be applicable to this Alternative, and, therefore, the offset of 21,907 million tons of CO_2 equivalent attributable to private automobile travel to Spectator Events at the Event Center would not occur. However, this Alternative would include Project Features (e.g., compliance with the Los Angeles Green Building Code, reduce vehicular traffic, and encouraging the use of mass transit) to reduce GHG emissions compared to the "business-as-usual" scenario and would constitute an equivalent or larger break from "business-as-usual" than has been determined by CARB to be necessary to meet AB 32's goals (approximately 16 percent for 2020). Therefore, GHG emissions under Alternative 2 would be less than those that would occur under the Proposed Project, and, similar to the Proposed Project, this Alternative would have a less than significant impact on the environment due to its GHG emissions.

G. Geology and Soils

The Project Site is located within the seismically active region of Southern California; thus, Alternative 2 and the Proposed Project would be exposed to certain geologic hazards (e.g., ground shaking, liquefaction, soil instability). In terms of seismic hazards, impacts would be greater under Alternative 2 as the Proposed Project would be constructed in accordance with current seismic safety requirements which are more stringent (i.e., more protective) than those in effect when the existing West Hall was constructed.

As the Project would involve grading, excavation, and other earth-moving activities during construction; these activities could potentially result in sedimentation and erosion as well as landform alteration. Under Alternative 2, grading would be minimal and no below grade excavation would occur on the Project Site and, thus, would result in less ground-disturbing activities than the Proposed Project. Impacts related to fault rupture, liquefaction, lateral spreading, tsunamis, inundation, flooding, slope stability, and the potential for encountering groundwater during construction and operation would be less than significant and less than that which occurs under the Proposed Project. Impacts due to strong seismic ground shaking, subsidence, expansive soils, and sedimentation and erosion under Alternative 2 would be mitigated to a less than significant level through adherence to similar mitigation measures and applicable regulatory requirements as the Proposed Project. Thus, impacts due to strong seismic ground shaking, subsidence, expansive soils, and sedimentation and erosion would be less than significant under Alternative 2 and similar to the Proposed Project.

H. Hydrology and Soils

1. Surface Water

(a) Surface Water Hydrology

Construction activities under Alternative 2 would involve clearing and grading of the development area. However, it is anticipated that grading activities under this Alternative would be reduced when compared to the Proposed Project due to the elimination of the Event Center and the below grade level at the proposed L.A. Live Way Garage. Nonetheless, construction activities would temporarily alter existing drainage patterns and flows by exposing the underlying soils and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, in accordance with regulatory requirements, construction would occur in a manner and sequence that would preclude flooding during construction. In addition, this Alternative would be required to comply with applicable City grading permit regulations that require necessary measures,

plans, and inspections to reduce sedimentation and erosion. Therefore, as with the Proposed Project, construction-related impacts on surface water hydrology would be less than significant. However, due to the reduced construction activities that would occur under this Alternative, such impacts would be less than those of the Proposed Project.

Alternative 2 would maintain the plazas in their current condition, as such there would be no change in the amount of impervious surfaces at the Project Site, compared to the decrease in impervious surfaces under the Proposed Project. Therefore, this Alternative would not result in an incremental increase in stormwater runoff flows and would therefore not impact the existing storm drain system. Since this Alternative would result in no change to peak flow rates from the existing peak flow rates, no detention facilities would be required. Consequently, Alternative 2 would not result in on or off-site flooding during a 50-year storm event, would not substantially reduce or increase the amount of surface water in a water body, and would not result in a permanent adverse change to the movement of surface water. Notwithstanding, Standard Urban Stormwater Mitigation Plan (SUSMP) requirements would be implemented that would outline the stormwater treatment measures or post-construction BMPs required to control pollutants associated with storm events up to the 0.75-inch precipitation level, per the City's Stormwater Program. In addition, Low Impact Development (LID) BMPs intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater, while also reducing or eliminating the discharge of potential pollutants from stormwater runoff and reducing the quantity and intensity of stormwater flows would be incorporated. The BMPs to be implemented with the Proposed Project would ensure that at a minimum, no increase in flows from existing conditions would result. Therefore, as with the Proposed Project, operation-related impacts on surface water hydrology would be less than significant. However, due to the reduced landscaping to be provided by this Alternative compared to the Proposed Project, such impacts would be greater than those of the Proposed Project.

(b) Surface Water Quality

Construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of hazardous materials for Alternative 2 could contribute to pollutant loading in stormwater runoff. However, similar to the Proposed Project, in accordance with the requirements of the NPDES General Construction Activity Permit, a site-specific Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented. The SWPPP would specify BMPs to be used during construction. With implementation of the BMPs included as part of the SWPPP, the discharge of potential pollutants from stormwater runoff would be eliminated or reduced to the maximum extent practicable. Construction-related impacts on surface water quality would be less than significant and would be similar to those of the Proposed Project.

During operation of this Alternative, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. However, in accordance with National Pollutant Discharge Elimination System (NPDES) requirements, SUSMP requirements would be implemented throughout the operational life of Alternative 2. Stormwater BMPs to address water quality in stormwater runoff would be incorporated into the design of the development. With implementation of source control and treatment BMPs, Alternative 2 would reduce or eliminate the discharge of potential pollutants from stormwater runoff to the maximum extent practicable. Thus, operational impacts on surface water quality would be less than significant and would be similar to those of the Proposed Project.

2. Groundwater

As with the Proposed Project, construction activities under Alternative 2 would involve the use of hazardous materials. The handling, storage and disposal of construction hazardous waste would be in compliance with all applicable federal, state, and local requirements, thereby limiting the potential for groundwater contamination impacts attributable to construction. Grading and excavation for Alternative 2 would be minimal since the Event Center and the subterranean level at L.A. Live Way Garage would be eliminated. Furthermore, as construction activities would occur to a lesser extent under Alternative 2, the potential for impacts to occur would also be less than under the Proposed Project and also less than significant.

Since new development would occur under Alternative 2, new pollutants from storm water runoff would be introduced into the groundwater through infiltration from available landscape areas. However like the Proposed Project, Alternative 2 would implement source control and treatment control Best Management Practices (BMPs). By implementing BMPs in accordance with NPDES, SUSMP, and LID requirements during operations, ground water quality would be improved. Therefore, impacts to ground water quality would be similar under Alternative 2 to the Proposed Project and less than significant.

Groundwater levels could result from the conversion of impervious to pervious surfaces. This has the potential to change groundwater levels through infiltration of surface runoff within available landscape areas and through the implementation of BMPs designed to infiltrate in accordance with the NPDES, SUSMP, and LID requirements. The groundwater contribution from infiltration systems is less than significant because they are designed to infiltrate smaller storm events equivalent to 0.75 inch of rainfall. Similarly, groundwater levels are typically impacted from larger, regional contributions from injection wells and spreading grounds than from localized infiltration through available landscape areas. Like the Proposed Project, the additional landscaped areas provided by Alternative

2 allow for an incremental increase in infiltration, though less than the Proposed Project. Therefore, the impacts to groundwater level would be less than those that would occur under the Proposed Project, although still less than significant.

I. Cultural Resources

1. Historical Resources

As discussed in detail in the Historical Assessment provided in Appendix S, the Project Site does not include any buildings that appear eligible for inclusion in the National Register, California Register, or as a local HCM. Nonetheless, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall.

Alternative 2 would not result in the demolition of the West Hall, although a new pedestrian bridge would connect to the north side of the West Hall and thus would physically alter the West Hall and its context. However, such alteration would not substantially change the existing character of the West Hall. Therefore, Alternative 2's impacts to historical resources would be less than significant and thus, the potentially significant impact attributable to removal of the West Hall in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM would be avoided.

2. Archaeological Resources

Under Alternative 2, grading and other earthwork activities would occur to the extent needed during construction of the New West Hall Annex and the L.A. Live Way Garage. Ground disturbance under Alternative 2 would be limited to the area north of the existing West Hall and the area of the Proposed L.A. Live Way Garage in an area identified as having archaeological sensitivity. However, the potential to encounter buried archaeological resources would be less than under the Proposed Project as no grading would occur due to Event Center construction and below grade parking at the L.A. Live Way Garage. Therefore, it is possible that archaeological resources may be encountered during construction of Alternative 2. However, such potential impacts would be mitigated to a less than significant level through adherence to the same mitigation measures as the Proposed Project. Thus, impacts to archaeological resources under Alternative 2 would be less than those of the Proposed Project and also less than significant.

J. Public Services (Police and Fire)

Even though substantially less construction would occur under Alternative 2 as compared to the Proposed Project, enough construction would occur such that the same security fire protection measures that would be implemented under the Proposed Project would be implemented under Alternative 2, including, but not limited to, security fencing and lighting, locked entries, security patrols, and the implementation of a construction Transportation Management Plan. Impacts of Alternative 2 would be less than those of the Proposed Project due to the reduction in development, and less than significant.

The existing security measures in place at the Convention Center, as is the case with the Proposed Project, would be extended to include the new facilities that would be developed under Alternative 2. Similarly, Alternative 2 would be developed taking into consideration the LAPD's Design Out Crime Guidelines. The increased development and on-site activity under Alternative 2 would place increased demand on police and fire protection services as compared to existing conditions. However, due to the dramatically reduced levels of development as compared to the Proposed Project plus the elimination of the Event Center, the demand on police and fire services under this Alternative would be reduced from those anticipated to occur with the Proposed Project. Even though the Event Center would not be constructed under Alternative 2, special measures to address crowd and traffic flow management may be required from time to time, but would not be as extensive or have the same level of importance as under the Proposed Project. The same relationship also exists with regard to emergency planning in the event of a natural or man-made disaster. The Proposed Project impacts are concluded to be less than significant, impacts of Alternative 2 would be less than those of the Proposed Project due to the elimination of the Event Center, and also less than significant with the implementation of measures commensurate with the level of impact that would occur under Alternative 2.

K. Utilities

1. Water

Like the Proposed Project, a short-term demand for water would occur during construction of Alternative 2. Overall, construction activities would require minimal water demand and would not be expected to have any adverse impact on available water supplies and infrastructure. Therefore, as with the Proposed Project, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant. Such impacts would be less than those of the Proposed Project due to the reduction in total development.

As with the Proposed Project, operation of Alternative 2 would generate an increased demand for water. As shown in Table V-5 on page V-64, this Alternative would result in a net increase in water demand of approximately 91,959 gallons per day (gpd) and 47.11 acre-feet per year (afy). Thus, water demand for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase in water demand of 640,683 gpd and 194 afy. This Alternative also assumes that the water conservation measures similar to those of the Proposed Project would be implemented. As with the Proposed Project, impacts on water supply would be less than significant. Such impacts would be less than those of the Proposed Project.

The existing water infrastructure would not be adequate to accommodate the Proposed Project's water demand during a fire scenario and impacts would be potentially significant. Although Alternative 2 would result in a reduced water demand compared to the Proposed Project, given that the fire flow requirements of this Alternative would be similar to that of the Proposed Project, it is anticipated that the existing water infrastructure would also not be adequate to accommodate this Alternative's water demand during a fire scenario. Nonetheless, as with the Proposed Project, Alternative 2 would implement improvements to the existing water infrastructure that would be adequate to accommodate the water demands of this Alternative. Therefore, impacts would be reduced to less than significant and would be similar to those of the Proposed Project.

2. Sewer

Similar to the Proposed Project, construction activities would result in a temporary increase in wastewater generation as a result of construction workers on-site. Overall, construction of the Proposed Project is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the IRP. Therefore, construction impacts to the wastewater system under Alternative 2 would be less than significant due to the reduction in total development and less than those of the Proposed Project. As with the Proposed Project, operation of Alternative 2 would result in an increased generation of wastewater.

As shown in Table V-6 on page V-65, Alternative 2 would result in a net increase in wastewater of approximately 75,669 gpd. Thus, wastewater generation for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase of 640,754 gpd. As with the Proposed Project, Alternative 2 could connect to one or both of the two sewer systems that are used under existing conditions subject to available capacity and design efficiency. The available capacity of System 1 is approximately 0.11 mgd while System 2 has an available capacity of approximately 4.58 mgd. Based on this information, up to 0.11 mgd could discharge to

Table V-5
No Project—Buildout Per Existing Approvals Alternative: Water Demand

Land Use	Attendance		Rate	Water Demand	
	Annual	Daily		Gallons/ Day	Acre-Feet/Year
Convention Center	3,159,412	20,603	4.6874	96,575	45.46
Central Plant				28,783	32.25
Irrigation				12,498	14.00
Total Convention Center				137,856	91.71
Less Water Conservation				8,005	2.16
Alternative 2 Total Water Demand				**129,851**	**89.55**
Existing Project Site Uses to Be Removed				37,892	42.44
Alternative 2 Net Water Demand				**91,959**	**47.11**
Proposed Project Net Water Demand				**640,683**	**194**
Alternative 2 Water Demand Compared to the Proposed Project				**-548,724**	**-146.89**

Source: Matrix Environmental, 2012.

System 1, with the balance discharging to System 2, or the entire Alternative 2 could discharge to System 2. Wastewater generated by Alternative 2 would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant, which is a component of the City of Los Angeles Hyperion Service Area. Based on the City of Los Angeles Integrated Resources Plan, the existing effective capacity of the entire Hyperion Service Area is approximately 529 mgd with future improvements identified in the Integrated Resources Plan increasing the total effective capacity of the Hyperion Service Area in 2020 to approximately 570 mgd. Based on these forecasts Alternative 2's increase in wastewater generation would be adequately accommodated within the Hyperion Service Area. Impacts on wastewater generation and wastewater infrastructure would be less than significant and less than those of the Proposed Project.

3. Solid Waste

As with the Proposed Project, construction under Alternative 2 would involve demolition, site grading/preparation, and building construction activities. These activities would generate construction and demolition wastes that would be recycled or collected by private waste haulers and taken for disposal at the County's inert landfills. As shown in Table V-7 on page V-66, when compared with the Proposed Project, this Alternative would generate approximately 26,634.62 tons of construction and demolition waste, which is less than the 91,331.56 tons of waste that would be generated by Project construction. As

Table V-6
No Project—Buildout Per Existing Approvals: Wastewater Generation

	Daily Attendance	Rate	Wastewater Generation (gallons/day)
Convention Center	20,603	4.6874	96,575
Central Plant			5,239
Total Convention Center			101,814
STAPLES Center Central Plant			434
Less Water Conservation			8,005
Alternative 2 Total Wastewater Demand			**94,243**
Less Existing Project Wastewater Use			18,574
Alternative 2 Net Wastewater Demand			**75,669**
Proposed Project Net Wastewater Demand			**640,754**
Alternative 2 Wastewater Demand Compared to the Proposed Project			**-565,085**

Source: Matrix Environmental, 2012.

unclassified landfills generally do not face capacity shortages and would have adequate capacity. Thus, as with the Proposed Project, construction impacts relative to solid waste would be less than significant. Due to the decreased generation of construction and demolition wastes under this Alternative, construction impacts relative to solid waste would be less than those of the Proposed Project.

As shown in Table V-8 on page V-67 during operation, Alternative 2 would generate 1.8 tons per day of municipal solid waste compared to 123.716 tons per Event Day of the Proposed Project. Alternative 2 would generate 223.53 tons per year of municipal solid waste compared the 8,391.7 tons per year for the Proposed Project. Solid waste would be recycled or collected by private waste haulers and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. While it is anticipated that future iterations of the CIWMP would provide for improvements beyond 2025 to serve future waste disposal needs, it is conservatively assumed that no new landfills or increases in capacity would occur. Thus, based on this worst case assumption, the County may not be able to accommodate the disposal needs of this Alternative. Therefore, as with the Proposed Project, impacts on solid waste disposal facilities under Alternative 2 are conservatively concluded to be potentially significant. Due to the decrease in solid waste generation, such impacts would be less than those of the Proposed Project.

Table V-7
No Project—Buildout Per Existing Approvals: Construction Solid Waste Generation

	Square Footage	Generation Rate (tons/sq.ft.)[a]	Total Debris (tons)	Diversion Rate	Recycled	Net to Landfill
Demolition						
Cherry Street Garage	319,584	0.0775	24,767.76	75%	18,575.82	6,191.94
New Construction						
Event Deck Hall	250,000	0.001945	486.25	75%	364.69	121.56
West Hall Annex	73,329	0.001945	142.62	75%	106.97	35.65
L.A. Live Way Garage	636,500	0.001945	1,237.99	75%	928.49	309.50
Subtotal	*959,829*		*1,866.86*		*1,400.15*	*466.71*
Total Construction Debris			**26,634.62**		**19,975.97**	**6,658.65**

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, pages 2-3, 2-4, and 2-8.*

Source: Matrix Environmental, 2012.

Table V-8
No Project—Buildout Per Existing Approvals: Operational Solid Waste Generation

Land Use	Patrons or Employees	Factors (tons/unit)	Total Waste Generated	Recycled Waste (tons/day)	Net to Landfills
Daily (Convention Center)					
Exhibit/Meeting Rooms	3,599	0.0005	1.8	0.9	0.9
Annual (Convention Center)					
Exhibit/Meeting Rooms	447,055	0.0005	223.53	111.77	111.76

Source: Matrix Environmental, 2012.

Private waste haulers would be expected to continue to utilize existing solid waste routes. As such, this Alternative would not result in the need for additional solid waste collection routes to adequately handle waste. As with the Proposed Project, impacts on solid waste collection routes would be less than significant. Such impacts would be similar to those of the Proposed Project.

4. Electricity

As with the Proposed Project, construction activities associated with development of Alternative 2 would consume electrical power, although to a lesser extent than the Proposed Project. Overall, construction activities would require minimal electricity consumption. Nonetheless, like the Proposed Project, this demand would be supplied from existing electrical services within the Project Site and would not affect other services as there is sufficient existing capacity to also meet this Alternative's construction demands. Therefore, as with the Proposed Project, impacts on electrical supplies and infrastructure associated with short-term construction activities would be less than significant under Alternative 2. However, as Alternative 2 would result in reduced construction activities, such impacts would be less than those of the Proposed Project. In addition, construction activities associated with the installation of new electrical infrastructure would primarily be confined to trenching and would not have any significant impacts for the Project Site or to adjoining properties.

Similar to the Proposed Project, operation of Alternative 2 would generate an increased demand for electricity. As shown in Table V-9 on page V-68, Alternative 2 would result in an increase in electricity consumption of approximately 17,854 megawatt hours (MWh) annually. Thus, electricity consumption for Alternative 2 would be increased relative to existing conditions but would be less than the Proposed Project's estimated increase in electrical consumption of 33,542 MWh per year. Additionally, this Alternative would have a

Table V-9
No Project—Buildout Per Existing Approvals Alternative: Electricity Consumption and Demand

Land Use	Consumption		Peak Demand (kVA)
	Daily (kWh)	Annual (MWh)	
Convention Center (New Facilities)	38,232	13,951	10,573
Convention Center (Existing Facilities)	4,557	401	1,581
Bond Garage	1,978	722	236
L.A. Live Garage	4,253	1,516	496
West Hall Garage	3,464	1,264	413
Total Alternative 2 Proposed Uses	**52,484**	**17,854**	**9,974**
Total Proposed Project	**151,768**	**33,542**	**19,286**
Existing On-Site Uses to Be Removed Under Proposed Project	20,598	7,519	5,967
Net Alternative 2	31,886	10,335	4,007
Net Proposed Project	131,170	26,023	13,319
Net Difference in Total Consumption and Peak Demand	**-99,284**	**-15,688**	**-9,312**

Source: Matrix Environmental, 2012.

peak demand of 9,974 kilovolt amperes (kVA) compared to the Proposed Project's peak demand of 19,286 kVA. Electrical supplies would be adequate to accommodate the Proposed Project's demand for electricity. Therefore, impacts with regard to electricity would be less than those of the Proposed Project and also less than significant, as is the case with the Proposed Project.

5. Natural Gas

As with the Proposed Project, construction activities associated with development of Alternative 2 would not require the consumption of natural gas. In addition, as described further below, no construction activities associated with the installation of new natural gas distribution lines would occur. Nonetheless, like the Proposed Project, prior to ground disturbance, Project contractors would coordinate with the Southern California Gas Company (SCG) to identify the locations and depth of all lines within the Project Site. Further, SCG would be notified in advance of proposed ground disturbance activities to avoid natural gas lines and disruption of natural gas service. Therefore, as with the Proposed Project, impacts on natural gas supplies and infrastructure associated with short-term construction activities would be less than significant under Alternative 2. However, as Alternative 2 would result in reduced construction activities, such impacts would be less than those of the Proposed Project.

Like the Proposed Project, operation of Alternative 2 would generate an increased demand for natural gas. As shown in Table V-10 on page V-70, Alternative 2 would result in a net increase in natural gas of approximately 149,997 therms annually. Thus, natural gas for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase in natural gas of 444,736 therms per year. This Alternative also assumes that the energy conservation measures similar to those of the Proposed Project would be implemented. Thus, as with the Proposed Project, impacts on natural gas would be less than significant under Alternative 2 and less than those of the Proposed Project.

The existing infrastructure would be adequate to accommodate the Proposed Project's natural gas demand except for the natural gas line located on Chick Hearn Court between L.A. Live Way and Georgia Street. In order to provide adequate service to the Event Center, the Proposed Project would upgrade the existing 4-inch line in Chick Hearn Court between L.A. Live Way and Georgia Street to a 6-inch line. As this upsizing would primarily be required to serve the Event Center and as this Alternative does not propose development of the Event Center, the existing infrastructure would be capable of delivering the increase in natural gas demand and no upgrades would be required under Alternative 2. As such, impacts under Alternative 2 associated with the existing infrastructure would be less than significant and less than those of the Proposed Project.

L. Environmental Safety

As with the Proposed Project, construction activities under Alternative 2 would involve the use of hazardous materials (e.g., paints, coatings, adhesives), and include the storage of fuels and oils associated with construction equipment in accordance with applicable regulations. Additionally, asbestos and ACMs, LBPs, and PCBs could be encountered during replacement of the existing Cherry Street Garage. Also, as with the Proposed Project, grading under Alternative 2 could uncover or disturb existing known and unknown USTs, which could lead to soil and/or groundwater impacts and the potential exposure of people and the environment to hazardous materials. However, all construction activities would occur in accordance with all applicable federal, state, and local laws and regulations. Therefore, construction of Alternative 2 would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, construction impacts under Alternative 2 would be less than significant. However, as construction activities would be substantially less under Alternative 2 than the Proposed Project, the potential for impacts to occur would be less than those attributable to the Proposed Project.

Table V-10
No Project—Buildout Per Existing Approvals Alternative:
Annual Natural Gas Consumption

Land Use	Total Therms/Year
Convention Center (New Facilities)	201,928
Convention Center (Existing Facilities)	5,169
Total Alternative 2 Proposed Uses	**207,097**
Proposed Project	**501,836**
Total Existing Convention Center to be Replaced	**57,100**
Net Alternative 2	149,997
Net Proposed Project	444,736
Net Difference in Total Consumption and Peak Demand	**-294,739**

Source: Matrix Environmental, 2012.

Under both Alternative 2 and the Proposed Project, the existing on-site hazardous materials and hazardous waste programs are assumed to continue. Therefore, Alternative 2 is not anticipated to expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. As such, a less than significant impact with regard to hazardous materials would occur under Alternative 2. Furthermore, impacts under Alternative 2 would be less than those of the Proposed Project due to the potential handling of lesser quantities of hazardous materials under this alternative.

Construction of the Proposed Project, due to its location within a City designated Methane Zone, would require the implementation of mitigation measures that would reduce potential methane impacts to a less than significant level. As the West Hall was constructed decades before the City methane ordinance was adopted, it was not constructed with the additional protections required by the City's current methane ordinance. As the existing West Hall would not benefit from these additional protections and would be retained under Alternative 2, methane impacts under Alternative 2 would be greater than those of the Proposed Project, but less than significant.

3. Summary of Comparative Impacts

Alternative 2 would reduce the Proposed Project's land use intensity by replacing the proposed Event Center with 323,329 additional square feet of Convention Center related uses. As many of the Proposed Project's potential environmental impacts are directly related to the types of events at the Project Site and their corresponding attendance levels, Alternative 2 would lessen these types of impacts, including most of

those for which the Proposed Project would result in significant impacts. As a result of these and other factors, Alternative 2 would avoid the Proposed Project's significant impacts with regard to visual resources, artificial light, operational noise (with the exception of parking garage noise), and historical resources, and would lessen many of the other impacts, including those that would be significant under both the Proposed Project and Alternative 2. As such, Alternative 2, as is the case with the Proposed Project, would result in significant impacts with regard to traffic, air quality, construction noise, operational parking garage noise and solid waste disposal. However, this Alternative would have greater impacts than the Proposed Project with respect to land use plans, geology and hydrology during operations. While impacts for a number of other issues would also be reduced under Alternative 2, the change in uses as well as the reduced levels of development under this Alternative also serve to reduce the beneficial effects of the Proposed Project, particularly with regard to advancing key land use policies and the provision of new employment opportunities in an existing urbanized area located in proximity to multiple transit lines. In summary, Alternative 2 would not introduce additional significant environmental impacts, and in a few cases would avoid and in others lessen the Proposed Project's significant impacts, while also lessening the Proposed Project's beneficial effects. A tabular summary comparing the impacts of Alternative 2 to those of the Proposed Project is presented in Table V-2 on page V-9.

4. Relationship of this Alternative to Project Objectives

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

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

would substantially improve the rank of the Convention Center and make it more competitive nationally.

Alternative 2 would not increase the anticipated number of trade shows and conventions attracting largely out-of-town visitors to the same extent as the Proposed Project. In addition, this Alternative would not provide a new multi-purpose room of a size that can function as exhibit hall space, meeting rooms or a ballroom, which is a new amenity that the Convention Center cannot provide today. Because the Event Center would not be developed under this Alternative, it would not provide Convention Center expansion capabilities through joint booking with the Event Center.

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

Alternative 2 would realize the Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles, but to a much lesser extent than the Proposed Project. Specifically, without an Event Center the Alternative would not promote the development of major sports, entertainment and convention center facilities in the Downtown Center and in close proximity to transportation corridors and transit stations, or create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area. Nor would it synergistically build upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level, or create a catalyst to enhance further the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another.

Alternative 2 would not meet the Project Objectives to design a Project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events and is consistent with smart growth and urban design principles to the same extent as the Proposed Project. This Alternative would design a Project that is compatible with existing Convention Center facilities. However, it would not implement a sustainability program to the same extent as the Proposed Project because this Alternative would retain the West Hall instead of replacing it with a modern LEED Gold New Hall. In addition, this Alternative would not develop the Event Center and therefore would not

promote the spectator experience at Event Center events. Unlike the Proposed Project, this Alternative would not create additional open space assembly area for fans and visitors, including a reconfigured Gilbert Lindsay Plaza.

Alternative 2 would not include the Event Center. It would therefore not take maximum advantage of existing and planned transportation infrastructure, as the Event Center would attract many more visitors who would use using existing and planned transportation infrastructure, especially public transit. In addition, this Alternative would not implement the provisions of SB 292, which applies only to the Event Center. Alternative 2 would also generate far fewer jobs, and therefore would not foster job growth in an area served by mass transit to the same degree as the Proposed Project.

Alternative 2 would achieve the Project Objective to promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism to a much lesser degree than the Proposed Project. Specifically, Alternative 2 would not replace the outmoded West Hall, or add contiguous exhibition space and a multi-purpose room, all of which are necessary to allow the Convention Center to be competitive with other venues. Without modernization, the marketability of the Convention Center would not improve and it may continue to lose its market share. Moreover, this Alternative would not develop the Event Center. Therefore, while Alternative 2 would create some additional temporary and permanent jobs during construction and operation, it would create substantially fewer new jobs than the Proposed Project. Without the Event Center, the Alternative would not finance construction of the New Hall at no risk to the City's General Fund, as a private developer, including the Event Center Applicant, would not finance the West Hall unless it can construct the Event Center. In addition, Alternative 2 would not construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship. Similarly, this Alternative would not develop entertainment and sports facilities on public lands that provide a return to the City's General Fund and/or provides civic, cultural and sporting amenities that serve a wide range of public interests in the City and region. Without the Event Center and contiguous space added to the Convention Center, Alternative 2 would not generate substantial additional revenues for the City government. It also would not stimulate economic activity in the greater Los Angeles area to the extent of the Proposed Project. While some jobs would be created under Alternative 2, it would not create the magnitude of good paying construction and permanent jobs as the Proposed Project. In addition, because Alternative 2 would retain the outmoded West Hall and would develop only non-contiguous new exhibition space, it would not increase the anticipated number of trade shows and conventions attracting largely out-of-town visitors to the same extent as the Proposed Project. Therefore, this Alternative would provide economic development opportunities in Pico-Union and South Los Angeles by attracting out of town visitors to additional exhibition events to a lesser degree as the

Proposed Project. Because it would not develop the Event Center, Alternative 2 would not attract any local or out of town fans to additional spectator events.

D. Alternative 3: Reduced Intensity Alternative

1. Description of the Alternative

The Reduced Intensity Alternative (Alternative 3) includes the same land uses and structures as the Proposed Project but reduces the Floor Area of the New Hall, the number of seats and height of the Event Center, and the amount of parking provided in the L.A. Live Way Garage. The smallest stadium in the NFL is Soldier Field in Chicago with a seating capacity of 61,500 seats. This is why Alternative 3 analyzes 61,500 seats. Under Alternative 3, the New Hall would provide the same Floor Area as the existing West Hall, and the subterranean level of the L.A. Live Way Garage would be eliminated. Under Alternative 3, the Floor Area of the New Hall would be reduced by 37,799 square feet to a total of 462,201 square feet of Floor Area, the Event Center would be reduced by 10,500 seats, the L.A. Live Way Garage would be reduced by 339 spaces to a total of 2,611 spaces, and the Bond Street Garage would be the same as under the Proposed Project. The total Floor Area for the Convention Center under Alternative 3 would be 1,538,671 square feet, which is the same as what exists today. However, under Alternative 3 the Floor Area would be contiguous and reflect the same configuration as the Proposed Project, albeit somewhat reduced in size. The total Floor Area for the Event Center under Alternative 3 would be 1,494,500 square feet, which when combined with the Convention Center would result in 3,033,171 square feet of Floor Area at the Project Site. Included within those totals are 209,785 square feet of new Rentable Area, all of which would be located within the Event Center and available for use when the Event Center is not being used for other purposes. Thus, a total of 1,095,878 square feet of Rentable Area of exhibition space would be available at the Project Site under Alternative 3. However, the multi-purpose room would not be constructed under this Alternative due to the reduce square footage of the New Hall.

The height of the New Hall would be reduced from the proposed 90 feet to approximately 60 feet, the height of the Event Center would be reduced from the proposed 220 feet to approximately 200 feet, and the L.A. Live Way Garage would be reduced to eight levels above grade.

This Alternative would provide a total of 6,331 parking spaces, an increase of 773 spaces over the existing supply. Under Alternative 3, the existing South Hall and Venice Garages would remain, the Bond Street Garage would be built (928 spaces as per the Proposed Project), and the L.A. Live Way Garage would be built but with 2,611 spaces (compared to 2,950 spaces with the Proposed Project).

A comparison of this Alternative and the Proposed Project is provided in Table V-11 on page V-77.

2. Environmental Impacts

A. Land Use

Alternative 3 includes the development of the same uses within the same structures at the same locations as the Proposed Project, with the only difference being a reduction in the amount of development (i.e., reduction in intensity). Alternative 3 would implement pedestrian and streetscape improvements that would be substantially similar to those proposed under the Proposed Project to encourage pedestrian activity and connections to nearby transit facilities. Overall, Alternative 3 would result in no net increase in Convention Center Floor Area, compared to existing conditions, and an approximately 15 percent reduction in Event Center seating when compared to the Proposed Project.

1. Land Use Consistency

Alternative 3, like the Proposed Project, would be designed as a transit-oriented development with limited on-site parking to encourage the use of alternative modes of transportation. Further, Alternative 3 would host the same nature of events as the Proposed Project, including exhibitions, trade shows, sporting events and entertainment activities, which would attract visitors from across the region as well as from the immediate Downtown area, making transit use a viable option. However, the reduction in seating capacity under Alternative 3 would preclude use of the Event Center for certain special events, such as the Super Bowl, as it would not meet NFL seating requirements. Like the Proposed Project, Alternative 3 would be an infill development on a previously developed site that would complement existing sports, entertainment, and convention uses at the Convention Center, STAPLES Center, and L.A. LIVE. Therefore, Alternative 3 would help advance SCAG Policies GV P1.3 to, “Encourage transit-oriented development,” GV P2.1 to, “Promote infill development and redevelopment to revitalize existing communities,” and GV P1.4 to, “Promote a variety of travel choices,” but to a slightly lesser degree than the Proposed Project.

Alternative 3 would implement a substantially similar Streetscape Plan that would serve to promote attractive, functional, and safe streets as well as pedestrian-friendly sidewalks and thus help advance SCAG Policy GV P2.3 to, “Promote “people-scaled” pedestrian-friendly communities,” similar to the Proposed Project.

Alternative 3 would implement the same sustainability features intended to reduce the potential for impacts related to climate change by minimizing air and GHG emissions,

Table V-11
Comparison of Proposed Project and Alternative 3—Reduced Intensity

	Proposed Project	Alternative 3	Change from Proposed Project	
			Number	Percent
Seats				
Event Center	72,000	61,500	(10,500)	-14.6%
Total Floor Area				
Event Center	1,750,000	1,494,500	(255,500)	-14.6%
Convention Center				
Proposed Project or Alternative	500,000	462,201	(37,799)	-7.6%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Convention Center	1,576,470	1,538,671	(37,799)	-2.4%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	2,250,000	1,956,701	(293,299)	-13.0%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Project Site	3,326,470	3,033,171	(293,299)	-8.8%
Net Floor Area (Change from Existing Conditions)				
Event Center	1,750,000	1,494,500	(255,500)	-14.6%
Convention Center				
Proposed Project or Alternative	37,799	0	(37,799)	-100.0%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Convention Center	37,799	0	(37,799)	-100.0%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	1,787,799	1,494,500	(293,299)	-16.4%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Project Site	1,787,799	1,494,500	(293,299)	-16.4%
Rentable Area				
Event Center (When Used for Exhibition Use Only)	245,650	209,785	(35,865)	-14.6%
Convention Center				
Proposed Project or Alternative	286,310	285,552	(758)	-0.3%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Convention Center	886,851	886,093	(758)	-0.1%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	531,960	495,337	(36,623)	-6.9%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Project Site	1,132,501	1,095,878	(36,623)	-3.2%

Table V-11 (Continued)
Comparison of Proposed Project and Alternative 3—Reduced Intensity

	Proposed Project	Alternative 3	Change from Proposed Project	
			Number	Percent
Parking				
Proposed Project or Alternative				
L.A. Live Way Garage	2,950	2,611	(339)	-11.5%
Bond Street Garage	928	928	0	0.0%
West Hall/West Hall Replacement Building/Hotel	0	0	0	0.0%
Total Proposed Project or Alternative	3,878	3,539	(339)	-8.7%
Not a Part of Proposed Project or Alternative	2,792	2,792	0	0.0%
Total Project Site	6,670	6,334	(339)	-5.4%

Source: Matrix Environmental, 2012.

water and energy usage, and solid waste generation and disposal. Alternative 3 would also create additional temporary and permanent jobs during construction and operation; however, since job creation is a function of development size, Alternative 3 would create fewer new jobs than the Proposed Project. As such, Alternative 3 would locate new jobs near existing housing, but to a lesser extent than the Proposed Project. Therefore, development of Alternative 3 would be consistent with and would support SCAG's Compass Blueprint Growth Vision, but to a slightly lesser extent than the Proposed Project.

Because Alternative 3 would create fewer new jobs than the Proposed Project, it would be consistent with SCAG's employment forecasts for the Subregion as it would not cause an exceedance. Furthermore, for the reasons stated above, Alternative 3 would promote the use of public transportation and would be designed as a transit-oriented development that incorporates a number of pedestrian-friendly design elements. Also, similar to the Proposed Project, Alternative 3 would promote a variety of travel choices, including use of transit, in order to meet the "Best in the NFL" requirements of SB 292. Therefore, Alternative 3 would be consistent with and would not conflict with SCAG's Regional Transportation Plan to a similar extent as the Proposed Project.

Like the Proposed Project, Alternative 3 would be consistent with the Project Site's designation in the City of Los Angeles General Plan Framework Element as part of the Downtown Center. The Alternative 3's FAR and maximum building height would be less than the Proposed Project, and as such would be well within what is permitted at the Project Site. Like the Proposed Project, Alternative 3 would be consistent with the General

Plan Framework Element's vision of the Downtown Center as an international center for finance and trade that serves the population of the metropolitan region. It is also assumed that Alternative 3 would be developed in accordance with appropriate building and site design standards and guidelines as well as specific urban design elements to ensure a high-quality design and environment. As stated above, Alternative 3 would incorporate the same sustainability features as the Proposed Project. Alternative 3 would also provide a series of interconnected public plazas designed to facilitate and enhance pedestrian circulation and outdoor gathering, including the improvements to Gilbert Lindsay Plaza proposed by the Proposed Project, which is intended to serve as a pre- and post-event gathering space for Event Center functions and a community amenity on non-event days. Alternative 3 would implement substantially similar streetscape improvements that would serve to enhance the aesthetic environment on-site and along the Project Site perimeter, connect existing on-site uses, and connect the Project Site to the Pico Union area by improving Pico Boulevard, 11th Street, and 12th Street under the SR-110. Like the Proposed Project, Alternative 3 would concentrate a mix of Convention Center and entertainment uses within a transit-oriented development in a regional center near existing transit stations and mixed-use corridors, while complementing and expanding upon the types of uses found both on-site and within the immediate Project area. Alternative 3 would also create additional temporary and permanent jobs during construction and operation, but would create fewer jobs than the Proposed Project as it would involve less construction. Therefore, Alternative 3 would be consistent with the overall intent of the City's General Plan Framework Element, but to a slightly lesser extent than the Proposed Project due to the fewer number of jobs that would be created in support of the objectives and policies in the Framework Element's Economic Development Chapter.

Both the Proposed Project and Alternative 3 would require a General Plan Amendment and approval of a Specific Plan to guide development on the Project Site. Similar to the Proposed Project, the expanded sports, entertainment, convention and other event activities that would result from implementation of Alternative 3 would serve to further complement and benefit the tourism, hotel and entertainment uses in the immediate Project vicinity, throughout Downtown, and in the City as a whole. Alternative 3 would introduce new visitor-serving uses and pedestrian-oriented amenities, support tourism and generate nighttime activity and create a safe, clean, attractive, and lively environment. With respect to the Downtown Design Guide, Alternative 3 would meet many of the standards and guidelines that address sustainability, sidewalks and setbacks, ground floor treatment, parking and access, building massing and street walls, open space, architectural detail, streetscape improvements, signage, public art, and civic and cultural life, to a similar extent as the Proposed Project. The proposed building designs would also incorporate relevant standards and guidelines pertaining to architectural details, including horizontal variation, vertical variation, building materials, windows and doors, glazing, lighting, security features and associated impacts affecting neighboring properties and uses. Parking garages would be integrated with the on-site buildings. Similar to the Proposed Project, Alternative 3

would include streetscape improvements that would serve to enhance the aesthetic environment as described above. Alternative 3 would include signage, lighting and public art that complement the character of the Project Site and support the provisions of the Design Guide. Overall, Alternative 3 would be consistent with and would not be in substantial conflict with the Central City Community Plan or the associated Downtown Design Guide to a similar extent as the Proposed Project.

The Downtown Strategic Plan identifies the need to both expand the Convention Center and develop the area surrounding it with complementary uses including entertainment, shopping and hotel uses, outdoor activities and other tourist attractions. Alternative 3 would directly support the objectives of the Downtown Strategic Plan by renovating and modernizing the usable space within the Convention Center, but to a lesser extent than the Proposed Project; developing a new sports venue; capitalizing on nearby circulation and transit systems; improving streetscape and creating pedestrian linkages; and supporting Downtown Los Angeles as an international tourist destination with major attractions related to sports, culture, and conventions. Therefore, Alternative 3 would be consistent with and would not be in substantial conflict with the Downtown Strategic Plan, but to a lesser extent than the Proposed Project due to the reduced expansion of the Convention Center.

Similar to the Proposed Project, Alternative 3 would include numerous design elements to foster an accessible, safe and visually appealing pedestrian environment, in accordance with the City of Los Angeles Walkability Checklist. Such features would include open space elements including new and redesigned plaza spaces, and pedestrian amenities including street furniture, safety and accent lighting, way-finding signage, trash containers, bike racks, landscaping, pedestrian-scaled entrances, special paving materials to demark pedestrian pathways, and designated bus/taxi and VIP drop-off areas. Therefore, Alternative 3 would be consistent with the City's Walkability Checklist to a similar extent as the Proposed Project.

The proposed Figueroa Corridor Streetscape Project is studying and would eventually provide a design for a coordinated streetscape that will complement the existing buildings and businesses in the area while promoting pedestrian and bike activity. Based on public input to date in community workshops, it is anticipated that Alternative 3 and in particular the proposed streetscape improvements would be consistent with the Figueroa Corridor Streetscape Project. As discussed earlier, similar to the Proposed Project, Alternative 3 would be a transit-oriented development with numerous features designed to encourage the use of alternative modes of transportation. The redesigned Gilbert Lindsay Plaza, in particular, would feature prominently along Figueroa Street. The streetscape improvements under Alternative 3 would serve to enhance the aesthetic environment on-site and along the Project Site perimeter, connect existing on-site uses, and connect the

Project Site to the Pico Union area. Therefore, Alternative 3 would be consistent with and would not be in substantial conflict with the Figueroa Corridor Streetscape Project to a similar extent as the Proposed Project.

Like the Proposed Project, Alternative 3 would include a Zone Change for the entire Project Site from PF and C2 to CECSP (Convention and Event Center Specific Plan Zone). It is assumed that the CECSP under Alternative 3 would permit the same land uses as the Proposed Project and its associated subareas would be the organizing tool for development standards for the CECSP Zone, including provisions related to building height, setbacks and parking. Furthermore, upon approval of the proposed General and Community Plan Amendment previously discussed, the new CECSP Zone would be consistent with the Project Site's PF Community Plan land use designation. Therefore, Alternative 3 would be consistent with the relevant provisions of the Los Angeles Municipal Code to a similar extent as the Proposed Project.

Based on the above, Alternative 3 would be substantially consistent with and would not conflict with regional and local plans and policies that govern the Project Site. However, the extent to which Alternative 3 would be consistent with relevant plans and policies aimed toward creating jobs and modernizing the usable space within the Convention Center would be slightly less than the Proposed Project due to the reduced amount of development. Nonetheless, impacts with respect to land use consistency would be less than significant and similar to the Proposed Project.

2. Land Use Compatibility

Alternative 3 would construct the same types of land uses on the Project Site but at a reduced size and height. Therefore, like the Proposed Project, Alternative 3 would be consistent with and would build on the existing uses on the Project Site and in the immediate area. Further, Alternative 3 would not introduce new types of uses that do not already occur within the Project Site. Rather, the proposed uses would reinforce Downtown and the immediate Project area in particular as a world-class destination for tourist attractions including conventions, trade shows, sporting events and entertainment, serving the general population with convenient access from throughout the Los Angeles region via transit as well as freeways. The Proposed Project's increase in building height, density and mass on the Project Site would be consistent with the relatively recent (and planned future) development of dense entertainment and high-rise uses within the South Park district. Alternative 3 would provide reductions in building height, density and mass as compared to the Proposed Project, and as such would also be compatible with the surrounding vicinity. Like the Proposed Project, Alternative 3 represents infill development on land owned by the City that is designated for public facilities such as those proposed. Furthermore, given the location of the Project Site, the nature of the nearby surrounding

uses, and the adjacent freeways that separate the Project Site from neighboring lower density residential areas, no existing neighborhood or community would be physically disrupted, divided, or isolated. Therefore, impacts with respect to the compatibility of the proposed land uses with surrounding uses would be less than significant under Alternative 3 and similar to the Proposed Project.

3. Urban Decay

Based on the characteristics of the spectator event and convention facilities within the region, recent and ongoing investments in these facilities, and the lack of potential for the Proposed Project to result in displacement at these facilities, the Proposed Project would not result in result in the closure or disinvestment in competing facilities leading to their abandonment or decay. As Alternative 3 would construct the same types of land uses on the Project Site but at a reduced size and height, impacts with respect to urban decay would also be less than significant under Alternative 3 and less than the Proposed Project.

B. Transportation, Parking, and Pedestrian Safety

1. Transportation

Alternative 3 would have lower but very similar levels of construction activity as the Proposed Project in all respects, with slightly less haul and delivery trucks and slightly less construction workers, but would have similar temporary roadway lane closures. Impacts from truck trips and construction worker trips would be temporary in nature, would be slightly less than for the Proposed Project, and as with the Proposed Project would be expected to be significant. Traffic impacts from temporary roadway lane closures would in some cases be expected to be significant, as for the Proposed Project. It is unlikely there would be significant traffic impacts from roadway closures along L.A. Live Way and Chick Hearn Court as these are not arterial roadways and carry less traffic than major streets in the area. The potential significant impacts associated with the lane closures along Pico Boulevard would be anticipated to be very similar but slightly less because of incrementally shorter duration than those identified under the Proposed Project.

Alternative 3 would generate between approximately 8,415 and 13,150 vehicle trips in the hours analyzed for the Proposed Project. These additional trips would occur as a result of both the modernization of the Convention Center and construction of the 61,500-seat Event Center, and would be slightly lower than the additional trip totals for the Proposed Project (approximately 9,840 to 15,400 trips per hour).

The number of significant impacts under Alternative 3 would be similar but somewhat less at intersections and freeway mainline locations than with the Proposed

Project. The freeway ramp impacts under Alternative 3 would be very similar but somewhat less than the Proposed Project and the same significant impacts would occur. There would be no significant Congestion Management Plan (CMP) intersection impacts, as for the Proposed Project. The CMP freeway mainline impacts identified for this Alternative would be very similar but somewhat less than the Proposed Project, with many of the same significant impact locations. Alternative 3 would lead to a slightly lower increase in transit trips with similar significant transit impacts, which would be reduced to a less than significant level by slightly lower levels of additional transit service than for the Proposed Project. The Pico Station improvements that would occur with the Proposed Project would also occur under this Alternative. Access provisions for this Alternative would be very similar to the Proposed Project and there would be no significant access impacts, as for the Proposed Project. With the slightly lower trip volumes for this Alternative, the neighborhood intrusion impacts would be anticipated to be slightly less but very similar to the Proposed Project and also potentially significant.

2. Parking

Alternative 3 would require a total of 11,615 parking spaces based on the parking ratio under the existing zone variance, which would be slightly less than the 12,503 spaces required by the Proposed Project. This Alternative would provide a total of 6,331 parking spaces, an increase of 773 spaces over the existing supply.

The existing South Hall and Venice Garages would remain, the Bond Street Garage would be built (928 spaces as per the Proposed Project), and the L.A. Live Way Garage would be built but with 2,611 spaces (compared to 2,950 spaces with the Proposed Project). The same parking management strategy and use of off-site parking in the downtown area would occur as for the Proposed Project, but slightly less off-site spaces would be needed. There would therefore be no significant parking impacts (as was also concluded for the Proposed Project with the proposed parking supply and management plan) and impacts would be less than those of the Proposed Project due to the reduced levels of parking under this Alternative.

3. Pedestrian Safety

Additional pedestrian volumes would be slightly lower for Alternative 3 than for the Proposed Project. Pedestrian facilities enhancements would be similar to the Proposed Project. The temporary street closures that would occur with Proposed Project would also occur with this Alternative. Impacts for pedestrian circulation and safety and for bicycle circulation and safety would be slightly less than for the Proposed Project and would similarly be less than significant.

C. Visual Resources

1. Visual Quality

During construction of Alternative 3, the visual appearance of portions of the Project Site would be altered due to the removal of an existing building, parking areas, plazas/paving and landscaping. Construction of Alternative 3 would last approximately two to three months less than the Proposed Project. Given the similarities between Alternative 3 and the Proposed Project, the same types of construction activities would be required and would occur in the same general locations on the Project Site. Truck activity would be similar to the Proposed Project on a daily basis, as the duration and not intensity of construction activities would be reduced as compared to the Proposed Project. Like the Proposed Project, Alternative 3 would use construction fencing to reduce visual impacts and would promptly remove graffiti when necessary. Given the temporary nature of construction activities, construction of Alternative 3 would not substantially and adversely alter or degrade the existing visual character of the Project Site. However, like the Proposed Project, Alternative 3 would remove the West Hall. As discussed in Section IV.I.1, Cultural Resources—Historical Resources, of this Draft EIR, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall because under the *City of Los Angeles CEQA Thresholds Guide* historical resources are considered to be visual resources. Therefore, for purposes of a conservative analysis, demolition of the West Hall is considered to represent the loss of a visual resource in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. As such, construction-related impacts to visual resources that contribute to the visual quality of the Project Site would be potentially significant and unavoidable under Alternative 3 and would be similar to the Proposed Project.

Like the Proposed Project, Alternative 3 would create an integrated site with a mix of convention, sports, entertainment and office uses that would be consistent with and build on the existing uses on the Project Site and in the immediate area. Alternative 3 would increase the height, density and mass of on-site structures as compared to existing conditions, but to a lesser extent than the Proposed Project. Alternative 3 would incorporate the same design features as the Proposed Project, such as pedestrian-scaled entrances and variations in building planes, to reduce the effect of massing and provide pedestrian scale. Alternative 3 would introduce new and enhanced outdoor plazas networked by pedestrian pathways and improved streetscapes, thus enhancing the quality of the public realm and creating an active, pedestrian-friendly environment. With a 20-foot reduction in height of the Event Center, Alternative 3 would reduce the prominence of the

Event Center within short-range views. From farther vantage points, the height reduction would not be as apparent and like the Proposed Project would not substantially alter long-range views of the Project Site. The reduced height of the Event Center would also reduce the prominence and massing of the Proposed Project as viewed from adjacent freeway locations. Similar to the Proposed Project, the increases in building height, density and mass that would occur under Alternative 3 would be consistent and compatible with the existing and planned development of entertainment and high-rise uses at the adjacent L.A. LIVE and numerous mid-rise hotel and residential buildings to the east. Furthermore, like the Proposed Project, Alternative 3 would introduce distinctive architecture, outdoor plazas, new streetscape and landscape, and a variety of human-scaled elements that activate the public realm, all of which would build on many of the existing visual character-defining elements within and near the Project Site. Alternative 3 would include a similar signage program as the Proposed Project. As such, Alternative 3 would not present a contrast between proposed features and existing features that represent the area's aesthetic image given the signage that currently exists at L.A. LIVE. Based on the above, Alternative 3 would remove the West Hall, which could be determined by a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, to be eligible for the California Register, the National Register or as a local HCM. Thus, Alternative 3 would not avoid the Proposed Project's significant impacts on visual resources resulting from removal of the West Hall. Therefore, visual quality impacts associated with operation of Alternative 3 would be significant and unavoidable, but would be less than those that would occur under the Proposed Project due to the reduced visual effects that would result from the proposed height and size reductions of the Event Center.

2. Views

With the reduced height of the Event Center under Alternative 3, potential obstruction of an existing, publicly available, recognized view resource would be reduced as compared to the Proposed Project. However, given the extent of blockage of views of the Downtown skyline that would occur along SR-110 under the Proposed Project, it is not anticipated that the 20-foot reduction in the Event Center would be sufficient to reduce view blockage impacts at this location to a less than significant level. Additionally, Alternative 3 would remove the West Hall, which, as described above, is conservatively considered to be a visual resource. Therefore, impacts to views under Alternative 3 would be significant and unavoidable, but would be less than those that would occur under the Proposed Project due to the reduced l visual effects that would result from the proposed height and size reductions of the Event Center.

D. Light and Glare

1. Natural Light

New development under Alternative 3 would be the same as the Proposed Project in terms of building type and location. However, the density, bulk, and height of the Event Center, which generates the largest shadows under the Proposed Project, would be reduced. Further, under Alternative 3 no building heights would exceed the building heights allowed under the Proposed Project, and no additional structures would be introduced. Therefore, shadows from new buildings under Alternative 3 would generally be reduced as compared to the Proposed Project. As the Proposed Project would not result in significant shade and shadow impacts on any of the identified sensitive uses during the winter solstice, summer solstice, fall equinox, or spring equinox, no impacts related to natural light (shading) would occur under Alternative 3. Impacts would be less than those that would occur under the Proposed Project due to the reduction in Event Center building height.

2. Artificial Light and Glare

Alternative 3 would include the same types of development at the same locations as the Proposed Project. However, Alternative 3 when compared to the Proposed Project would result in a reduction in Floor Area at the Convention Center and a reduction in height and seating capacity at the Event Center. Like the Proposed Project, Alternative 3 would require nighttime construction to complete the Event Center within the timeframe identified in the Project Objectives. Therefore, construction lighting impacts under Alternative 3 would be significant and unavoidable, and similar to the Proposed Project. Impacts related to construction glare would be less than significant and similar to the Proposed Project, as Alternative 3 would not be anticipated to introduce significant sources of glare during construction activities.

The Proposed Project's impacts would be less than significant or less than significant with mitigation on: light trespass; lighting levels at the analyzed receptors;; the use of skytrackers; signage; driver visibility/distraction; building/façade lighting; plaza lighting; headlights within the parking garages; daytime glare; and sky glow. While Alternative 3 would reduce the amount of developed square footage on-site, it would require substantially similar lighting and signage elements to provide public safety and security; illuminate buildings, landscaping, plazas, roadways, pedestrian and bicycle pathways; and illuminate signage to identify on-site uses. In order to meet NFL requirements for illuminating fields for high definition video recording, Alternative 3 would require the same type of sports lighting equipment as the Proposed Project. Alternative 3 would also involve the same degree of skytracker searchlight use as the Proposed Project. Therefore, impacts associated with the types of artificial lighting elements identified above

under Alternative 3 would be less than significant, and the 20-foot reduction in the height of the bowl would slightly reduce impacts compared to those of the Proposed Project.

Alternative 3, in comparison with the Proposed Project, would result in similar sources of temporary lighting for productions, special events, and fireworks displays and, therefore, impacts related to temporary lighting during operation would be significant and unavoidable and similar to the Proposed Project.

The Proposed Project would cause significant impacts on some sensitive receptors due to new sports lighting associated with the Event Center, as well as spill light impacts at Receptor Location 8 with sports lighting on at times when low cloud ceilings with high albedo (+50 percent) are present. Therefore, Alternative 3 impacts related to sports lighting during operation would be significant and unavoidable but slightly reduced as compared to the Proposed Project due to the reduction in the height of the Event Center under this Alternative.

E. Noise

Construction activities under Alternative 3 would slightly be reduced as compared to the Proposed Project due to the reduction in overall square footage of development. However, Alternative 3 would involve similar construction activities (i.e., similar types and quantities of construction equipment) as the Proposed Project. Therefore, all on-site and off-site construction activities occurring concurrently under Alternative 3 would generate noise levels similar to the Proposed Project, which would exceed the stated significance threshold at sensitive receptor locations during daytime hours. Like the Proposed Project, mitigation measures would be implemented, but impacts would remain significant. As Alternative 3 would require construction activities similar to those of the Proposed Project (e.g., driven piles), ground vibration levels up to 0.0805 inch per sec peak particle velocity (PPV) could occur during Alternative 3 construction, as is the case with the Proposed Project, at the nearest off-site building structure. The construction generated ground vibration level would be below the 0.5 inch per second (PPV) significance thresholds for commercial structures resulting in less than significant impacts. However, the construction activities would generate vibration levels up to 86 VdB at the Nokia Theatre at L.A. LIVE (due to pile driving occurring within 100 feet), which would exceed the 72 VdB significance thresholds (with respect to annoyance). Like the Proposed Project, Alternative 3 would implement the recommended mitigation measures (as prescribed under the Proposed Project) to reduce the vibration impacts at the Nokia Theatre at L.A. LIVE to less than significant.

Alternative 3 would include similar on-site noise sources (i.e., building mechanical equipment, parking garages, loading docks, crowd cheering and use of sound system at

the Event Center, and firework display shows). Therefore, noise levels generated by the on-site sources would be similar to the Proposed Project, except for those noise sources related to attendance (e.g., crowd noise, etc.), which would be somewhat reduced under Alternative 3 due to the reduced seating capacity. Nonetheless, these noise sources would result in significant impacts, as is the case with the Proposed Project. The reduction in overall development under Alternative 3 would also result in a reduction of Project generated off-site traffic and public transit (bus and rail) usage. Although noise levels generated by off-site traffic and public transit usage under Alternative 3 would be reduced, the magnitude of the reduction would not reduce the impact to less than significant. Furthermore, noise associated with media helicopter overflights would also result in significant impacts at the nearby noise sensitive receptors.

Although, the construction duration for Alternative 3 would be two to three months shorter than the Proposed Project, significant construction noise and vibration impacts due to construction activities under this Alternative would be similar to the Proposed Project. Long-term operation under Alternative 3 would result in significant noise impacts as in the Proposed Project. However, the long-term operation noise impacts under Alternative 3, as compared to the Proposed Project, would be less due to the reduction in the overall amount of development.

F. Air Quality and Climate Change

1. Air Quality

(a) Construction

Under Alternative 3, construction activities associated with development would be reduced in duration compared to the Proposed Project but daily construction activity levels would be similar. As with the Proposed Project, construction of Alternative 3 would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. The overall amount of building construction would be less under this Alternative compared to the Proposed Project. However, pollutant emissions and fugitive dust from site preparation and total construction activities would be similar on a peak day, as the duration and not the intensity of these activities would decrease compared to the Proposed Project. The construction emissions generated by Alternative 3 would be less than those of the Proposed Project over the construction period. However, impacts during daily maximum conditions, those used for measuring significance, would be similar to those of the Proposed Project and would be significant and unavoidable for regional CO, VOC, and NO_X and localized NO_X impacts.

With respect to construction air toxics, diesel particulate emissions represent the greatest potential for TAC emissions. As mentioned previously, the construction duration

of Alternative 3 would be reduced in comparison to the Proposed Project resulting in reduced diesel particulate emissions. In addition, there would be no residual emissions after construction and the corresponding individual cancer risk would be less. As with the Proposed Project, construction-related air toxic emission impacts during construction of Alternative 3 would be less than significant.

(b) Operation

The number of daily trips generated by the Convention Center under Alternative 3 would decrease slightly in comparison to the Proposed Project due to the incremental decrease in attendance. The limited reduction in Convention Center Floor Area under Alternative 3 would generate less than one percent fewer new daily trips during a peak event day compared to the Proposed Project. In addition, the 15 percent reduction in seating capacity for the Event Center would have a corresponding reduction in daily trips on a peak event day. As vehicular emissions are dependent on the number of trips, vehicular sources associated with this Alternative would have a similar decrease in pollutant emissions compared to the Proposed Project. With the reduction in overall square footage, both area sources and stationary sources would also generate a similar reduction in on-site operational pollutant emissions. Regional operational emissions under this Alternative would likely be reduced in comparison to the Proposed Project. However, as with the Proposed Project, this Alternative would still result in VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$ regional significant air quality impacts.

From a localized operational standpoint, the reduction in on-site area and stationary source emissions for this Alternative would reduce potential incremental localized NO_2 and PM_{10} impacts associated with the Proposed Project. However, as with the Proposed Project these localized impacts would be significant and unavoidable.

Alternative 3 is forecasted to generate fewer total (inbound + outbound) operational trips during peak hours. The local CO hotspot analysis conducted for the Proposed Project showed a maximum CO concentration of 6.7 parts per million (ppm) for the 1-hour CO concentration (approximately 66 percent below the 20 ppm standard) and 5.5 ppm for the 8-hour concentration (approximately 39 percent below the 9.0 ppm standard), of which the Project contribution was 0.4 ppm for the 1-hour and 0.2 ppm for the 8-hour pollutant averaging times. Since the localized CO hotspot analysis for the Proposed Project did not result in any significant impacts, Alternative 3 would likewise not have any localized CO impacts.

With respect to potential air toxic impacts, the reduction in onsite area and stationary source emissions for this Alternative would further reduce potential air toxic emissions in

comparison to the Proposed Project. Thus, similar to the Proposed Project, Alternative 3 would result in a less than significant air quality impact related to air toxics.

Alternative 3 would not include any uses identified by the SCAQMD as being associated with odors. As with the Proposed Project, the proposed uses under the Existing Approvals Alternative would not be a source of odors and odor impacts would be less than significant.

Although both construction and operational emissions associated with Alternative 3 would be reduced in comparison to the Proposed Project, Alternative 3 would still result in cumulatively significant short-term construction and operational air quality impacts.

2. Climate Change

The number of annual trips generated by the Convention Center under Alternative 3 would decrease in comparison to the Proposed Project due to the incremental decrease in annual attendance. In addition, the 15 percent reduction in seating capacity for the Event Center would have a corresponding reduction in total annual trips. Overall the total annual trips and resultant GHG emissions would be reduced in comparison to the Proposed Project. It should be noted that SB 292 would be applicable to this Alternative, but the offset quantity of 21,907 million tons of CO2 equivalent required for the Proposed Project would be reduced by approximately 15 percent. With the reduction in overall square footage, a corresponding reduction in GHG emissions associated with water usage, wastewater generation, electricity usage, natural gas usage, and solid waste generation and disposal would be anticipated. Thus, while the percent reduction in comparison to "business-as-usual" would decrease for this Alternative in comparison to the Proposed Project because the offset quantity of GHG emissions under SB 292 would be reduced, the total GHG emissions would be reduced. This Alternative would include project design features (e.g., compliance with the Los Angeles Green Building Code, reduce vehicular traffic, and encouraging the use of mass transit) to reduce GHG emissions compared to the "business-as-usual" scenario and would constitute an equivalent or larger break from "business-as-usual" than has been determined by CARB to be necessary to meet AB 32's goals (approximately 16 percent for 2020). Therefore, similar to the Proposed Project, this Alternative would have a less than significant impact on the environment due to its GHG emissions.

G. Geology and Soils

The Project Site is located within the seismically active region of Southern California; thus, Alternative 3 and the Proposed Project would be exposed to certain geologic hazards (e.g., ground shaking, liquefaction, soil instability). As the Project would involve grading,

excavation, and other earth-moving activities during construction; these activities could potentially result in sedimentation and erosion as well as landform alteration. Under Alternative 3 grading and excavation would be similar to the Proposed Project. Impacts due to strong seismic ground shaking, subsidence, expansive soils, and sedimentation and erosion would be mitigated to a less than significant level through adherence to similar mitigation measures and applicable regulatory requirements as those of the Proposed Project. Thus impacts due to strong seismic ground shaking, subsidence, expansive soils, and sedimentation and erosion would be less than significant and similar to the Proposed Project.

H. Hydrology and Soils

1. Surface Water

(a) Surface Water Hydrology

As with the Proposed Project, construction activities under Alternative 3 would involve the removal of existing structures as well as the clearing and grading of development areas. Such activities would temporarily alter existing drainage patterns and flows by exposing the underlying soils and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, in accordance with regulatory requirements, construction would occur in a manner and sequence that would preclude flooding during construction. In addition, as with the Proposed Project, this Alternative would be required to comply with applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Moreover, new storm drain connections would be installed to support development and would be in place and functioning as development progresses to serve their respective catchments. Therefore, as with the Proposed Project, construction-related impacts on surface water hydrology would be less than significant. Such impacts would be similar to those of the Proposed Project as the Project Site would be similarly modified.

Through the provision of additional landscaped areas, Alternative 3 would serve to decrease the area of impervious surfaces within the Project Site when compared to existing conditions. Therefore, as with the Proposed Project, Alternative 3 would also not result in an incremental increase in stormwater runoff flows and would therefore not impact the existing storm drain systems. In addition, similar to the Proposed Project, the new landscaped areas to be provided would allow for more opportunities to direct stormwater to flow through the planting media, thereby reducing the amount of runoff flows. Consequently, the Proposed Project would not result in on or off-site flooding during a 50-year storm event, would not substantially reduce or increase the amount of surface

water in a water body, nor result in a permanent adverse change to the movement of surface water. Notwithstanding, SUSMP requirements would be implemented that would outline the stormwater treatment measures or post-construction BMPs required to control pollutants associated with storm events up to the 0.75-inch precipitation level, per the City's Stormwater Program. In addition, LID BMPs intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater, while also reducing or eliminating the discharge of potential pollutants from stormwater runoff and reducing the quantity and intensity of stormwater flows would be incorporated. The BMPs to be implemented with the Proposed Project would ensure that at a minimum, no increase in flows from existing conditions would result. Therefore, as with the Proposed Project, operation-related impacts on surface water hydrology would be less than significant and would be similar to those of the Proposed Project.

(b) Surface Water Quality

Construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of hazardous materials for Alternative 3 could contribute to pollutant loading in stormwater runoff. However, similar to the Proposed Project, in accordance with the requirements of the NPDES General Construction Activity Permit, a site-specific SWPPP would be prepared and implemented. The SWPPP would specify BMPs to be used during construction. With implementation of these BMPs included as part of the SWPPP, the discharge of potential pollutants from the storm water runoff would be eliminated or reduced to the maximum extent practicable. Construction-related impacts on surface water quality would be less than significant, and similar to those of the Proposed Project.

During operation of this Alternative, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. However, in accordance with NPDES requirements, SUSMP requirements would be implemented. As part of the SUSMP requirements, stormwater BMPs to address water quality in stormwater runoff would be incorporated into the design of the development. Similar to the Proposed Project, with implementation of source control and treatment BMPs, this Alternative would reduce or eliminate the discharge of potential pollutants from stormwater runoff to the maximum extent practicable. Thus, operational impacts on surface water quality would be less than significant and would be similar to those of the Proposed Project.

2. Groundwater

As with the Project, construction activities under Alternative 3 would involve the use of hazardous materials in accordance with applicable regulations. The handling, storage, and disposal of construction hazardous waste would be in compliance with all applicable federal, state, and local requirements thereby limiting the potential for groundwater

contamination impacts attributable to construction. Such practices would reduce potential construction impacts to a less than significant level under both this Alternative and the Project. Like the Proposed Project, excavation depths could reach an average depth of 41 feet for the Event Center. Due to the deep groundwater level at the Project Site it is not expected that these excavations would intercept groundwater or require dewatering. However, due to the decreased development under Alternative 3, the potential impacts of this Alternative would be less than those of the Project.

Since new development would occur under Alternative 3, new pollutants from storm water runoff would be introduced into the groundwater through infiltration from available landscape areas. However like the Proposed Project, Alternative 3 would implement the Proposed Project's source control and treatment control Best Management Practices (BMPs). By implementing BMPs in accordance with NPDES, SUSMP, and LID requirements during operations, ground water quality is improved. Therefore, impacts to ground water quality would be similar under Alternative 3 to the Proposed Project, and similarly less than significant.

Changes to groundwater levels could result from the conversion of impervious to pervious surfaces via infiltration of surface runoff within available landscape areas and through the implementation of BMPs designed to infiltrate in accordance with NPDES, SUSMP, and LID requirements. The groundwater contribution from infiltration systems is less than significant because they are designed to infiltrate smaller storm events equivalent to ¾" of rainfall. Similarly, groundwater levels are typically impacted from larger, regional contributions from injection wells and spreading grounds than from localized infiltration through available landscape areas. Like the Proposed Project, the additional landscaped areas provided by Alternative 3 allow for an incremental increase in infiltration. Therefore, the impacts to groundwater level would be similar to the Proposed Project, and similarly less than significant.

I. Cultural Resources

1. Historical Resources

As discussed in detail in the Historical Assessment provided in Appendix S of this Draft EIR, the Project Site does not include any buildings that have previously been evaluated as eligible for inclusion in the National Register, California Register, or as a local HCM. Nonetheless, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall.

Similar to the Proposed Project, Alternative 3 would provide for the modernization of the Convention Center and the creation of a multi-purpose event center. To provide for these improvements, the West Hall would be demolished. Thus, similar to the Proposed Project, this Alternative would result in a potentially significant impact resulting from the demolition of the West Hall in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. Impacts would be similar to those occurring under the Proposed Project.

2. Archaeological Resources

Under Alternative 3, grading and other earthwork activities would occur during construction of the Event Center and Convention Center expansion similar to those that would occur under the Proposed Project. While Alternative 3 would result in less overall square footage and seating than the Proposed Project, it would utilize a similar building footprint in terms of ground disturbance and involve earthwork activities in areas identified as having archaeological sensitivity. However, under this alternative, no below grade excavation would occur at the L.A. Live Way Garage for below grade parking. As it is possible that archaeological resources may be encountered during construction of Alternative 3, such impacts would be considered potentially significant and could be mitigated to a less than significant level through adherence to the same mitigation measures as the Proposed Project. Thus, impacts under Alternative 3 would be less than significant with mitigation and less than those under the Proposed Project.

J. Public Services (Police and Fire)

Construction levels under Alternative 3 would be reduced by approximately 10 to 15 percent compared to the Proposed Project. This level of construction would warrant implementation of the same security and fire protection measures that would occur under the Proposed Project, including, but not limited to, security fencing and lighting, locked entries, security patrols, and the implementation of a construction Transportation Management Plan. Impacts of Alternative 3 would be somewhat less than those of the Proposed Project due to the reduction in development, but would be similarly less than significant.

As Alternative 3 includes the same uses as the Proposed Project, including an Event Center with 61,500 seats, the types of impacts that occur under the Proposed Project are also anticipated to occur under Alternative 3. As such, security and fire protection measures comparable to those identified for the Proposed Project would be implemented under this Alternative. For example, Alternative 3 would implement a Comprehensive Security Plan, Fire Life Safety Resources Management Plan, develop and implement crowd and traffic control measures, as well as establishing a unified command center.

While crime and calls for fire services would increase above existing conditions under Alternative 3, due to the reduced levels of development the number of incidents would be reduced from those anticipated to occur with the Proposed Project. The same relationship also exists with regard to emergency planning in the event of a natural or man-made disaster. As Proposed Project impacts are concluded to be less than significant, impacts of Alternative 3 would similarly be less than significant due to the reduction in seating capacity at the Event Center and the size of the New Hall and with implementation of measures commensurate with the level of impact that would occur under Alternative 3.

K. Utilities

1. Water

Like the Proposed Project, a short-term demand for water would occur during construction of Alternative 3. Overall, construction activities would require minimal water demand and would not be expected to have any adverse impact on available water supplies and infrastructure. Therefore, as with the Proposed Project, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 3. Such impacts would be less than those of the Proposed Project due to the reduction in total development.

As with the Proposed Project, operation of Alternative 3 would generate an increased demand for water. As shown in Table V-12 on page V-96, this Alternative would result in a net increase in water demand of approximately 593,588 gpd and 130.66 afy. Thus, water demand for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase in water demand of 640,683 gpd and 194 acre-feet per year. This Alternative also assumes that the water conservation measures similar to those of the Proposed Project would be implemented. As with the Proposed Project, impacts on water supply would be less than significant under Alternative 3. Such impacts would be less than those of the Proposed Project.

The existing water infrastructure would not be adequate to accommodate the Proposed Project's water demand during a fire scenario and impacts would be potentially significant. Although Alternative 3 would result in a reduced water demand compared to the Proposed Project, given that the fire flow requirements of this Alternative would be similar to those of the Proposed Project, it is anticipated that the existing water infrastructure would also not be adequate to accommodate this Alternative's water demand during a fire scenario. Nonetheless, as with the Proposed Project, Alternative 3 would implement improvements to the existing water infrastructure that would be adequate to accommodate the water demands of this Alternative and impacts would be reduced to less than significant and would be similar to the Proposed Project.

Table V-12
Reduced Intensity Alternative: Water Demand

Land Use	Attendance		Rate	Water Demand	
	Annual	Daily		Gallons/ Day	Acre-Feet/Year
Convention Center	4,018,015	19,529	4.6874	91,540	57.81
Event Center	3,462,900	61,500	8.8778	545,985	94.36
Central Plant				30,209	33.84
Irrigation				11,686	13.09
Total Alternative 3				679,420	199.10
Less Water Conservation				47,940	26.00
Alternative 3 Total Water Demand				**631,480**	**173.10**
Less Existing t Water Use for On-Site Uses to Be Removed				37,892	42.44
Alternative 3 Net Water Demand				**593,588**	**130.66**
Proposed Project Net Water Demand				**640,683**	**194**
Alternative 3 Water Demand Compared to the Proposed Project				**-47,095**	**-63.34**

Source: Matrix Environmental, 2012.

2. Sewer

Similar to the Proposed Project, construction activities under Alternative 3 would result in a temporary increase in wastewater generation as a result of construction workers on-site. Overall, construction of the Proposed Project is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the IRP. Therefore, construction impacts to the wastewater system under Alternative 3 would be less than significant and impacts would be less than those of the Proposed Project due to the reduction in total development.

As with the Proposed Project, operation of Alternative 3 would result in an increased generation of wastewater. As shown in Table V-13 on page V-98, Alternative 3 would result in a net increase in wastewater of approximately 585,283 gpd. Thus, wastewater generation for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase of 640,754 gpd.

As with the Proposed Project, Alternative 3 could connect to one or both of the two sewer systems that are used under existing conditions subject to available capacity and

design efficiency. The available capacity of System 1 is approximately 0.11 mgd while System 2 has an available capacity of approximately 4.58 mgd. Based on this information, up to 0.11 mgd could discharge to System 1, with the balance discharging to System 2, or the entire Alternative 3 could discharge to System 2. Wastewater generated by Alternative 3 would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant, which is a component of the Hyperion Service Area. Based on the Integrated Resources Plan, the existing effective capacity of the entire Hyperion Services Area is approximately 529 mgd with future improvements identified in the IRP increasing the total effective capacity of the Hyperion Service Area in 2020 to approximately 570 mgd. Based on these forecasts Alternative 3's increase in wastewater generation would be adequately accommodated within the Hyperion Service Area. Impacts on wastewater generation and wastewater infrastructure would be less than significant and less than those of the Proposed Project.

3. Solid Waste

As with the Proposed Project, construction under Alternative 3 would involve demolition, site grading/preparation, and building construction activities. The additional solid waste generation under this Alternative would be substantially similar to the proposed project due to the similar amount of demolition and construction. As shown in Table V-14 on page V-99, when compared to the Proposed Project, this Alternative would generate approximately 90,156.17 tons of construction and demolition waste, which is less than the 91,331.56 tons of waste that would be generated by Project construction. The unclassified landfills that would receive this waste generally do not face capacity shortages and would have adequate capacity to accept this waste. Thus, as with the Proposed Project, construction impacts relative to solid waste would be less than significant. Due to the decreased generation of construction and demolition waste under this Alternative, construction impacts relative to solid waste would be less than those of the Proposed Project.

As shown in Table V-15 on page V-100 during operation, Alternative 3 would generate 100 tons per day of municipal solid waste compared to 123.716 tons per Event Day of the Proposed Project. In addition, Alternative 3 would generate 7,152.8 tons per year of municipal solid waste compared to the 8,391.7 tons per year for the Proposed Project. Solid waste would be recycled or collected by private waste haulers and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. While it is anticipated that future iterations of the CIWMP would provide for improvements beyond 2025 to serve future waste disposal needs, it is conservatively assumed that no new landfills or increases in capacity would occur. Thus, based on this worst case assumption, the County may not be able to accommodate the disposal needs of this Alternative. Therefore, as with the Proposed Project, impacts on solid waste disposal facilities under

Table V-13
Reduced Intensity Alternative: Wastewater Generation

Land Use	Daily Attendance	Rate	Wastewater Generation (gallons/day)
Convention Center	19,529	4.6874	91,540
Event Center	61,500	8.8778	545,985
Central Plant			5,498
STAPLES Center Central Plant			434
Less Water Conservation			39,420
Alternative 3 Total Wastewater Demand			**604,037**
Less Existing Project Wastewater Use			18,754
Alternative 3 Net Wastewater Demand			**585,283**
Proposed Project Net Wastewater Demand			**640,754**
Alternative 3 Wastewater Demand Compared to the Proposed Project			**-55,471**

Source: Matrix Environmental, 2012.

Alternative 3 are conservatively concluded to be potentially significant. Due to the decrease in solid waste generation, such impacts would be less than those of the Proposed Project.

Private waste haulers would be expected to utilize existing solid waste routes to serve Alternative 3, as is the case with the Proposed Project. As such, this Alternative would not result in the need for additional solid waste collection routes to adequately handle waste generated by this Alternative. As with the Proposed Project, impacts on solid waste collection routes would be less than significant. Such impacts would be similar to those of the Proposed Project.

4. Electricity

As with the Proposed Project, construction activities associated with development of Alternative 3 would consume electrical power, although to a lesser extent than the Proposed Project. Overall, construction activities would require minimal electrical consumption. Nonetheless, like the Proposed Project, this demand would be supplied from existing electrical services within the Project Site and would not affect other services as there is sufficient existing capacity to also meet this Alternative's construction demands. Therefore, as with the Proposed Project, impacts on electrical supplies and infrastructure associated with short-term construction activities would be less than significant under

Table V-14
Reduced Intensity Alternative: Construction Solid Waste Generation

	Square Footage	Generation Rate (tons/sq.ft.)	Total Debris (tons)	Diversion Rate	Recycled	Net to Landfill
Demolition						
West Hall	538,925	0.0775	41,766.69	75%	31,325.02	10,441.67
Cherry Street Garage	319,584	0.0775	24,767.76	75%	18,575.82	6,191.94
Bond Street Parking Lot	56,627	0.0875	4,954.86	75%	3,716.15	1,238.71
Gilbert Lindsay Plaza	176,628	0.0628	11,092.24	75%	8,319.18	2,773.06
Subtotal	*1,091,764*		*82,581.55*		*61,936.17*	*20,645.38*
New Construction						
Event Center	1,417,500	0.001945	2,757.04	50%	1,378.52	1,378.52
New Hall	538,925	0.001945	1,048.21	75%	786.16	262.05
L.A. Live Way Garage	845,500	0.001945	1,644.50	75%	1,233.38	411.13
Bond Street Parking Garage	296,463	0.001945	576.62	75%	432.47	144.16
Gilbert Lindsay Plaza	146,514	0.001945	284.97	75%	213.73	71.24
Subtotal	*3,244,902*	*0.001945*	*6,311.34*		*4,044.25*	*2,267.10*
Renovation						
Concourse Building (construction)	31,490	0.001945	61.25	75%	45.94	15.31
Concourse Building (demolition)	15,510	0.0775	1,202.03	75%	901.52	300.51
Subtotal			*1,263.28*		*947.46*	*315.82*
Total Construction Debris			**90,156.17**		**66,927.88**	**23,228.30**

Source: Matrix Environmental, 2012.

Alternative 3. However, as Alternative 3 would result in reduced construction activities, such impacts would be less than those of the Proposed Project. In addition, construction activities associated with the installation of new electrical infrastructure would primarily be confined to trenching and would not have any significant impacts for the Project Site or to adjoining properties.

Similar to the Proposed Project, operation of Alternative 3 would generate an increased demand for electricity. As shown in Table V-16 on page V-101, Alternative 3 would result in an increase in consumption of electricity of approximately 21,500 MWh annually. Thus, electricity consumption for Alternative 3 would be increased relative to existing conditions but would be less than the Proposed Project's estimated increase in electrical consumption of 33,542 MWh per year. Additionally, this Alternative would have a peak demand of 17,062 compared to the Proposed Project's peak demand of 19,286 kVA.

Table V-15
Reduced Intensity Alternative: Operational Solid Waste Generation

Land Use	Patrons or Employees	Factors (tons/unit)	Total Waste Generated	Recycled Waste (tons/day)	Net to Landfills
Daily					
Convention Center					
Exhibit/Meeting Rooms	2,525	0.0005	1.26	0.63	0.63
Event Center					
Spectator Events	61,500	0.0016	98.40	49.20	49.20
Office	36	0.37	0.05	0.03	0.02
Retail	56	1.52	0.23	0.12	0.11
Restaurant	11	2.98	0.09	0.05	0.04
Subtotal	*61,603*		*98.77*	*49.40*	*49.37*
Daily Convention Center and Event Center (Spectator)			**100.03**	**50.03**	**50.00**
Annual					
Convention Center					
Exhibit/Meeting Rooms	1,305,658	0.0005	652.83	326.42	326.41
Event Center					
Spectator Events	3,462,900	0.0016	5,540.64	2,770.32	2,770.32
Exhibition Events/Meeting Rooms	1,656,220	0.0005	828.11	414.06	414.05
Office	36	0.37	13.32	6.66	6.66
Retail	56	1.52	85.12	42.56	42.56
Restaurant	11	2.98	32.78	16.39	16.39
Subtotal			6,499.97	3,249.99	3,249.98
Annual Convention Center and Event Center			**7,152.80**	**3,576.41**	**3,576.39**

Source: Matrix Environmental, 2012.

Electrical supplies would be adequate to accommodate the Proposed Project's demand for electricity. Therefore, given that Alternative 3 would result in a decreased demand as compared to the Proposed Project, electrical supplies would also be adequate to accommodate the electrical demand for this Alternative. In addition, Alternative 3 would also implement energy conservation measures similar to those of the Proposed Project. Thus, as with the Proposed Project, impacts on electrical supplies would be less than significant under Alternative 3 and less than those of the Proposed Project.

Based on LADWP's analysis, the existing electrical infrastructure may not be adequate to meet the Proposed Project's demand and impacts on the existing electrical infrastructure and upgrades to the system may be required. Although Alternative 3 would result in a reduced demand for electricity compared to the Proposed Project, it is

Table V-16
Reduced Intensity Alternative: Electricity Consumption and Demand

Land Use	Consumption		Peak Demand (kVA)
	Daily (kWh)	Annual (MWh)	
Convention Center (New Facilities)	22,495	8,209	6,221
Convention Center (Existing Facilities)	3,869	1,416	1,343
Event Center	98,400	17,282	10,701
Bond Garage	1,978	722	236
L.A. Live Garage	5,698	2,080	681
Total Alternative 3 Proposed Uses	**109,945**	**21,500**	**17,062**
Total Proposed Project	**151,768**	**33,542**	**19,286**
Existing On-Site Uses to Be Removed as Part of Proposed Project	20,598	7,519	5,967
Net Alternative 3	89,347	13,981	11,095
Net Proposed Project	131,170	26,023	13,319
Net Difference in Total Consumption and Peak Demand	**-41,823**	**-12,042**	**-2,224**

Source: Matrix Environmental, 2012.

anticipated that the existing electrical infrastructure would also not be adequate to accommodate this Alternative's demand for electricity. However, as with the Proposed Project, Alternative 3 would implement similar mitigation measures as the Proposed Project. After implementation of these improvements, if determined to be required by LADWP, adequate electrical infrastructure would be in place to serve the Project Site and impacts would be reduced to less than significant. Thus, as with the Proposed Project, impacts on electrical infrastructure would be less than significant under Alternative 3 and less than those of the Proposed Project.

5. Natural Gas

As with the Proposed Project, construction activities associated with development of Alternative 3 would not require the consumption of natural gas. In addition, similar to the Proposed Project, construction impacts associated with the installation of new natural gas distribution lines would primarily involve trenching and would not have any significant impacts for the Project Site or to adjoining properties. Furthermore, like the Proposed Project, prior to ground disturbance, contractors would coordinate with SCG to identify the locations and depth of all lines within the Project Site. Additionally, SCG would be notified in advance of proposed ground disturbance activities to avoid natural gas lines and

disruption of natural gas service. Therefore, as with the Proposed Project, impacts on natural gas supplies and infrastructure associated with short-term construction activities would be less than significant under Alternative 3 and less than those of the Proposed Project.

As with the Proposed Project, operation of Alternative 3 would generate an increased demand for natural gas. As shown in Table V-17 on page V-103, Alternative 3 would result in a net increase in natural gas consumption of approximately 379,523 therms annually. Thus, natural gas for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase in natural gas of 444,736 therms per year. This Alternative also assumes that the energy conservation measures similar to those of the Proposed Project would be implemented. Thus, as with the Proposed Project, impacts on natural gas would be less than significant under Alternative 3 and less than those of the Proposed Project.

As the demand for natural gas under Alternative 3 is similar to that of the Proposed Project it is assumed that that the existing natural gas infrastructure would also not be adequate to accommodate this Alternative's natural gas demand. Nonetheless, as with the Proposed Project, Alternative 3 would implement upgrades that would reduce impacts to a less than significant level. Due to the reduction in development under Alternative 3, impacts would be less than those of the Proposed Project.

L. Environmental Safety

As with the Proposed Project, construction activities under Alternative 3 would involve the use of small quantities of hazardous materials (e.g., paints, coatings, adhesives), and include the storage of fuels and oils associated with construction equipment in accordance with applicable regulations. Additionally, asbestos and ACMs, LBPs, and PCBs could be encountered during demolition of existing buildings. Also, as with the Proposed Project, grading under Alternative 3 could uncover or disturb existing known and unknown USTs, which could lead to soil and/or groundwater contamination and the potential exposure of people and the environment to hazardous materials. However, all construction activities would occur in accordance with all applicable federal, state, and local laws and regulations. In addition, project design features and mitigation measures similar to those for the Proposed Project would be expected to be implemented under this alternative. Therefore, construction of Alternative 3 would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, construction impacts under Alternative 3 would be less than significant. However, as construction activities would be less under Alternative 3, the potential for impacts to occur would be less than those that would occur under the Proposed Project.

Table V-17
Reduced Intensity Alternative: Annual Natural Gas Consumption

Land Use	Total Therms/Year
Event Center	299,541
Convention Center (New Facilities)	118,813
Convention Center (Existing Facilities)	18,269
Total Alternative 3 Proposed Uses	**436,623**
Proposed Project	**501,836**
Total Existing Convention Center to be Replaced	**57,100**
Net Alternative 3	379,523
Net Proposed Project	444,736
Net Difference in Total Consumption and Peak Demand	**-65,213**

Source: Matrix Environmental, 2012.

As with the Proposed Project, Alternative 3 would modify the existing uses on the Project Site and would include activities that would continue to involve the use and storage of hazardous materials. As with the Proposed Project, these materials would be contained, stored, and used in accordance with manufacturers' instructions and applicable standards and regulations. As such, Alternative 3 is not anticipated to expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, a less than significant impact with regard to hazardous materials would occur under this alternative. However, impacts under Alternative 3 would be less than those of the Proposed Project due to the potential handling of lesser quantities of hazardous materials under this alternative.

As with the Proposed Project, Alternative 3 would develop new uses within a Methane Zone. As such, potential impacts relative to methane gas could occur during construction and/or operation of this Alternative. As with the Proposed Project, this Alternative would comply with Cal-OSHA requirements, the City's Methane Seepage Regulations and the specifications set forth by the City of Los Angeles Department of Building and Safety (LADBS). With implementation of mitigation measures, potential methane impacts would be reduced to a less than significant level. However, such impacts would be less than those that would occur under the Proposed Project due to the reduced footprint under this alternative.

3. Summary of Comparative Impacts

Alternative 3 would reduce the Event Center's seating by 15 percent and reduce the Floor Area of the New Hall. As many of the Proposed Project's potential environmental impacts are directly related to the amount of development that occurs, Alternative 3 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. Even though most of the Proposed Project's significant impacts would be reduced under Alternative 3, they would not be sufficiently reduced to less than significant levels. As such, Alternative 3, as is the case with the Proposed Project, would result in significant impacts with regard to transportation, visual resources, artificial light, noise, air quality, historical resources, and solid waste. While impacts for a number of issues would be reduced under Alternative 3, the reduced levels of development under this Alternative also serve to reduce the beneficial effects of the Proposed Project, particularly with regard to advancing key land use policies and the provision of new employment. In summary, Alternative 3 would not introduce additional significant environmental impacts, and in many cases would lessen the Proposed Project's overall impacts as well as its potential beneficial effects. A tabular summary comparing the impacts of Alternative 3 to those of the Proposed Project is presented in Table V-2 on page V-9.

4. Relationship of this Alternative to Project Objectives

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

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

that can function as exhibit hall space, meeting rooms or a ballroom, which is a new amenity that the Convention Center cannot provide today.

Alternative 3 would meet the Project Objective related to constructing a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses, but to a lesser extent than the Proposed Project due to the reduced seating capacity of the Event Center. This Alternative would provide a state-of-the-art venue capable of attracting and maintaining up to two NFL teams and that could be used for event floor exhibit hall space. However, with the reduced seating capacity, the Event Center would be less attractive to NFL teams. Ticket sales are an important revenue source for a team and fewer seats would mean less revenues to the team. Moreover, the Event Center would not be expandable to 76,250 seats to host occasional major sporting events (e.g., an NFL Super Bowl) under this Alternative. However, even with the reduced capacity Event Center, this Alternative would accommodate a variety of other spectator events beyond NFL games.

Alternative 3 would realize the Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles, but to a lesser extent than the Proposed Project due to the reduced square footage of exhibition space and Event Center seating capacity.

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

Due to reduced square footage of exhibition space and Event Center seating capacity, Alternative 3 would not achieve the Project Objective to promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism to the same degree as the Proposed Project. Specifically, this Alternative would provide economic development opportunities in Pico-Union and South Los Angeles by attracting out of town visitors to additional exhibition events to a lesser degree as the Proposed Project.

E. Alternative 4: Enclosed Stadium Alternative

1. Description of the Alternative

Alternative 4, the Enclosed Stadium Alternative, is exactly the same as the Proposed Project, with two exceptions: the Event Center's deployable roof is replaced by a permanent fixed roof and all Event Center façade openings would be eliminated. This design modification is intended to address artificial lighting and noise impacts on adjacent sensitive receptors. Other than this distinction, all other design elements would be identical to the Proposed Project. However, a fixed roof would also require more time to construct. Therefore, only artificial light, construction traffic, construction and operational regional air quality emissions, climate change, construction and operational noise, electricity, and environmental safety impacts would be different than those of the Proposed Project and are the focus of the analysis presented below.

2. Environmental Impacts

A. Land Use

Same as Proposed Project.

B. Transportation, Parking, and Pedestrian Safety

1. Transportation

The roof and façade design for the Event Center, which are the only differences between Alternative 4 and the Proposed Project, have no affect on the transportation issues analyzed in the Draft EIR, except for the longer construction period under Alternative 4. As such, construction transportation impacts attributable to Alternative 4 would be significant, as is the case with the Proposed Project, but greater due to the longer construction period under Alternative 4. Specifically, a fixed roof would require approximately 6 months longer to construct due to the roof's larger and more complex structural members, the potential use of shoring towers, a much larger roof area assembly and waterproof membrane, and more complex mechanical systems and fire/life safety system installations, Operational traffic impacts under Alternative 4 would be the same as the Proposed Project.

2. Parking and Pedestrian Safety

Same as the Proposed Project.

C. Visual Resources

Construction activities, including the location and type of construction activities under Alternative 4 would be similar to those under the Proposed Project. However, the duration of construction activities would be increased by approximately six months under Alternative 4 when compared with the Proposed Project due to the construction of the permanent fixed roof. As described above, for purposes of a conservative analysis, demolition of the West Hall is considered to represent the loss of a visual resource in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. Alternative 4 would remove the West Hall. As such, construction-related impacts to visual resources that contribute to the visual quality of the Project Site would be significant and unavoidable under Alternative 4 and would be similar to the Proposed Project.

Other than the construction of a permanent fixed roof and the elimination of the façade openings within the Event Center Alternative 4 would be identical to the Proposed Project during operation. The changes to the roof element and façade openings would primarily affect artificial light impacts, which are addressed below under the "Artificial Light and Glare" heading.

D. Light and Glare

1. Natural Light

Same as Proposed Project.

2. Artificial Light and Glare

Under Alternative 4 the fixed permanent roof and enclosure of the façade openings would assist in screening lighting sources from within the Event Center from adjacent sensitive receptors. Like the Proposed Project, Alternative 4 would require nighttime construction to complete the Event Center within the timeframe identified in the Project Objectives. Therefore, construction lighting impacts under Alternative 4 would be significant and unavoidable. However, given the increased construction timeframe associated with the fixed roof, such impacts would be greater than those that would occur under the Proposed Project. Impacts related to construction glare would be less than significant and similar to the Proposed Project, as Alternative 4 would not be anticipated to introduce significant sources of glare during construction activities.

The Proposed Project's impacts are less than significant or less than significant with mitigation on: light trespass; lighting levels at the analyzed receptors;; the use of skytrackers; signage; driver visibility/distraction; building/façade lighting; plaza lighting; headlights within the parking garages; daytime glare; and sky glow. As stated above, Alternative 4 would entail the same types and amounts of development as the Proposed Project, but would provide additional shielding to screen lighting sources from within the Event Center from adjacent sensitive receptors. Therefore, the Proposed Project's significant impacts with regard to temporary lighting for concerts and special events internal to the Event Center, fireworks displays conducted within the Event Center and impacts of sports lighting that could cause glare impacts as well as spill light impacts at Receptor Location 8 when low cloud ceilings with high albedo (+50 percent) are present would not occur under Alternative 4. Thus, artificial light impacts under operation of Alternative 4 would be less than significant and reduced as compared to the Proposed Project.

E. Noise

The location and type of construction activities under Alternative 4 would be the same as under the Proposed Project. However, the duration of construction activities would increase relative to the Proposed Project. Therefore, on-site construction activities under Alternative 4 would generate noise levels that would be similar to those that would occur under the Proposed Project. Like the Proposed Project, on-site construction activities for Alternative 4 would result in short-term significant noise impacts at sensitive receptors during daytime and nighttime construction activities. Noise impacts at sensitive receptors resulting from off-site construction truck traffic would be the same as the Proposed Project and would be less than significant. Due to the increased duration of construction activities, noise impacts from on-site construction activities and off-site construction trucks under Alternative 4 would be greater than under the Proposed Project.

Due to the similar type and location of construction activities, construction vibration levels would be similar under the Proposed Project and Alternative 4. Thus, impacts under Alternative 4 would be similar to the Proposed Project and also less than significant with implementation of mitigation measures.

Alternative 4 would include the same on-site noise sources (i.e., building mechanical equipment, parking garages, loading docks, crowd cheering and sound system at the Event Center, and firework display shows), as the Proposed Project. Therefore, like the Proposed Project, noise impacts associated with on-site building mechanical, loading dock/refuse collection, and bus operations within the Pico Passage would be less than significant. As discussed above, under Alternative 4, the Event Center would be fully enclosed with a non-operable roof and several of the façade openings would also be eliminated. For the purposes of this Alternative, it is assumed that the roof material, as well

as the balance of the materials used to construct the Event Center would be designed so as to preclude the transmission of noise beyond the Event Center site. Thus, the significant noise impacts associated with operation of the Event Center, including firework displays, would be avoided under this Alternative. However, noise impacts associated with the parking garages, and the outdoor plazas would be similar to the Proposed Project, and would result in significant noise impacts. Alternative 4 would also generate the same off-site traffic volumes, public transit usage (increase in bus and rail operations), and media helicopters would occur, although fewer media helicopters would likely occur with an enclosed stadium. As such, noise impacts associated with these sources under Alternative 4 would be similar to the Proposed Project, although less with regard to media helicopters. Such impacts would be significant.

In summary, whereas the change in roof design would eliminate the Event Center's significant noise impacts, significant noise impacts under Alternative 4 would still occur during construction and from the following operational sources, as is the case with the Proposed Project: parking garage operations; the outdoor plazas; off-site traffic; public transit operations; and media helicopters. In addition, due to the increased duration of construction activities under Alternative 4, construction noise impacts would be greater when compared with the Proposed Project.

F. Air Quality and Climate Change

1. Air Quality

(a) Construction

With the exception of the increased duration of construction, construction activities including construction equipment, grading activities, locations of construction activity, and amount of building area constructed would be similar under Alternative 4 and the Proposed Project. Thus, under Alternative 4, pollutant emissions and fugitive dust from site preparation and total construction activities would be the same on a daily basis as that of the Proposed Project. Impacts during daily maximum conditions, those used for measuring significance, would also be the same as those of the Proposed Project and would be significant and unavoidable for regional VOC, CO, and NO_X, and localized NO_X impacts with the incorporation of mitigation measures. However, overall, such impacts under Alternative 4 would be greater than those under the Proposed Project due to the increased duration of construction activities (i.e., same daily use of equipment over a longer duration).

As daily construction activities under Alternative 4 would be sufficiently similar to those of the Proposed Project, Alternative 4 would also result in comparable levels of diesel particulate emissions. Thus, as with the Proposed Project, construction-related air toxic

emission impacts during construction of Alternative 4 would be less than significant, but greater due to the increased duration of construction activities.

(b) Operation

The number of daily trips generated by Alterative 4 would be the same as the Proposed Project. While the square footage and uses would also be the same, enclosing the Event Center would require climate control systems (e.g., air conditioning) and increased lighting requirements during daytime hours that would notably increase electricity consumption at the Project Site. This increase in electrical consumption would result in an increase in regional emissions levels for those pollutants for which the Proposed Project exceeds established levels (i.e., Alternative 4 causes a worsening of the Proposed Project's forecasted significant impacts). Regional operational emissions under this Alternative, as is the case with the Proposed Project, would result in significant regional air quality impacts related to VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions.

From a localized operational standpoint, the onsite area and stationary source emissions for this Alternative would be the same as the Proposed Project (i.e., no electricity would be generated at the Project Site) with the exception of a small increase in particulate matter emissions from the increased use of the chillers. As with the Proposed Project localized PM_{10} and NO_2 impacts would be significant and unavoidable.

As Alternative 4 would generate the same amount of traffic as the Proposed Project, this Alternative would also generate the same local CO concentrations as the Proposed Project. Like the Proposed Project, such impacts would be less than significant.

With respect to potential air toxic impacts, Alternative 4 would result in the same onsite area and stationary source emissions as the Proposed Project. Thus, similar to the Proposed Project, Alternative 4 would result in a less than significant air quality impact related to air toxics.

Alternative 4 would not include any uses identified by the SCAQMD as being associated with odors. As with the Proposed Project, the proposed uses under Alternative 4 would not be a source of odors and odor impacts would be less than significant.

2. Climate Change

Alternative 4 GHG emissions associated with vehicle, transportation, water usage, wastewater generation, natural gas usage, and solid waste generation and disposal would be the same as the Proposed Project. However, with the reduction in natural ventilation resulting from the fixed permanent roof and the elimination of the façade openings within

the Event Center, electricity usage under Alternative 4 would be greater than under the Proposed Project, which in turn would increase the GHG emissions generated by this Alternative. As with the Proposed Project, this Alternative would include project design features (e.g., reduced vehicular traffic and increased use of mass transit) to reduce GHG emissions compared to the "business-as-usual" scenario and would constitute an equivalent or larger break from "business-as-usual" than has been determined by CARB to be necessary to meet AB 32's goals (approximately 16 percent for 2020). Further, SB 292 would be applicable to Alternative 4, which, as is the case with the Proposed Project, would result in the offset of 21,907 million tons CO2 equivalent attributable to private automobile traffic to Spectator Events at the Event Center. Thus, while GHG impacts associated with Alternative 4 would be greater than under the Proposed Project, as with the Proposed Project, such impacts are anticipated to be less than significant.

G. Geology and Soils

Same as Proposed Project.

H. Hydrology and Soils

Same as Proposed Project.

I. Cultural Resources

1. Historical Resources

Same as Proposed Project.

2. Archaeological Resources

Same as Proposed Project.

J. Public Services (Police and Fire)

Same as Proposed Project.

K. Utilities

The potential impacts of Alternative 4 are virtually the same as the Proposed Project, except that with the permanent fixed roof and elimination of façade openings within the Event Center, the demand for electricity would increase under Alternative 4 when compared with the Proposed Project as the natural ventilation provided by the deployable

roof and façade openings would be eliminated. The increase in electricity consumption that would occur under Alternative 4 would not exceed regional supplies, and as such impacts would be less than significant. The improvements to the area's electrical infrastructure that may be required under the Proposed Project would most likely need to be expanded to meet the demand associated with Alternative 4. Thus, as with the Proposed Project, impacts on electrical infrastructure would be less than significant under Alternative 4, but would likely be greater than those of the Proposed Project.

L. Environmental Safety

Same as Proposed Project.

3. Summary of Comparative Impacts

The roof design and façade for the Event Center are the only differences between Alternative 4 and the Proposed Project. The analyses conducted for this Alternative indicate that the impacts of Alternative 4 would be the same as those of the Proposed Project for all issues except artificial light, construction traffic, construction and operational regional air quality emissions, construction and operational noise, and electricity. As such, Alternative 4 would result in significant impacts, as is the case with the Proposed Project, with regard to transportation, visual resources, construction and operational noise, air quality, historical resources, and solid waste (i.e., due to limitations on regional landfill capacity). By placing a fixed roof on the Event Center and façade treatments that keep the Event Center's lighting within the structure, the Proposed Project's significant operational artificial light impacts from Event Center operations would be reduced to a less than significant level. However, with the increased duration of construction activities, artificial light impacts during construction activities would increase relative to the Proposed Project. Under Alternative 4, a fixed Event Center roof would reduce the significant noise impacts attributable to crowd noise, the in-house sound system and fireworks during operation of the Event Center to a less than significant level. However, similar to the Proposed Project, significant noise impacts would continue to occur from the following sources under Alternative 4: (1) construction; (2) parking garage operations; (3) outdoor public areas; (4) off-site traffic; (5) public transit operations; and (6) media helicopters. In addition, due to the increased duration of construction activities, Alternative 4 would result in increased impacts associated with artificial light, traffic, noise, and regional air quality emissions during construction. With the permanently enclosed Event Center building, impacts associated with demand for electricity, GHG emissions, and environmental safety would also be increased under Alternative 4 when compared with the Proposed Project.

In conclusion, Alternative 4 eliminates the operational significant artificial lighting and some operational noise impacts, but significant impacts would remain for all of the same

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

4. Relationship of this Alternative to Project Objectives

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

Alternative 4 would not meet the Project Objective to construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses to the same extent as the Proposed Project. Specifically, it would not design the Event Center to include a deployable roof to enable a broad range of uses.

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

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

F. Alternative 5: New Hotel and Expansion Alternative

1. Description of the Alternative

The New Hotel and Expansion Alternative (Alternative 5) includes the development of a 1,000-room convention hotel with approximately 50,000 square feet of banquet hall space within the Project Site. In addition, as with the Proposed Project, this Alternative increases the size of the Convention Center through the development of the New Hall. Under this Alternative, the New Hall would be built as under the Proposed Project (i.e., contiguous to the South Hall and built over Pico Boulevard) and the West Hall would be demolished and additional convention center Floor Area would be developed to the north of the New Hall within a new West Hall Replacement Building. In total, an additional 573,399 square feet of Convention Center Floor Area would be developed.

Under Alternative 5, the 1,000-room convention hotel would be located at the north end of the Project Site adjacent to Chick Hearn Court and across the street from the JW Marriott at L.A LIVE and the Ritz Carlton at L.A. LIVE hotels. Parking for the hotel would be provided via a subterranean structure below the hotel. An overview of the Project Site under Alternative 5, moving southward from Chick Hearn Court, starts with the 1,000-room convention hotel, followed by the West Hall Replacement Building and the Concourse Building, with the New Hall being located south of the West Hall Replacement Building, and finishing with the South Hall on the south side of Pico Boulevard.

The total Floor Area for the Convention Center under Alternative 5 would be 2,112,070 square feet. For analysis purposes, the 1,000-room convention hotel would consist of 900,000 square feet of Floor Area, which in conjunction with the Convention Center would result in a total of approximately 3.0 million square feet of Floor Area within the Project Site. Alternative 5 would also add approximately 311,406 square feet of Rentable Area. Thus, a total of 1.20 million square feet of Rentable Area would be available at the Project Site under Alternative 5.

Under Alternative 5, the New Hall would be the same height as under the Proposed Project, 90 feet, which would also be the height of the West Hall Replacement Building. The hotel that would be developed under this Alternative would be approximately 300 feet in height and configured as a tower similar to the Ritz Carlton Hotel and Residences at L.A. LIVE. The Event Center would not be developed under Alternative 5.

This Alternative would provide a total of 7,544 parking spaces, an increase of 1,986 spaces over the existing supply. The existing South Hall and Venice Garages would remain, the Bond Street Garage would not be built, and the L.A. Live Way Garage would be built as per the Proposed Project. The West Hall Garage would be reconstructed under the new West Hall Replacement Building with 1,100 spaces and 419 spaces would be provided under the hotel.

A comparison of this Alternative and the Proposed Project is provided in Table V-18 on page V-116.

2. Environmental Impacts

A. Land Use

1. Land Use Consistency

Alternative 5 would be consistent with the public investment in the transportation system by virtue of its location in proximity to transit in downtown Los Angeles, which is the hub of the rail and bus transit system for the metropolitan Los Angeles area. Alternative 5 would be designed as a transit-oriented development that would include improved on-site pedestrian amenities and landscaping throughout the Project Site that would promote pedestrian activity in proximity to multiple rail and bus transit opportunities. The Convention Center growth that would occur under this Alternative is anticipated to substantially increase the level of activity at the Project Site which would make the use of transit a considerably more attractive way to access the Project Site. However, the increased transit usage that would result from the Proposed Project would be largely associated with the Event Center. The transit use associated with Alternative 5 would likely be reduced when compared to the Proposed Project because it is likely that the hotel would be supported by shuttles and motor coaches and the larger trade shows and conventions at the Convention Center would attract largely out-of-town visitors who would be more inclined to use services offered by their hotel as compared to 72,000 attendees at a regional sports event or concert who would be more inclined to use public transit. Furthermore, Alternative 5 does not include the trip reduction provisions required for the Proposed Project by SB 292 which would result in increased transit use. Therefore, the extent to which Alternative 5 would promote transit usage would be less than that of the Proposed Project.

Alternative 5 would be an infill development on a previously developed site that would complement existing convention uses at the Convention Center and existing hotel and entertainment uses at L.A. LIVE. Therefore, similar to the Proposed Project, Alternative 5 would largely help advance SCAG Policies GV P1.3 to, “Encourage

Table V-18
Comparison of Proposed Project and Alternative 5—New Hotel and Expansion

	Proposed Project	Alternative 5	Change from Proposed Project	
			Number	Percent
Seats				
Event Center	72,000	0	(72,000)	-100.0%
Total Floor Area				
Event Center	1,750,000	0	(1,750,000)	-100.0%
Convention Center				
Proposed Project or Alternative	500,000	1,035,600	535,600	107.1%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Convention Center	1,576,470	2,112,070	535,600	34.0%
Hotel (1,000 Rooms)	0	900,000	900,000	100.0%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	2,250,000	1,1935,600	(314,400)	-14.0%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Project Site	3,326,470	3,012,070	(314,400)	-9.5%
Net Floor Area (Change from Existing Conditions)				
Event Center	1,750,000	0	(1,750,000)	-100.0%
Convention Center				
Proposed Project or Alternative	37,799	573,399	535,600	1,417.0%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Convention Center	37,799	573,399	535,600	1,417.0%
Hotel (1,000 Rooms)	0	900,000	900,000	100.0%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	1,787,799	1,473,399	(314,400)	-17.6%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Project Site	1,787,799	1,473,399	(314,400)	-17.6%
Rentable Area				
Event Center (When Used for Exhibition Use Only)	245,650	0	(245,650)	-100.0%
Convention Center				
Proposed Project or Alternative	286,310	596,958	310,648	108.5%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Convention Center	886,851	1,197,499	310,648	35.0%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	531,960	596,958	64,998	12.2%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Project Site	1,132,501	1,197,499	64,998	5.7%

Table V-18 (Continued)
Comparison of Proposed Project and Alternative 5—New Hotel and Expansion

	Proposed Project	Alternative 5	Change from Proposed Project	
			Number	Percent
Parking				
Proposed Project or Alternative				
L.A. Live Way Garage	2,950	2,950	0	0.0%
Bond Street Garage	928	283	(645)	-69.5%
West Hall/West Hall Replacement Building/Hotel	0	1,100	1,100	100.0%
Hotel (1,000 Rooms)	0	419	419	100.0%
Total Proposed Project or Alternative	3,878	4,752	874	22.5%
Not a Part of Proposed Project or Alternative	2,792	2,792	0	0.0%
Total Project Site	6,670	7,544	874	14.0%

Source: Matrix Environmental, 2012.

transit-oriented development," GV P2.1 to, "Promote infill development and redevelopment to revitalize existing communities," and GV P1.4 to, "Promote a variety of travel choices."

Alternative 5 would implement similar streetscape improvements that would serve to promote attractive, functional, and safe streets as well as pedestrian-friendly sidewalks and thus help advance SCAG Policy GV P2.3 to, "Promote "people-scaled" pedestrian-friendly communities," similar to the Proposed Project.

Alternative 5 would also implement sustainability features intended to reduce the potential for impacts related to climate change by minimizing air and GHG emissions, water and energy usage, and solid waste generation and disposal. Like the Proposed Project, Alternative 5 would also create additional temporary and permanent jobs during construction and operation. Alternative 5 would not include the Event Center, but would entail a larger expansion of the Convention Center, and would also introduce a new hotel use that would generate jobs. It is estimated that the level of employment under Alternative 5 would be similar to that associated with the Proposed Project. As such, Alternative 5 would locate new jobs near existing housing to a similar extent as the Proposed Project. Overall, development of Alternative 5 would be consistent with and would support SCAG's Compass Blueprint Growth Vision, but to a lesser extent than the Proposed Project due to the reduced diversity of entertainment and tourism related uses at the Project Site and a reduced potential to promote regional transit use because the Event Center would not be built under this Alternative.

The Proposed Project would be consistent with SCAG's employment forecasts for the Subregion. As Alternative 5 would be anticipated to create a similar number of new jobs as the Proposed Project, it would also be consistent with SCAG's employment forecasts for the Subregion. Alternative 5 would also be an infill development in proximity to public transportation, and would be designed as a transit-oriented development that would include interconnected pedestrian plazas and amenities that are part of an integrated primarily on-site streetscape program. However, as discussed above, Alternative 5 would not promote transit use to the same extent that the Proposed Project would. Therefore, Alternative 5 would be consistent with SCAG's Regional Transportation Plan, but to a lesser extent than the Proposed Project due to the reduced potential to promote regional transit use.

Like the Proposed Project, Alternative 5 would be consistent with the Project Site's designation in the City of Los Angeles General Plan Framework Element as part of the Downtown Center. Similar to the Proposed Project, Alternative 5's FAR would be permitted under the Project Site's zoning designations. While Alternative 5 would provide different types and a different mix of facilities than the Proposed Project, it would remain consistent with the General Plan Framework Element's vision of the Downtown Center as an international center for finance and trade that serves the population of the metropolitan region. Alternative 5 would be developed with similar building and site design standards and guidelines and specific urban design elements as the Proposed Project to ensure a high-quality design and environment. Alternative 5, like the Proposed Project, would provide a series of interconnected public plazas designed for pedestrian circulation and outdoor gathering. However, Alternative 5 would not include the improvements to Gilbert Lindsay Plaza proposed by the Proposed Project, which is intended to serve as a pre- and post-event gathering space for Event Center functions. Nonetheless, Alternative 5 would be consistent with the overall intent of the City's General Plan Framework Element to a similar extent as the Proposed Project.

Hotel uses are not permitted in the Public Facilities land use designation, therefore, it is anticipated that Alternative 5 would require a zone text amendment with regard to land use approvals to implement this Alternative. The additional convention and hotel uses that would result from implementation of Alternative 5 would serve to further complement and benefit the tourism, hotel and entertainment uses in the immediate Project vicinity, throughout Downtown, and in the City as a whole. However, the manner in which Alternative 5 would support the vision for the Project Site would be different than the Proposed Project. Specifically, while the Proposed Project would provide new sports, entertainment and modernized convention uses, Alternative 5 would focus solely on convention center and supporting hotel facilities. Thus, this Alternative would achieve the overall goal to complement existing sports and entertainment venues in the vicinity to a lesser degree than the Proposed Project. Despite this difference, Alternative 5 would

introduce new visitor-serving uses and pedestrian-oriented amenities, provide needed Convention-serving hotel rooms, and support tourism. With respect to the Downtown Design Guide, Alternative 5 would meet many of the standards and guidelines that address sustainability, sidewalks and setbacks, ground floor treatment, parking and access, building massing and street walls, open space, architectural detail, streetscape improvements, signage, public art, and civic and cultural life, to a similar extent as the Proposed Project. The proposed building designs would also be expected to incorporate relevant standards and guidelines pertaining to architectural details, including horizontal variation, vertical variation, building materials, windows and doors, glazing, lighting, security features and associated impacts affecting neighboring properties and uses. Parking garages would be integrated with the on-site buildings. Similar to the Proposed Project, Alternative 5 would include streetscape improvements that would serve to enhance the aesthetic environment on-site and along the Project Site perimeter, connect existing on-site uses, and connect the Project Site to the Pico Union area by providing landscaped corridors under the SR-110. Alternative 5 would include signage, lighting and public art that complement the character of the Project Site and support the provisions of the Design Guide. Overall, Alternative 5 would be consistent with the Central City Community Plan and the associated Downtown Design Guide to a similar extent as the Proposed Project.

The potential inconsistencies of the Proposed Project with the Downtown Design Guidelines related to building length and signage discussed above under Alternatives 1 and 2, would not occur with Alternative 5 because the Event Center would not be constructed with this Alternative. The Downtown Strategic Plan identifies the need to both expand the Convention Center and develop the area surrounding it with complementary uses including entertainment, shopping and hotel uses, outdoor activities and other tourist attractions. Alternative 5 would directly support the objectives of the Downtown Strategic Plan by renovating and modernizing the usable space within the Convention Center; developing a new hotel adjacent to the Convention Center; capitalizing on nearby circulation and transit systems; improving streetscape and creating pedestrian linkages; and supporting Downtown Los Angeles as an international tourist destination with major attractions related to sports, culture, and conventions. The manner in which Alternative 5 would support these objectives would be different than the Proposed Project. While the Proposed Project would provide new sports, entertainment and modernized convention uses, Alternative 5 would provide just convention center and related hotel uses. While all of these functions are consistent with the vision for the Convention Center site set forth in the Downtown Strategic Plan, Alternative 5 would provide a less diverse set of uses and as a result does not implement the Downtown Strategic Plan to the same degree as the Proposed Project.

Similar to the Proposed Project, Alternative 5 would include numerous design elements to foster an accessible, safe and visually appealing pedestrian environment, in

accordance with the City of Los Angeles Walkability Checklist. Such features would include open space elements including new and redesigned plaza spaces, and pedestrian amenities including street furniture, safety and accent lighting, way-finding signage, trash containers, bike racks, landscaping, pedestrian-scaled entrances, and designated bus/taxi drop-off areas. Therefore, Alternative 5 would be consistent with the City's Walkability Checklist to a similar extent as the Proposed Project.

The proposed Figueroa Corridor Streetscape Project is studying and would eventually provide a design for a coordinated streetscape that will complement the existing buildings and businesses in the area while promoting pedestrian and bike activity. Based on public input to date in community workshops, it is anticipated that Alternative 5 and in particular the proposed Streetscape Plan would be consistent with the Figueroa Corridor Streetscape Project. As discussed earlier, similar to the Proposed Project, Alternative 5 would be a transit-oriented development with numerous features designed to encourage pedestrian activity and the use of alternative modes of transportation. However, Alternative 5 would not include the improvements to Gilbert Lindsay Plaza proposed by the Proposed Project, which is intended to serve as a pre- and post-event gathering space for Event Center functions. Therefore, Alternative 5 would be consistent with the Figueroa Corridor Streetscape Project, but to a lesser extent than the Proposed Project.

As discussed above, it is anticipated that Alternative 5 would require a zone text amendment to permit development of this Alternative on the Project Site since hotel uses are not permitted under the PF land use designation. This is different than the Proposed Project which includes a Zone Change for the entire Project Site from PF and C2 to a Specific Plan Zone. The zone text amendment would permit the types of land uses contemplated under Alternative 5. Upon approval of the zone text amendment, this Alternative would be consistent with the Project Site's PF land use designation. Therefore, Alternative 5 would be consistent with the relevant provisions of the Los Angeles Municipal Code to a similar extent as the Proposed Project.

Based on the above, Alternative 5 would be substantially consistent with and would not conflict with regional and local plans and policies that govern the Project Site. With regard to regional plans, Alternative 5 would be slightly less consistent than the Proposed Project with relevant plans and policies due to the loss of the diversity of the sports and entertainment uses that occurs under the Proposed Project. Overall, impacts with respect to land use consistency would be less than significant and similar to those of the Proposed Project.

2. Land Use Compatibility

With the exception of the hotel, the types of land uses proposed under Alternative 5 are included in the Proposed Project. The hotel use would be similar to surrounding high-rise hotel uses in the Project Site vicinity, including the JW Marriot and Ritz Carlton at L.A. LIVE hotels across the street from the Project Site. Therefore, like the Proposed Project, Alternative 5 would be consistent with and would build on the existing uses on the Project Site and in the immediate area. Alternative 5 would not introduce new types of uses that do not already occur within the immediate vicinity of the Project Site. Rather, the proposed uses would reinforce Downtown and the immediate Project area in particular as a world-class destination for tourist attractions including conventions and trade shows, serving the general population with convenient access from throughout the Los Angeles region via transit as well as freeways. The Proposed Project's increase in building height, density and mass on the Project Site would not be atypical in the area given the relatively recent (and planned future) development of entertainment and high-rise uses at the adjacent L.A. LIVE development and the numerous mid-rise hotel and residential buildings to the east. Therefore, Alternative 5's overall increase in building density and mass would also be compatible with the Project Site and surrounding vicinity. With regard to building heights, while Alternative 5 would increase the maximum building height on the Project Site, as compared to the Proposed Project, building heights would be consistent with adjacent development in L.A. LIVE. Like the Proposed Project, Alternative 5 represents infill development on land owned by the City that is designated for public facilities such as those proposed. Furthermore, given the location of the Project Site, the nature of the nearby surrounding uses, and the adjacent freeways that separate the Project Site from neighboring lower density residential areas, no existing neighborhood or community would be physically disrupted, divided, or isolated. Therefore, impacts with respect to the compatibility of the proposed land uses with surrounding uses would be less than significant under Alternative 5 and similar to the Proposed Project.

3. Urban Decay

Alternative 5 would not develop the Event Center. Therefore, there is no potential that this Alternative would result in disinvestment in, or closure of, stadia in the region. Alternative 5 would provide a greater expansion of exhibition space at the Convention Center than the Proposed Project. Based on the characteristics of the existing convention facilities in the region, recent and ongoing investments in these facilities, and the lack of potential for the Proposed Project to result in displacement at these facilities, the Proposed Project would not result the closure or disinvestment in competing facilities leading to their abandonment or decay. While Alternative 5 would construct more convention center Floor Area than the Proposed Project, this additional development would not alter the conclusions reached with regard to the Proposed Project not causing an urban decay impact. With regard to the hotel proposed under Alternative 5, the downtown Los Angeles

area is currently experiencing a shortage of convention hotel rooms. Therefore, the hotel would be anticipated to serve existing unmet demand and would not create competition to the extent that competing hotels would close. Therefore, impacts with respect to urban decay would also be less than significant under Alternative 5 and similar to the Proposed Project.

B. Transportation, Parking, and Pedestrian Safety

1. Transportation

Alternative 5 would have lower levels of construction activity (due to less building construction), than for the Proposed Project with respect to fewer haul and delivery trucks and fewer construction workers but would have similar temporary roadway lane closures (temporary lane closures would occur on Pico Boulevard as for the Proposed Project). While there may be impacts from truck trips and construction worker trips these would be temporary in nature, would be less than for the Proposed Project, and with mitigation measures would be expected to be less than significant—unlike the Proposed Project's significant impacts. Traffic impacts from temporary roadway lane closures on Pico Boulevard would be expected to be significant, as for the Proposed Project.

Alternative 5 would generate between approximately 320 and 1,300 vehicle trips in the hours analyzed for the Proposed Project. These additional trips would occur from the expansion of the Convention Center and from the new hotel, and would be substantially lower than the additional trip totals for the Proposed Project (9,840 to 15,400 trips per hour). Hotel trips would also occur throughout the day, and every day, rather than the vast majority being focused on events and occurring only during events with the Proposed Project.

There would be substantially fewer significant impacts at intersections and freeway mainline locations from Alternative 5 than with the Proposed Project, and it is estimated that most but not all of the Proposed Project's significant impacts in these categories (and particularly a substantial number of LOS E and LOS F impacts) would be eliminated with this Alternative. The remaining impacts would be at locations in close proximity to or on corridors leading directly to the Project Site. This Alternative would likely eliminate most if not all of the freeway ramp impacts identified for the Proposed Project. There would be no significant Congestion Management Plan (CMP) intersection impacts, as for the Proposed Project. This Alternative would eliminate most if not all of the CMP freeway mainline impacts identified for the Proposed Project, with any remaining impacts being located in close proximity to the Project Site. Alternative 5 would lead to a nominal increase in transit trips and it is likely that no additional transit service would be needed. There would therefore be no significant transit impacts, and the Pico Station improvements that would

occur with the Proposed Project would not occur under this Alternative as they would not be needed. Access provisions for this Alternative would be similar to the Proposed Project, except with additional parking access locations on L.A. Live Way and Chick Hearn Court for the new development. There would be no significant access impacts, as there are with the Proposed Project. With the substantially lower trip volumes for this Alternative, there would be no significant neighborhood intrusion impacts, unlike the Proposed Project, which could cause potential significant impacts.

2. Parking

Alternative 5 would require a total of 7,447 parking spaces (including the hotel), or 2,232 more than today for the current Convention Center.[12] The increase would be attributable to the new hotel and the increase in size of the Convention Center. The spaces required would be substantially less than the 12,503 spaces required by the Proposed Project. This Alternative would provide a total of 7,544 parking spaces, an increase of 1,986 spaces over the existing supply.

The existing South Hall and Venice Garages would remain, the Bond Street Garage would not be built, and the L.A. Live Way Garage would be built as per the Proposed Project. The West Hall Garage would be reconstructed under the new West Hall Replacement Building with 1,100 spaces and 419 spaces would be provided under the hotel. The parking supply for this Alternative would be sufficient to meet the parking needs, so there would be no significant parking impacts (as was also concluded for the Proposed Project with the proposed parking supply and management plan).

3. Pedestrian Safety

Additional pedestrian volumes would be substantially lower for Alternative 5 than for the Proposed Project. Pedestrian facility enhancements would be similar to the Proposed Project but would be scaled back to reflect the much lower pedestrian volumes expected with this Alternative. The temporary event street closures that would occur with the Proposed Project would not occur with this Alternative as there would be no Event Center. Impacts for pedestrian circulation and safety and for bicycle circulation and safety would be less than for the Proposed Project and would also be less than significant.

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[12] *Code parking for the Convention Center based on the parking ratio under its existing zone variance, and the hotel is based on the LASED Specific Plan standards.*

C. Visual Resources

1. Visual Quality

During construction activities for Alternative 5, the visual appearance of portions of the Project Site would be altered due to grading and construction activities. Construction of Alternative 5 would require less time than the Proposed Project. However, Alternative 5 would require the same types of construction activities as the Proposed Project. Like the Proposed Project, Alternative 5 would use construction fencing to reduce visual impacts and would promptly remove graffiti when necessary. Given the temporary nature of construction activities, construction of Alternative 5 would not substantially and adversely alter or degrade the existing visual character of the Project Site. However, like the Proposed Project, Alternative 5 would remove the West Hall. As discussed in Section IV.I.1, Cultural Resources—Historical Resources, of this Draft EIR, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall because under the *City of Los Angeles CEQA Thresholds Guide* historical resources are considered to be visual resources. Therefore, for purposes of a conservative analysis, demolition of the West Hall is considered to represent the loss of a visual resource in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. As such, construction-related impacts to visual resources that contribute to the visual quality of the Project Site would be potentially significant and unavoidable under Alternative 5 and similar to the Proposed Project.

Like the Proposed Project, Alternative 5 would create an integrated site with a mix of convention and hotel uses that would build on the existing uses within the Project Site and in the immediate area. Alternative 5 would increase the height, density, and mass of on-site structures as compared to existing conditions. While density and massing would be increased to a lesser extent than the Proposed Project due to the reduced overall square footage, the tallest on-site building under Alternative 5 (the approximately 300-foot, 25-story hotel) would be taller than the tallest on-site building under the Proposed Project (the 200-foot Event Center). Nonetheless, the 25-story hotel would be consistent with surrounding building heights including the immediately adjacent 54-story Ritz-Carlton Residences at L.A. LIVE building. Alternative 5 would incorporate the same design features as the Proposed Project, such as pedestrian-scaled entrances and variations in building planes, to reduce the effect of massing and provide pedestrian scale. Like the Proposed Project, Alternative 5 would also introduce new and enhanced outdoor plazas networked by pedestrian pathways and improved streetscapes, thus enhancing the quality of the public realm and creating an active, pedestrian-friendly environment. With the elimination of the Event Center, massing may appear to be reduced from short-range views

as compared to the Proposed Project. However, with the taller hotel, on-site development would be more visible within long-range views. As the Bond Street Garage would not be developed, Alternative 5 would be more visible from adjacent freeway locations on SR-110. Similar to the Proposed Project, the increases in building height, density and mass that would occur under Alternative 5 would be consistent and compatible with the existing and planned development of entertainment and high-rise uses at the adjacent L.A. LIVE and numerous mid-rise hotel and residential buildings to the east. Furthermore, like the Proposed Project, Alternative 5 would introduce distinctive architecture, outdoor plazas, new streetscape and landscape, and a variety of human-scaled elements that activate the public realm, all of which would build on many of the existing visual character-defining elements within and near the Project Site. Without the Event Center, it is expected that Alternative 5 would include a reduced signage program as compared to the Proposed Project. Based on the above, Alternative 5 would not degrade the general visual character of the Project Site. Based on the above, Alternative 5 would remove the West Hall, which could be determined by a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, to be eligible for the California Register, the National Register or as a local HCM. Thus, Alternative 5 would not avoid the Proposed Project's significant impacts on visual resources resulting from removal of the West Hall. Therefore, visual quality impacts associated with operation of Alternative 5 would be significant and unavoidable under Alternative 5 and similar to those of the Proposed Project.

2. Views

While Alternative 5 would eliminate the Event Center, it would introduce a taller, 25-story hotel and the West Hall Replacement Building (which would be the same height as the New Hall) in the same general location. Therefore, Alternative 5's potential to obstruct an existing, publicly available, recognized view resource could be greater than the Proposed Project, depending on the viewer's location. While Alternative 5 would not construct the Event Center or the Bond Street Garage, the L.A. Live Way Garage, which would be the same height as the Proposed Project, the 25-story hotel, and the West Hall Replacement Building would be seen from adjacent vantage points along SR-110. Therefore, the Proposed Project's significant impact associated with the blockage of views of the Downtown skyline that would occur along an approximately 0.5-mile segment (roughly from the SR-110/I-10 interchange to Chick Hearn Court) of SR-110 would also occur under Alternative 5. However, the extent of impact is likely to be less as the portion of the Project Site that reaches heights of over 200 feet would be less under Alternative 5. Additionally, Alternative 5 would remove the West Hall, which, as described above, is conservatively considered to be a visual resource. Therefore, impacts to views under Alternative 5 would be significant and similar to those of the Proposed Project.

D. Light and Glare

1. Natural Light

With regard to shading patterns, the primary change that would result from Alternative 5 would be the shadows generated from the northwest portion of the Project Site. Under the Proposed Project, shadows from this area would be generated by the Event Center. Under Alternative 5, shadows from this area would be generated by the new hotel and West Hall Replacement Building. The West Hall Replacement Building would be the same height as the New Hall, but shorter than the Event Center. However, the 300-foot hotel would be approximately 80 feet taller than the 220-foot Event Center. As the Event Center results in less than significant shading impacts, the same conclusion would apply to the West Hall Replacement Building, which would be lower in height.

The nearest sensitive receptors to the hotel would be the Nokia Plaza (Sensitive Use No. 1), the Ritz-Carlton Residences at L.A. LIVE (Sensitive Use No. 2), and the residential uses located west of SR-110 (Sensitive Use No. 3). The season with the highest potential for impacting these receptors would be the winter, when shadow lengths in the direction of these sensitive receptors are the longest due to the angle of the sun.

Depending on its placement within the Project Site, the hotel may cast shadows on Sensitive Use Nos. 1, 2, and 3 during the winter solstice. Based on the Proposed Project's analysis, shading on some residential uses located west of SR-110 could occur at 9:00 A.M., when shadows from the Project Site point northwest, but would be removed by 11:00 A.M. when shadows from the Project Site point north. Therefore, it is not anticipated that the hotel would shade any single residential use located west of SR-110 for more than three hours during the winter between the hours of 9:00 A.M. and 3:00 P.M., and thus, impacts on Sensitive Use No. 3 would be less than significant.

Shadows from the Proposed Project would be closest to Nokia Plaza and the Ritz-Carlton Residences at L.A. LIVE between 1:00 P.M. and 3:00 P.M., when shadows would span in a north to northeast direction across the western portion of L.A. LIVE. The shading pattern of the Event Center provides a useful proxy for gauging potential shadows from Alternative 5's hotel because the hotel would fall somewhere within the footprint of the Event Center. Based on the Event Center's shadow pattern, if the hotel's additional height were to result in a shadow that extends beyond the existing Event Deck on the L.A. LIVE site, at 1:00 P.M.it would shade the Ritz-Carlton Hotel Ballrooms and cinema building, which is located north of the Event Deck. As shadows move northeast, the hotel shadow could reach the Ritz-Carlton Residences at L.A. LIVE sometime between 1:00 P.M. and 3:00 P.M. However, shading would not occur on this sensitive receptor for more than three hours. Based on the shading pattern of the Event Center, it is not anticipated that the shadow from

Alternative 5's hotel would reach Nokia Plaza between the hours of 9:00 A.M. and 3:00 P.M. Therefore, it is not anticipated that the hotel under this Alternative would shade Nokia Plaza and the Ritz-Carlton Residences at L.A. LIVE for more than three hours during the winter between the hours of 9:00 A.M. and 3:00 P.M., and impacts on Sensitive Use Nos. 1 and 2 would be less than significant.

With regard to shadows from the parking structures to the west of the Convention Center, the Bond Street Garage would not be developed under Alternative 5, and the height of the L.A. Live Way Garage would not change. Thus, shadows emanating from the western portion of the Project Site would generally be reduced. Nonetheless, under the Proposed Project, shadows from these buildings would not reach any of the identified sensitive receptors during the threshold hours of any season. As such, Alternative 5 would not shade any shade-sensitive uses in the area of potential impact.

As with the Proposed Project, shade-sensitive uses would not be shaded by Alternative 5 structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November). Therefore, natural light (shading) impacts would be less than significant under Alternative 5. Therefore, while natural light (shading) impacts under Alternative 5 would be less than significant, such impacts would be greater than those of the Proposed Project.

2. Artificial Light and Glare

The Proposed Project would require nighttime construction to complete the Event Center. Such lighting would result in significant lighting impacts. Without the time constraints associated with constructing the Event Center, nighttime construction is not anticipated to be required under this Alternative. Therefore, Alternative 5 would avoid the Proposed Project's significant construction lighting impacts. Impacts related to construction glare would be less than significant and similar to the Proposed Project, since Alternative 5 would not be anticipated to introduce significant sources of glare during construction activities.

Proposed Project impacts with respect to the following would be less than significant or less than significant with mitigation: light trespass; lighting levels at the analyzed receptors; illuminated signage; the use of skytrackers; signage; driver visibility/distraction; building/façade lighting; plaza lighting; headlights within the parking garages; daytime glare; and sky glow. For each of these categories except plaza lighting, headlights within the parking garages, and daytime glare, the Event Center would be the greatest contributor to future lighting levels under the Proposed Project. While the addition of the new hotel,

the New Hall, and the West Hall Replacement Building under Alternative 5 would include new lighting sources, these new lighting sources would also be similar to those that currently exist on-site and similar to lighting affixed to the Ritz-Carlton Residences at L.A. LIVE. Thus, the intensity of light generated by these sources would be substantially less than that of the Event Center and are anticipated to result in less than significant artificial lighting impacts. Therefore, impacts associated with the categories identified above would be less than significant under Alternative 5 and less than the Proposed Project. Due to the reduction in new parking, impacts related to headlights within the parking garages would be less than significant under Alternative 5 and less than the Proposed Project. Impacts associated with plaza lighting and daytime glare would also be less than significant under Alternative 5 and would be similar to the Proposed Project.

Alternative 5 would not result in new sources of temporary lighting for concerts, special events, and fireworks displaysevents, and therefore, Alternative 5 would avoid the Proposed Project's significant intermittent lighting impacts during operation.

Alternative 5 would not involve construction of the Event Center, so this Alternative would not result in new sources of sports lighting associated with the Event Center that is conservatively considered to significantly impact sensitive receptors and also cause spill light impacts at Receptor Location 8 with sports lighting on at times when low cloud ceilings with high albedo (+50 percent) are present. Therefore, Alternative 5 would avoid these significant operational lighting impacts.

E. Noise

Construction activities, including the types of equipment used, under Alternative 5 would be similar to the Proposed Project, except that without the time constraints associated with constructing the Event Center, nighttime construction is not anticipated to be required under this Alternative. Therefore, on-site construction-related activities under this Alternative would generate daytime construction noise levels that would be similar to that of the Proposed Project. As such, like the Proposed Project, it is estimated that with all on-site and off-site construction activities occurring concurrently, Alternative 5 would generate construction noise levels which would exceed the stated significance threshold at sensitive receptor locations during daytime hours. Like the Proposed Project, mitigation measures would be implemented, but impacts would remain significant.

Similar to the Proposed Project, construction activities under Alternative 5 would generate ground vibration levels up to 0.0805 inch per second PPV at the nearest off-site building structure. The construction generated ground vibration level would be below the 0.5 inch per second (PPV) significance threshold for building damage associated with commercial structures resulting in a less than significant impact. Similar to the Proposed

Project, construction activities would generate vibration levels up to 86 VdB at the Nokia Theatre at L.A. LIVE (due to pile driving occurring within 100 feet), which would exceed the 72 VdB significance threshold regarding annoyance. Under Alternative 5, the mitigation measures related to vibration that are proposed under the Project would be implemented. Thus, like the Proposed Project, with implementation of the proposed mitigation measures, potential impacts associated with vibration at the Nokia Theatre at L.A. LIVE would be reduced to a less than significant level.

Alternative 5 would not include the firework display shows that would occur under the Proposed Project. As such, the significant noise impacts from this noise source that would occur under the Proposed Project would be avoided under this Alternative. In addition, Alternative 5 would avoid the significant noise impacts associated with plaza noise and crowds and operation of sound systems in the Event Center.

Alternative 5 would include noise sources such as building mechanical equipment, and loading docks that would produce noise levels similar to those that would occur under the Proposed Project. These on-site noise sources would result in less than significant impacts with implementation of the project design features and proposed mitigation measures. Thus, with implementation of the same project design features and mitigation measures to be implemented under the Proposed Project, noise impacts associated with these noise sources under Alternative 5 would also be less than significant. Parking garage noise impacts under Alternative 5 would be significant and similar to the Proposed Project.

The off-site traffic volumes generated under Alternative 5 would not be concentrated in the Pre-Event and Post-Event hours as under the Proposed Project, but would be distributed throughout the day. In addition, the traffic volumes generated under this Alternative would not double the existing traffic volumes at some locations in the vicinity of the Project Site. Therefore, the significant noise impacts associated with off-site traffic under the Proposed Project would be avoided under this Alternative. In addition, Alternative 5 would not require the same level of increase in public transit (bus and rail operations) usage that would be generated under the Proposed Project. Therefore, the significant noise impacts associated with public transit that would occur under the Proposed Project would be avoided under Alternative 5. Finally, Alternative 5 would not generate media helicopters when compared with the Proposed Project due to the elimination of the Event Center. As such, the significant noise impacts associated with media helicopters that would occur under the Proposed Project would be avoided under Alternative 5.

In summary, noise impacts during daytime construction would be significant and similar to those occurring under the Proposed Project. Construction vibration and

operational noise impacts under Alternative 5 would be less than significant with implementation of the project design features and mitigation measures identified for the Proposed Project. The significant Project-related noise impacts associated with Event Center operations, firework displays, off-site traffic, public transit and media helicopters would not occur under Alternative 5. Significant operational noise and vibration impacts under Alternative 5 would still occur with regard to parking structure noise but would be reduced when compared with the Proposed Project.

F. Air Quality and Climate Change

1. Air Quality

(a) Construction

As with the Project, construction of Alternative 5 would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. Pollutant emissions and fugitive dust from site preparation and construction activities would be similar on a daily basis as the intensity of construction activities would be similar on a maximum day of construction. Overall pollutant emissions from construction of this Alternative would be similar to the Proposed Project and would result in significant regional VOC, CO, and NO_X and localized NO_X impacts with the implementation of mitigation measures.

With respect to construction air toxics, diesel particulate emissions represent the greatest potential for TAC emissions. Construction-related air toxic emission impacts would be less than significant. As the overall construction duration and intensity under Alternative 5 would be somewhat less than that of the Proposed Project, construction-related diesel particulate emissions would also be anticipated to be somewhat less than the Proposed Project and similarly less than significant.

(b) Operation

The reduction in daily trips due to the elimination of the Event Center under this Alternative would more than offset the increase in vehicle trips due to the increase in the size of the Convention Center and the development of the hotel under this Alternative. As vehicular emissions are dependent on the number of trips, vehicular sources associated with this Alternative would result in a proportionate decrease in pollutant emissions when compared to the Proposed Project. In addition, pollutant emissions associated with electricity and natural gas usage would also decrease under this Alternative, given that the demand would decrease in comparison to the Proposed Project. Thus, regional operational emissions under this Alternative would be reduced in comparison to the Proposed Project, such that VOC impacts would be less than significant. However, as with

the Proposed Project, this Alternative would still result in significant regional air quality impacts associated with PM_{10}, $PM_{2.5}$, NO_X, and CO.

From a localized operational standpoint, the decrease in stationary source emissions under this Alternative would likely decrease the incremental localized PM_{10} and NO_2 impacts associated with the Proposed Project to less than significant.

The reduction in vehicle trips forecasted under Alternative 5 would also result in reduced impacts with regard to local CO hotspots. Since the localized CO hotspot analysis for the Proposed Project did not result in any significant impacts, Alternative 5 would likewise not have any localized CO impacts.

With respect to potential air toxic impacts, the decrease in stationary source emissions for this Alternative would decrease the potential air toxic emissions in comparison to the Proposed Project. Thus, similar to the Proposed Project, Alternative 5 would result in a less than significant air quality impact related to air toxics.

Similar to the Proposed Project, Alternative 5 would not include any uses identified by the SCAQMD as being associated with odors. Thus, like the Proposed Project, such impacts would be less than significant and impacts would be similar to those that would occur under the Proposed Project.

Although operational emissions associated with Alternative 5 would be reduced in comparison to the Proposed Project, like the Proposed Project, Alternative 5 would result in significant short-term construction and long-term operational air quality impacts.

2. Climate Change

As discussed above, the number of vehicle trips attributable to Alternative 5 would decrease in comparison to the Proposed Project. With the reduction in vehicle trips and annual attendance under this Alternative, a corresponding reduction in GHG emissions associated with water usage, wastewater generation, electricity usage, natural gas usage, and solid waste generation and disposal would also be anticipated. This Alternative would include project design features (e.g., reduce vehicular traffic, and encouraging the use of mass transit) to reduce GHG emissions compared to the “business-as-usual” scenario and would constitute an equivalent or larger break from “business-as-usual” than has been determined by CARB to be necessary to meet AB 32’s goals (approximately 16 percent for 2020). The provisions of SB 292 would not be applicable to this Alternative, and, therefore, the offset of 21,907 million tons of CO_2 equivalent attributable to private automobile travel to Spectator Events at the Event Center would not occur under this Alternative. With incorporation of SB 292 and project design features, the Proposed Project would achieve a

much greater overall reduction in GHG emissions compared to the "business-as-usual" scenario (48 percent) versus this Alternative compared to the "business-as-usual" scenario (approximately 16 percent). Nevertheless, GHG emissions under Alternative 5 would be less than those that would occur under the Proposed Project, and, similar to the Proposed Project, this Alternative would have a less than significant impact on the environment due to its GHG emissions.

G. Geology and Soils

The Project Site is located within the seismically active region of Southern California; thus, Alternative 5 and the Proposed Project would be exposed to certain geologic hazards (e.g., ground shaking, liquefaction, soil instability). As the Project would involve grading, excavation, and other earth-moving activities during construction; these activities could potentially result in sedimentation and erosion as well as landform alteration. Under Alternative 5, grading and excavation would be less than the Proposed Project as the excavation required to construct the Event Center would be substantially greater than that required to construct the hotel's subterranean parking structure. The grading for the other development components under Alternative 5 and the Proposed Project would be comparable. Impacts due to strong seismic ground shaking, subsidence, expansive soils, and sedimentation and erosion would be mitigated to a less than significant level through adherence to similar mitigation measures and applicable regulatory requirements as those of the Proposed Project. Thus, impacts due to strong seismic ground shaking, subsidence, expansive soils, and sedimentation and erosion would be less than significant and similar to the Proposed Project.

H. Hydrology and Soils

1. Surface Water

(a) Surface Water Hydrology

As with the Proposed Project, construction activities under Alternative 5 would involve the removal of existing structures as well as the clearing and grading of development areas. Such activities would temporarily alter existing drainage patterns and flows by exposing the underlying soils and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, in accordance with regulatory requirements, construction would occur in a manner and sequence that would preclude flooding during construction. In addition, as with the Proposed Project, this Alternative would be required to comply with applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Moreover, new storm drain connections would be installed to support development and would be in place and functioning as development progresses to serve their respective catchments. Therefore, as with the Proposed Project, construction-related impacts on surface water hydrology would be less than significant. Such impacts would be similar to those of the Proposed Project as the Project Site would be similarly modified.

Through the provision of additional landscaped areas, Alternative 5 would serve to decrease the area of impervious surfaces at the Project Site when compared with existing conditions. As such, Alternative 5 would not result in an incremental increase in stormwater runoff flows compared to existing conditions and would therefore not impact the existing storm drain systems. In addition, similar to the Proposed Project, the new landscaped areas to be provided would allow for more opportunities to direct stormwater to flow through the planting media, thereby reducing the amount of runoff flows. Consequently, this Alternative would not result in on- or off-site flooding during a 50-year storm event, would not substantially reduce or increase the amount of surface water in a water body, nor result in a permanent adverse change to the movement of surface water. In addition, as part of this Alternative, SUSMP requirements would be implemented that would outline the stormwater treatment measures or post-construction BMPs required to control pollutants associated with storm events up to the 0.75-inch precipitation level, per the City's Stormwater Program. In addition, as with the Proposed Project, Alternative 5 would incorporate LID BMPs intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater, while also reducing or eliminating the discharge of potential pollutants from stormwater runoff and reducing the quantity and intensity of stormwater flows. The BMPs to be implemented would ensure that at a minimum, no increase in flows from existing conditions would result. Therefore, as with the Proposed Project, operational impacts on surface water hydrology would be less than significant and similar to the Proposed Project.

(b) Surface Water Quality

Construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of hazardous materials for Alternative 5 could contribute to pollutant loading in stormwater runoff. However, similar to the Proposed Project, in accordance with the requirements of the NPDES General Construction Activity Permit, a site-specific SWPPP would be prepared and implemented. The SWPPP would specify BMPs to be used during construction. With implementation of these BMPs included as part of the SWPPP, the discharge of potential pollutants from storm water runoff would be eliminated or reduced to the maximum extent practicable. Construction-related impacts on surface water quality would be less than significant, and similar to those of the Proposed Project.

During operation of this Alternative, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. However, in accordance with NPDES requirements, SUSMP requirements would be implemented throughout the operational life of this Alternative. As part of the SUSMP, stormwater BMPs to address water quality in stormwater runoff would be incorporated into the design of the development. With implementation of source control and treatment BMPs, this Alternative would reduce or eliminate the discharge of potential pollutants from storm water runoff to the maximum extent practicable. Thus, operational impacts on surface water quality would be less than significant and would be similar to those of the Proposed Project.

2. Groundwater

As with the Project, construction activities under Alternative 5 would involve the use of hazardous materials. The handling, storage and disposal of construction hazardous waste would be in compliance with all applicable federal, state, and local requirements, thereby limiting the potential for groundwater contamination impacts attributable to construction. Such practices would reduce potential construction impacts to a less than significant level under both this Alternative and the Project. Under this Alternative, excavation depths could reach an average depth of 40 feet, similar to the Proposed Project. Due to the deep groundwater level at the Project Site, it is not expected that this depth of excavation would intercept groundwater or require dewatering. Like the Proposed Project, construction-related groundwater impacts would be less than significant under this Alternative and similar to those of the Project.

Since new development would occur under Alternative 5, new pollutants from storm water runoff would be introduced into the groundwater through infiltration from available landscape areas. However like the Proposed Project, Alternative 5 would implement the Proposed Project's source control and treatment control Best Management Practices (BMPs). By implementing BMPs in accordance with NPDES, SUSMP, and LID requirements during operations, ground water quality is improved. Therefore, impacts to ground water quality under Alternative 5 would be less than significant and similar to those under the Proposed Project.

Like the Proposed Project, changes to groundwater levels under this Alternative could result from the conversion of impervious surface to pervious surfaces via infiltration of surface runoff within available landscape areas and through the implementation of BMPs designed to infiltrate in accordance with NPDES, SUSMP, and LID requirements. The groundwater contribution from infiltration systems is less than significant because such systems are designed to infiltrate smaller storm events equivalent to 0.75 inch of rainfall. Similarly, groundwater levels are typically impacted from larger, regional contributions from injection wells and spreading grounds than from localized infiltration through available

landscape areas. Like the Proposed Project, the additional landscaped areas provided by Alternative 5 allow for an incremental increase in infiltration. Therefore, impacts to groundwater level would be similar to the Proposed Project and such impacts would be less than significant.

I. Cultural Resources

1. Historical Resources

As discussed in detail in the Historical Assessment provided in Appendix S of this Draft EIR, the Project Site does not include any buildings that have previously been evaluated as eligible for inclusion in the National Register, California Register, or as a local HCM. Nonetheless, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall.

Alternative 5 would provide for the modernization of the Convention Center and the development of a new convention hotel. To provide for these improvements, the West Hall would be removed. Thus, similar to the Proposed Project, this Alternative would result in a potentially significant impact resulting from demolition of the West Hall in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. Impacts would be similar to those occurring under the Proposed Project.

2. Archaeological Resources

Construction under Alternative 5 would require approximately 40 feet of excavation to accommodate the subterranean parking garage for the 25-story hotel structure. Additional excavation activities of less depth would also be required for the remaining components proposed under this Alternative. As with the Proposed Project, earthwork activities would occur in areas identified as having archaeological sensitivity. While it is possible that archaeological resources may be encountered during construction of Alternative 5, such impacts would be reduced to a less than significant level through adherence to the same mitigation measures as the Proposed Project. Such impacts would be similar to those that have the potential to occur under the Proposed Project.

J. Public Services (Police and Fire)

Construction levels under Alternative 5 would be similar to those that would occur under the Proposed Project. Like the Proposed Project, this Alternative would implement measures such as, security fencing and lighting, locked entries, security patrols, and a construction Transportation Management Plan. Thus, like the Proposed Project, impacts on police and fire protection during construction of Alternative 5 would be less than significant and such impacts would be similar to those that would occur under the Proposed Project.

Similar to the Proposed Project, the existing security measures in place at the Convention Center would be extended to include the new convention center facilities that would be developed under Alternative 5. In addition, security features would also be implemented as part of operation of the new hotel. As with the Proposed Project, Alternative 5 would be developed taking into consideration the LAPD's Design Out Crime Guidelines. While crime and calls for LAFD service would increase above existing conditions under Alternative 5, due to the elimination of the Event Center, the number of crime incidents and calls for LAFD services would be reduced from those anticipated to occur with the Proposed Project. Even though the Event Center would not be constructed under Alternative 5, special measures to address crowd and traffic flow management may be required from time to time, but would not be as extensive or have the same level of importance as under the Proposed Project. The same relationship also exists with regard to emergency planning in the event of a natural or man-made disaster. As Proposed Project impacts would be less than significant, impacts of Alternative 5 would also be less than significant. Such impacts would be reduced when compared with those of the Proposed Project.

K. Utilities

1. Water

Like the Proposed Project, a short-term demand for water would occur during construction of Alternative 5. Overall, construction activities would require minimal water demand and would not be expected to have any adverse impact on available water supplies and infrastructure. Therefore, as with the Proposed Project, impacts on water supply and infrastructure associated with short-term construction activities under this Alternative would be less than significant. Such impacts would be similar to those that would occur under the Proposed Project. As with the Proposed Project, operation of Alternative 5 would generate an increased demand for water. As shown in Table V-19 on page V-137, this Alternative would result in a net increase in water demand of approximately 375,384 gpd and 357.04 acre-feet per year. Thus, water demand for this

Table V-19
New Hotel and Expansion Alternative: Water Demand

Land Use	Attendance/ Hotel Rooms		Rate	Water Demand	
	Annual	Daily		Gallons/ Day	Acre-Feet/Year
Convention Center	5,219,233	26,393	4.6874	123,715	75.09
Central Plant				37,946	42.51
Irrigation				12,498	14.00
Total Convention Center				174,159	131.60
Hotel		1,000	260	260,000	291.28
Less Water Conservation				20,883	23.40
Alternative 5 Total Water Demand				**413,276**	**399.48**
Less Existing Project Uses to Be Removed				37,892	42.44
Alternative 5 Net Water Demand				**375,384**	**357.04**
Proposed Project Net Water Demand				**640,683**	**194**
Alternative 5 Water Demand Compared to the Proposed Project				**-265,299**	**163.04**

Source: Matrix Environmental, 2012.

Alternative would be increased relative to existing conditions and would be more than the Proposed Project's estimated net increase in water demand of 640,683 gallons per day and 194 acre-feet per year. This Alternative also assumes that the water conservation measures similar to those of the Proposed Project would be implemented. As with the Proposed Project, impacts on water supply would be less than significant. However, based on the increase in water demand compared to the Proposed Project, such impacts would be greater than those that would occur under the Proposed Project.

The existing water infrastructure would not be adequate to accommodate the Proposed Project's water demand during a fire scenario and impacts would be potentially significant. In addition, given that the fire flow requirements of this Alternative would be similar, it is anticipated that the existing water infrastructure would also not be adequate to accommodate this Alternative's water demand during a fire scenario. Nonetheless, as with the Proposed Project, Alternative 5 would implement improvements to the existing water infrastructure that would be adequate to accommodate the water demands of this Alternative and impacts would be reduced to less than significant and would be similar to those of the Proposed Project.

2. Sewer

Similar to the Proposed Project, construction activities under Alternative 5 would result in a temporary increase in wastewater generation associated with on-site construction workers. Overall, construction of the Proposed Project is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Integrated Resources Plan. Therefore, based on a somewhat reduced amount of construction activity, construction impacts to the wastewater system under Alternative 5 would also be less than significant.

As with the Proposed Project, operation of Alternative 5 would result in an increased generation of wastewater when compared with existing conditions. As shown in Table V-20 on page V-139, Alternative 5 would result in a net increase in wastewater of approximately 351,418 gpd. Thus, wastewater generation under this Alternative would be increased relative to existing conditions and would be less than the Proposed Project's estimated net increase of 640,754 gpd.

As with the Proposed Project, Alternative 5 could connect to one or both of the two sewer systems that are used under existing conditions subject to available capacity and design efficiency. Per the Bureau of Sanitation Guidelines, the available capacity of System 1 is approximately 0.11 mgd, while System 2 has an available capacity of approximately 4.58 mgd. Based on this information, up to 0.11 mgd could discharge to System 1, with the balance discharging to System 2, or the entire development proposed under this Alternative could discharge to System 2. Wastewater generated by Alternative 5 would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plan, which is a component of the Hyperion Service Area. Based on the Integrated Resources Plan, the existing effective capacity of the entire Hyperion Service Area is approximately 529 mgd with future improvements identified in the Integrated Resources Plan increasing the total effective capacity of the Hyperion Service Area in 2020 to approximately 570 mgd. Based on these forecasts Alternative 5's increase in wastewater generation would be adequately accommodated within the Hyperion Service Area. Thus, like the Proposed Project, impacts on wastewater generation and wastewater infrastructure would be less than significant. Such impacts would be greater than those that would occur under the Proposed Project.

3. Solid Waste

As with the Proposed Project, construction activities associated with Alternative 5 would involve demolition, site grading/preparation, and building construction activities. These activities would generate construction and demolition wastes that would be recycled or collected by private waste haulers and taken for disposal at the County's inert landfills.

Table V-20
Annual Proposed Project Wastewater Generation—Alternative 5

Land Use	Daily Attendance/ Hotel Rooms	Rate	Wastewater Generation (gallons/day)
Convention Center	26,393	4.6874	123,715
Central Plant			6,906
Total Convention Center			130,621
Hotel	1,000	260	260,000
STAPLES Center Central Plant			434
Less Water Conservation			20,883
Alternative 5 Total Wastewater Demand			**370,172**
Less Existing Project Water Use			**18,754**
Alternative 5 Net Wastewater Demand			**351,418**
Proposed Project Net Wastewater Demand			**640,754**
Alternative 5 Wastewater Demand Compared to the Proposed Project			**-289,336**

Source: Matrix Environmental, 2012.

As shown in Table V-21 on page V-140, this Alternative would generate approximately 73,296 tons of construction and demolition waste, which is 18,035.56 tons less than that expected to be generated by construction of the Proposed Project. As unclassified landfills generally do not face capacity shortages, such landfills would have adequate capacity to accommodate the construction and demolition waste generated by this Alternative. Like the Proposed Project, impacts would be less than significant. Such impacts would be reduced when compared with those of the Proposed Project.

As shown in Table V-22 on page V-141 during operation, Alternative 5 would generate 12.16 tons of municipal solid waste per day compared to 123.716 tons generated by the Proposed Project per day. In addition, Alternative 5 would generate 3,980.44 tons of municipal solid waste per year compared to 8,391.7 tons generated by the Proposed Project per year. Like the Proposed Project, solid waste generated by this Alternative would be recycled or collected by private waste haulers contracted and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. While it is anticipated that future iterations of the CIWMP would provide for improvements beyond 2025 to serve future waste disposal needs, it is conservatively assumed that no new landfills or increases in capacity would occur. Thus, based on this worst case assumption, the County may not be able to accommodate the disposal needs of this Alternative. Therefore, as with the Proposed Project, impacts on solid waste disposal facilities are

Table V-21
New Hotel and Expansion Alternative: Construction Solid Waste Generation

	Square Footage	Generation Rate (tons/sq.ft.)	Total Debris (tons)	Diversion Rate	Recycled	Net to Landfill
Demolition						
West Hall	538,925	0.0775	41,766.69	75%	31,325.02	10,441.67
Cherry Street Garage	319,584	0.0775	24,767.76	75%	18,575.82	6,191.94
Subtotal			*66,534.45*		*49,900.84*	*16,633.61*
New Construction						
New Hall	500,000	0.001945	972.50	75%	729.38	243.12
Hotel	900,000	0.001945	1,750.50	75%	1,312.88	437.62
Hotel Parking	334,500	0.001945	650.60	75%	487.95	162.65
Convention Center Expansion	535,600	0.001945	1,041.74	75%	781.31	260.43
L.A. Live Way Garage	738,990	0.001945	1,437.34	75%	1,078.01	359.33
Parking Under New Building Expansion	467,500	0.001945	909.29	75%	681.97	227.32
Subtotal			*6,761.97*		*5,071.50*	*1,690.47*
Total Construction Debris			**73,296.42**		**54,972.34**	**18,324.08**

Source: Matrix Environmental, 2012.

Table V-22
New Hotel and Expansion Alternative: Operational Solid Waste Generation

Land Use	Patrons or Employees	Factors (tons/unit/year)	Total Waste Generated	Recycled Waste (tons/day)	Net to Landfills
Daily					
Exhibit/Meeting Rooms[a]	9,389	0.0005	4.69	2.35	2.34
Hotel	900	3.03	7.47	3.74	3.73
Subtotal			*12.16*	*6.09*	*6.07*
Annual					
Exhibit/Meeting Rooms	2,506,876	0.0005	1,253.44	626.72	626.72
Hotel	900	3.03	2,727.00	1,363.50	1,363.50
Subtotal			*3,980.44*	*1,990.22*	*1,990.22*

Source: Matrix Environmental, 2012.

conservatively concluded to be potentially significant. Due to the decrease in solid waste generation, such impacts would be less than those of the Proposed Project.

Under this Alternative, private waste haulers would be expected to utilize similar haul routes. As such, this Alternative would not result in the need for additional solid waste collection routes to adequately handle waste. As with the Proposed Project, impacts on solid waste collection routes would be less than significant. Such impacts would be similar to those of the Proposed Project.

4. Electricity

As with the Proposed Project, construction activities associated with development of Alternative 5 would consume electrical power. This demand would be supplied from existing electrical services within the Project Site and would not affect other services as there is sufficient existing capacity to meet this Alternative's construction demands. Therefore, as with the Proposed Project, impacts on electrical supplies and infrastructure associated with short-term construction activities would be less than significant under Alternative 5. Such impacts would be similar to those of the Proposed Project. In addition, like the Proposed Project, construction activities associated with the installation of new electrical infrastructure under this Alternative would primarily be confined to trenching and would not result in any significant impacts on adjoining properties.

Similar to the Proposed Project, operation of Alternative 5 would generate an increased demand for electricity. As shown in Table V-23 on page V-142, Alternative 5

Table V-23
New Hotel and Expansion Alternative: Electricity Consumption and Demand

Project Component	Consumption		Peak Demand (kVA)
	Daily (kWh)	Annual (MWh)	
Convention Center (New Facilities)	50,403	18,392	13,939
Convention Center (Existing Facilities)	10,480	1,980	3,637
Hotel	24,534	8,955	4,320
Other Parking	3,238	1,182	386
L.A. Live Garage	6,438	2,350	770
Total Alternative 5 Proposed Uses	**95,093**	**32,859**	**17,289**
Total Proposed Project	**151,768**	**33,542**	**19,286**
Existing On-Site Uses to Be Removed	20,589	7,519	5,967
Net Alternative 5	74,504	25,340	11,322
Net Proposed Project	131,170	26,023	13,319
Net Difference in Total Consumption and Peak Demand	**-56,666**	**-683**	**-1,997**

Source: Matrix Environmental, 2012.

would result in an increase in consumption of electricity of approximately 32,859 MWh annually. Thus, electricity consumption for Alternative 5 would be increased relative to existing conditions but less than the Proposed Project's estimated increase in electrical consumption of 33,542 MWh per year. Additionally, this Alternative would have a peak demand of 17,289 compared to the Proposed Project's peak demand of 19,286 kVA. Electrical supplies would be adequate to accommodate the Proposed Project's demand for electricity. Therefore, given that Alternative 5 would result in less demand as compared to the Proposed Project, electrical supplies would also be adequate to accommodate the electrical demand for this Alternative. In addition, Alternative 5 would also implement energy conservation measures similar to those of the Proposed Project. Thus, as with the Proposed Project, impacts on electrical supplies would be less than significant under Alternative 5. Such impacts would be slightly greater than those of the Proposed Project.

Based on LADWP's analysis, the existing electrical infrastructure may not be adequate to meet the Proposed Project's demand and impacts on the existing electrical infrastructure may be potentially significant. Although Alternative 5 would result in a reduced demand for electricity compared to the Proposed Project, it is anticipated that the existing electrical infrastructure would also not be adequate to accommodate this Alternative's demand for electricity. However, as with the Proposed Project, Alternative would implement mitigation measures that would ensure that adequate electrical capacity is provided to accommodate the demand generated by the Alternative. Similar to the

Project, with implementation of this mitigation, impacts on electrical infrastructure would be less than significant. Due to the reduced demand for electricity under this Alternative, such impacts would be reduced when compared with those of the Proposed Project.

5. Natural Gas

As with the Proposed Project, construction activities associated with the Alternative 5 would not require the consumption of natural gas. In addition, no construction activities associated with the installation of new natural gas distribution lines would occur. Nonetheless, like the Proposed Project, prior to ground disturbance under this Alternative, project contractors would coordinate with the Southern California Gas Company (SCG) to identify the locations and depth of all lines within the Project Site. Further, SCG would be notified in advance of proposed ground disturbance activities to avoid natural gas lines and disruption of natural gas service. Therefore, as with the Proposed Project, impacts on natural gas supplies and infrastructure associated with short-term construction activities would be less than significant under Alternative 5. However, as Alternative 5 would result in reduced construction activities, such impacts would be less than those of the Proposed Project.

As with the Proposed Project, operation of Alternative 5 would generate an increased demand for natural gas. As shown in Table V-24 on page V-144, this Alternative would result in a net increase in natural gas of approximately 52.1 million therms annually. Thus, natural gas for this Alternative would be increased relative to existing condition as well as increased compared to the Proposed Project's estimated net increase in natural gas of 444,736 therms per year. This Alternative also assumes that the energy conservation measures similar to those of the Proposed Project would be implemented. Thus, as with the Proposed Project, impacts on natural gas would be less than significant under Alternative 5. Such impacts would be less than those of the Proposed Project.

As the demand for natural gas under Alternative 5 is greater than that of the Proposed Project, it is assumed that the existing natural gas infrastructure would also not be adequate to accommodate this Alternative's natural gas demand. Nonetheless, as with the Proposed Project, Alternative 5 would implement upgrades that would reduce impacts to a less than significant level. Due to the increased demand under Alternative 5, impacts would be greater than those of the Proposed Project.

L. Environmental Safety

As with the Proposed Project, construction activities under Alternative 5 would involve the use of small quantities of hazardous materials (e.g., paints, coatings,

Table V-24
New Hotel and Expansion Alternative: Natural Gas Consumption

Land Use	Total Therms/Year
Convention Center (New Facilities)	266,211
Convention Center (Existing Facilities)	19,531
Hotel	51,840,000
Total Alternative 5 Proposed Uses	**52,125,742**
Proposed Project	**501,836**
Total Existing Convention Center to be Replaced	**57,100**
Net Alternative 5	52,068,642
Net Proposed Project	444,736
Net Difference in Total Consumption and Peak Demand	**51,623,906**

Source: Matrix Environmental, 2012.

adhesives), and include the storage of fuels and oils associated with construction equipment in accordance with applicable regulations. Additionally, asbestos and ACMs, LBPs, and PCBs could be encountered during demolition of existing buildings. Also, as with the Proposed Project, grading under Alternative 5 could uncover or disturb existing known and unknown USTs, which could lead to soil and/or groundwater contamination and the potential exposure of people and the environment to hazardous materials. However, all construction activities would occur in accordance with all applicable federal, state, and local laws and regulations. In addition, project design features and mitigation measures similar to those for the Proposed Project would be expected to be implemented under this alternative. Therefore, construction of Alternative 5 would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, construction impacts under Alternative 5 would be less than significant. However, as construction activities would be less under Alternative 5, the potential for impacts to occur would be less than those that would occur under the Proposed Project.

As with the Proposed Project, Alternative 5 would modify the existing uses on the Project Site and would include activities that would continue to involve the use and storage of hazardous materials. As with the Proposed Project, these materials would be contained, stored, and used in accordance with manufacturers' instructions and applicable standards and regulations. As such, Alternative 5 is not anticipated to expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, a less than significant impact with regard to hazardous materials would occur under this alternative. However, impacts

under Alternative 5 would be less than those of the Proposed Project due to the potential handling of lesser quantities of hazardous materials under this alternative.

As with the Proposed Project, Alternative 5 would develop new uses within a Methane Zone. As such, potential impacts relative to methane gas could occur during construction and/or operation of this Alternative. As with the Proposed Project, this Alternative would comply with Cal-OSHA requirements, the City's Methane Seepage Regulations and the specifications set forth by the City of Los Angeles Department of Building and Safety (LADBS). With implementation of mitigation measures, potential methane impacts would be reduced to a less than significant level. However, such impacts would be less than those that would occur under the Proposed Project due to the reduced footprint under this alternative.

3. Summary of Comparative Impacts

Alternative 5 would result in significant impacts for most of the same issues as the Proposed Project. As this Alternative does not include the Event Center, significant impacts with regard to artificial light and aspects of operational noise associated with the Event Center would be avoided. In addition, as Alternative 5 would not involve nighttime construction, the significant nighttime noise and artificial light impacts that occur under the Proposed Project would also be avoided. As peak daily guest and attendance levels under Alternative 5 are considerably lower than those of an Event Day under the Proposed Project, the significant traffic impacts that occur under the Proposed Project would be reduced. In addition, as many of the Proposed Project's potential environmental impacts are directly related to the amount of development that occurs, Alternative 5 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. Even though most of the Proposed Project's significant impacts would be reduced under Alternative 5, they would not all be reduced to less than significant levels. As such, Alternative 5, as is the case with the Proposed Project, would result in significant impacts with regard to transportation, visual resources, construction and operational noise, air quality, historical resources, and solid waste. While impacts for a number of issues would be reduced under Alternative 5, the elimination of the Event Center also eliminates important beneficial effects of the Proposed Project. In summary, Alternative 5 would not introduce additional significant environmental impacts, would avoid the Proposed Project's significant impacts associated with artificial light and aspects of operational noise associated with the Event Center, and in many cases would lessen the Proposed Project's overall impacts as well as its beneficial effects. A tabular summary comparing the impacts of Alternative 5 to those of the Proposed Project is presented in Table V-2 on page V-9.

4. Relationship of this Alternative to Project Objectives

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

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

Alternative 5 would also not meet the Project Objective to construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses. Because the Event Center would not be developed under this Alternative, it would not provide a state-of-the-art venue capable of attracting and maintaining up to two NFL teams that would be expandable to 76,250 seats to host occasional major sporting events (e.g., an NFL Super Bowl) and that could be used for event floor exhibit hall space. Nor would this Alternative accommodate a variety of other spectator events beyond NFL games.

Alternative 5 would realize the Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles, but to a lesser extent than the Proposed Project. Specifically, this Alternative would not create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area. Nor would it synergistically build upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level.

Alternative 5 would not meet the Project Objective to promote the spectator experience at Event Center events, since the Event Center would not be built. However, this Alternative would design a Project that is compatible with existing Convention Center facilities and consistent with smart growth and urban design principles to a similar extent as

the Proposed Project. Unlike the Proposed Project, this Alternative would not create additional open space assembly area for fans and visitors, including a reconfigured Gilbert Lindsay Plaza.

Alternative 5 would not develop the Event Center. It would therefore not take maximum advantage of existing and planned transportation infrastructure, as the Event Center would attract many more visitors who would use existing and planned transportation infrastructure, especially public transit. In addition, this Alternative would not implement the provisions of SB 292, which applies only to the Event Center.

Alternative 5 would not achieve the Project Objective to promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism to the same degree as the Proposed Project. Alternative 5 would replace the outmoded West Hall, and add contiguous exhibition space and a multi-purpose room, all of which are necessary to allow the Convention Center to be more competitive with other venues. However, this Alternative would not develop the Event Center. Without the Event Center, the Alternative would not finance construction of the New Hall at no risk to the City's General Fund, as a private developer, including the Event Center Applicant, would not finance the West Hall unless it can construct the Event Center. In addition, Alternative 5 would not construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship. Similarly, this Alternative would not develop entertainment and sports facilities on public lands that provide a return to the City's General Fund and/or provides civic, cultural and sporting amenities that serve a wide range of public interests in the City and region, or generate substantial additional revenues for the City government, stimulate economic activity in the greater Los Angeles area, and create thousands of good paying construction and permanent jobs as soon as possible to the same extent as the Proposed Project.

G. Alternative 6: Maximum Convention Center Alternative

1. Description of the Alternative

The Maximum Convention Center Alternative would develop the entire Convention Center site, including the Event Center site, as well as the Convention Center Expansion Parcel located within the LASED Specific Plan area with convention center uses. Under this Alternative, the New Hall would be developed as proposed under the Project. The Event Center site would be developed with a two-level convention center structure located above one level of at-grade parking. This new structure, hereafter referred to as the West Hall Replacement Building, would provide approximately 940,000 square feet of Floor Area. When accounting for this Floor Area as well as the 500,000 square feet of Floor Area within the New Hall and the 250,000 square feet of Floor Area of the Event Deck Hall within the LASED Specific Plan area, Alternative 6 would provide a total of approximately 1.69 million square feet of Floor Area. With the existing South Hall and Concourse Building, the Convention Center would total approximately 2.76 million square feet of Floor Area and approximately 1.58 million square feet of Rentable Area. The New Hall would be the same height as under the Proposed Project, 90 feet, which would also be the height of the West Hall Replacement Building. The Event Deck Hall would be 60 feet in height above the existing Event Deck, or a total of 93 feet above grade, and would connect to the West Hall Replacement Building via a bridge structure over Chick Hearn Court, which would be 36 feet in height above a roadway clearance of 24 feet (i.e., overall height of 60 feet), that would also include meeting room space. The West Hall Replacement Building would have direct connections to the New Hall, similar to how the Proposed Project connects the New Hall and the South Hall. Under Alternative 6, no changes to the existing Gilbert Lindsay Plaza would occur. The Event Center would not be developed under Alternative 6.

An overview of the development under Alternative 6 starts with the Event Deck Hall atop the LASED's West Garage on the north side of Chick Hearn Court, which crosses Chick Hearn Court via an above grade bridge which provides pedestrian circulation and meeting rooms, followed by the West Hall Replacement Building, located on the south side of Chick Hearn Court, with the New Hall being located south of the West Hall Replacement Building, and finishing with the South Hall on the south side of Pico Boulevard.

This Alternative would provide a total of 8,900 parking spaces, an increase of 3,342 spaces over the existing supply. The existing South Hall and Venice Garages would remain, the West Hall Garage would be rebuilt with 2,230 spaces, the Bond Street Garage

would be built (928 spaces as per the Proposed Project), and the L.A. Live Way Garage would be built with 2,950 spaces as with the Proposed Project.

A comparison of this Alternative and the Proposed Project is provided in Table V-25 on page V-150.

2. Environmental Impacts

A. Land Use

1. Land Use Consistency

Like the Proposed Project, Alternative 6 would support the public investment in the transportation system by virtue of its location in proximity to transit in downtown Los Angeles, which is the hub of the rail and bus transit system for the metropolitan Los Angeles area. Alternative 6 would be designed as a transit-oriented development and would include improved on-site pedestrian amenities and landscaping throughout the Project Site that would promote pedestrian activity. The Convention Center growth that would occur under this Alternative would substantially increase the level of activity at the Project Site, which would make the use of transit a more attractive way to access the Project Site. However, the increased transit usage that would result from the Proposed Project would be largely associated with the Event Center. The transit use associated with Alternative 6 would likely be reduced when compared to the Proposed Project because it is likely that a larger percentage of those attending trade shows and conventions at the modernized Convention Center would use hotel shuttles and motor coaches. These individuals would be less likely to use transit than those attending regional sporting events or concerts at the Event Center as a higher proportion of local residents would attend the sporting events and concerts and would be more likely to use transit. Further, Alternative 6 does not include the trip reduction provisions required for the Proposed Project by SB 292. Therefore, Alternative 6 would promote transit usage to a lesser extent than the Proposed Project. As such, Alternative 6 would be consistent with SCAG's Regional Transportation Plan, but to a lesser extent than the Proposed Project. Alternative 6 would be an infill development on a previously developed site that would complement existing convention uses at the Convention Center and L.A. LIVE,.and thus help advance SCAG Policy GV P2.1 to, "Promote infill development and redevelopment to revitalize existing communities," but to a lesser degree than the Proposed Project, because of the revitalization that would not occur with the absence of the Event Center.

Alternative 6 would implement the same sustainability features as the Proposed Project that are intended to reduce potential impacts related to climate change by minimizing air and GHG emissions, water and energy usage, and solid waste generation

Table V-25
Comparison of Proposed Project and Alternative 6—Maximum Convention Center

	Proposed Project	Alternative 6	Change from Proposed Project	
			Number	Percent
Seats				
Event Center	72,000	0	(72,000)	-100.0%
Total Floor Area				
Event Center	1,750,000	0	(1,750,000)	-100.0%
Convention Center				
Proposed Project or Alternative	500,000	1,686,916	1,186,916	237.4%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Convention Center	1,576,470	2,763,386	1,186,916	75.3%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	2,250,000	1,686,916	(563,084)	-25.0%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Project Site	3,326,470	2,763,386	(563,084)	-16.9%
Net Floor Area (Change from Existing Conditions)				
Event Center	1,750,000	0	(1,750,000)	-100.0%
Convention Center				
Proposed Project or Alternative	37,799	1,224,715	1,186,916	3,140.1%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Convention Center	37,799	1,224,715	1,186,916	3,140.1%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	1,787,799	1,224,715	(563,084)	-31.5%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Project Site	1,787,799	1,224,715	(563,084)	-31.5%
Rentable Area				
Event Center (When Used for Exhibition Use Only)	245,650	0	(245,650)	-100.0%
Convention Center				
Proposed Project or Alternative	286,310	974,721	688,411	240.4%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Convention Center	886,851	1,575,262	688,411	77.6%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	531,960	974,721	442,761	83.2%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Project Site	1,132,501	1,575,262	442,761	39.1%

Table V-25 (Continued)
Comparison of Proposed Project and Alternative 6—Maximum Convention Center

	Proposed Project	Alternative 6	Change from Proposed Project	
			Number	Percent
Parking				
Proposed Project or Alternative				
L.A. Live Way Garage	2,950	2,950	0	0.0%
Bond Street Garage	928	928	0	0.0%
West Hall/West Hall Replacement Building/Hotel	—	2,230	2,230	100.0%
Total Proposed Project or Alternative	3,878	6,108	2,230	57.5%
Not a Part of Proposed Project or Alternative	2,792	2,792	0	0.0%
Total Project Site	6,670	8,900	2,230	35.7%

Source: Matrix Environmental, 2012.

and disposal. Alternative 6 would also create additional temporary and permanent jobs during construction and operation. Due to the substantial increase in Convention Center Floor Area under Alternative 6, it is anticipated that the types of jobs and number of new full-time employees generated by Alternative 6 would be comparable to those of the Proposed Project. As such, Alternative 6 would locate new jobs near existing housing. Overall, development of Alternative 6 would be consistent with and would support SCAG's Compass Blueprint Growth Vision, but to a lesser extent than the Proposed Project due to the reduced potential to promote regional transit use. In addition, due to the similarity of job creation, Alternative 6 would also be consistent with SCAG's employment forecasts for the Subregion, and as such would not cause an exceedance of SCAG's forecast. Both the Proposed Project and Alternative 6 would be consistent with the Project Site's designation in the City of Los Angeles General Plan Framework Element as part of the Downtown Center. Further, the Alternative's FAR (0.7:1) and maximum building height (90 feet) would be permitted under the Project Site's zoning designations. While it would provide a different mix of facilities than the Proposed Project, it would remain consistent with the General Plan Framework Element's vision of the Downtown Center as an international center for finance and trade. As discussed below, it is anticipated that Alternative 6 would employ appropriate building and site design standards and guidelines as well as specific urban design elements set forth in the City's Walkability Checklist to ensure a high-quality design and environment. Alternative 6 would provide a series of interconnected public plazas designed for pedestrian circulation and outdoor gathering, although with the greater site coverage under this Alternative, the size of the public plazas would be smaller than those anticipated to occur under the Proposed Project. Like the Proposed Project, Alternative 6 would concentrate development in a regional center near existing transit

stations and mixed-use corridors, while complementing and expanding upon the types of uses found on-site. As a result this Alternative would function as a transit-oriented development and would incorporate the same sustainability features as the Proposed Project. As stated above, the Alternative would also create a comparable number and type of additional temporary and permanent jobs as the Proposed Project. However, on-site building coverage would be greater under Alternative 6, providing fewer areas for pedestrian circulation and outdoor gathering than the Proposed Project. Therefore, Alternative 6 would be consistent with the overall intent of the City's General Plan Framework Element, but to a lesser extent than the Proposed Project due to the reduced quality of the pedestrian environment.

Because the uses proposed under Alternative 6 are consistent with the PF land use designation, this Alternative would not require a General Plan Amendment or Specific Plan. Similar to the Proposed Project, the modernized convention center use that would result from this Alternative would serve to further complement and benefit the tourism, hotel and entertainment uses in the immediate Project vicinity, throughout Downtown, and in and the City as a whole. However, the manner in which the Alternative would support the vision for the Convention Center would be different than the Proposed Project. While the Proposed Project would provide new entertainment and modernized convention uses, Alternative 6 would provide a greater expansion of convention uses. This function is consistent with the overall goal to expand tourism and complement existing sports and entertainment venues in the vicinity. Alternative 6 would introduce new visitor-serving uses and pedestrian-oriented amenities, support tourism, and create a safe, clean, attractive, and lively environment.

With respect to the Downtown Design Guide, the Alternative would meet many of the standards and guidelines that address sustainability, sidewalks and setbacks, ground floor treatment, parking and access, building massing and street walls, open space, architectural detail, streetscape improvements, signage, public art, and civic and cultural life, to a similar extent as the Proposed Project. The proposed building designs would also incorporate relevant standards and guidelines pertaining to architectural details, including horizontal variation, vertical variation, building materials, windows and doors, glazing, lighting, security features. Parking garages would also be integrated with the on-site buildings. Similar to the Proposed Project, Alternative 6 would include streetscape improvements would serve to enhance the aesthetic environment on-site and along the Project Site perimeter, connect existing on-site uses, and connect the Project Site to the Pico Union area by providing streetscape improvements under the SR-110 at Pico Boulevard, 11th Street, and 12th Street. Alternative 6 would include signage, lighting and public art that would complement the character of the Project Site and support the provisions of the Design Guide, although the amount of signage would be less than the Proposed Project. Overall, this Alternative would be consistent with the Central City

Community Plan and the associated Downtown Design Guide to a similar extent as the Proposed Project. However, the potential inconsistencies of the Proposed Project with the Downtown Design Guidelines related to building length and signage discussed above under Alternatives 1 and 2, would not occur with Alternative 6 because the Event Center would not be constructed under this Alternative.

The Downtown Strategic Plan identifies the need to both expand the Convention Center and develop the surrounding area with complementary uses including entertainment, shopping and hotel uses, outdoor activities and other tourist attractions. Alternative 6 would directly support these objectives by renovating and modernizing the usable space within the Convention Center; capitalizing on nearby circulation and transit systems; improving streetscape; and supporting Downtown Los Angeles as an international tourist destination with major attractions related to culture and conventions. While the Proposed Project would provide new sports, entertainment and modernized convention uses, this Alternative would only provide for an expansion of convention uses. Each of these functions is consistent with the vision for the Convention Center site set forth in the Downtown Strategic Plan. Therefore, Alternative 6 would be consistent with the Downtown Strategic Plan to a similar extent as the Proposed Project.

Both the Proposed Project and this Alternative would include design elements to foster an accessible, safe and visually appealing pedestrian environment, in accordance with the City of Los Angeles Walkability Checklist. Such features would include open space elements including new pedestrian amenities such as street furniture, safety and accent lighting, way-finding signage, trash containers, bike racks, landscaping, streetscape, pedestrian-scaled entrances, special paving materials to demark pedestrian pathways, and designated bus/taxi drop-off areas. However, as discussed above, on-site building coverage would be greater under Alternative 6, providing fewer areas for pedestrian circulation and outdoor gathering than the Proposed Project. Alternative 6 would also remove landscaping from the existing Gilbert Lindsay Plaza in order to provide necessary bus parking for the modernized Convention Center uses. Therefore, Alternative 6 would be consistent with the City's Walkability Checklist but to a lesser extent than the Proposed Project.

The proposed Figueroa Corridor Streetscape Project is studying and would eventually provide a design for a coordinated streetscape that will complement the existing buildings and businesses in the area while promoting pedestrian and bike activity. Based on public input to date in community workshops, it is anticipated that Alternative 6 would not be consistent with the Figueroa Corridor Streetscape Project due to the changes in Gilbert Lindsay Plaza under this Alternative (i.e., reduced landscaping and pedestrian amenities and increased bus travel along Figueroa Street).

Because the uses proposed under Alternative 6 are permitted in the PF zone, Alternative 6 would not require a Zone Change to allow for the development of the uses included in this Alternative. It is also anticipated that Alternative 6 would be developed in accordance with the Project Site's zoning regulations with regard to building height, setbacks and parking. Therefore, Alternative 6 would be consistent with the relevant provisions of the Los Angeles Municipal Code to a greater extent than the Proposed Project.

Based on the above, Alternative 6 would be substantially consistent with regional and local plans and policies that govern the Project Site. With regard to regional plans, Alternative 6 would be less consistent than the Proposed Project with relevant plans and policies due to the loss of the diversity of the sports, entertainment, and convention center uses that would occur under the Proposed Project, and the reduced potential to promote regional transit use. With regard to local policies, Alternative 6 would be consistent with relevant plans and policies to a similar extent as the Proposed Project, but would achieve consistency in a different manner than the Proposed Project. With regard to local plans and policies related to providing a quality pedestrian environment, the Alternative would be less consistent than the Proposed Project. Overall, impacts with respect to land use consistency would be less than significant and similar to the Proposed Project.

2. Land Use Compatibility

The types of land uses proposed under Alternative 6 are also included in the Proposed Project. Therefore, like the Proposed Project, Alternative 6 would be consistent with and would build on the existing uses on the Project Site and in the immediate area. Alternative 6 would not introduce new types of uses that do not already occur within the Project Site. Rather, the proposed uses would reinforce Downtown and the immediate Project area in particular as a world-class destination for tourist attractions including conventions and trade shows, serving the general population with convenient access from throughout the Los Angeles region via transit as well as freeways. The Proposed Project's increase in building height, density and mass on the Project Site would not be atypical in the area given the relatively recent (and planned future) development of entertainment and high-rise uses at the adjacent L.A. LIVE and numerous mid-rise hotel and residential developments. While Alternative 6 would have a greater site coverage than the Proposed Project, the reduction in building height from a top of roof height under the Proposed Project of 220 feet to about 80 feet under this Alternative would yield a reduction in density and mass as compared to the Proposed Project. As a result, Alternative 6 would also be compatible with the surrounding vicinity. Building heights would be consistent with on-site development and adjacent development in L.A. LIVE. The Proposed Project and Alternative 6 are both infill development on land owned by the City that is designated for public facilities such as those proposed. Furthermore, given the location of the Project Site, the nature of the nearby surrounding uses, and the adjacent freeways that separate

the Project Site from neighboring lower density residential areas, no existing neighborhood or community would be physically disrupted, divided, or isolated. Therefore, impacts with respect to the compatibility of the proposed land uses with surrounding uses would be less than significant under Alternative 6 and similar to the Proposed Project.

3. Urban Decay

Alternative 6 would not develop the Event Center. Therefore, there is no potential that this Alternative would result in disinvestment in, or closure of, stadia in the region. Alternative 6 would provide a greater expansion of exhibition space at the Convention Center than the Proposed Project. There is some likely overlap in the regional market between the Los Angeles Convention Center and other free standing public assembly facilities over 100,000 square feet in the Los Angeles area. These include the Long Beach Convention Center, the Los Angeles County Fair Association (Fairplex) in Pomona, and the Pasadena Center. One important cause of urban decay is the lack of reinvestment in the fixed capital stock in existing facilities. Thus, one indicator of the relative strength of existing facilities in the market is their current levels of capital investments that serve as an indication of future decay. Investments have been recently made or are underway for each of the primary public assembly locations listed above with which the Proposed Project has the potential to compete. In addition, with regard to the potential for displacement associated with public assemblies, it is concluded that the capacities of the Proposed Project do not fundamentally alter the market dynamics for public assembly events in Los Angeles County. The Convention Center is the largest public assembly facility in the market and the proposed expansions and improvements associated with the Proposed Project are intended to reinforce its position as the primary convention site in the Los Angeles market. Alternative 6 would provide a total of nearly 1.6 million square feet of Rentable Area compared to 886,851 square feet of Rentable Area under the Proposed Project. This amount of additional space would not be anticipated to change the conclusions of the Project's urban decay analysis. Therefore, impacts with respect to urban decay would also be less than significant under Alternative 6 and greater than the Proposed Project due to the increase in contiguous convention space.

B. Transportation, Parking, and Pedestrian Safety

1. Transportation

Alternative 6 would have lower levels of construction activity than for the Proposed Project due to less building construction, with somewhat fewer haul and delivery trucks, somewhat fewer construction workers, but with similar if not greater roadway lane closures (lanes on Chick Hearn Court would need to be closed, as well as the lane closures identified for the Proposed Project). While there may be impacts from truck trips and construction worker trips these would be temporary in nature and with mitigation measures

would be expected to be less than significant. As for the Proposed Project, it is unlikely there would be significant traffic impacts from roadway lane closures on L.A. Live Way as it is not an arterial roadway and carries less traffic than major streets in the area. However, the temporary lane closures on Pico Boulevard would lead to temporary significant traffic impacts as for the Proposed Project. The temporary lane closures on Chick Hearn Court could also lead to temporary significant impacts (lanes would need to be closed to construct the building bridging over the street), so impacts would be greater in this respect than for the Proposed Project.

Alternative 6 would generate between approximately 820 and 1,870 vehicle trips in five of the six hours analyzed for the Proposed Project with zero trips occurring in the Weekday Evening Post-Event Hour (no Convention Center activity). These additional trips would occur only from the expansion of the Convention Center, and would be substantially lower than the additional trip totals for the Proposed Project (9,840 to 15,400 trips per hour).

There would be fewer significant impacts at intersections and freeway mainline locations from Alternative 6 than with the Proposed Project, and it is estimated that many but not all of the Proposed Project's significant impacts in these categories would be avoided with this Alternative. However, with an additional approximately 1,870 vehicle trips generated in the Weekday Evening Pre-Event Hour, for example, significant impacts would remain, particularly at locations in proximity to or on corridors leading directly to the Project Site. This Alternative would likely avoid most if not all of the freeway ramp impacts identified for the Proposed Project but could also generate additional significant impacts on ramps immediately adjacent to and in the proximity of the Convention Center. There would be no significant Congestion Management Plan (CMP) intersection impacts, as for the Proposed Project. This Alternative would avoid many but not all of the CMP freeway mainline impacts identified for the Proposed Project, with remaining impacts being located near the Project Site.

Based on the existing transportation characteristics for the Convention Center, Alternative 6 would slightly increase public transit trips. However, it would generate far fewer public transit trips than for the Proposed Project, and the need for additional public transit service would likely be minimal. There would likely be no significant transit impacts, and the Pico Station improvements that would occur with the Proposed Project would not occur under this Alternative as they would not be needed. However, there would be an increase in the number of shuttle buses and coaches bringing convention center attendees to conventions from area hotels, and additional bus loading/unloading areas would need to be provided –at a minimum expanding the existing bus loading area in Gilbert Lindsay Plaza, which would preclude open space enhancements there. It is also possible that given the substantial increase in size of the Convention Center, transportation strategies

could be adopted to reduce use of autos and increase use of public transit, in which case additional transit service may be necessary during peak periods.

Access provisions for this Alternative would be similar to the Proposed Project, but with additional parking access locations on L.A. Live Way and Chick Hearn Court for the new development, but there would be no significant access impacts, as for the Proposed Project. With the substantially lower trip volumes for this Alternative, neighborhood intrusion impacts would be less than significant and less than the Proposed Project's potentially significant impacts.

2. Parking

Alternative 6 would require a total of 10,432 code parking spaces, or 4,967 more than today for the current Convention Center. The increase would be solely attributable to the increase in size of the Convention Center. The spaces required would be less than the 12,503 spaces required by the Proposed Project. This Alternative would provide a total of 8,900 parking spaces, an increase of 3,342 spaces over the existing supply.

The existing South Hall and Venice Garages would remain, the West Hall Garage would be rebuilt with 2,230 spaces, the Bond Street Garage would be built (928 spaces as per the Proposed Project), and the L.A. Live Way Garage would be built with 2,950 spaces as with the Proposed Project. The on-site parking supply for this Alternative would not be sufficient to meet the parking needs, parking impacts would be potentially significant. However, such impacts could be mitigated with a similar off-site parking plan as for the Proposed Project (although because of shorter acceptable walking distances for Convention Center events the off-site parking would need to be in close proximity to the Convention Center). It is also possible that with such a large increase in the size of the Convention Center, policies of increasing transit use and reducing auto trips would reduce the number of parking spaces needed. With the adoption of either of these strategies, it is likely that there would be no significant parking impacts for this Alternative, as under the Proposed Project.

3. Pedestrian Safety

Pedestrian volumes would be substantially lower for Alternative 6 than for the Proposed Project, but would be higher than existing volumes during major events at the Convention Center, which would be expected to occur more often under this alternative. Pedestrian facility enhancements would be similar to the Proposed Project but may be scaled back to reflect the lower pedestrian volumes expected with this Alternative and without the Event Center. The temporary event street closures that would occur with the Proposed Project would not occur with this Alternative. Impacts for pedestrian circulation

and safety and for bicycle circulation and safety would be less than for the Proposed Project and would also be less than significant.

C. Visual Resources

1. Visual Quality

During construction activities for Alternative 6, the visual appearance of portions of the Project Site would be altered due to the removal of an existing building, parking areas, plazas, paving and landscaping. Construction of Alternative 6 would be approximately 18 months shorter than the Proposed Project. The Alternative would require the same types of construction activities as the Proposed Project. Truck activity would be similar on a daily basis, as the duration but not the intensity of construction activities would be reduced as compared to the Proposed Project. Like the Proposed Project, Alternative 6 would use construction fencing to reduce visual impacts and would promptly remove graffiti when necessary. Given the temporary nature of construction activities, construction of the Alternative would not substantially and adversely alter or degrade the existing visual character of the Project Site. However, like the Proposed Project, Alternative 6 would remove the West Hall. As discussed in Section IV.I.1, Cultural Resources—Historical Resources, of this Draft EIR, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall because under the *City of Los Angeles CEQA Thresholds Guide* historical resources are considered to be visual resources. Therefore, for purposes of a conservative analysis, demolition of the West Hall is considered to represent the loss of a visual resource in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. As such, construction-related impacts to visual resources that contribute to the visual quality of the Project Site would be significant and unavoidable under Alternative 6 and similar to the Proposed Project.

The Proposed Project and this Alternative would create an integrated site that would build on the existing uses on the Project Site and in the immediate area. The Alternative would increase the height, density and mass of on-site structures as compared to existing conditions, but to a lesser extent than the Proposed Project due to the elimination of the Event Center. However, the Alternative would increase the building density and mass north of the Project Site with the construction of the Chick Hearn Court bridge, and the Event Deck Hall on the L.A. LIVE site. The top of the Event Deck Hall would be 60 feet, and the height of the bridge over Chick Hearn Court would be 36 feet, with a roadway clearance of 24 feet (i.e., overall height of 60 feet above grade).

The Alternative would incorporate the same design features as the Proposed Project such as pedestrian-scaled entrances and variations in building planes to reduce the effect of massing and provide pedestrian scale. It would introduce new and enhanced outdoor plazas networked by pedestrian pathways and improved streetscapes, thus enhancing the quality of the public realm and creating an active, pedestrian-friendly environment. With the elimination of the Event Center, the Alternative would seem less massive than the Proposed Project from within both short- and long-range views. However, the building density and mass north of the Project Site would be increased with the introduction of the Chick Hearn Bridge and the Event Deck Hall. In addition, the Chick Hearn Bridge would introduce a new element to the visual environment that would physically connect the Event Deck Hall to the Convention Center. It would mirror the functionality, and to some degree the look, of the Convention Center's existing Concourse, which connects the existing West Hall to the South Hall. The introduction of this architectural element would define the western boundary of the Convention Center and L.A. LIVE area and further contribute to the unique visual character that currently exists along Chick Hearn Court. As the Bond Street Garage and L.A. Live Way Garage would be developed in the same manner as the Proposed Project, Alternative 6 would appear similar from adjacent freeway locations on SR-110.

Similar to the Proposed Project, the increases in building height, density and mass that would occur under Alternative 6 would be consistent and compatible with the existing and planned development of entertainment and high-rise uses at the adjacent L.A. LIVE and numerous mid-rise hotel and residential buildings to the east. Furthermore, it would introduce distinctive architecture, outdoor plazas and a variety of human-scaled elements that activate the public realm, and substantial new streetscape elements including a cohesive street tree palette, all of which would build on many of the existing visual character-defining elements within and near the Project Site. Without the Event Center, it is expected that the Alternative would include a reduced signage program. In addition, as discussed above, the Chick Hearn Bridge would introduce a new element to the visual environment that would further contribute to the unique visual character that currently exists along Chick Hearn Court.

Similar to the Proposed Project, Alternative 6 would include a Streetscape Plan that would serve to enhance the aesthetic environment on-site and along the Project Site perimeter and connecting existing on-site uses, except the streetscape improvements under Alternative 6 would not include the Proposed Project's connections to the Pico Union area by providing landscaped corridors under SR-110. In addition, this Alternative would not include the improvements to Gilbert Lindsay Plaza proposed by the Proposed Project, which is intended to serve as a pre- and post-event gathering space for Event Center functions. In fact, as discussed above, this Alternative would remove landscaping from the existing Gilbert Lindsay Plaza in order to provide necessary bus parking for the modernized

Convention Center uses. Furthermore, on-site building coverage would be greater under Alternative 6, providing fewer areas for pedestrian circulation and outdoor gathering than the Proposed Project. Therefore, the visual character and quality of the pedestrian realm would be reduced under this Alternative as compared to the Proposed Project.

Based on the above, Alternative 6 would not degrade the general visual character of the Project Site. However, Alternative 6 would remove the West Hall, which could be determined by a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, to be eligible for the California Register, the National Register or as a local HCM. Thus, Alternative 6 would not avoid the Proposed Project's significant impacts on visual resources resulting from removal of the West Hall. Therefore, visual quality impacts associated with operation of Alternative 6 would be significant and unavoidable, and would be similar to the Proposed Project due to the lower building heights along Chick Hearn Court.

2. Views

Under Alternative 6 development would generally appear less tall, and perception of building mass would be reduced, compared to the Proposed Project. This would be due to the elimination of the Event Center and the proposed height of the new West Hall Replacement Building and Event Deck Hall, which would be the same height as existing Convention Center buildings. While the introduction of the Chick Hearn Bridge would be a new element to the visual environment, the height of the bridge would be similar to other building heights under this Alternative. Therefore, in general, Alternative 6's potential to obstruct an existing, publicly available, recognized view resource would be reduced as compared to the Proposed Project. However, given that the blockage of views of the Downtown skyline with the Proposed Project that would occur along SR-110 is largely due to the presence of the Bond Street Garage and L.A. Live Way Parking Garage immediately adjacent to the freeway, it is not anticipated that the Alternative would reduce this significant impact. Additionally, the Alternative would remove the West Hall, which, as described above, is conservatively considered to be a visual resource. Therefore, impacts to views under Alternative 6 would be significant and unavoidable, but would be less than under the Proposed Project due to the reductions in building height and size with the elimination of the Event Center.

D. Light and Glare

1. Natural Light

As compared to the Proposed Project, the expansion of the Convention Center under Alternative 6 would have the potential to affect shadows from the West Hall Replacement Building, the Event Deck Hall, and the Chick Hearn Bridge. The West Hall

Replacement Building would be the same height as the New Hall, which would be 90 feet. This is approximately 130 feet shorter than the 220-foot Event Center that would be in the same location. The Proposed Project (including the Event Center) would not cast additional shadows on any of the identified sensitive uses during the winter solstice, summer solstice, fall equinox, or spring equinox. Thus, it is anticipated that the shorter West Hall Replacement Building would have no significant shade and shadow impacts on any of the identified sensitive uses. Since under this Alternative the West Hall Replacement Building would occupy a portion of the courtyard space in between the West Hall and STAPLES Center along the northern perimeter of the Project Site, it would cast additional shadows in the direction of Nokia Plaza and the Ritz-Carlton Residences at L.A. LIVE as compared to the Proposed Project. Based on the limited extent of existing shadows from the West Hall and the height of the intervening buildings, it is not anticipated that the West Hall Replacement Building under this Alternative would create shadows that would be capable of reaching the Ritz-Carlton Residences at L.A. LIVE or Nokia Plaza. Therefore, impacts from this component of Alternative 6 would be less than significant.

Under the Alternative, new shadows would also be cast by the Event Deck Hall and the Chick Hearn Bridge. The EIR for the LASED included an analysis of the potential shading impacts of a Event Deck building with a greater height than the Event Deck Hall proposed under this Alternative.[13] This analysis concluded that the taller Event Deck building would not shade sensitive uses for more than three hours during the winter or more than four hours during the summer.[14] Furthermore, the sensitive uses within the Ritz-Carlton Residences at L.A. LIVE are residential uses located on the 27th floor and above. Shadows from the proposed 60-foot Event Deck Hall and 36-foot bridge over Chick Hearn Court under this Alternative would not reach the 27th floor of the Ritz-Carlton tower. In order to reach Nokia Plaza, shadows from Alternative 6's Event Deck Hall and Chick Hearn Bridge would need to extend over the Nokia Theater that is located to the east of the Event Deck. Based on the height of the intervening building and the location of Nokia Plaza in relation to the Event Deck Hall and Chick Hearn Bridge, it is not anticipated that these uses would create shadows that would be capable of reaching Nokia Plaza during the threshold hours of any season. Therefore, the Event Deck Hall and Chick Hearn Bridge would have no effect on shade-sensitive uses in the area of potential impact.

With regard to shadows generated by the proposed parking structures and New Hall, these development components are the same under Alternative 6 and the Proposed

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[13] *City of Los Angeles Planning Department, Draft EIR for the Los Angeles Sports and Entertainment District, SCH No. 2000091046/EIR No. 2000-3577, January 11, 2001. See Section IV.B.3, Shade/Shadow.*

[14] *Ibid, pg. 172.*

Project and as such would have no cast shadows on any of the identified sensitive uses during the winter solstice, summer solstice, fall equinox, or spring equinox. Therefore, these development components under Alternative 6 also would have no effect on shade-sensitive uses in the area of the Proposed Project.

Based on the above analysis, impacts related to natural light (shading) would be less than significant under Alternative 6, and such impacts would be similar to the Proposed Project.

2. Artificial Light and Glare

The Proposed Project would require nighttime construction to complete the Event Center within the timeframe identified in the Project Objectives. Without the Event Center, nighttime construction would not be required. Furthermore, the Proposed Project's significant construction lighting impacts would only occur from Event Center construction lighting. Therefore, Alternative 6 would avoid the Proposed Project's significant nighttime construction lighting impacts. Impacts related to construction glare would be similar to the Proposed Project and less than significant, as Alternative 6 would not be anticipated to introduce significant sources of glare during construction activities.

The Proposed Project impacts are less than significant or less than significant with mitigation on: light trespass; lighting levels at the analyzed receptors; the use of skytrackers; signage; driver visibility/distraction; building/façade lighting; plaza lighting; headlights within the parking garages; daytime glare; and sky glow. For each of these categories except plaza lighting, headlights within the parking garages, and daytime glare, the Event Center would be the greatest contributor to future lighting levels under the Proposed Project. While the West Hall Replacement Building, the new Event Deck Hall, and the Chick Hearn Bridge proposed under Alternative 6 would produce new lighting sources, the intensity of light generated by these sources would be substantially less than that of the Event Center and would not be anticipated to result in new or increased artificial lighting impacts. These new lighting sources would also be similar to those that currently exist on-site at the Convention Center. Thus, while the Event Deck Hall, would be closer to sensitive uses in L.A. LIVE, it is not anticipated that these lighting sources would result in new significant impacts to these uses. Therefore, the significant impacts identified above would be less than significant under Alternative 6 and less than the Proposed Project. Impacts associated with headlights within the parking garages, plaza lighting, and daytime glare would also be less than significant under Alternative 6 and would be similar to the Proposed Project.

Alternative 6 would not involve construction of the Event Center. Therefore, this Alternative would not result in new sources of temporary lighting for productions and

special events, including fireworks displays, as such lighting would only be associated with the Event Center. Therefore, Alternative 6 would avoid the Proposed Project's significant lighting impacts during operations.

Because Alternative 6 would not involve construction of the Event Center, this Alternative would not result in new sources of sports lighting associated with the Event Center that could cause significant impacts to sensitive receptors and spill light impacts at Receptor Location 8 with sports lighting on at times when low cloud ceilings with high albedo (+50 percent) are present. Therefore, Alternative 6 would avoid these significant operational lighting impacts.

E. Noise

Construction activities under Alternative 6 would be similar (i.e., types of construction equipment) to the Proposed Project, except that without the time constraints associated with constructing the Event Center, nighttime construction is not anticipated to be required under this Alternative. Therefore, on-site construction-related activities under this Alternative would generate daytime construction noise levels that would be similar to that of the Proposed Project. As such, like the Proposed Project, it is estimated that with all on-site and off-site construction activities occurring concurrently, Alternative 6 would generate construction noise levels that would exceed the stated significance threshold at five receptor locations during daytime hours. Like the Proposed Project, even with implementation of mitigation measures, impacts would remain significant. However, such impacts would occur for a shorter duration due to the reduced timeframe required to construct this Alternative.

Construction under Alternative 6 would not require the use of pile drivers but would use vibratory rollers. As such, building construction under Alternative 6 would result in lower vibration levels than those forecasted to occur under the Proposed Project. As the Proposed Project's construction generated ground vibration level would be below the 0.5-inch-per-second (PPV) significance threshold for building damage associated with commercial structures, impacts of Alternative 6, as with the Proposed Project would be less than significant. Similar to the Proposed Project, construction activities under Alternative 6 would generate vibration levels which would exceed the 72 VdB significance threshold regarding annoyance. Under Alternative 6, the mitigation measures related to vibratory rollers that are proposed under the Project would be implemented. Thus, like the Proposed Project, with implementation of the proposed mitigation measures, potential impacts associated with vibration at the Nokia Theatre at L.A. LIVE would be reduced to a less than significant level.

Alternative 6 would not include the firework display shows that would occur under the Proposed Project. As such, the significant noise impacts from this noise source that would occur under the Proposed Project would be avoided under this Alternative. In addition, this Alternative would avoid the significant noise impacts associated with crowds and operation of sound systems that would occur as part of operation of the proposed Event Center.

The Alternative would include noise sources such as building mechanical equipment and loading docks that would produce noise levels similar to those that would occur under the Proposed Project. These on-site noise sources would result in less than significant impacts with implementation of the project design features and proposed mitigation measures. Parking garage noise impacts under Alternative 6, similar to the Proposed Project, would be significant. Thus, with implementation of the same project design features and mitigation measures to be implemented under the Proposed Project, noise impacts associated with these noise sources under Alternative 6 would also be less than significant.

The off-site traffic volumes generated under Alternative 6 would not be concentrated in the Pre-Event and Post-Event hours as under the Proposed Project, but would be distributed throughout the day. In addition, the traffic volumes generated under this Alternative would not double the existing traffic volumes at some locations in the vicinity of the Project Site. Therefore, the significant noise impacts associated with off-site traffic under the Proposed Project would be avoided under this Alternative. In addition, this Alternative would not require the same level of increase in public transit (bus and rail operations) usage that would be generated under the Proposed Project. Therefore, the significant noise impacts associated with public transit that would occur under the Proposed Project would be avoided under Alternative 6. Finally, the Alternative would not generate media helicopters due to the elimination of the Event Center. As such, the significant noise impacts associated with media helicopters that would occur under the Proposed Project would be avoided under this Alternative.

In summary, noise impacts during daytime construction would be significant and similar to those occurring under the Proposed Project. Construction vibration and operational noise impacts under Alternative 6, except for parking garage noise impacts, would be less than significant with implementation of the project design features and mitigation measures identified for the Proposed Project. Thus, the significant Project-related impacts associated with event center operations, firework displays, off-site traffic, public transit and media helicopters would be avoided and operational noise and vibration impacts under Alternative 6 would be reduced when compared with the Proposed Project.

F. Air Quality and Climate Change

1. Air Quality

(a) Construction

As with the Project, construction of Alternative 6 would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. Pollutant emissions and fugitive dust from site preparation and construction activities would be similar on a daily basis under this Alternative, as the intensity would be similar to the Proposed Project on a maximum day of construction. Overall pollutant emissions from construction of this Alternative would be similar to the Proposed Project and would result in significant regional VOC, CO, and NO_X and localized NO_X impacts with implementation of mitigation measures.

With respect to construction air toxics, diesel particulate emissions represent the greatest potential for TAC emissions. As the overall construction duration would be somewhat less under this Alternative in comparison to the Proposed Project, construction-related diesel particulate emissions would also be anticipated to be somewhat less. Thus, construction-related air toxic emission impacts during construction of Alternative 6 would be less than those that would occur under the Proposed Project. Like the Proposed Project, such impacts would be less than significant.

(b) Operation

The reduction in daily trips due to the elimination of the Event Center would more than offset the increase in vehicle trips associated with the increase in the size of the Convention Center under this Alternative. As vehicular emissions are dependent on the number of trips, this Alternative would result in a decrease in pollutant emissions compared to the project. In addition, pollutant emissions associated with electricity and natural gas usage would also decrease under this Alternative. Thus, regional operational emissions under this Alternative would be reduced in comparison to the Proposed Project, such that VOC impacts would be less than significant. However, as with the Proposed Project, this Alternative would still result in significant regional air quality impacts associated with PM_{10}, $PM_{2.5}$, NO_X, and CO.

This Alternative would generate less stationary source emissions, including PM_{10} and NO_2 than the Proposed Project. As such, localized operation impacts would be less than those that would occur under the Proposed Project but would remain significant and unavoidable.

The reduction in vehicle trips forecasted under Alternative 6, as compared to the Proposed Project, would also result in reduced impacts with regard to local CO hotspots. Since the localized CO hotspot analysis for the Proposed Project did not result in any significant impacts, Alternative 6 would likewise not have any localized CO impacts.

This Alternative would generate less stationary source emissions compared to the Proposed Project, and would thus generate less potential air toxic emissions. Thus, similar to the Proposed Project, Alternative 6 would result in a less than significant air quality impact related to air toxics.

Similar to the Proposed Project, Alternative 6 would not include any uses identified by the SCAQMD as being associated with odors. Thus, like the Proposed Project, such impacts would be less than significant and impacts would be similar to those that would occur under the Proposed Project.

Although operational emissions associated with Alternative 6 would be reduced in comparison to the Proposed Project, like the Proposed Project, Alternative 6 would result in significant short-term construction and operational air quality impacts.

2. Climate Change

The number of vehicle trips and annual attendance would decrease with Alternative 6, which would result in a corresponding reduction in GHG emissions associated with water usage, wastewater generation, electricity usage, natural gas usage, and solid waste generation and disposal would also be anticipated. This Alternative would include project design features (e.g., reduce vehicular traffic, and encouraging the use of mass transit) to reduce GHG emissions compared to the “business-as-usual” scenario and would constitute an equivalent or larger break from “business-as-usual” than has been determined by CARB to be necessary to meet AB 32’s goals (approximately 16 percent for 2020). The provisions of SB 292 would not be applicable to this Alternative. With incorporation of SB 292 and project design features, the Proposed Project would achieve a much greater overall reduction in GHG emissions compared to the “business-as-usual” scenario (48 percent) versus this Alternative (approximately 16 percent). Nevertheless, GHG emissions under Alternative 6 would be less than those that would occur under the Proposed Project. Similar to the Proposed Project, this Alternative would have a less than significant impact on the environment due to its GHG emissions.

G. Geology and Soils

The Project Site is located within the seismically active region of Southern California. Thus, both the Alternative and the Proposed Project would be exposed to certain geologic

hazards (e.g., ground shaking, liquefaction, soil instability). The Project would involve grading, excavation, and other earth-moving activities during construction, which could potentially result in sedimentation and erosion as well as landform alteration. Under Alternative 6 grading and excavation required to construct the Event Center would not occur and the balance of grading would be comparable to that of the Proposed Project. Impacts due to strong seismic ground shaking, subsidence, expansive soils, and sedimentation and erosion would be mitigated to a less than significant level through adherence to similar mitigation measures and applicable regulatory requirements as those of the Proposed Project. Thus impacts due to strong seismic ground shaking, subsidence, expansive soils, and sedimentation and erosion would be less than significant and similar to the Proposed Project.

H. Hydrology and Soils

1. Surface Water

(a) Hydrology

As with the Proposed Project, construction activities under Alternative 6 would involve the removal of existing structures as well as the clearing and grading of development areas. Such activities would temporarily alter existing drainage patterns and flows by exposing the underlying soils and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, in accordance with regulatory requirements, construction would occur in a manner and sequence that would preclude flooding during construction. In addition, as with the Proposed Project, this Alternative would be required to comply with applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Moreover, new storm drain connections would be installed to support development and would be in place and functioning as development progresses to serve their respective catchments. Therefore, as with the Proposed Project, construction-related impacts on surface water hydrology would be less than significant. Such impacts would be similar to those of the Proposed Project as the Project Site would be similarly modified.

Alternative 6, due to a larger building footprint, would serve to increase the area of impervious surfaces at the Project Site when compared with existing conditions. As such, Alternative 6 would result in an incremental increase in stormwater runoff flows compared to existing conditions, but would not result in conditions that would significantly impact the existing storm drain systems. In addition, similar to the Proposed Project, the new landscaped areas to be provided would allow for more opportunities to direct stormwater to flow through landscaped areas. Consequently, this Alternative would not result in on- or

off-site flooding during a 50-year storm event, would not substantially reduce or increase the amount of surface water in a water body, nor result in a permanent adverse change to the movement of surface water. In addition, as part of this Alternative, SUSMP requirements would be implemented that would outline the stormwater treatment measures or post-construction BMPs required to control pollutants associated with storm events up to the 0.75-inch precipitation level, per the City's Stormwater Program. In addition, as with the Proposed Project, Alternative 6 would incorporate LID BMPs intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater, while also reducing or eliminating the discharge of potential pollutants from stormwater runoff and reducing the quantity and intensity of stormwater flows. The BMPs to be implemented would ensure that at a minimum, no increase in flows from existing conditions would result. Therefore, as with the Proposed Project, operational impacts on surface water hydrology under this Alternative would be less than significant. Such impacts would be similar to those of the Proposed Project.

(b) Surface Water Quality

Construction activities such as earth moving, maintenance and operation of construction equipment, and handling, storage, and disposal of hazardous materials for Alternative 6 could contribute to pollutant loading in stormwater runoff. However, similar to the Proposed Project, in accordance with the requirements of the NPDES General Construction Activity Permit, a site-specific SWPPP would be prepared and implemented. The SWPPP would specify BMPs to be used during construction. With implementation of these BMPs, the discharge of potential pollutants from storm water runoff would be eliminated or reduced to the maximum extent practicable. Construction-related impacts on surface water quality would be less than significant and similar to those of the Proposed Project.

During operation of this Alternative, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. However, in accordance with NPDES requirements, SUSMP requirements would be implemented throughout the operational life of this Alternative. As part of the SUSMP, stormwater BMPs to address water quality in stormwater runoff would be incorporated into the design of the development. With implementation of source control and treatment BMPs, this Alternative would reduce or eliminate the discharge of potential pollutants from storm water runoff to the maximum extent practicable. Thus, operational impacts on surface water quality would be less than significant and would be similar to those of the Proposed Project.

2. Groundwater

As with the Project, construction activities under Alternative 6 would involve the use of hazardous materials. The handling, storage and disposal of construction hazardous

waste would be in compliance with all applicable federal, state, and local requirements, thereby limiting the potential for groundwater contamination impacts attributable to construction. Such practices would reduce potential construction impacts to a less than significant level under both this Alternative and the Project. Grading and excavation for Alternative 6 would be limited since the Event Center is not included in this Alternative. Due to the deep groundwater level at the Project Site, it is not expected that this depth of excavation would intercept groundwater or require dewatering. Like the Proposed Project, construction-related groundwater impacts would be less than significant under this Alternative and similar to those of the Project.

Since new development would occur under Alternative 6, new pollutants from storm water runoff would be introduced into the groundwater through infiltration from available landscape areas. However like the Proposed Project, Alternative 6 would implement the Proposed Project's source control and treatment control Best Management Practices (BMPs). By implementing BMPs in accordance with NPDES, SUSMP, and LID requirements during operations, ground water quality is improved. Therefore, impacts to ground water quality under Alternative 6 would be less than significant and similar to those of the Proposed Project.

Like the Proposed Project, changes to groundwater levels under this Alternative could result from the conversion of impervious surface to pervious surfaces via infiltration of surface runoff within available landscape areas and through the implementation of BMPs designed to infiltrate in accordance with NPDES, SUSMP, and LID requirements. The groundwater contribution from infiltration systems is less than significant because such systems are designed to infiltrate smaller storm events equivalent to 0.75 inch of rainfall. Similarly, groundwater levels are typically impacted from larger, regional contributions from injection wells and spreading grounds than from localized infiltration through available landscape areas. Like the Proposed Project, the additional landscaped areas provided by Alternative 6 allow for an incremental increase in infiltration. Therefore, impacts to groundwater level would be similar to the Proposed Project, and such impacts would be less than significant.

I. Cultural Resources

1. Historical Resources

As discussed in detail in the Historical Assessment provided in Appendix S of this Draft EIR, the Project Site does not include any buildings that have previously been evaluated as eligible for inclusion in the National Register, California Register, or as a local HCM. Nonetheless, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission,

could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall.

Similar to the Project, Alternative 6 would provide for the modernization and expansion of the Convention Center and the creation of a multi-purpose event center. To provide for these improvements, the West Hall would be removed. Thus, similar to the Proposed Project, this Alternative would result in a significant impact resulting from the demolition of the West Hall in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. Impacts would be similar to those occurring under the Proposed Project.

2. Archaeological Resources

Grading and other earthwork activities under Alternative 6 would be limited east of L.A. Live Way, due to the elimination of the Event Center, but would be the same as the Proposed Project west of L.A. Live Way. As with the Proposed Project, earthwork activities would occur in areas identified as having archaeological sensitivity. While it is possible that archaeological resources may be encountered during construction of Alternative 6, such impacts would be reduced to a less than significant level through adherence to the same mitigation measures as the Proposed Project. Such impacts would be similar to those that have the potential to occur under the Proposed Project.

J. Public Services (Police and Fire)

Construction levels under Alternative 6 would be similar to those that would occur under the Proposed Project. This Alternative would implement measures such as, security fencing and lighting, locked entries, security patrols, and a construction Transportation Management Plan. Thus, like the Proposed Project, impacts on police and fire protection services during construction of the Alternative would be less than significant and such impacts would be similar to those that would occur under the Proposed Project.

Similar to the Proposed Project, the existing security measures in place at the Convention Center would be extended to include the new convention center facilities that would be developed under Alternative 6. As with the Proposed Project, the Alternative would be developed taking into consideration the LAPD's Design Out Crime Guidelines. While crime and calls for LAFD services would increase above existing conditions under Alternative 6, due to the elimination of the Event Center, the number of crime incidents and LAFD calls for service would be reduced from those anticipated to occur with the Proposed Project. Even though the Event Center would not be constructed under Alternative 6, special measures to address crowd and traffic flow management may be required from

time to time, but would not be as extensive or have the same level of importance as under the Proposed Project. The same relationship also exists with regard to emergency planning in the event of a natural or man-made disaster. As Proposed Project impacts are concluded to be less than significant, impacts of Alternative 6 would also be less than significant. Such impacts would be reduced when compared with those of the Proposed Project.

K. Utilities

1. Water

Like the Proposed Project, a short-term demand for water would occur during construction of Alternative 6. Overall, construction activities would require minimal water demand and would not be expected to have any adverse impact on available water supplies and infrastructure. Therefore, as with the Proposed Project, impacts on water supply and infrastructure associated with short-term construction activities under this Alternative would be less than significant. Such impacts would be less than those of the Proposed Project.

As with the Proposed Project, operation of Alternative 6 would generate an increased demand for water. As shown in Table V-26 on page V-172, this Alternative would result in a net increase in water demand of approximately 159,758gpd. Thus, water demand for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase in water demand of 640,683 gallons per day and 194 acre-feet per year. This Alternative also assumes that the water conservation measures similar to those of the Proposed Project would be implemented. As with the Proposed Project, impacts on water supply would be less than significant. Such impacts would be less than those that would occur under the Proposed Project.

The existing water infrastructure would not be adequate to accommodate the Proposed Project's water demand during a fire scenario and impacts would be potentially significant. Although Alternative 6 would result in reduced water demand compared to the Proposed Project, given that the fire flow requirements of this Alternative would be similar to those of the Proposed Project, it is anticipated that the existing water infrastructure would also not be adequate to accommodate this Alternative's water demand during a fire scenario. Nonetheless, as with the Proposed Project, Alternative 6 would implement improvements to the existing water infrastructure that would be adequate to accommodate the water demands of this Alternative and impacts would be reduced to less than significant level. Such impacts would be similar to those of the Proposed Project.

Table V-26
Maximum Convention Center Alternative: Water Demand

Land Use	Attendance/ Annual	Attendance/ Daily	Rate	Water Demand Gallons/ Day	Water Demand Acre-Feet/Year
Convention Center	6,676,416	34,719	4.6874	162,742	96.06
Central Plant				61,812	69.25
Irrigation				12,498	14.00
Total Convention Center				237,052	179.31
Less Water Conservation				39,402	44.14
Alternative 6 Total Water Demand				**197,650**	**135.17**
Less Existing On-Site Uses to Be Removed				37,892	42.44
Alternative 6 Net Water Demand				**159,758**	**92.73**
Proposed Project Net Water Demand				**640,683**	**194**
Alternative 6 Water Demand Compared to the Proposed Project				**-480,925**	**-101.27**

Source: Matrix Environmental, 2012.

2. Sewer

Similar to the Proposed Project, construction activities under Alternative 6 would result in a temporary increase in wastewater generation associated with on-site construction workers. Overall, construction of the Proposed Project is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Integrated Resources Plan. Therefore, based on a somewhat reduced amount of construction activity, construction impacts to the wastewater system under Alternative 6 would also be less than significant.

As with the Proposed Project, operation of the Alternative would result in an increased generation of wastewater. As shown in Table V-27 on page V-173, Alternative 6 would result in a net increase in wastewater of approximately 116,270 gpd. Thus, wastewater generation for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase of 640,754 gpd.

As with the Proposed Project, Alternative 6 could connect to one or both of the two sewer systems that are used under existing conditions subject to available capacity and design efficiency. Per the Bureau of Sanitation Guidelines, the available capacity of System 1 is approximately 0.11 mgd, while System 2 has an available capacity of

Table V-27
Maximum Convention Center Alternative: Wastewater Generation

Land Use	Daily Attendance	Rate	Wastewater Generation (gallons/day)
Convention Center	34,719	4.6874	162,742
Central Plant			11,250
Total Convention Center			173,992
STAPLES Center Central Plant			434
Less Water Conservation			39,402
Alternative 6 Total Wastewater Demand			**135,024**
Less Existing Project Water Use			**18,754**
Alternative 6 Net Wastewater Demand			**116,270**
Proposed Project Net Wastewater Demand			**640,754**
Alternative 6 Wastewater Demand Compared to the Proposed Project			**-524,484**

Source: Matrix Environmental, 2012.

approximately 4.58 mgd. Based on this information, up to 0.11 mgd could discharge to System 1, with the balance discharging to System 2, or the entire development proposed under this Alternative could discharge to System 2. Wastewater generated by Alternative 6 would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plan, which is a component of the Hyperion Service Area. Based on the Integrated Resources Plan, the existing effective capacity of the entire Hyperion Service Area is approximately 529 mgd with future improvements identified in the Integrated Resources Plan increasing the total effective capacity of the Hyperion Service Area in 2020 would be approximately 570 mgd. Based on these forecasts the increase in wastewater generation under Alternative 6 would be adequately accommodated within the Hyperion Service Area. Impacts on wastewater generation and infrastructure under Alternative 6 would be less than significant and less than those of the Proposed Project.

3. Solid Waste

As with the Proposed Project, construction activities associated with Alternative 6 would involve demolition, site grading/preparation, and building construction activities. These activities would generate construction and demolition wastes that would be recycled or collected by private waste haulers and taken for disposal at the County's inert landfills. As shown in Table V-28 on page V-174, this Alternative would generate approximately 78,154.81 tons of construction and demolition waste, which is less than the 91,331.56 tons of waste that would be generated by Project construction. As unclassified landfills generally do not face capacity shortages, such landfills would have adequate capacity to

Table V-28
Maximum Convention Center Alternative: Construction Solid Waste Generation

	Square Footage	Generation Rate (tons/sq.ft.)	Total Debris (tons)	Diversion Rate	Recycled	Net to Landfill
Demolition						
West Hall	538,925	0.0775	41,766.69	75%	31,325.02	10,441.67
Cherry Street Garage	319,584	0.0775	24,767.76	75%	18,575.82	6,191.94
Bond Street Parking Lot	56,627	0.0875	4,954.86	75%	3,716.15	1,238.71
Subtotal	*915,136*		*71,489.31*		*53,616.99*	*17,872.32*
New Construction						
New Hall	531,215	0.001945	1,033.21	75%	774.91	258.30
Expansion Building	936,916	0.001945	1,822.30	75%	1,366.73	455.57
Event Deck	250,000	0.001945	486.25	75%	364.69	121.56
Parking Expansion	462,400	0.001945	899.37	75%	674.53	224.84
L.A. Live Way Garage	950,000	0.001945	1,847.75	75%	1,385.81	461.94
Bond Street Parking Garage	296,463	0.001945	576.62	75%	432.47	144.15
Subtotal	*3,573,508*		*6,665.50*		*4,999.14*	*1,666.38*
Total Construction Debris			**78,154.81**		**58,616.13**	**19,538.70**

Source: Matrix Environmental, 2012.

accommodate the construction and demolition waste generated by this Alternative. Therefore, impacts associated with construction activities would be less than significant under Alternative 6 and less than those of the Proposed Project.

As shown in Table V-29 on V-176 during operation, Alternative 6 would generate 8.86 tons per day of municipal solid waste compared with 123.716 tons per day under the Proposed Project. Alternative 6 would generate 1,982.0 tons per year of municipal solid waste compared with 8,391.7 tons per year under the Proposed Project. Solid waste would be recycled or collected by private waste haulers contracted and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. While it is anticipated that future iterations of the County Integrated Waste Management Plan would provide for improvements beyond 2025 to serve future waste disposal needs, it is conservatively assumed that no new landfills or increases in capacity would occur. Thus, based on this worst case assumption, the County may not be able to accommodate the disposal needs of this Alternative. Therefore, as with the Proposed Project, impacts on solid waste disposal facilities are conservatively concluded to be potentially significant and unavoidable. Due to the decrease in solid waste generation, impacts under Alternative 6 would be less than those of the Proposed Project.

Under this Alternative, private waste haulers would be expected to utilize similar haul routes as the Proposed Project. As such, this Alternative would not result in the need for additional solid waste collection routes to adequately handle waste. As with the Proposed Project, impacts on solid waste collection routes would be less than significant. Such impacts would be similar to those of the Proposed Project.

4. Electricity

As with the Proposed Project, construction activities associated with development of the Alternative would consume electrical power. This demand would be supplied from existing electrical services within the Project Site and would not affect other services as there is sufficient existing capacity to meet this Alternative's construction demands. Therefore, as with the Proposed Project, impacts on electrical supplies and infrastructure associated with short-term construction activities would be less than significant under Alternative 6. Such impacts would be similar to those of the Proposed Project. In addition, like the Proposed Project, construction activities associated with the installation of new electrical infrastructure under this Alternative would primarily be confined to trenching and would not result in any significant impacts on adjoining properties.

Similar to the Proposed Project, operation of Alternative 6 would generate an increased demand for electricity. As shown in Table V-30 on page V-177, Alternative 6 would result in an increase in consumption of electricity of approximately 37,160 MWh

Table V-29
Maximum Convention Center Alternative: Operational Solid Waste Generation

Land Use	Patrons or Employees	Factors (tons/unit/year)[a]	Total Waste Generated	Recycled Waste (tons/day)	Net to Landfills
Daily (Convention Center)					
Exhibit/Meeting Rooms	17,715	0.0005	8.86	4.43	4.43
Annual (Convention Center)					
Exhibit/Meeting Rooms	3,964,059	0.0005	1,982.03	991.02	991.01

Source: Matrix Environmental, 2012.

annually. Thus, electricity consumption for Alternative 6 would be increased relative to existing conditions as well as the Proposed Project's estimated increase in electrical consumption of 33,542 MWh per year. Additionally, this Alternative would have a peak demand of 22,143 kVA compared to the Proposed Project's peak demand of 19,286 kVA. Electrical supplies would be adequate to accommodate the Proposed Project's demand for electricity. Therefore, given that Alternative 6 would result in a limited increased demand as compared to the Proposed Project, electrical supplies are anticipated to also be adequate to accommodate the electrical demand for this Alternative. In addition, Alternative 6 would also implement energy conservation measures similar to those of the Proposed Project. Thus, as with the Proposed Project, impacts on electrical supplies would be less than significant under Alternative 6. Such impacts would be greater than those of the Proposed Project.

Based on LADWP's analysis, the existing electrical infrastructure may not be adequate to meet the Proposed Project's demand and impacts on the existing electrical infrastructure may be potentially significant. Alternative 6 would result in an increased demand for electricity compared to the Proposed Project and it is anticipated that the existing electrical infrastructure would also not be adequate to accommodate this Alternative's demand for electricity. However, as with the Proposed Project, Alternative 6 would implement mitigation measures that would ensure that adequate electrical capacity is provided to accommodate the demand generated by the Alternative. Similar to the Project, with implementation of this mitigation, impacts on electrical infrastructure would be less than significant. Due to the increaseddemand for electricity under this Alternative, such impacts would be increased when compared with those of the Proposed Project.

Table V-30
Maximum Convention Center Alternative: Electricity Consumption and Demand

Project Component	Consumption		Peak Demand (kVA)
	Daily (kWh)	Annual (MWh)	
Convention Center (New Facilities)	82,102	29,960	22,706
Convention Center (Existing Facilities)	15,113	2,393	5,245
Bond Garage	1,978	722	236
L.A. Live Garage	6,438	2,350	770
Other Garage	4,753	1,735	567
Total Alternative 6 Proposed Uses	**110,384**	**37,160**	**22,143**
Total Proposed Project	**151,768**	**33,542**	**19,286**
Existing On-Site Uses to Be Removed	20,598	7,519	5,967
Net Alternative 6	89,786	29,641	16,176
Net Proposed Project	131,170	26,023	13,319
Net Difference in Total Consumption and Peak Demand	**-41,384**	**3,618**	**2,857**

Source: Matrix Environmental, 2012.

5. Natural Gas

As with the Proposed Project, construction activities for Alternative 6 would not require the consumption of natural gas. In addition, construction impacts associated with the installation of new natural gas distribution lines would primarily involve trenching and would not have any significant impacts for the Project Site or to adjoining properties. Furthermore, like the Proposed Project, prior to ground disturbance, Project contractors would coordinate with SCG to identify the locations and depth of all subsurface lines.

Further, SCG would be notified in advance of proposed ground disturbance activities to avoid natural gas lines and disruption of natural gas service. Therefore, as with the Proposed Project impacts on natural gas supplies and infrastructure associated with short-term construction activities would be less than significant under Alternative 6. Such impacts would be similar to those of the Proposed Project.

As with the Proposed Project, operation of Alternative 6 would generate an increased demand for natural gas. As shown in Table V-31 on page V-178, this Alternative would result in a net increase in natural gas of approximately 407,423 therms annually.

Table V-31
Maximum Convention Center Alternative: Natural Gas Consumption

Land Use	Total Therms/Year
Convention Center (New Facilities)	433,639
Convention Center (Existing Facilities)	30,884
Total Alternative 6 Proposed Uses	**464,523**
Proposed Project	**501,836**
Total Existing Convention Center to be Replaced	**57,100**
Net Alternative 6	407,423
Net Proposed Project	444,736
Net Difference in Total Consumption and Peak Demand	**-37,313**

Source: Matrix Environmental, 2012.

Thus, natural gas for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase in natural gas of 444,736 therms per year. This Alternative also assumes that the energy conservation measures similar to those of the Proposed Project would be implemented. Thus, as with the Proposed Project, impacts on natural gas would be less than significant under Alternative 6. Such impacts would be less than those of the Proposed Project.

The existing natural gas infrastructure in the Project area would not be adequate to accommodate the Proposed Project's natural gas demand and impacts would be potentially significant. Although Alternative 6 would result in a reduced demand for natural gas compared to the Proposed Project, given amount of natural gas demand, it is anticipated that the existing natural gas infrastructure would also not be adequate to accommodate this Alternative's natural gas demand. Nonetheless, with improvements to the infrastructure system similar to those required for the Proposed Project, impacts would be reduced to a less than significant level. Such impacts would be less than those of the Proposed Project.

L. Environmental Safety

As with the Proposed Project, construction activities under Alternative 6 would involve the use of small quantities of hazardous materials (e.g., paints, coatings, adhesives), and include the storage of fuels and oils associated with construction equipment in accordance with applicable regulations. Additionally, asbestos and ACMs, LBPs, and PCBs could be encountered during demolition of existing buildings. Also, as with the Proposed Project, grading under Alternative 6 could uncover or disturb existing

known and unknown USTs, which could lead to soil and/or groundwater contamination and the potential exposure of people and the environment to hazardous materials. However, all construction activities would occur in accordance with all applicable federal, state, and local laws and regulations. In addition, project design features and mitigation measures similar to those for the Proposed Project would be expected to be implemented under this alternative. Therefore, construction of Alternative 6 would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, construction impacts under Alternative 6 would be less than significant. However, as construction activities would be less under Alternative 6, the potential for impacts to occur would be less than those that would occur under the Proposed Project.

As with the Proposed Project, Alternative 6 would modify the existing uses on the Project Site and would include activities that would continue to involve the use and storage of hazardous materials. As with the Proposed Project, these materials would be contained, stored, and used in accordance with manufacturers' instructions and applicable standards and regulations. As such, Alternative 6 is not anticipated to expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, a less than significant impact with regard to hazardous materials would occur under this alternative. However, impacts under Alternative 6 would be less than those of the Proposed Project due to the potential handling of lesser quantities of hazardous materials under this alternative.

As with the Proposed Project, Alternative 6 would develop new uses within a Methane Zone. As such, potential impacts relative to methane gas could occur during construction and/or operation of this Alternative. As with the Proposed Project, this Alternative would comply with Cal-OSHA requirements, the City's Methane Seepage Regulations and the specifications set forth by the City of Los Angeles Department of Building and Safety (LADBS). With implementation of mitigation measures, potential methane impacts would be reduced to a less than significant level. However, such impacts would be similar to those that would occur under the Proposed Project due to the comparable levels of site coverage.

3. Summary of Comparative Impacts

Alternative 6 would result in significant impacts for most of the same issues as the Proposed Project. As this Alternative does not include the Event Center, significant impacts with regard to artificial light and aspects of operational noise associated with the Event Center would be avoided. In addition, as this Alternative would not involve nighttime construction, the significant nighttime noise and artificial light impacts that occur under the Proposed Project would also be avoided. As traffic volumes under Alternative 6 would be

lower than those of an Event Day under the Proposed Project, the significant traffic impacts that occur under the Proposed Project would be reduced. However, impacts with respect to lane closures would be greater under this Alternative than under the Proposed Project. In addition, as many of the Proposed Project's potential environmental impacts are directly related to the amount of development that occurs, Alternative 6 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. Even though a number of the Proposed Project's significant impacts would be reduced under Alternative 6, they would not be sufficiently reduced to less than significant levels. As such, both Alternative 6 and the Proposed Project would result in significant impacts with regard to transportation, visual resources, construction and operational noise, air quality, historical resources, and solid waste. The elimination of the Event Center also eliminates important beneficial effects of the Proposed Project. In summary, Alternative 6 would not introduce additional significant environmental impacts, would avoid two of the Proposed Project's significant impacts, and in many cases would lessen the Proposed Project's overall impacts including its beneficial effects. A tabular summary comparing the impacts of Alternative 6 to those of the Proposed Project is presented in Table V-2 on page V-9.

4. Relationship of this Alternative to Project Objectives

Alternative 6 would only partly achieve the Project's underlying purpose to "enhance the marketability of the Los Angeles Convention Center through modernized facilities and the addition of a major multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District." Although Alternative 6 would provide additional exhibition space for the Convention Center, it would not add a major multi-purpose sports and entertainment venue that builds upon the character and success of the adjacent Los Angeles Sports and Entertainment District.

Alternative 6 would meet the Project Objective to modernize or enhance the marketability of the Convention Center as it would provide more new exhibition space. However, without the development of an additional 4,000 to 5,000 hotel rooms, the potential that this Alternative creates in terms of increasing convention and trade shows attracting out of town visitors would not be realized as the required off-site facilities to support this Alternative would not occur.

Alternative 6 would not meet the Project Objective to construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses. Because the Event Center would not be developed under this Alternative, it would not provide a state-of-the-art venue capable of attracting and maintaining up to two NFL teams that would be expandable to 76,250 seats to host occasional major sporting events (e.g., an NFL Super Bowl) and that could be used for

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

Alternative 6 would realize the Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles, but to a much lesser extent than the Proposed Project. Specifically, without an Event Center the Alternative would not promote the development of major sports, entertainment and Convention Center facilities in the Downtown Center and in close proximity to transportation corridors and transit stations, or create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area. Nor would it synergistically build upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level, or create a catalyst to enhance further the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another.

Alternative 6 would not meet the Project Objectives to design a Project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events and is consistent with smart growth and urban design principles to the same extent as the Proposed Project. This Alternative would design a Project that is compatible with existing Convention Center facilities. However, this Alternative would not develop the Event Center and therefore would not promote the spectator experience at Event Center events. Unlike the Proposed Project, this Alternative would not create additional open space assembly area for fans and visitors as this Alternative would remove landscaping from the existing Gilbert Lindsay Plaza in order to provide necessary bus parking for the modernized Convention Center uses.

Alternative 6 would not develop the Event Center. It would therefore not take advantage of existing and planned transportation infrastructure to the extent the Proposed Project would, as the Event Center would attract many more visitors who would use using existing and planned transportation infrastructure, especially public transit. In addition, this Alternative would not implement the provisions of SB 292, which applies only to the Event Center.

Alternative 6 would only partially achieve the Project Objective to promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism to a much lesser degree than the Proposed Project. Specifically, this Alternative would not develop the Event Center. Without the Event Center, a private developer, including the Event Center Applicant, would not finance the project. The City would not be able to undertake the cost of constructing the new Convention Center facilities and the general fund would be at risk. In addition, Alternative 6 would not construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship.

Similarly, this Alternative would not develop entertainment and sports facilities on public lands that provide a return to the City's General Fund and/or provides civic, cultural and sporting amenities that serve a wide range of public interests in the City and region. Without the Event Center and contiguous space added to the Convention Center, Alternative 6 would generate not substantial additional revenues for the City government, stimulate economic activity in the greater Los Angeles area, and create thousands of good paying construction and permanent jobs as soon as possible. Because it would not develop the Event Center, Alternative would not attract any local and out of town fans to additional spectator events.

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

1. Description of the Alternative

As discussed in Section IV.I.1, Cultural Resources—Historical Resources, of this Draft EIR, the West Hall and other buildings within the Project Site do not appear eligible for inclusion in the National Register, California Register, or as a local HCM. However, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall. The Rehabilitation of West Hall and Limited Expansion Alternative (Alternative 7) would include retention of the West Hall to avoid this potential impact. No new convention center facilities would be constructed on the Project Site other than a pedestrian bridge to connect the West Hall to a new two-level Event Deck Hall on the Convention Center Expansion Parcel within the LASED Specific Plan Area. The Event Deck Hall would provide 216,000 square feet of Floor Area with one level of meeting rooms on top of one level for exhibit use. With the existing West Hall, South Hall, and Concourse Building, the Convention Center would total 1.75 million square feet of Floor Area and approximately 1.01 million square feet of Rentable Area. The Event Center would not be developed under this Alternative.

The Event Deck Hall would reach a height of 60 feet above the existing Event Deck and the underside of the Chick Hearn Bridge would be 36 feet above the street. The Event Center would not be developed under Alternative 7.

This Alternative would provide a total of 6,300 parking spaces, an increase of 742 spaces over the existing supply. The existing West Hall, South Hall and Venice Garages would remain, the Bond Street Garage would not be built, and the L.A. Live Way Garage would be built but only to 5 levels and 1,600 spaces (compared to 2,950 spaces with the Proposed Project).

A comparison of this Alternative and the Proposed Project is provided in Table V-32 on page V-184.

Table V-32
Comparison of Proposed Project and Alternative 7—Rehabilitation of West Hall and Limited Expansion

	Proposed Project	Alternative 7	Change from Proposed Project	
			Number	Percent
Seats				
Event Center	72,000	0	(72,000)	-100.0%
Total Floor Area				
Event Center	1,750,000	0	(1,750,000)	-100.0%
Convention Center				
Proposed Project or Alternative	500,000	678,201	178,201	35.6%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Convention Center	1,576,470	1,754,671	178,201	11.3%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	2,250,000	678,201	(1,571,799)	-69.9%
Not a Part of Proposed Project or Alternative	1,076,470	1,076,470	0	0.0%
Total Project Site	3,326,470	1,754,671	(1,571,799)	-47.3%
Net Floor Area (Change from Existing Conditions)				
Event Center	1,750,000	0	(1,750,000)	-100.0%
Convention Center				
Proposed Project or Alternative	37,799	216,000	178,201	471.4%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Convention Center	37,799	216,000	178,201	471.4%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	1,787,799	216,000	(1,571,799)	-87.9%
Not a Part of Proposed Project or Alternative	0	0	0	0.0%
Total Project Site	1,787,799	216,000	(1,571,799)	-87.9%
Rentable Area				
Event Center (When Used for Exhibition Use Only)	245,650	0	(245,650)	-100.0%
Convention Center				
Proposed Project or Alternative	286,310	410,832	124,522	43.5%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Convention Center	886,851	1,011,373	124,522	14.0%
Totals				
Proposed Project or Alternative (Event Center + Convention Center)	531,960	410,832	(121,128)	-22.8%
Not a Part of Proposed Project or Alternative	600,541	600,541	0	0.0%
Total Project Site	1,132,501	1,011,373	(121,128)	-10.7%

Table V-32 (Continued)
Comparison of Proposed Project and Alternative 7—Rehabilitation of West Hall and Limited Expansion

	Proposed Project	Alternative 7	Change from Proposed Project	
			Number	Percent
Parking				
Proposed Project or Alternative				
L.A. Live Way Garage	2,950	1,600	(1,350)	-45.8%
Bond Street Garage	928	283	(645)	-69.5%
West Hall/West Hall Replacement Building/Hotel	—	1,625	1,625	100.0%
Total Proposed Project or Alternative	3,878	3,508	(370)	-9.5%
Not a Part of Proposed Project or Alternative	2,792	2,792	0	0.0%
Total Project Site	6,670	6,300	(370)	-5.5%

2. Environmental Impacts

A. Land Use

1. Land Use Consistency

Alternative 7 would be consistent with public investments in the transportation system to some extent by virtue of its location in proximity to transit in downtown Los Angeles, which is the hub of the rail and bus transit system for the metropolitan Los Angeles area. Also, like the Proposed Project, it would be an infill development on a previously developed site that would modernize the Convention Center. However, this Alternative would promote transit usage and pedestrian activity substantially less than the Proposed Project since the Event Center and the New Hall would not be constructed. The increased transit usage that would result from the Proposed Project would be largely associated with the Event Center. Further, the Alternative would provide a smaller expansion of the Convention Center. Therefore, it would function less like a transit-oriented development. With fewer new structures and a rehabilitated West Hall, Alternative 7 would have less of an opportunity to implement sustainability features intended to reduce the potential for impacts related to climate change by minimizing air and GHG emissions or by reducing water and energy usage. Overall, as an infill development in proximity to numerous public transportation options, Alternative 7 would not conflict with SCAG's Compass Blueprint Growth Vision or Regional Transportation Plan, but it would support the relevant goals and policies (i.e., those listed in Table IV.A.-1, Land Use, of this Draft EIR) in these plans to a lesser extent than the Proposed Project.

Like the Proposed Project, Alternative 7 would be consistent with the Project Site's designation in the City of Los Angeles General Plan Framework Element as part of the Downtown Center. This Alternative's FAR and maximum building height would be less than the Proposed Project, and as such would be well within what is typical within the Downtown area. Although Alternative 7 would provide less new development than the Proposed Project, it would remain consistent with the General Plan Framework Element's vision of the Downtown Center as an international center for finance and trade. It is anticipated that the building and site design of Alternative 7 would complement the types of uses found both on-site and within the immediate Project area. However, it would include design features to promote transit use and pedestrian activity to a far lesser extent than the Proposed Project. Specifically, this Alternative would not include the streetscape, landscape, or pedestrian amenities proposed by the Proposed Project because with the reduction in pedestrian activity levels, these improvements would not be consistent with the nature of on-site activities. Also, as stated above, it would create substantially fewer new jobs than the Proposed Project. Therefore, while Alternative 7 would not conflict with the City's General Plan Framework Element, it would support the relevant goals and policies to a substantially lesser extent than the Proposed Project.

Development of the land uses contemplated under Alternative 7 is currently allowed under existing entitlements for the LASED. Therefore, it would not require a General Plan Amendment or zone change and would be consistent with the existing General Plan designation for the Project Site. However, as the Event Deck Hall would be a City building, Alternative 7 would require approval by the City's Cultural Affairs Commissions, and if it were to be designated a historical resource, Alternative 7 would also need approval by the City's Cultural Heritage Commission. The Event Deck would serve to further complement and benefit the tourism, hotel and entertainment component in the immediate Project vicinity, but to a much lesser extent than the Proposed Project due to the elimination of the Event Center. It is anticipated that the building and site design of Alternative 7 would complement the types of uses found both on-site and within the immediate Project area, and would not conflict with the Downtown Design Guide. However, the extent to which it would include design features to promote transit use and pedestrian activity would be far less than the Proposed Project, as described above. Overall, Alternative 7 would not conflict with the Central City Community Plan or the associated Downtown Design Guide, but it would support the relevant goals and policies substantially less than the Proposed Project. However, the potential inconsistencies of the Proposed Project with the Downtown Design Guidelines related to building length and signage discussed above under Alternatives 1 and 2, would not occur under Alternative 7 because the Event Center would not be constructed under this Alternative.

The Downtown Strategic Plan identifies the need to both expand the Convention Center and to develop the area surrounding it with complementary uses including

entertainment, shopping and hotel uses, outdoor activities and other tourist attractions. Alternative 7 would support these objectives by developing the Event Deck Hall which would capitalize on nearby circulation and transit systems, improve streetscape and create pedestrian linkages. This would support Downtown Los Angeles as an international tourist destination with major attractions related to sports, culture, and conventions. However, Alternative 7 would support these objectives much less than the Proposed Project due to the elimination of the Event Center within the Project Site. While Alternative 7 would be consistent with the Downtown Strategic Plan, it would support the relevant goals and policies substantially less than under the Proposed Project.

As Alternative 7 would not include notable open space elements or pedestrian amenities, Alternative 7 likely would not meet many of the design features promoted in the City's Walkability Checklist. As Alternative 7 would be developed per the provisions of the LASED Specific Plan, it would be consistent with both Community Plan and zoning regulations.

Based on the above, Alternative 7 would not conflict with most regional and local plans and policies that govern the Project Site. However, the extent to which Alternative 7 would support such plans and policies would be substantially less than the Proposed Project due to the elimination of the Event Center. Overall, impacts with respect to land use consistency would be less than significant but greater than under the Proposed Project.

2. Land Use Compatibility

The Event Deck Hall would serve as an expansion of the Convention Center, which is an already approved use under the LASED Specific Plan. Therefore, like the Proposed Project, Alternative 7 would be consistent with and would build on the existing uses on the Project Site and in the immediate area. It would not introduce new types of uses that do not already occur within the Project Site. Rather, the proposed uses would reinforce Downtown and the immediate Project area in particular as a world-class destination for tourist attractions including conventions, trade shows, sporting events and entertainment, serving the general population with convenient access from throughout the Los Angeles region via transit as well as freeways. The Proposed Project's increase in building height, density and mass on the Project Site would not be atypical in the area given the relatively recent (and planned future) development of entertainment and high-rise uses at the adjacent L.A. LIVE and numerous mid-rise hotel and residential buildings to the east. Alternative 7 would provide reductions in building height, density and mass as compared to the Proposed Project. Like the Proposed Project, this Alternative would also be compatible with the surrounding vicinity. Also similar to the Proposed Project, Alternative 7 represents infill development. Furthermore, given the location of the Project Site, the nature of the

nearby surrounding uses, and the adjacent freeways that separate the Project Site from neighboring lower density residential areas, no existing neighborhood or community would be physically disrupted, divided, or isolated by this Alternative. Therefore, impacts with respect to the compatibility of the proposed land uses with surrounding uses would be less than significant under Alternative 7 and similar to the Proposed Project.

3. Urban Decay

It has been concluded that the Proposed Project would not have a significant impact with regard to urban decay issues. As Alternative 7 is limited to Convention Center uses, urban decay issues related to the Event Center would not apply. The Rentable Area under Alternative 7 is less than the Proposed Project when the Event Center is used for exhibition and meeting room purposes**.** Therefore, impacts with respect to urban decay would also be less than significant under Alternative 7 and such impacts would be less than under the Proposed Project.

B. Transportation, Parking, and Pedestrian Safety

1. Transportation

Alternative 7 would have lower levels of construction activity than for the Proposed Project in all respects, with fewer haul and delivery trucks, fewer construction workers, and fewer roadway lane closures (Pico Boulevard lanes would not need to closed during construction and lane closures would be limited to L.A. Live Way and Chick Hearn Court). While there may be impacts from truck trips and construction worker trips these would be temporary in nature and with mitigation measures would be expected to be less than significant. It is unlikely there would be significant traffic impacts from roadway lane closures as L.A. Live Way and Chick Hearn Court are not arterial roadways and carry less traffic than major streets in the area. While the previous analysis determined there would be significant construction impacts for the Proposed Project, impacts under this Alternative would likely be less than significant, and therefore less than the construction traffic impacts for the Proposed Project.

Alternative 7 would generate between approximately 130 and 255 vehicle trips in five of the six the hours analyzed for the Proposed Project with zero trips occurring in the Weekday Evening Post-Event Hour (as there would be no Convention Center activity at this time). These additional trips would occur only from the expansion of the Convention Center, and would be substantially lower than the additional trip totals for the Proposed Project (approximately 9,840 to 15,400 trips per hour).

There would be substantially fewer significant impacts at intersections and freeway mainline locations from Alternative 7 than with the Proposed Project, and it is estimated that most but not all of the Proposed Project's significant impacts in these categories (and particularly a substantial number of LOS E and LOS F impacts) would be eliminated with this Alternative. The few remaining impacts would be at locations in close proximity to or on corridors leading directly to the Project Site. This Alternative would likely eliminate most but not all of the freeway ramp impacts identified for the Proposed Project. There would be no significant Congestion Management Plan (CMP) intersection impacts, as for the Proposed Project. This Alternative would eliminate most if not all of the CMP freeway mainline impacts identified for the Proposed Project, with any remaining impacts being located in close proximity to the Project Site. Alternative 7 would lead to a negligible increase in transit trips, and no additional transit service would be needed. There would be no significant transit impacts, and the Pico Station improvements that would occur with the Proposed Project would not occur under this Alternative as they would not be needed. Access provisions for this Alternative would be similar to the Proposed Project, but with additional parking access locations on L.A. Live Way and Chick Hearn Court for the new development, but there would be no significant access impacts, as for the Proposed Project. With the substantially lower trip volumes for this Alternative there would be no significant neighborhood intrusion impacts, unlike the Proposed Project which could cause potentially significant impacts.

2. Parking

Alternative 7 would require a total of 6,238 code parking spaces, or 733 more than today for the current Convention Center. The increase would be solely attributable to the increase in size of the Convention Center. The spaces required would be substantially less than the 12,503 spaces required by the Proposed Project. This Alternative would provide a total of 6,300 parking spaces, an increase of 742 spaces over the existing supply.

The existing West Hall, South Hall and Venice Garages would remain, the Bond Street Garage would not be built, and the L.A. Live Way Garage would be built but only to 5 levels and 1,600 spaces (compared to 2,950 spaces with the Proposed Project). The parking supply for this Alternative would be sufficient to meet the parking needs, so there would be no significant parking impacts (as was also concluded for the Proposed Project with the proposed parking supply and management plan).

3. Pedestrian Safety

Additional pedestrian volumes would be substantially lower for Alternative 7 than for the Proposed Project. Pedestrian facilities would remain largely as today. The temporary event street closures and the streetscape and sidewalk enhancements that would occur with the Proposed Project would not occur with this Alternative as there would be no Event

Center. Impacts for pedestrian circulation and safety and for bicycle circulation and safety would be less than for the Proposed Project and would also be less than significant.

C. Visual Resources

1. Visual Quality

Construction of the Event Deck Hall under Alternative 7 would occur atop the LASED's West Garage and above grade across Chick Hearn Court via the Chick Hearn Bridge. The only construction within the Project Site would be for connecting the Chick Hearn Bridge to the West Hall. No at-grade construction would occur under Alternative 7 and the Chick Hearn Bridge would be for pedestrian travel only (i.e., no convention center uses). Nevertheless, to secure the construction site construction fencing would be used and any graffiti would be promptly removed. Visual quality impacts associated with construction of Alternative 7 would be less than significant and less than the Proposed Project due to the reduced extent and duration of construction.

Alternative 7 would increase the building density and mass over Chick Hearn Court and on the L.A. LIVE site. The height of the Event Deck Hall would be 60 feet atop the Event Deck, and the underside of the Chick Hearn Bridge would be 36 feet above the street. The massing and height of the new structures would be consistent and compatible with the existing development of the existing Convention Center and L.A. LIVE. As compared to the Proposed Project, the amount of signage would be reduced. In addition, the Chick Hearn Bridge would introduce a new element to the visual environment that would physically connect the Event Deck Hall to the Convention Center. It would mirror the functionality, and to some degree the look, of the Convention Center's existing Concourse, which connects the existing West Hall to the South Hall. The introduction of this architectural element would define the western boundary of the Convention Center and L.A. LIVE area and further contribute to the unique visual character that currently exists along Chick Hearn Court. As the SR-110 Freeway is elevated through the Downtown area, the bridge would have, at most, limited visibility from locations west of the Freeway. Based on the above, Alternative 7 would not degrade the general visual character of the Project Site. However, while it is anticipated that the building and site design of Alternative 7 would complement the types of uses found both on-site and within the immediate Project area, the extent to which Alternative 7 would include design features to enhance the quality of the public realm and create an active, pedestrian-friendly environment would be far less than under the Proposed Project. Notwithstanding, Alternative 7 would not remove the West Hall. As discussed in Section IV.I.1, Cultural Resources—Historical Resources, of this Draft EIR, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register or as a local HCM. If any such determination were to be made, a significant impact would occur as

a result of demolition of the West Hall because under the *City of Los Angeles CEQA Thresholds Guide* historical resources are considered to be visual resources. Therefore, for purposes of a conservative analysis, demolition of the West Hall is considered to represent the loss of a visual resource in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. Thus, Alternative 7, which would retain the West Hall, would avoid this potential impact on visual resources. Therefore, visual quality impacts associated with the operations of Alternative 7 would be less than significant and less than under the Proposed Project.

2. Views

Building heights and envelopes of new construction under Alternative 7 would be substantially reduced as compared to the Proposed Project, and would be concentrated within a smaller area. Therefore, Alternative 7's potential to obstruct an existing, publicly available, recognized view resource would be reduced as compared to the Proposed Project. By eliminating the Event Center and reducing the height of the L.A. Live Way Garage by three levels compared to the Proposed Project, it is anticipated that Alternative 7 would eliminate the Proposed Project's significant impact related to the blockage of views of the Downtown skyline that would occur roughly from the SR-110/I-10 interchange to Chick Hearn Court. Additionally, Alternative 7 would not remove the West Hall, and thus, would avoid the potential impact that would occur in the event that the West Hall were to be determined eligible for the California Register, the National Register or as a local HCM. Therefore, Alternative 7 would avoid the Proposed Project's significant impacts related to valued views of this resource. Overall, impacts to views under Alternative 7 would be less than significant and less than those that would occur under the Proposed Project.

D. Light and Glare

1. Natural Light

Under Alternative 7, new shadows would be introduced by the Event Deck Hall and bridge over Chick Hearn Court. The nearest shadow sensitive receptors that could be affected would be the Nokia Plaza (Sensitive Use No. 1) and the Ritz-Carlton Residences at L.A. LIVE (Sensitive Use No. 2). The EIR for the LASED included an analysis of the potential shading impacts of a Event Deck building with a greater height than the Event Deck Hall proposed under this Alternative.[15] That analysis concluded that the taller Event

[15] *City of Los Angeles Planning Department, Draft EIR for the Los Angeles Sports and Entertainment District, SCH No. 2000091046/EIR No. 2000-3577, January 11, 2001. See Section IV.B.3, Shade/Shadow.*

Deck building would not shade sensitive uses for more than three hours during the winter or more than four hours during the summer.[16] Furthermore, the sensitive uses within the Ritz-Carlton Residences at L.A. LIVE are the residential uses located on the 27th floor and above. Shadows from the proposed 60-foot Event Deck Hall and bridge over Chick Hearn Court under this Alternative would not reach the 27th floor of the Ritz-Carlton tower. To reach Nokia Plaza, these shadows would need to extend over the Nokia Theater that is located to the east of the Event Deck. Based on the height of the intervening building and the location of Nokia Plaza in relation to the Event Deck Hall and Chick Hearn bridge under this Alternative, it is not anticipated that these uses would create shadows that would be capable of reaching Nokia Plaza during the threshold hours of any season. Therefore, the Event Deck Hall and bridge over Chick Hearn Court would not result in a significant impact on shade-sensitive uses in the area of potential impact.

The height of the L.A. Live Way Garage would be reduced from 8 above-grade levels to five above-grade levels under Alternative 7. Thus, shadows emanating from the western portion of the Project Site would generally be reduced under this Alternative. Shadows from the L.A. Live Way Garage would not result in significant impacts under the Proposed Project and would be less under this Alternative due to the reduced height of the L.A. Live Way Garage.

Based on the above analysis, shadow impacts of Alternative 7 would be less than significant and less than those impacts that would occur under the Proposed Project.

2. Artificial Light and Glare

The Proposed Project would require nighttime construction to complete the Event Center within the timeframe identified in the Project Objectives. Without the Event Center, nighttime construction would not be required. Therefore, Alternative 7 would avoid the Proposed Project's significant construction lighting impacts. Impacts related to construction glare would be less than significant and less than those of the Proposed Project as Alternative 7 would not be anticipated to introduce significant sources of glare during construction activities.

The Proposed Project's impacts are less than significant or less than significant with mitigation on: light trespass; lighting levels at the analyzed receptors; Event Center field lighting field; the use of skytrackers; signage; driver visibility/distraction; building/façade lighting; plaza lighting; headlights within the parking garages; daytime glare; and sky glow.

[16] *Ibid, pg. 172.*

For each of these categories except plaza lighting, headlights within the parking garages, and daytime glare, the Event Center would be the greatest contributor to future lighting levels under the Proposed Project. While the Event Deck Hall and Chick Hearn Bridge under Alternative 7 would produce new lighting sources, the intensity of light generated by these sources would be substantially less than that of the Event Center and would not be anticipated to result in new or increased artificial lighting impacts. Thus, while new lighting from the Event Deck Hall would be closer to sensitive uses located within L.A. LIVE, it is not anticipated that this would result in new significant impacts to these uses given the existing lighting levels within the L.A. LIVE development itself. Therefore, the significant impacts identified above would be less than significant under Alternative 7 and such impacts would be less than under the Proposed Project. Impacts associated with headlights within the parking garages would also be less than significant under Alternative 7 and less than the Proposed Project due to the reduced scale of parking Structure. It is anticipated that impacts associated with plaza lighting and daytime glare would also be less than significant and similar to the Proposed Project.

Alternative 7 would not involve construction of the Event Center. Therefore, this Alternative would not result in new sources of temporary lighting for productions and special events; including fireworks displayss, as such lighting would only be associated with the Event Center. Therefore, Alternative 7 would avoid the Proposed Project's significant lighting impacts during operation.

The Proposed Project causes spill light impacts at Receptor Location 8 with sports lighting on at times when low cloud ceilings with high albedo (+50 percent) are present. Alternative 7 would avoid this significant operational lighting impact which occurs during unusual atmospheric conditions.

E. Noise

Construction activities under Alternative 7 would be substantially reduced as compared to the Proposed Project due to the elimination of new construction, except for the pedestrian Chick Hearn Bridge that would connect the existing West Hall to the Event Deck Hall. The reduction in construction activity is sufficient to reduce but not eliminate the Proposed Project's significant impacts at Receptors R1. In addition, Alternative 7 would avoid the significant noise impacts that would occur during the nighttime hours, as nighttime construction activities are not anticipated under Alternative 7. Furthermore, the construction vibration impacts to nearby building structures (i.e., potential building damage) associated with Alternative 7 would be less than significant like the Proposed Project, as similar types of construction equipment as under the Proposed Project would be used. However, the significant vibration impacts (i.e., annoyance on sensitive use) at the Nokia Theatre at L.A. LIVE, that are mitigated to a less than significant level under the Proposed

Project, would not be expected to occur under Alternative 7 as the construction equipment that generates the Proposed Project's impacts would not be used during Alternative 7 construction (i.e., vibratory rollers and driven piles).

Alternative 7 would avoid the significant operational noise impacts associated with on-site noise sources under the Proposed Project including; crowd cheering and the use of the sound system at the Event Center, firework display shows, and the outdoor plazas. Noise associated with other on-site operational noise sources, such as building mechanical equipment, and loading dock operations, would be designed per the LASED Specific Plan, thus meeting the noise mitigation requirements of the LAMC, which would result in less than significant impacts. Parking garage operations under Alternative 7, as is the case with the Proposed Project, would be significant. The off-site daily traffic volumes would be substantially less under Alternative 7 than the Proposed Project. Therefore, it is anticipated that the off-site traffic noise impacts would be less than significant under this Alternative. In addition, the forecasted increase in public transit (bus and rail) usage under Alternative 7 would also be substantially less than under the Proposed Project. As such, noise impacts associated with the public transit usage is anticipated to be less than significant under Alternative 7.

In summary, noise and vibration impacts under Alternative 7 for short-term construction would be significant, whereas long-term operation noise and vibration impacts would be less than significant, with the exception of noise from parking garage operations. Both construction and operational noise impacts under Alternative 7 would be less than those of the Proposed Project.

F. Air Quality and Climate Change

1. Air Quality

(a) Construction

Under Alternative 7, construction activities associated with development would be substantially reduced in scale. In particular, the large amount of excavation required for the Event Center would not occur under this Alternative. As with the Project, construction of Alternative 7 would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. Construction of the Event Deck Hall would require less excavation than the Event Center. Less heavy construction equipment, and fewer haul trucks would also be required under this Alternative. Pollutant emissions from construction of the Event Deck Hall, and the Chick Hearn Bridge under Alternative 7 would be less than with the Event Center. However, similar to the Proposed Project, significant regional VOC, CO, and NO_X and localized NO_X impacts would occur. The new parking facility would be the same location with Alternative

7 or the Proposed Project and would use similar construction equipment procedures (i.e., including similar construction equipment and schedule). However, the overall amount of grading activities would decrease since the below grade level of the parking structure would be eliminated. Nonetheless, construction activities associated with the new parking facility under Alternative 7 would be significant for regional and localized NO_X impacts, similar to the Proposed Project.

With respect to construction air toxics, diesel particulate emissions represent the greatest potential for TAC emissions. As mentioned previously, the construction intensity would be reduced with Alternative 7, which would result in reduced diesel particulate emissions. In addition, there would be no residual emissions after construction and the corresponding individual cancer risk would not exceed the established significance thresholds. As with the Proposed Project, construction-related air toxic emission impacts during construction of Alternative 7 would be less than significant.

(b) Operation

The number of daily trips generated under the Alternative 7 would decrease in comparison to the trips attributable to the Proposed Project. This Alternative would also not include the Event Center, and, therefore, the total daily trips during a peak event day would be reduced by approximately 80 percent in comparison to the Proposed Project. As vehicular emissions are dependent on the number of trips, vehicular sources associated with this Alternative would have a similar decrease in pollutant emissions compared to the Proposed Project. The same is true with regard to both area sources and stationary sources. Regional operational emissions under Alternative 7 would likely be reduced in comparison to the Proposed Project, such that VOC and $PM_{2.5}$ impacts would be less than significant. However, as with the Proposed Project, this Alternative would still result in significant regional PM_{10}, NO_X and CO air quality impacts.

This Alternative would generate less stationary source emissions from natural gas consumption and charbroiler usage for cooking, including PM_{10} and NO_2, than the Proposed Project. As such, localized operation impacts would be reduced in comparison to the Proposed Project such that localized PM_{10} and NO_2 impacts would likely be reduced to less than significant.

Alternative 7 is forecasted to generate fewer total (inbound + outbound) operational trips during peak hours on peak event days. The local CO hotspot analysis conducted for the Proposed Project showed a maximum CO concentration of 6.7 parts per million (ppm) for the 1-hour CO concentration (approximately 66 percent below the 20 ppm standard) and 5.5 ppm for the 8-hour concentration (approximately 39 percent below the 9.0 ppm standard), of which the Project contribution was 0.4 ppm for the 1-hour and 0.2 ppm for the

8-hour pollutant averaging times. Since the localized CO hotspot analysis for the Proposed Project on peak event days did not result in any significant impacts, Alternative 7 would likewise not have any localized CO impacts.

With respect to potential air toxic impacts, the reduction in onsite area and stationary source emissions on peak event days for this Alternative would further reduce potential air toxic emissions in comparison to the Proposed Project. Thus, similar to the Proposed Project, Alternative 7 would result in a less than significant air quality impact related to air toxics.

Alternative 7 would not include any uses identified by the SCAQMD as being associated with odors. As with the Proposed Project, the proposed uses would not be a source of odors and odor impacts would be less than significant.

Although both construction and operational emissions associated with Alternative 7 would be reduced in comparison to the Proposed Project, the Alternative would still result in cumulatively significant regional construction and operational air quality impacts.

2. Climate Change

The number of annual trips generated by the Convention Center uses under Alternative 7 would increase by approximately seven percent in comparison to the Proposed Project due to the incremental increase in annual attendance. However, this Alternative would not include the Event Center and, therefore, on an overall basis the total annual trips and resultant GHG emissions would be reduced in comparison to the Proposed Project. It should be noted that SB 292 would not be applicable to this Alternative and, therefore, the offset of 21,907 million tons of CO_2 equivalent attributable to private automobile traffic to Spectator Events at the Event Center would not occur. As discussed below, water usage, wastewater generation, electricity usage, natural gas usage, and solid waste generation and disposal would be anticipated to decrease under this Alternative in comparison to the Proposed Project. Thus, while the percent reduction in comparison to "business-as-usual" would decrease for this Alternative in comparison to the Proposed Project because it would not be subject to SB 292, total GHG emissions would be reduced. This Alternative would include Project Features (e.g., reduction in vehicular traffic, and encouraging the use of mass transit) to reduce GHG emissions compared to the "business-as-usual" scenario and would constitute an equivalent or larger break from "business-as-usual" than has been determined by CARB to be necessary to meet AB 32's goals (approximately 16 percent for 2020). This Alternative would result in a decrease of GHG emissions in comparison to the Proposed Project, and similar to the Proposed Project, would result in a less than significant impact on the environment due to its GHG emissions.

G. Geology and Soils

The Project Site is located within the seismically active region of Southern California; thus, Alternative 7 and the Proposed Project would be exposed to certain geologic hazards (e.g., ground shaking, liquefaction, soil instability). As the Project would involve grading, excavation, and other earth-moving activities during construction; these activities could potentially result in sedimentation and erosion as well as landform alteration. With the exception of the L.A. Live Way Garage, these impacts would not occur under Alternative 7 as all construction would be above grade and physically related to existing structures. As the below grade level of the L.A. Live Way Garage would be eliminated under this Alternative, grading and earth-moving impacts would be minimal. Impacts related to geology and soils during both construction and operations of Alternative 7 would be less than significant through adherence to mitigation measures and applicable regulatory requirements as the case with the Proposed Project. Such impacts would be reduced when compared with the Proposed Project. However, In terms of seismic hazards, impacts would be greater under Alternative 2 as the Proposed Project would be constructed in accordance with current seismic safety requirements which are more stringent (i.e., more protective) than those in effect when the existing West Hall was constructed.

H. Hydrology and Soils

1. Surface Water

(a) Surface Water Hydrology

No demolition or excavation activities would occur under Alternative 7. As such, the Project Site, with the exception of the above-grade Chick Hearn Bridge that would connect the West Hall to the Event Deck Hall, would remain in its existing condition. However, the Proposed Project would slightly reduce flow volumes from the Project Site as compared to existing conditions due to an increase in the amount of landscaped area. Therefore, impacts to hydrology would be greater under Alternative 7 than the Proposed Project, although still less than significant.

(b) Surface Water Quality

Construction activities such as maintenance and operation of construction equipment, and handling, storage and disposal of hazardous materials for Alternative 7 could contribute to pollutant loading in stormwater runoff. However, similar to the Proposed Project, in accordance with the requirements of the NPDES General Construction Activity Permit, a site-specific SWPPP would be prepared and implemented. The SWPPP would specify BMPs to be used during construction. With implementation of these BMPs, the discharge of potential pollutants from the storm water runoff would be eliminated or

reduced to the maximum extent practicable. As such, construction-related impacts on surface water quality would be less than significant, and similar to those of the Proposed Project.

During operation of this Alternative, stormwater runoff has the potential to introduce pollutants into the stormwater system. However, in accordance with NPDES requirements, SUSMP requirements would be implemented. As part of the SUSMP, stormwater BMPs to address water quality in stormwater runoff would be incorporated into the design of the development. With implementation of source control and treatment BMPs, this Alternative would reduce or eliminate the discharge of potential pollutants from the stormwater runoff to the maximum extent practicable. Thus, operational impacts on surface water quality would be less than significant and would be similar to those of the Proposed Project.

2. Groundwater

As with the Proposed Project, construction activities under Alternative 7 would involve the use of hazardous materials. The handling, storage, and disposal of construction hazardous waste would be in compliance with all applicable federal, state, and local requirements, thereby limiting the potential for groundwater contamination impacts. Grading and excavation for Alternative 7 would be minimal since all structures, except for the L.A. Live Way Garage, would be above grade. In addition, the L.A. Live Way Garage would not include a subterranean level, further reducing the grading and excavation required under this Alternative. As construction activities would occur to a lesser extent under Alternative 7, the potential for impacts to occur would also be less than under the Proposed Project.

Since new development would occur under this Alternative, new pollutants from storm water runoff would be introduced into the groundwater through infiltration from available landscape areas. However, as the Event Deck Hall would be within the L.A. LIVE development, existing BMPs are in place and would be reviewed in the context of the new development and modified as necessary. Via compliance with NPDES, SUSMP, and LID requirements during operations, ground water quality is improved. Therefore, impacts to ground water quality under Alternative 7 would be similar to those of the Proposed Project, and as such, would be less than significant.

The potential for groundwater recharge under Alternative 7 would be very limited as the new structures would either be above-grade or occupy areas covered by impervious surfaces. As groundwater levels are typically impacted from larger, regional contributions (e.g., injection wells and spreading grounds) than from localized infiltration through available landscape areas, changes in groundwater levels caused by either the Proposed Project or Alternative 7 are not anticipated. Therefore, impacts to groundwater level would

be less than those that would occur under the Proposed Project, and like the Proposed Project would be less than significant.

I. Cultural Resources

1. Historical Resources

As discussed in detail in the Historical Assessment provided in Appendix S of this Draft EIR, the Project Site does not include any buildings that have previously been evaluated as eligible for inclusion in the National Register, California Register, or as a local HCM. Nonetheless, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall. This Alternative is intended to avoid this potential impact.

Alternative 7 would not result in the demolition of the West Hall, although a new pedestrian bridge would connect to the north side of the West Hall and thus would physically alter the West Hall and its context. However, such alteration would not substantially change the existing physical character of the West Hall. Therefore, Alternative 7's impacts to historical resources would be less than significant and thus, the potentially significant impact attributable to the Proposed Project would be avoided.

2. Archaeological Resources

Under Alternative 7 the potential to encounter buried archaeological resources would be less than under the Proposed Project as the below grade parking level at the L.A. Live Way Garage would not be built under this Alternative. However, as it is possible that archaeological resources may be encountered during construction of Alternative 7, such potential impacts would be mitigated to a less than significant level through adherence to the same mitigation measures as the Proposed Project. Thus, like the Proposed Project, impacts to archaeological resources under Alternative 7 would be less than significant and such potential impacts would be less than those that could occur under the Proposed Project.

J. Public Services (Police and Fire)

Even though substantially less construction would occur under Alternative 7 as compared to the Proposed Project, enough construction would occur such that the same security and fire protection measures that would be implemented under the Proposed

Project would be implemented under Alternative 7, including, but not limited to, security fencing and lighting, locked entries, and security patrols. Impacts of Alternative 7 would be less than those that would occur under the Proposed Project due to the reduction in development. Like the Proposed Project, such impacts would be less than significant.

As is the case with the Proposed Project, the existing security measures in place at the Convention Center would be extended to include the new convention center facilities that would be developed under Alternative 7. Similarly, Alternative 7 would be developed taking into consideration the LAPD's Design Out Crime Guidelines. While crime and calls for LAFD services would increase above existing conditions under Alternative 7, due to the reduced levels of development and the elimination of the Event Center, the number of crime incidents and calls for LAFD services under this Alternative would be reduced from those anticipated with the Proposed Project. Even though the Event Center would not be constructed under Alternative 7, special measures to address crowd and traffic flow management may be required from time to time. However, such measures would not be as extensive or have the same level of importance as under the Proposed Project. The same relationship also exists with regard to emergency planning in the event of a natural or man-made disaster. As Proposed Project impacts are concluded to be less than significant, impacts of Alternative 7 would also be less than significant. Due to the elimination of the Event Center, such impacts would be reduced under Alternative 7 when compared with the Proposed Project.

K. Utilities

1. Water

Like the Proposed Project, a short-term demand for water would occur during construction of Alternative 7. Overall, construction activities would require minimal water demand and would not be expected to have any adverse impact on available water supplies and infrastructure. Therefore, as with the Proposed Project, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant. Such impacts would be less than those of the Proposed Project due to the reduction in total development.

As with the Proposed Project, operation of Alternative 7 would generate an increased demand for water. As shown in Table V-33 on page V-201, this Alternative would result in a net increase in water demand of approximately 84,525 gpd. Thus, water demand for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase in water demand of 640,683 gpd and 194 acre-feet per year. This Alternative also assumes that the water conservation measures similar to those of the Proposed Project would be implemented. As with the

Table V-33
West Hall Rehabilitation and Limited Convention Center Expansion Alternative: Water Demand

Land Use	Attendance		Rate	Water Demand	
	Annual	Daily		Gallons/ Day	Acre-Feet/Year
Convention Center	3,011,012	19,408	4.6874	90,973	43.32
Central Plant				24,851	27.84
Irrigation				12,498	14.00
Total Convention Center				128,322	85.16
Less Water Conservation				5,905	6.62
Alternative 7 Total Water Demand				**122,417**	**78.54**
Less Existing On-Site Uses to Be Removed				**37,892**	**42.44**
Alternative 7 Net Water Demand				**84,525**	**36.1**
Proposed Project Net Water Demand				**640,683**	**194**
Alternative 7 Water Demand Compared to the Proposed Project				**-556,158**	**-157.9**

Source: Matrix Environmental, 2012.

Proposed Project, impacts on water supply would be less than significant. Such impacts would be less than those that would occur under the Proposed Project.

As the water demand under Alternative 7 would be limited to expansion of the Event Deck Hall, it is anticipated that any water infrastructure needed to accommodate this development would have been implemented as part of the L.A. LIVE development. Therefore, this Alternative is not anticipated to require additional water infrastructure. In any event, as with the Proposed Project impacts would be less than significant and the Alternatives' impacts would be less than those of the Proposed Project.

2. Sewer

Similar to the Proposed Project, construction activities under this Alternative would result in a temporary increase in wastewater generation as a result of construction workers on-site. Due to the reduction of development under this Alternative, wastewater generation during construction would be less than under the Proposed Project. Like the Proposed Project, such impacts would be less than significant.

As with the Proposed Project, operation of Alternative 7 would result in an increased generation of wastewater. As shown in Table V-34 on page V-202, Alternative 7 would result in a net increase in wastewater of approximately 71,271 gpd. Thus, wastewater generation for this Alternative would be increased relative to existing conditions.

Table V-34
West Hall Rehabilitation and Limited Convention Center Expansion Alternative: Wastewater Generation

Land Use	Daily Attendance	Rate	Wastewater Generation (gallons/day)
Convention Center	19,408	4.6874	90,973
Central Plant			4,523
Total Convention Center			95,496
STAPLES Center Central Plant			434
Less Water Conservation			5,905
Alternative 7 Total Wastewater Demand			**90,025**
Less Existing Project Water Use			18,754
Alternative 7 Net Wastewater Demand			**71,271**
Proposed Project Net Wastewater Demand			**640,754**
Alternative 7 Wastewater Demand Compared to the Proposed Project			**-569,483**

Source: Matrix Environmental, 2012.

As with the Proposed Project, Alternative 7 could connect to one or both of the two sewer systems that are used under existing conditions subject to available capacity and design efficiency. Per the Bureau of Sanitation Guidelines, the available capacity of System 1 is approximately 0.11 mgd while System 2 has an available capacity of approximately 4.58 mgd. Based on this information, up to 0.11 mgd could discharge to System 1, with the balance discharging to System 2, or the entire Proposed Project could discharge to System 2. Based on the Integrated Resources Plan, the existing effective capacity of the entire Hyperion Service Area is approximately 529 mgd, with future improvements identified in the Integrated Resources Plan increasing the total effective capacity of the Hyperion Service Area in 2020 to 570 mgd. Based on these forecasts the Project's increase in wastewater generation would be adequately accommodated by the Hyperion Service Area. Wastewater generated by Alternative 7 would be substantially less than the Proposed Project and therefore would be within the capacity parameters of the local conveyance and regional treatment systems. As such, impacts on water conveyance under Alternative 7 would be less than significant and reduced when compared with the Proposed Project.

3. Solid Waste

As with the Proposed Project, construction under Alternative 7 would involve demolition, site grading and preparation, and building construction activities. These activities would generate construction and demolition waste that would be recycled or

collected by private waste haulers and taken for disposal at the County's inert landfills. As shown in Table V-35 on page V-204, this Alternative would generate approximately 26,005.36 tons of construction and demolition waste, compared to 91,331.56 tons of waste that would be generated by Proposed Project construction. Construction of the Proposed Project would not result in the need for additional disposal facility capacity to adequately handle Project-generated waste. Therefore, impacts associated with construction activities would also be less than significant under Alternative 7 and reduced when compared with the Proposed Project.

As shown in Table V-36 on page V-205, during operation, Alternative 7 would generate 1.2 tons per day of municipal solid waste compared to 123.716 tons per Event Day for the Proposed Project. Alternative 7 would generate 149.33 tons per year of municipal solid waste compared to 8,391.7 tons per year for the Proposed Project. Solid waste would be recycled or collected by private waste haulers contracted and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. While it is anticipated that future iterations of the Countywide Integrated Waste Management Plan would provide for improvements beyond 2025 to serve future waste disposal needs, it is conservatively assumed that no new landfills or increases in capacity would occur. Thus, based on this worst case assumption, the County may not be able to accommodate the disposal needs of this Alternative. Therefore, as with the Proposed Project, impacts on solid waste disposal facilities are conservatively concluded to be potentially significant. Due to the decrease in solid waste generation, such impacts would be substantially less than with the Proposed Project.

Private waste haulers would be expected to use similar haul routes to those serving the existing Convention Center. As such, this Alternative would not result in the need for additional solid waste collection routes to adequately handle waste. As with the Proposed Project, impacts on solid waste collection routes would be less than significant. Such impacts would be less than those of the Proposed Project due to the reduction in daily and annual solid waste generation.

4. Electricity

Construction activities associated with development of Alternative 7 would consume electrical power, although to a lesser extent than the Proposed Project. Overall, construction activities would require minimal electricity consumption. Nonetheless, like the Proposed Project, the demand for electricity would be supplied from existing electrical services within the Project Site and would not affect other services as there is sufficient existing capacity to also meet this Alternative's construction demands. Therefore, as with the Proposed Project, impacts on electrical supplies and infrastructure associated with short-term construction activities would be less than significant under Alternative 7.

Table V-35
Rehabilitation of West Hall and Limited Expansion: Construction

	Square Footage	Generation Rate (tons/sq.ft.)	Total Debris (tons)	Diversion Rate	Recycled	Net to Landfill
Demolition						
Cherry Street Garage	319,584	0.0775	24,767.76	75%	18,575.82	6,191.94
New Construction						
Event Deck Hall	216,000	0.001945	420.12	75%	315.09	105.03
Chick Hearn Court Bridge	2,300	0.001945	4.47	75%	3.35	1.12
L.A. Live Way Garage	418,000	0.001945	813.01	75%	609.76	203.25
Subtotal			**1,237.60**		**928.20**	**309.40**
Total Construction Debris			**26,005.36**		**19,504.02**	**6,501.34**

Source: Matrix Environmental, 2012.

However, as Alternative 7 would result in reduced construction activities, such impacts would be less than those of the Proposed Project.

As with the Proposed Project, operation of Alternative 7 would generate an increased demand for electricity. As shown in Table V-37 on page V-206, Alternative 7 would result in an increase in electrical consumption of approximately 14,868 MWh annually. Thus, electricity consumption for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated increase in electrical consumption of 33,542 MWh per year. Additionally, this Alternative would have a peak demand of 8,311 kVA compared to the Proposed Project's peak demand of 19,286 kVA.

Electrical supplies would be adequate to accommodate the Proposed Project's demand for electricity. Therefore, given that Alternative 7 would result in a decreased demand for electricity as compared to the Proposed Project, electrical supplies would also be adequate to accommodate the electricity demand for this Alternative. In addition, Alternative 7 also assumes that the energy conservation measures similar to those of the Proposed Project would be implemented. Thus, impacts on electrical supplies under Alternative 7 would be less significant and less than those that would occur under the Proposed Project.

As Alternative 7 would be limited to construction of the Event Deck Hall and Chick Hearn Bridge on the north side of the West Hall, it is anticipated that any electrical infrastructure needed to accommodate this development would have been implemented as part of the L.A. LIVE development. Therefore, implementation of Alternative 7 is not

Table V-36
Rehabilitation of West Hall and Limited Expansion: Operation

Land Use	Patrons or Employees	Factors (year)	Total Waste Generated	Recycled Waste (tons/day)	Net to Landfills
Daily (Convention Center)					
Exhibit/Meeting Rooms	2,404	0.0005	1.2	0.60	0.60
Annual (Convention Center)					
Exhibit/Meeting Rooms	298,655	0.0005	149.33	74.67	74.66

Source: Matrix Environmental, 2012.

anticipated to require additional electrical infrastructure. In any event, impacts would be less than significant and less than those of the Proposed Project.

5. Natural Gas

As with the Proposed Project, construction activities associated with development of Alternative 7 would not require the consumption of natural gas. In addition, as the existing natural gas lines have sufficient capacity, no construction activities associated with the installation of new natural gas distribution lines would occur. Furthermore, construction activities associated with development of Alternative 7 would not require ground disturbance. Therefore, as with the Proposed Project, impacts on natural gas supplies and infrastructure associated with short-term construction activities would be less than significant under this Alternative. However, as Alternative 7 would result in reduced construction activities compared to the Proposed Project, such impacts would be less than those that would occur under the Proposed Project.

Like the Proposed Project, operation of Alternative 7 would generate an increased demand for natural gas. As shown in Table V-38 on page V-207, this Alternative would result in a net increase in natural gas of approximately 120,902 therms annually. Thus, natural gas for this Alternative would be increased relative to existing conditions but would be less than the Proposed Project's estimated net increase in natural gas of 444,736 therms per year. This Alternative also assumes that the energy conservation measures similar to those of the Proposed Project would be implemented. Thus, as with the Proposed Project, impacts on natural gas would be less than significant under Alternative 7 and such impacts would be less than those that would occur under the Proposed Project.

As Alternative 7 would be limited to construction of the Event Deck Hall and the Chick Hearn Bridge, it is anticipated that any natural gas infrastructure needed to

Table V-37
West Hall Rehabilitation and Limited Expansion Alternative: Electricity Consumption and Demand

Project Component	Consumption		Peak Demand (kVA)
	Daily (kWh)	Annual (MWh)	
Convention Center (New Facilities)	33,008	12,045	9,129
Convention Center (Existing Facilities)	1,121	284	1,121
Other Garage	413	1,264	413
L.A. Live Garage	418	1,275	418
Total Alternative 7 Proposed Uses	**34,960**	**14,868**	**8,311**
Total Proposed Project	**151,768**	**33,542**	**19,286**
Existing On-Site Uses to Be Removed	20,598	7,519	5,967
Net Alternative 7	14,362	7,349	2,344
Net Proposed Project	131,170	26,023	13,319
Net Difference in Total Consumption and Peak Demand	**-116,808**	**-18,674**	**-10,975**

Source: Matrix Environmental, 2012.

accommodate this development would have been implemented as part of the L.A. LIVE development. Therefore, implementation of Alternative 7 is not anticipated to require additional natural gas infrastructure. Impacts would be less than significant and less than those that would occur under the Proposed Project.

L. Environmental Safety

As with the Project, construction activities under Alternative 7 would involve the use of hazardous materials (e.g., paints, coatings, adhesives), and include the storage of fuels and oils associated with construction equipment in accordance with applicable regulations. Additionally, asbestos and ACMs, LBPs, and PCBs could be encountered during replacement of the existing Cherry Street Garage. Also, as only minimal grading would be required for this Alternative, no known or unknown USTs which could lead to soil and/or groundwater impacts and the potential exposure of people and the environment to hazardous materials are expected to be uncovered or disturbed. Nonetheless, any construction activities would occur in accordance with all applicable federal, state, and local laws and regulations. Therefore, as with the Proposed Project, construction of Alternative 7 would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards.

Table V-38
West Hall Rehabilitation and Limited Expansion Alternative: Natural Gas Consumption

Land Use	Total Therms/Year
Convention Center (New Facilities)	174,338
Convention Center (Existing Facilities)	3,664
Total Alternative 7 Proposed Uses	**178,002**
Proposed Project	**501,836**
Total Existing Convention Center to be Replaced	**57,100**
Net Alternative 7	120,902
Net Proposed Project	444,736
Net Difference in Total Consumption and Peak Demand	**-323,834**

Source: Matrix Environmental, 2012.

Therefore, construction impacts under this Alternative would be less than significant and given the reduced construction activities, the potential for impacts to occur would be less than those under the Proposed Project.

Under Alternative 7 and the Project, the existing on-site hazardous materials and hazardous waste programs are assumed to continue. As with the Proposed Project, Alternative 7 is not anticipated to expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. As such, a less than significant impact with regard to hazardous materials would occur under this Alternative. However, based on the reduced development, impacts under Alternative 7 would be less than those that have the potential to occur under the Proposed Project.

Construction of the Proposed Project, due to its location within a City designated Methane Zone, would require the implementation of mitigation measures that would reduce potential methane impacts to a less than significant level. As the West Hall was constructed decades before the City methane ordinance was adopted, it was not constructed with the additional protections required by the City's current methane ordinance. As a result, the West Hall would not benefit from these additional protections and methane impacts under Alternative 7 would be greater than those of the Proposed Project.

3. Summary of Comparative Impacts

Alternative 7 would reduce the Proposed Project's land use intensity by replacing the proposed Event Center with additional Convention Center related uses consisting of 216,000 square feet of Floor Area. As many of the Proposed Project's potential environmental impacts are directly related to the types and sizes of events, Alternative 7 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. Specifically, Alternative 7 would avoid the Proposed Project's significant impacts with regard to visual resources, artificial light, operational noise (i.e., noise from crowd cheering, the use of the sound system at the Event Center, firework display shows, and the outdoor plazas) and historical resources. Alternative 7 would also lessen many of the other impacts, including those that are significant under the Proposed Project. However, this Alternative would have greater impacts than the Proposed Project with respect to land use plans, geology, methane and hydrology during operations. Moreover, Alternative 7, as is the case with the Proposed Project, would result in significant impacts with regard to traffic, air quality, construction noise and solid waste disposal. While impacts for a number of the other issues would also be reduced under Alternative 7, the change in uses as well as the reduced levels of development under this Alternative also serve to reduce the beneficial effects of the Proposed Project, particularly with regard to advancing key land use policies and the provision of new employment opportunities in an existing urbanized area located in proximity to multiple transit lines. In summary, Alternative 7 would not introduce additional significant environmental impacts, and in several cases would avoid or lessen the Proposed Project's significant impacts, while also lessening the Proposed Project's beneficial effects. A tabular summary comparing the impacts of Alternative 7 to those of the Proposed Project is presented in Table V-2 on page V-9.

4. Relationship of this Alternative to Project Objectives

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

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

Alternative 7 would also not meet the Project Objective to construct a multi-purpose Event Center that complements and promotes the adjacent convention and sports and entertainment uses. Because the Event Center would not be developed under this Alternative, it would not provide a state-of-the-art venue capable of attracting and maintaining up to two NFL teams that would be expandable to 76,250 seats to host occasional major sporting events (e.g., an NFL Super Bowl) and that could be used for event floor exhibit hall space. Nor would this Alternative accommodate a variety of other spectator events beyond NFL games.

Alternative 7 would realize the Project Objective to develop a project that promotes General Plan goals, objectives and policies related to the ongoing revitalization of the nearby area and downtown Los Angeles, but to a much lesser extent than the Proposed Project. Specifically, without an Event Center the Alternative would not promote the development of major sports, entertainment and Convention Center facilities in the Downtown Center and in close proximity to transportation corridors and transit stations, or create a dynamic and exciting urban sports and entertainment destination within the downtown Los Angeles area. Nor would it synergistically build upon existing venues, including STAPLES Center and L.A. LIVE, to create a sports and entertainment center recognized at a local, regional, national, and international level, or create a catalyst to enhance further the downtown Los Angeles area in terms of overall economic growth and as a 24-hour environment with a diversity of uses that complement one another.

Alternative 7 would not meet the Project Objectives to design a Project that is compatible with existing Convention Center facilities, promotes the spectator experience at Event Center events and is consistent with smart growth and urban design principles to the

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

Alternative 7 would not develop the Event Center. It would therefore not take maximum advantage of existing and planned transportation infrastructure, as the Event Center would attract many more visitors who would use using existing and planned transportation infrastructure, especially public transit. In addition, this Alternative would not implement the provisions of SB 292, which applies only to the Event Center. Alternative 7 would also generate far fewer jobs, and therefore would not foster job growth in an area served by mass transit to the same degree as the Proposed Project.

Alternative 7 would achieve the Project Objective to promote economic development and job creation in the Project area and greater Los Angeles areas through increased private investment, event activity and tourism to a much lesser degree than the Proposed Project. Specifically, Alternative 2 would not replace the outmoded West Hall, or add contiguous exhibition space and a multi-purpose room, all of which are necessary to allow the Convention Center to be competitive with other venues. Without modernization and expansion, the marketability of the Convention Center would not substantially improve and it is expected to continue to lose its market share. Moreover, this Alternative would not develop the Event Center. Therefore, while Alternative 7 would create some additional temporary and permanent jobs during construction and operation, it would create substantially fewer new jobs than the Proposed Project. Under the Proposed Project, risk to the general fund is eliminated due to the transactions surrounding development of the Event Center and use as an NFL stadium. Without the Event Center, a private developer, including the Event Center Applicant, would not finance construction of the New Hall or rehabilitation of the West Hall at no risk to the City's fund. Given the rehabilitation and new construction costs associated with this Alternative, it is not likely that the City could undertake it without risk to the general fund

In addition, Alternative 7 would not construct the Event Center and new parking structures solely from private funding sources, including signage, naming rights and project sponsorship. Similarly, this Alternative would not develop entertainment and sports facilities on public lands that provide a return to the City's General Fund and/or provides civic, cultural and sporting amenities that serve a wide range of public interests in the City and region. Without the Event Center and contiguous space added to the Convention Center,

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

J. Environmentally Superior Alternative

The State CEQA Guidelines require the identification of an environmentally superior alternative to the Proposed Project and, if the environmentally superior alternative is the "No Project Alternative," the identification of an environmentally superior alternative from among the remaining alternatives. An environmentally superior alternative is an alternative to the Proposed Project that would reduce and/or eliminate the significant, unavoidable environmental impacts associated with the Proposed Project without creating other significant impacts.

Table V-2 on page V-9 provides a tabular comparison of environmental impacts under each alternative and the Proposed Project and indicates whether impacts would be "similar," "greater" or "less" than those of the Proposed Project. In conducting this comparative evaluation, it can be difficult to make a determination of relative significance because some environmental topics include many issues, the conclusions of comparative impacts varies among the issues, and because of their varying importance depending on the perspective of the individual reader. In other cases, these categories do not create a picture of the nuances of the alternatives.

The environmentally superior alternative is determined through a review of the Summary of Comparative Impacts: Proposed Project and Alternatives table and reviewing the number of impact areas in which an alternative is determined to have less relative impact in relation to the Project. As shown in Table V-2, the No Project Alternative (Alternative 1) would be the environmentally superior alternative, as it would have less impacts relative to the Proposed Project than the other alternatives. CEQA requires that when the No Project Alternative is the environmentally superior alternative, another alternative needs to be selected as environmentally superior. In accordance with this requirement, the Rehabilitation of the West Hall and Limited Convention Center Expansion Alternative (Alternative 7) would be the environmentally superior alternative. As indicated in Table V-2, Alternative 7 would have relatively less environmental impact than the Proposed Project or any of the other alternatives, other than the No Project Alternative. Alternative 7 is distinguished from the Proposed Project, since it would have less overall development and more limited types of uses (e.g., no Event Center).

As many of the Proposed Project's potential environmental impacts are directly related to the types and sizes of events, Alternative 7 would lessen these types of impacts, including most of those for which the Proposed Project would result in significant impacts. Specifically, Alternative 7 avoids the Proposed Project's significant impacts with regard to visual resources (both visual quality and views), artificial light and glare, and historical resources. However, similar to the Proposed Project, Alternative 7 would still result in significant impacts with regard to traffic during both construction and operations, noise

during construction, parking structure noise during operations, solid waste during operations, and air quality during both construction and operations, although to a lesser extent than the Proposed Project. On the other hand, Alternative 7 would result in greater impacts than the Proposed Project with respect to land use plans, geology, and surface water hydrology, although these impacts would still be less than significant under both Alternative 7 and the Proposed Project.

With less overall development, Alternative 7 would have incrementally fewer and reduced impacts for those issues where the amount and type of development defines the impact, including impacts to traffic, visual resources, artificial light and glare, noise, historical resources, public services, utilities, air quality, and environmental safety. Alternative 7 is also environmentally superior to Alternative 2 (No Project: Existing Approvals), Alternative 3 (Reduced Intensity), Alternative 4 (Enclosed Stadium), Alternative 5 (New Hotel and Convention Center Expansion) and Alternative 6 (Maximum Convention Center Expansion). It should be noted that, other than the No Project Alternative—Status Quo (Alternative 1), no alternative would eliminate the significant, unavoidable impacts related to traffic during construction and operations, noise during construction, parking structure noise during operations, solid waste during operations, and air quality during both construction and operations to levels that are less than significant.

Whereas Alternative 7 would result in the significant impacts discussed above, Alternative 2 would result in these same significant impacts. Alternative 3 would result in the same significant impacts as Alternative 7 plus the following additional significant impacts: visual quality: views; artificial light and glare for construction and operations; noise during operation (except for parking structure noise); and historical resources. Alternative 4 would result in the following additional significant impacts: visual resources; views; artificial light and glare during construction; noise during operations (except for parking structure noise); and historical resources. Alternative 5 would result in the following additional significant impacts: visual resources; views; and historical resources. Alternative 6 would result in the following additional significant impacts: visual resources; views; and historical resources.

Alternative 7, selected as the environmentally superior alternative, would partially achieve some aspects of the Project Objective related to enhancing the marketability of the Convention Center, although it would do so to a significantly lesser degree than the Proposed Project. Alternative 7 would also not achieve any of the Project Objectives related to the Event Center. As such, the beneficial effects of the Proposed Project, particularly with regard to advancing key land use policies and the provision of new employment opportunities in an existing urbanized area located in proximity to multiple transit lines, would be substantially reduced under Alternative 7. A full analysis of the

degree to which Alternative 7 would achieve Project Objectives is provided in Subsection V.I.4, above.