



JW Marriott Hotel and Conference Center Expansion Project

Eighth Addendum to the Los Angeles Sports and Entertainment District
Environmental Impact Report

Case Number: ENV-2000-3577-EIR
State Clearinghouse No. 2000091046

Project Location: Los Angeles Sports and Entertainment District

Community Plan Area: Central City

Council District: 9—Price; 14—De León

Project Description: This document serves as the Eighth Addendum to the Los Angeles Sports and Entertainment District (LASED) Final EIR (ENV-2000-3577-EIR, SCH No. 2000091046) certified by the City of Los Angeles on September 4, 2001 (the “Certified EIR”). This Addendum analyzes the potential impacts of an amendment to the Los Angeles Sports and Entertainment District Specific Plan (the “Specific Plan”) and previously approved entitlements (the “Approved Project”) to allow for the development of an 861 guest-room hotel tower and a 228,200-square-foot conference center on Development Sites 1a and 1b (Hotel and Conference Center Expansion). Specifically, the proposed Specific Plan amendment and related entitlements (the “Modified Project”) include: (1) permitting hotel uses on the Development Sites 1a and 1b; (2) converting 231,564 square feet of office floor area permitted within Development Site 12 to 851 hotel guest rooms in accordance with the Specific Plan; (3) removing 10 hotel guest rooms in the existing JW Marriott Hotel on Development Site 2 and transferring those rooms to the Hotel and Conference Center Expansion; (4) reallocating an additional 332,136 square feet of office floor area from Development Site 12 to hotel floor area in accordance with the Specific Plan and allocating 14,700 square feet of Convention Center Expansion Use floor area to the Hotel Expansion; (5) increasing the maximum allowable tower height in the Olympic West Subarea (Development Sites 1a and 1b) from 150 feet to 420 feet above existing grade; (6) reducing parking requirements for the Olympic West and Olympic East Subareas, as well as STAPLES Center; (7) modifying certain signage provisions; (8) modifying a limited number of LASED Specific Plan development standards and procedures; (9) modifying Alcohol Use Approvals for the cinemas and existing JW Marriott Hotel; and (10) modifying standards for a street vacation for the Eleventh Street Pedestrian Area. In addition, a General Plan Amendment is proposed to redesignate a portion of Chick Hearn Court as a Local Street.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Eyestone Environmental

APPLICANT:

AEG

December 2021

TABLE OF CONTENTS

	Page
1. Introduction	1
2. CEQA Authority for an Addendum	2
3. Background	4
4. Project Location and Existing Conditions	6
5. Overview of Approved Project	9
6. Modified Project	11
6.1. Hotel Expansion	12
6.2. Conference Center Expansion	16
6.3. Parking	16
6.4. Circulation	16
6.5. Landscaping and Open Space	18
6.6. Signage and Lighting	18
6.7. Land Use Equivalency and Floor Area Transfers	19
6.8. Construction	20
6.9. Required Approvals	20
7. Previous Environmental Documents Incorporated by Reference	22
8. Comparative Analysis of Modified Project Impacts	23
8.1. Analysis of Impacts	23
8.1.1. Aesthetics	25
8.1.2. Agriculture and Forest Resources (Agricultural Resources)	39
8.1.3. Air Quality	41
8.1.4. Biological Resources	51
8.1.5. Cultural Resources	54
8.1.6. Energy	57
8.1.7. Geology and Soils	63
8.1.8. Greenhouse Gas Emissions	69
8.1.9. Hazards and Hazardous Materials	79

	Page
8.1.10. Hydrology and Water Quality (Drainage and Surface Water Quality)	87
8.1.11. Land Use and Planning	94
8.1.12. Mineral Resources	102
8.1.13. Noise	104
8.1.14. Population and Housing	110
8.1.15. Public Services	115
8.1.16. Recreation	127
8.1.17. Transportation	130
8.1.18. Tribal Cultural Resources	141
8.1.19. Utilities and Service Systems	145
8.1.20. Wildfire	159
8.1.21. Cumulative Impacts	161
8.1.22. Mandatory Findings of Significance	163

LIST OF FIGURES

Figure		Page
Figure 1	LASED Boundaries—Development Areas.....	5
Figure 2	LASED Specific Plan Boundaries—Development Areas and Development Sites	7
Figure 3	Conceptual Site Plan	13
Figure 4	Conceptual Cross Section of Overall Building 1	14
Figure 5	Conceptual Cross Section of Overall Building 2	15
Figure 6	Conceptual South Elevation	17
Figure 7	Rendering of the Modified Project	32

LIST OF TABLES

Table		Page
Table 1	Los Angeles Sports and Entertainment District Specific Plan Area— Permitted Development	10
Table 2	Proposed Development and Transfer	11
Table 3	Los Angeles Sports and Entertainment District Specific Plan Area— Permitted Development With Modified Project	21
Table 4	Maximum Daily Regional Construction Emissions Associated with Hotel and Conference Center Expansion (pounds per day)	45
Table 5	Estimate of Regional Operational Emissions Associated with the Hotel and Conference Center Emissions.....	47
Table 6	Comparison of Hotel and Conference Center Expansion to Office Uses under Approved Project—Annual Net New Energy Use During Project Operation.....	60
Table 7	Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan	75
Table 8	Comparison of Hotel and Conference Center Expansion to Approved Project (Removed Office Uses)—Annual GHG Emissions Summary (metric tons of carbon dioxide equivalent [MTCO ₂ e])	78
Table 9	Estimated Employment Generation under Approved Project and Modified Project.....	114
Table 10	Estimated Water Demand under Approved Project and Modified Project	148
Table 11	Estimated Wastewater Generation under Approved Project and Modified Project.....	150
Table 12	Estimated Solid Waste Generation under Approved Project and Modified Project.....	151

APPENDICES

Appendix

Appendix A	Overview of Subsequent Addenda
Appendix B	Shading Diagrams
Appendix C	Air Quality, Greenhouse Gas, and Energy Worksheets
Appendix D	Transportation Study and LADOT Approval Letter
Appendix E	Utilities Technical Reports (Water and Wastewater)
Appendix F	Analysis per Appendix D of the Specific Plan

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES SPORTS AND ENTERTAINMENT DISTRICT

1. Introduction

This document is the Eighth Addendum to the Environmental Impact Report (EIR) prepared for the Los Angeles Sports and Entertainment District (LASED) (ENV-2000-3577-EIR, State Clearinghouse No. 2000091046), which was certified by the City of Los Angeles (City) on September 4, 2001. The Certified EIR, as referred to herein, comprises the Draft EIR, Final EIR and all attachments and appendices. As discussed below, in the years following certification of the EIR, several modifications have been made to the LASED. These modifications were addressed in seven Subsequent Addenda to the EIR, which are summarized in Appendix A. This Eighth Addendum analyzes additional proposed modifications to the development program for the LASED, as detailed below in Section 6, Project Description, of this Addendum.

The majority of development within the LASED is governed by the LASED Specific Plan.¹ As a planning document governing long-term development for a portion of the LASED, the LASED Specific Plan allows for flexibility in development through the exchange of certain land uses and floor areas within the LASED Specific Plan area, provided certain restrictions and conditions are followed. These exchanges are outlined in the LASED Specific Plan Equivalency Matrix and are discussed further below in Section 6.7, Land Use Equivalency and Floor Area Transfers.

As detailed in Section 5, Project Description, of this Addendum, modifications to the currently entitled Project (referred to herein as the Approved Project) are proposed to provide for the development of new hotel and conference center uses within Development Site 1a (known as the Convention Center Expansion Parcel) and modifications to the existing parking garage on Development Site 1b of the Olympic West development area. Specifically, the proposed development includes the expansion of the existing JW Marriott complex, which currently includes the JW Marriott Conference Center, located at Development Site 1 on the northern portion of the Olympic West subarea, and the Los Angeles L.A. LIVE hotel (JW Marriott Hotel), located directly east of the Conference Center at Development Site 2 (900 W. Olympic Boulevard) within the Olympic East subarea.

¹ As discussed further below “LASED” is comprised of five subareas, four of which comprise the LASED Specific Plan.

As described in more detail in Section 6, below, the Hotel and Conference Center Expansion includes the construction and operation of a 37-story hotel tower with 861 guest rooms and a five-story podium with conference center uses and parking, all above three subterranean levels of parking and ancillary hotel uses on the southern 3.1-acre portion of a 6.5-acre site (Olympic West Subarea).² The hotel tower would be located along the southeastern portion of the Project Site on Georgia Street and would contain approximately 578,400 square feet of floor area, including 9,900 square feet of hotel-related retail and restaurant uses (Hotel Expansion). The adjoining podium would be located on the remaining southwestern portion of the Project Site and would include replacement parking for the existing Olympic West Parking Structure and approximately 228,200 square feet of conference center floor area. Building heights would vary from a maximum of 420 feet for the Hotel Expansion tower to 90 feet for the Conference Center Expansion structure. The Project includes the partial demolition and structural alterations to the existing Olympic West Parking Structure (removal of approximately 870 parking spaces) and the removal of some existing on-site signage (removal of freeway-facing wedge signs and a STAPLES Center pole sign). Other site improvements include two elevated pedestrian bridges to link the Project to the existing JW Marriott Conference Center on the northern portion of the Project Site, additional landscape/streetscape improvements, and implementation of a comprehensive signage program. Other potential development within the LASSED would include modifications to alcohol approvals for the adjacent cinemas and existing JW Marriott Hotel; the permanent vacation of the Eleventh Street Pedestrian Area, which is already routinely closed for events; and the conversion of a static sign to a Digital Display at the corner of Olympic Boulevard and Figueroa Street. The proposed modifications to the Approved Project described herein are collectively referred to in this Addendum as the Modified Project.

This Addendum provides a review of the proposed modifications to demonstrate that the Modified Project does not meet the standards for a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines Section 15162.

2. CEQA Authority for an Addendum

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

² *The Modified Project also would provide for the reduction of 10 hotel guest rooms in the existing JW Marriott Hotel on Development Site 1 and the transfer of those rooms to the Hotel and Conference Center Expansion, resulting in a net increase of 851 rooms under the Modified Project. The 10 hotel guest rooms removed from the existing JW Marriott Hotel would be replaced by approximately 3,500 square feet of ancillary meeting room space.*

The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

Section 15162 of the CEQA Guidelines requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project and one or more of the following circumstances exist:

1. *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
2. *Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
3. *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*
 - a. *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
 - b. *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
 - c. *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - d. *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Supplemental or Subsequent EIR shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis herein (refer to Section 8, Comparative Analysis of Modified Project Impacts, below), the Modified Project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Furthermore, the Modified Project would incorporate all applicable and feasible mitigation measures. Therefore, the modifications resulting from the Modified Project do not meet the standards for a Supplemental or Subsequent EIR pursuant to Public Resources Code, section 21166 or CEQA Guidelines Section 15162.

3. Background

The LASED analyzed in the Certified EIR (Original Project) comprised approximately 27 acres over all or portions of six city blocks in the southwest section of downtown Los Angeles and within the Central City Community Plan Area. As shown in Figure 1 on page 5, the LASED includes six development areas referred to as Olympic West, Olympic East, Olympic North, Figueroa North, Figueroa Central, and Figueroa South. The Olympic development areas are located immediately north and south of Olympic Boulevard between the 110 Freeway (Harbor Freeway) and Figueroa Street, while the Figueroa development areas are located immediately east of Figueroa Street from just north of Olympic Boulevard to just north of Pico Boulevard. Four of these development areas (except Olympic North and Figueroa North) were incorporated into the original LASED Specific Plan. Subsequent amendments to the Specific Plan, described and analyzed in seven Subsequent Addenda, added the Olympic North subarea³ and an expansion of the Olympic North subarea⁴ to the LASED Specific Plan. Thus, within this Addendum, “LASED” refers to the subareas that comprise the LASED Specific Plan as well as the Figueroa North subarea that is located outside of the LASED Specific Plan. These subareas are further subdivided into individual

³ *Modifications to the LASED Specific Plan, including the addition of the Olympic North subarea into the Specific Plan, were analyzed in the Third Addendum, dated August 11, 2006.*

⁴ *Modifications to the LASED Specific Plan, including an expansion of the Olympic North subarea from 1.48 to 2.17 acres into properties to the north along Georgia Street, were analyzed in the Fifth Addendum, dated August 18, 2009.*

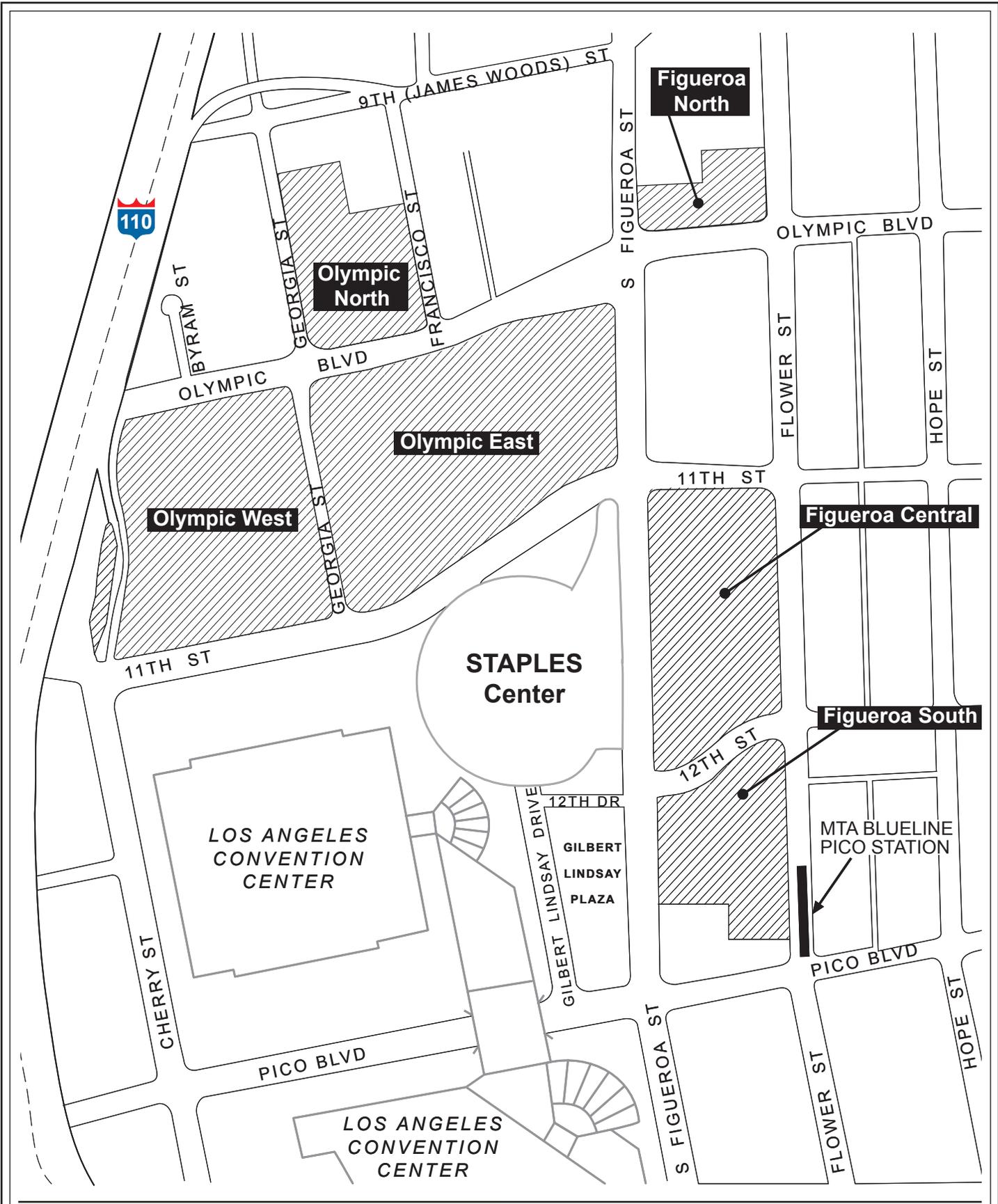


Figure 1
LASER Boundaries—Development Areas

Source: Eystone Environmental, 2016.

development sites (referred to as Development Sites 1 through 12), as shown in Figure 2 on page 7. Development Sites 1, 1a, and 1b comprise the Olympic West development area; Development Sites 2 through 6 comprise the Olympic East development area; Development Sites 7 through 9 comprise the Figueroa Central development area; Development Sites 10 and 11 comprise the Figueroa South development area; and Development Site 12 comprises the Olympic North development area.

The Certified EIR analyzed the development of approximately four million square feet of hotel, retail/entertainment/restaurant, office/commercial, and residential uses within the six development areas that comprise the LASED under the Original Project. Since certification of the EIR, the City has adopted seven Subsequent Addenda to the Certified EIR, which evaluated modifications to the original LASED development program and amendments to the LASED Specific Plan.⁵ An overview of each of the modifications addressed in the Subsequent Addenda is provided in Appendix A. All references within this Addendum to the Approved Project reflect the LASED as evaluated in the Certified EIR, the modifications evaluated in the Subsequent Addenda, and the associated approvals.

The LASED Specific Plan includes an equivalency program that provides flexibility in the amount and location of proposed land uses to be developed in order to respond to evolving market demand and economic conditions. The equivalency program defines a framework within which land uses can be exchanged for certain other land uses so long as no additional environmental impacts would occur.

4. Project Location and Existing Conditions

The Modified Project would provide for the development of the Hotel and Conference Center Expansion located within the Olympic West development area. As shown in Figure 1 on page 5, the Olympic West development area is bounded by Olympic Boulevard on the north, Georgia Street on the east, Chick Hearn Court on the south, and the Harbor Freeway on the west.⁶ The Olympic West subarea is comprised of a Development Sites 1, 1a, 1b, and a freeway-adjacent parcel developed with a dog park. The Hotel and Conference Center Expansion would be located on Development Site 1a, with associated partial demolition and structural work within the existing Olympic West Parking Structure to occur on Development Site 1b, and minor work to occur on Development Site 1 for elevated pedestrian bridge connections.

⁵ *Los Angeles Sports and Entertainment District EIR Addenda, dated August 2005; December 2005; August 2006; June 2007; August 2009; August 2014, and January 2015. Refer to Appendix A for an overview of the modifications addressed in the seven subsequent addenda.*

⁶ *The segment of 11th Street running through the LASED was renamed Chick Hearn Court following adoption of the LASED Specific Plan.*

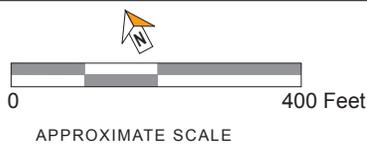
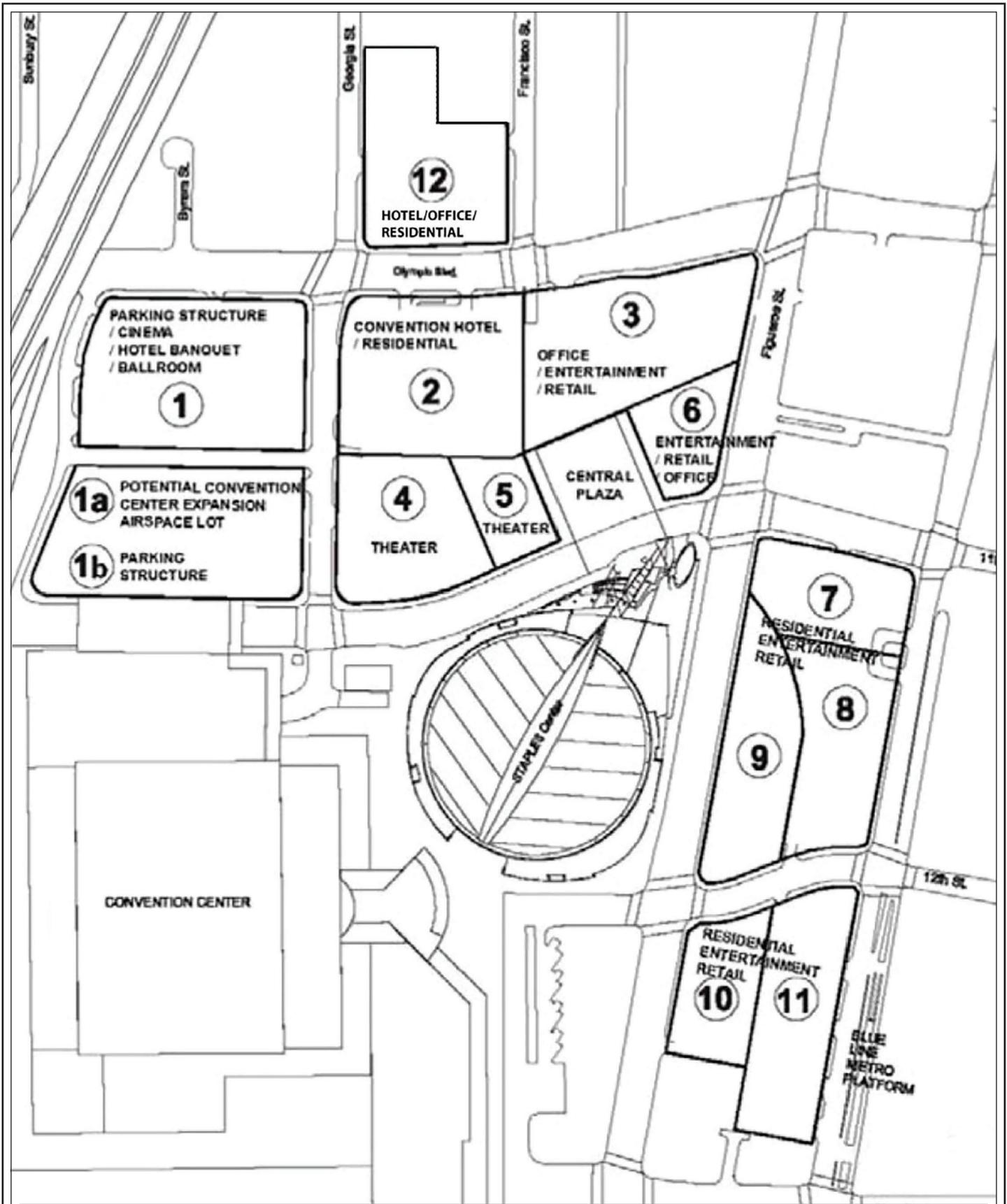


Figure 2
LASED Specific Plan
Boundaries—Development
Areas and Development Sites

Development Site 1 is improved with an existing JW Marriott Conference Center that includes a connecting bridge to the JW Marriott Hotel, the Regal Cinemas and subterranean parking. Development Sites 1a and 1b are located south of Development Site 1 and are bounded by West Road (a private drive) to the north, Georgia Street to the east, Chick Hearn Court to the south, and L.A. Live Way to the west. Development Site 1a, also known as the Convention Center Expansion Parcel, is currently defined by the Specific Plan as Lot 15 of Vesting Tract Map 53383, a 135,700-square-foot airspace lot located above the Olympic West parking garage located at 1005-1015 Chick Hearn Court. No development currently exists in this airspace lot. Development Site 1b comprises Lots 1 and 3 of Vesting Tract Map 53383. On-site improvements on Development Site 1b include the existing one-story Olympic West Parking Structure with subterranean parking containing 2,701 parking spaces, two wedge-shaped freeway edge sign structures, and a STAPLES Center pole sign. The Olympic West parking structure's subterranean parking areas extend under both Development Sites 1b and 1 (under the JW Marriott Conference Center) and are utilized as one unified parking business. Amendments to the Specific Plan are proposed to update the definitions of Development Site 1a and 1b, so that they correspond to updated lot lines under the proposed Vesting Tract Map 82421.

Existing on-site signage includes four signs, which are double-sided Freeway Edge Signs (as defined in the LASED Specific Plan) located on the west façade of the Olympic West Parking Garage. These signs consist of static signage, with a total area of 6,000 square feet. The northeast, southwest, and southeast corners of the parking garage include an additional 968 square feet of static signage on the parking structure. This signage was approved under Planning Case No. DIR-2007-3722-SPP.⁷ In addition, a STAPLES Center marquee pole sign is located at the southwest corner of the site. The sign is 3,560 square feet in area and contains three main panels, including digital display elements.

Parking for the existing facilities owned, leased, and operated by the Applicant within the LASED (AEG Facilities) is provided through on-site and off-site parking facilities.⁸ Approximately 5,829 parking spaces are available, which exceeds the 5,714 parking spaces required by the Specific Plan by 115 parking spaces.

Uses that are located within the LASED in the vicinity of the Project Site include the Microsoft Theater, Xbox Plaza, and various retail, office, broadcast, entertainment, and restaurant uses, as well as the STAPLES Center and the Los Angeles Convention Center

⁷ On September 18, 2007, the Planning Director approved a Specific Plan Sign Application for the Olympic West Parking Garage (DIR-2007-3722-SPP), which included a total of 25 signs.

⁸ On-site parking facilities include the Olympic East Parking Garage, the Olympic West Parking Garage, Lot 4 (Olympic North-West) and off-site parking facilities include the West Hall Garage, Cherry Street Garage, Hope Street Garage, the Luxe Hotel and the 11th and Grand Lot.

to the south. In addition, a portion of 11th Street (Chick Hearn Court) located to the east of Development Sites 1a and 1b, referred to as the Eleventh Street Pedestrian Area under the Specific Plan, is routinely closed to serve as a pedestrian plaza for various events. Although incremental development has occurred within and around the LASED Specific Plan area, such development has largely occurred in a manner that is consistent with the Central City Community Plan (Community Plan) and the cumulative development previously anticipated and analyzed within the Certified EIR and Subsequent Addenda. There are no substantial changes to the environmental setting which would alter the determinations of the Certified EIR with respect to buildout of the LASED Specific Plan.

5. Overview of Approved Project

The Certified EIR analyzed the development of approximately four million square feet of hotel, retail/entertainment/restaurant, office/commercial, and residential uses within the six development areas that comprise the LASED. Following certification of the Final EIR, the City approved a number of Project Permit Compliance Reviews, LASED Specific Plan amendments, and vesting tract maps. These approvals were addressed in seven Subsequent Addenda to the Certified EIR. All references herein to the Approved Project reflect the LASED as evaluated in the Certified EIR and Subsequent Addenda, and modified by the subsequent City approvals. As summarized in Table 1 on page 10 the Approved Project currently permits approximately 5,827,313 square feet of total development within the LASED Specific Plan area as well as additional development within Figueroa North, which is located outside of the LASED Specific Plan and has been developed and entitled under a separate CEQA process from the LASED.

As summarized in Table 2 on page 11, Development Site 12 (in Olympic North) and Development Sites 1a and 1b (in Olympic West), which are the sites currently proposed for development or floor area transfer, are currently permitted for the following uses and floor areas:

- Olympic North/Development Site 12: 295,750 square feet of floor area (393 rooms) of hotel uses and 601,800 square feet of floor area for office uses.
- Olympic West/Development Site 1a: 250,000 square feet of floor area for Convention Center Expansion Uses.
- Olympic West/Development Site 1b: No floor area is permitted, although parking structures are allowed. Parking uses generally do not count as floor area per the Los Angeles Municipal Code.

As evaluated in the Certified EIR, the LASED includes an equivalency program that provides flexibility in the amount of proposed land uses to be developed in order to respond to the evolving market demand and economic conditions. The equivalency program

**Table 1
Los Angeles Sports and Entertainment District Specific Plan Area—Permitted Development^a**

Development Area/Site	Convention Center Expansion (sf)	Cinema (sf)	Hotel and Ballroom (sf)	Office (sf)	Residential (sf)	Retail/ Entertainment/ Restaurant (sf)	Total (sf)
Olympic West							
1		127,327	170,165				297,492
1a	250,000						250,000
1b							0
Olympic East							
2			805,065 (1,001 rm)		503,105 (224 du)		1,308,170
3				170,500		237,700	408,200
4 and 5						195,500	195,500
6				75,300		37,000	112,300
Figueroa Central							
7, 8, and 9			283,347 (183 rm)		1,038,171 (504 du)	166,583	1,488,101
Figueroa South							
10 and 11					822,000 (648 du)	48,000	870,000
Olympic North							
12			295,750 (393 rm)	601,800			897,550
Total	250,000	127,327	1,554,327 (1,577 rm)	847,600	2,363,276 (1,376 du)	684,783	5,827,313
<p><i>sf = square feet</i> <i>rm = rooms</i> <i>du = dwelling units</i></p> <p>^a <i>In addition, the Figueroa North development area is located within the LASED but outside of the LASED Specific Plan area. After Certification of the LASED EIR, separate CEQA documentation was prepared for the Figueroa North development area and development was approved separate from the LASED Project. Half of the Figueroa North parcel has been developed with residential and commercial uses and the remainder is entitled for educational uses and student housing. Therefore, the Figueroa North subarea is not included in the table above.</i></p> <p>Source: Eyestone Environmental, 2020.</p>							

defines a framework within which land uses can be exchanged for certain other land uses so long as no additional environmental impacts would occur.

As set forth in the LASED Specific Plan, allowable building heights within the Olympic West development area are defined in terms of a podium height (i.e., the height of the base for a building tower) and a tower height (i.e., the maximum height permitted within the development area). The maximum permitted podium height within the Olympic West

**Table 2
Proposed Development and Transfer**

Development Site	Existing Use	Approved Project— Specific Plan Allocation	Proposed Development—Hotel and Conference Room Expansion	Remaining Allocation After Hotel and Conference Center Expansion
1a/1b	1a—Vacant Airspace Lot 1b—Parking	1a—Convention Center Expansion Uses: 250,000 sf 1b—No Floor Area	1a—Hotel: ^a 578,400 sf (861 rm) Conference Center: 228,200 sf 1b—No Floor Area	1a—Convention Center Expansion Uses: 7,100 sf
12	Hotel and Parking	Hotel: 295,750 sf (393 rm) Office: 601,800 sf	0 sf	Office: 38,100 sf
<hr/> <p><i>rm = rooms</i> <i>sf = square feet</i> ^a <i>Includes an equivalency transfer to convert 231,564 square feet of Office floor area permitted within Development Site 12 to 851 hotel rooms, a transfer of floor area of an additional approximately 332,136 square feet of Office floor area permitted within Development Site 12 to the Hotel Expansion and an allocation of 14,700 square feet of Convention Center Expansion Use floor area to the Hotel Expansion to achieve the approximately 578,400 square feet of Hotel floor area necessary for the Hotel Expansion.</i> <i>Source: Eystone Environmental, 2020.</i></p>				

development area is 100 feet above grade, whereas the maximum permitted tower height is 150 feet above existing grade. The footprint of all towers in Olympic West shall not exceed 20 percent of the total land area within this subarea.

The LASED Specific Plan also includes standards for the 11th Street Pedestrian Area, such as required street widths, allowable uses, and other limits on permanent development within the Pedestrian Area. In addition, the Specific Plan provides signage standards for sign size, typology, illumination, hours of operation, and other design considerations. The Specific Plan is divided into four Sign Districts; Development Sites 1a and 1b are located in Sign District B.

6. Modified Project

Modifications to the Approved Project are proposed to provide for the Hotel and Conference Center Expansion, which is comprised of the Hotel Room Expansion that includes the addition of 861 rooms to the JW Marriott Hotel (Hotel Expansion) in a standalone tower, the Conference Center Expansion, involving approximately 228,200 square feet of meeting and conference rooms, multi-purpose space, and ancillary uses above the Olympic West Parking Structure. The Modified Project would also provide for the reduction of 10 hotel guest rooms in the existing JW Marriott Hotel on Development Site 2, resulting in a net increase of 851 rooms under the Modified Project. The 10 hotel

guest rooms removed from the existing JW Marriott Hotel would be replaced by approximately 3,500 square feet of ancillary meeting room space within the existing hotel. The Hotel and Conference Center Expansion would be connected to the adjacent existing JW Marriott Conference Center to the north via two elevated pedestrian bridges. In addition, the existing parking structure would be partially demolished, signage would be removed and replaced, certain alcohol provisions would be modified, and the Eleventh Street Pedestrian Area, which is currently frequently closed for special events, would be vacated. The primary components are described in further detail below and illustrated in the conceptual site plan provided in Figure 3 on page 13.

6.1. Hotel Expansion

The Hotel Expansion would construct a new 578,400 square-foot JW Marriott West Tower on the southeastern portion of the Olympic West subarea, along Georgia Street between Chick Hearn Court and West Road. While the primary hotel entrance would be located at the existing JW Marriott Hotel, limited hotel guest check-in, staff access, and a drop-off area would be located on Georgia Street. In addition to 861 rooms, the JW Marriott West Tower would contain ancillary uses for hotel guests including a hotel bar, lobby lounge, restaurants, fitness facility, rooftop pool deck, amenity deck on the tower rooftop, as well as back-of-house uses such as offices, laundry, loading, and storage. Back-of-house uses would be limited and many of the support services for the JW Marriott West Tower would be provided at the existing hotel. Hotel guests primarily would check in at the existing hotel then use the existing pedestrian bridge to cross west over Georgia Street to the JW Conference Center and a proposed bridge to cross south over West Road to access rooms in the JW Marriott West Tower. Amenities would be shared between the existing and proposed towers.

As shown in Figure 4 and Figure 5 on pages 14 and 15, respectively, the new JW Marriott West Tower would be 37 stories tall, with a podium of up to approximately 70.5 feet and tower of up to 420 feet. Elevators, mechanical equipment, and window-washing equipment would be located in penthouses as well as on the rooftop and would be screened and integrated into architectural volumes, walls, or extensions of the curtain wall of a consistent height up to 24 feet above the tower roofline. In addition, an architectural beacon would extend 38 feet above the 24-foot screening element. Neither the screening element nor the beacon is included in the overall building height. The podium of the new hotel tower has been designed to provide a consistent podium height with the adjoining Conference Center Expansion as well as with neighboring buildings. The Hotel Expansion would be connected to the existing JW Marriott Conference Center via two pedestrian bridges over West Road.



Figure 3
Conceptual Site Plan

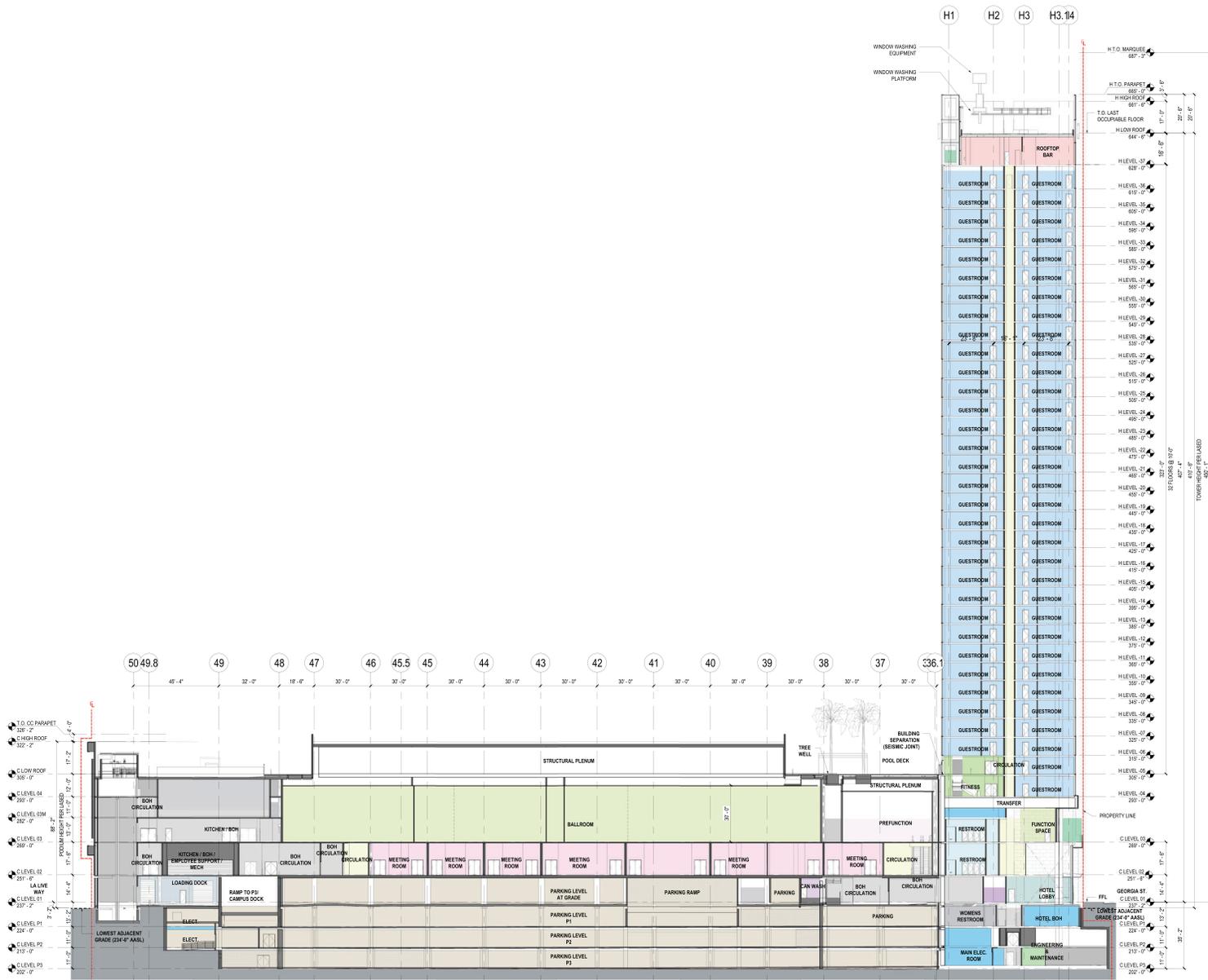


Figure 5
Conceptual Cross Section of Overall Building 2

6.2. Conference Center Expansion

The Conference Center Expansion would be located above the existing Olympic West Parking Structure and would contain a range of convention center expansion uses, including approximately 40,900 square feet of meeting and conference rooms, and an approximately 50,500 square foot ballroom. The facility would also include ground floor lobby areas at the corner of Georgia Street and Chick Hearn Court and approximately 137,000 square feet of ancillary back-of-house uses such as kitchen and storage spaces.

The Conference Center Expansion would have a maximum height of 90 feet. The Conference Center Expansion would be connected to the existing JW Marriott Conference Center via a second pedestrian bridge over West Road. The Conference Center Expansion would also be designed to accommodate a bridge connection to the Los Angeles Convention Center across Chick Hearn Court, as contemplated by Map 2 of the LASED Specific Plan. A conceptual elevation of the proposed Conference Center Expansion is provided in Figure 6 on page 17.

6.3. Parking

The Specific Plan requires 136 parking spaces for the Hotel Expansion and 334 parking spaces for the Conference Center Expansion. In addition, to accommodate structural reinforcement of the Olympic West Parking Garage necessary for the Hotel and Conference Center Expansion and the removal of the existing Event Deck, approximately 870 parking spaces would be removed. As permitted by the Specific Plan, a 10-percent reduction to the overall required parking for AEG Facilities (e.g., L.A. Live, STAPLES Center, Regal Cinemas, Microsoft Theater, existing Conference Center, and Office Buildings A and B) and the proposed Hotel and Conference Center Expansion is proposed (618 spaces). Parking for the Hotel and Conference Center Expansion would be met within existing parking facilities within the LASED, and existing Convention Center parking facilities, including expanded use of the West Hall Garage. In total, 5,807 parking spaces would be provided for AEG Facilities, including the Hotel and Conference Center Expansion. This total would exceed the total overall required number of spaces by 241 spaces.

With regard to bicycle parking, the Hotel and Conference Center Expansion would include 54 short-term curbside stalls for bicycles, located at grade along Chick Hearn Court and Georgia Street, and 41 long-term bicycle parking spaces in Level 1 of the Olympic West parking garage, with access from West Road.

6.4. Circulation

The main pedestrian access to the JW Marriott West Tower would be via the lobby of the existing hotel. Guests would check in at the main registration desks and proceed to

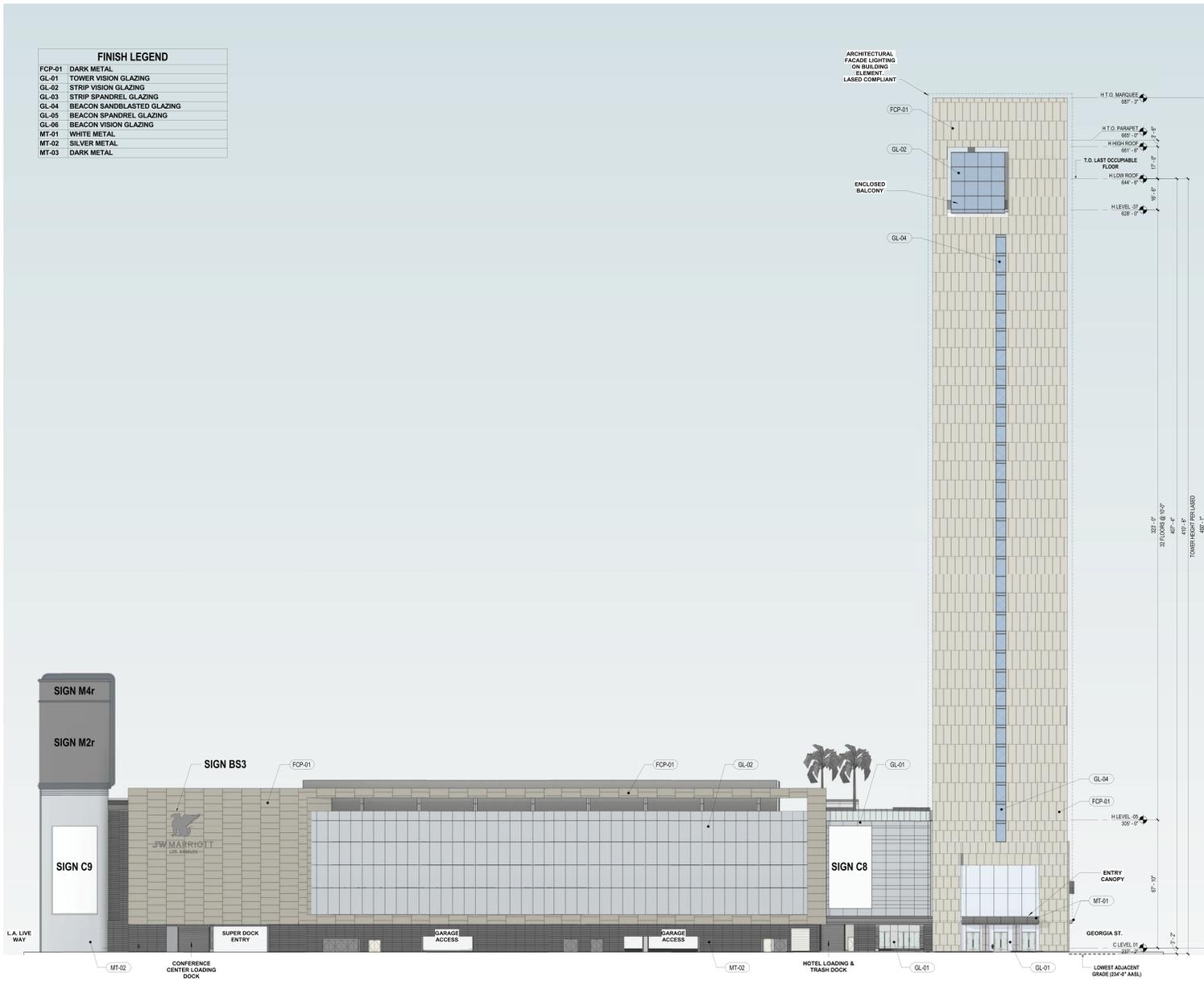


Figure 6
Conceptual South Elevation

the third level. From there, they would cross the existing pedestrian bridge west over Georgia Boulevard to the JW Marriott Conference Center and then cross a new pedestrian bridge south across West Road to access rooms in the JW Marriott West Tower. Hotel guest valet parking and return would occur at the porte cochère of the existing hotel. In addition, a secondary check-in area would be available within the JW Marriott West Tower at the ground-floor lobby on Georgia Street.

Primary pedestrian access to the Conference Center Expansion would be through two lobbies along Chick Hearn Court on the south side of the site. Additional pedestrian access would be provided to and from the existing JW Marriott Conference Center via two new pedestrian bridges across West Road at Level 3. Vehicular access would continue to be provided via the existing L.A. LIVE Lot W parking garage driveways on West Road.

6.5. Landscaping and Open Space

The Hotel and Conference Center Expansion would include a variety of common open spaces and gathering areas, transitioning from the sidewalks to entrances and lobbies, to interior public spaces, raised outdoor decks, restaurants, and meeting areas. The JW Marriott West Tower would include a Level 5 pool deck on top of the Conference Center Expansion and a Level 38 rooftop club deck on top of the Hotel Tower. Consistent with the streetscape design criteria in the Specific Plan, the new development would be visually and functionally connected by a consistent streetscape system consisting of street trees, pedestrian lights, and banded concrete paving that would unify the entire LASED.

6.6. Signage and Lighting

As part of the proposed development, an updated signage program would be implemented to provide architecturally integrated signage in conjunction with the Hotel and the Conference Center Expansion.

The Hotel and Conference Center Expansion Project would include a total of 20,890 square feet of new and replacement signage, with a net addition of 8,862 square feet, as follows:

- 9,200 square feet of Freeway Edge Signs along the west façade of the Conference Center Expansion, which would replace the existing 6,000 square feet of existing Freeway Edge Signs;
- 4,700 square feet of signage to replace the existing STAPLES Center marquee sign, which would be removed from its current location and replaced with a new sign integrated into the architecture at the southwest corner of the Conference Center Expansion;

- 3,035 square feet of wall signs on the east façade of Hotel Expansion, including 2,000 square feet on the hotel podium and 1,035 square feet on the new pedestrian bridge across West Road;
- 1,980 square feet of wall signs on the south façade of the Conference Center Expansion; and
- 1,995 square feet of building identification signs for the JW Marriott West Tower.

In order to accommodate these changes in signage, the Specific Plan text would be modified for the increase in sign area and signage height. In addition, Large-Scale Architectural Lighting (as defined in the LASED Specific Plan) would be installed on the south façade of the JW Marriott West Tower to light the beacon building element and create a signature design feature. As the beacon element would consist of a solid opaque material, the lighting approach is still being investigated as to which method would best achieve a dynamic effect while minimizing light spillover effects.

In addition, outside the Hotel and Conference Center Expansion Project Site, but within the LASED area, an existing static sign at the corner of Figueroa Street and Olympic Boulevard would be replaced with a new LED sign of the same size and at the same location.

6.7. Land Use Equivalency and Floor Area Transfers

Pursuant to the provisions within the LASED Specific Plan, the Hotel Expansion would be implemented through a Transfer of Floor Area from Development Site 12 to Development Site 1a and an Environmental Equivalency Transfer to convert the permitted office use floor area in Development Site 12 to hotel uses (collectively, these transfers are sometimes referred to herein as the proposed Land Use Equivalency Transfer).⁹

Specifically, the Environmental Equivalency Transfer would: (i) convert 231,564 square feet of office floor area permitted within Development Site 12 to 851 hotel rooms; and (ii) reallocate an additional approximately 332,136 square feet of office floor area from Development Site 12 and utilize 14,700 square feet of Convention Center Expansion Use floor area from Development Site 1a for the Hotel Expansion to achieve a total of 578,400 square feet of hotel floor area necessary for the Hotel Expansion. As noted above, an additional 10 hotel rooms would be relocated from the existing JW Marriott Hotel to the Hotel Expansion Project resulting in a total of 861 hotel rooms. The 10 hotel guest rooms removed from the existing JW Marriott Hotel would be repurposed with approximately

⁹ *The LASED Specific Plan uses the terms Environmental Equivalency Transfer and Land Use Equivalency Transfer interchangeably. The former term is used herein.*

3,500 square feet of ancillary meeting room space. With completion of the Environmental Equivalency Transfer and floor area reallocation, approximately 38,100 square feet of office floor area would remain permitted within Development Site 12. The Hotel Expansion Project also would include a Transfer of Floor Area, pursuant to Specific Plan Section 15, to transfer the above-referenced converted floor area from Development Site 12 to Development Site 1a. Development Site 1a is currently permitted for 250,000 square feet of Convention Center Expansion uses. Thus, no equivalency or land use transfer are required for the 228,200 square-foot Conference Center Expansion proposed under the Modified Project. The Specific Plan would also be amended to explicitly allow for convention-supporting hotel uses on Development Site 1a (Convention Center Expansion Parcel). This would be in addition to the Convention Center Expansion Uses already allowed on the site. A summary of the permitted uses within each of the development sites within the LASED Specific Plan area upon implementation of the proposed improvements is provided in Table 3 on page 21.

As previously discussed, this Addendum provides the additional environmental review required by CEQA and the LASED Specific Plan to permit these land use modifications.

6.8. Construction

Construction of the Modified Project is anticipated to commence in 2020 and be completed in 2023. Approximately 26,371 cubic yards of export, approximately 3,812 cubic yards of soil import, and approximately 9,000 cubic yards of demolition waste are anticipated. Construction activities would occur in accordance with Los Angeles Municipal Code (LAMC) requirements, which prohibit construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday.

6.9. Required Approvals

The following discretionary actions are proposed to implement the Modified Project:

- Amendments to the LASED include: increasing the permitted tower height to up to 420 feet on Development Site 1a, permitting hotel uses on the Convention Center Expansion Parcel, creating regulations for the Eleventh Street Pedestrian Area upon its vacation, modifying certain signage provisions, modifying permitted alcohol service at the cinemas from beer and wine only to a full line of alcoholic beverages, and other minor changes and technical corrections.
- Project Permit Compliance to construct Convention Center Expansion Uses, including a hotel and conference, meeting, and ballroom facilities within the Olympic West Subarea of the LASED, including a Transfer of Floor Area from Development Site 12 to Development Site 1a, an Environmental Equivalency

**Table 3
Los Angeles Sports and Entertainment District Specific Plan Area—Permitted Development With Modified Project^a**

Development Area/Site	Convention Center Expansion (sf) ^b	Cinema (sf)	Hotel and Ballroom (sf)	Office (sf)	Residential (sf)	Retail/ Entertainment/ Restaurant (sf)	Total (sf)
Olympic West							
1		127,327	170,165				297,492
1a	235,300		578,400 (861 rm)				813,700
1b							0
2			805,065 (991 rm)		503,105 (224 du)		1,308,170
3				170,500		237,700	408,200
4 and 5						195,500	195,500
6				75,300		37,000	112,300
Figueroa Central							
7, 8, and 9			283,347 (183 rm)		1,038,171 (504 du)	166,583	1,488,101
Figueroa South							
10 and 11					822,000 (648 du)	48,000	870,000
Olympic North							
12			295,750 (393 rm)	38,100 ^b			333,850
Total	235,300	127,327	2,132,727 (2,428 rm)	283,900	2,363,276 (1,376 du)	684,783	5,827,313
<p><i>du = dwelling units</i> <i>rm = rooms</i> <i>sf = square feet</i></p> <p>^a In addition, the Figueroa North development area is located within the LASED but outside of the LASED Specific Plan area. After Certification of the LASED EIR, separate CEQA documentation was prepared for the Figueroa North development area and development was approved separate from the LASED Project. Half of the Figueroa North parcel has been developed with residential and commercial uses and the remainder is entitled for educational uses and student housing.</p> <p>^b Reflects amount remaining for future development.</p> <p>Source: Eyestone Environmental, 2019.</p>							

Transfer of permitted office floor area to hotel uses, and reduced parking for the Hotel Expansion and all existing uses within the Olympic West and Olympic East Subareas, as well as STAPLES Center.

- Specific Plan Sign Application Compliance to allow the construction of 20,800 feet of signage (or a net addition of 8,862 square feet) within Specific Plan Sign District B on Development Site 1a and 1b, as well as replacement signage within Development Site 3.

- Vesting Tentative Tract Map to create one airspace parcel each for the Hotel Expansion and the Conference Center Expansion and one airspace parcel for the existing parking structure. The subdivision map also would allow for a limited airspace merger and resubdivision to accommodate a hotel balcony over the south property line and a chamfer at the southeast corner of the property at Georgia Street and Chick Hearn Court, and a haul route for the export of approximately 26,371 cubic yards of soil.
- Street vacation of Chick Hearn Court for the creation of an Eleventh Street Pedestrian Plaza and General Plan Amendment to change the street designation of Chick Hearn Court from a Collector to a Local Street, which would be a condition of the street vacation.
- Plan Approvals to expand (i) the Alcohol Use Approval for the Existing JW Marriott to cover the Hotel Expansion, and (ii) the Alcohol Use Approval for the cinemas to expand service from beer and wine only to a full line of alcoholic beverages.
- Bureau of Engineering Urban Forestry Division approval, pursuant to the LASED Streetscape Plan, of removal and replacement of certain street trees associated with the Modified Project.
- Any additional actions deemed necessary to implement the Modified Project.

7. Previous Environmental Documents Incorporated by Reference

Consistent with Section 15150 of the CEQA Guidelines, the following documents were used in preparation of this Addendum and are incorporated herein by reference:

- Los Angeles Sports and Entertainment District EIR, State Clearinghouse (SCH) No. 2000091046, Case No. ENV-2000-3577-EIR.
- Los Angeles Sports and Entertainment District EIR Subsequent Addenda, dated August 2005, December 2005, August 2006, June 2007, August 2009, August 2014, and January 2015.

Pursuant to CEQA Guidelines Section 15150(b), the above documents are available for review by appointment only at the following location during the hours of 9 A.M. and 4 P.M.

Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, California 90012

8. Comparative Analysis of Modified Project Impacts

8.1. Analysis of Impacts

This section provides an impact assessment of the Modified Project, which provides for the Hotel and Conference Center Expansion. The various components of the Hotel and Conference Center Expansion and associated modifications to the Approved Project are evaluated in the comparative impact analyses below when the modifications would result in a notable change to the specific impact analysis within the Certified EIR and Subsequent Addenda. A Modified Environmental Checklist Form was used to compare the anticipated environmental effects of the Modified Project with those disclosed in the Certified EIR and to review whether any of the conditions set forth in Public Resources Code Section 21166 or CEQA Guidelines Section 15162, requiring preparation of a Supplemental or Subsequent EIR, have been triggered. The environmental effects for each of the following impact areas were evaluated:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Circulation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The checklist and evaluation below provides the following information for each of these environmental impact categories:

- **Impact Determination in the Certified EIR**—This section lists the impact determination made in the Certified EIR for each impact category.
- **Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**—Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this section indicates whether the Modified Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact.
- **Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?**—Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the Modified Project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in the Modified Project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.
- **Any New Information Requiring New Analysis or Verification?** Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this section indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative; then the question would be answered “Yes,” requiring the preparation of a Supplemental or Subsequent EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain unchanged and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or there are no additional mitigation measures or alternatives now available or feasible but declined for adoption by the project proponent, then the question would be answered ‘No’ and no additional

environmental documentation (Supplemental or Subsequent EIR) is required. New studies completed as part of this environmental review are attached to this sixth Addendum or are on file with the Department of City Planning.

- **Mitigation Measures Addressing Impacts**—Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this section indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the previously adopted mitigation measures have already been implemented or are not applicable to the currently proposed development, in which case the measures are not listed below. If “None” is indicated, a significant impact was not identified and mitigation was not required.
- **Conclusion**—For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

8.1.1. Aesthetics

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(a) Have a substantial adverse effect on a scenic vista?	Significant and Unavoidable	No	No	No	No
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Significant and Unavoidable ^a	No	No	No	No
(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Significant and Unavoidable ^b	No	No	No	Yes ^b
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Significant and Unavoidable	No	No	No	Yes

^a Note that this question focuses on a state scenic highway and there are no state scenic highways in the vicinity of the Project Site. As such, no impacts would occur. As discussed below, the Certified EIR concluded impacts would be significant as the Project would affect scenic views from the I-110 freeway, which was identified as a scenic highway in the City's previous 1979 Scenic Highway Plan. The 1979 plan has now been superseded by the Mobility Plan that does not designate that I-110 as a scenic highway.

^b Note that this question within Appendix G of the CEQA Guidelines was updated to provide for analysis of visual character and views in non-urbanized areas, and thus an analysis of visual quality is not applicable to the Modified Project. Visual character and views were addressed in the Certified EIR and Subsequent Addenda based on the previous version of Appendix G and were

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<i>determined to be significant and unavoidable. The Project's consistency with regulations regarding scenic quality was addressed in the Certified EIR and Subsequent Addenda and the Approved Project was determined to be consistent with such regulations.</i>					

It is noted that changes to CEQA since the Certified EIR now provide that aesthetic and parking impacts should not be considered significant for the proposed Project. Specifically, Senate Bill 743 (SB 743), which became effective on January 1, 2014, adds Public Resources Code Section 21099(d)(1), which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Public Resources Code Section 21099(a)(7) defines a transit priority area as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines a major transit stop as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Public Resources Code Section 21099(a)(4) defines an infill site as a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. Finally, Public Resources Code Section 21099(a)(1) defines an employment center project as a project that is located on a property zoned for commercial uses with a floor area ratio (FAR) of no less than 0.75 and located within a transit priority area.

This state law supersedes previous aesthetic impact thresholds in the City of Los Angeles’ 2006 *L.A. CEQA Thresholds Guide*, including those established for aesthetics, obstruction of views, shading, and nighttime illumination. The related City of Los Angeles Department of City Planning Zoning Information (ZI) File No. 2452 provides further instruction concerning the definition of transit priority projects and states “[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the [*L.A. CEQA Thresholds Guide*] shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”

Pursuant to Public Resources Code Section 21099, the Modified Project would be considered an employment center project because it is located on property zoned to permit commercial uses with a maximum FAR greater than 0.75. In addition, the Modified Project

Site is an infill site that is less than 0.5 mile from several bus lines, as well as Metro's Blue Line station at Flower Street north of Pico Boulevard (Pico Station). Therefore, the Modified Project Site is located in a transit priority area as defined in Public Resources Code Section 21099. The City's Zone Information and Map Access System (ZIMAS) also confirms the Modified Project Site's location within a transit priority area, as defined in the City's ZI File No. 2452.

Thus, any aesthetic impacts that might be identified for the Modified Project would not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Nonetheless, for informational purposes only and to provide a thorough assessment of all aspects of the Modified Project, an analysis of the Modified Project's potential impacts regarding aesthetics is provided below.

Impact Determination in the Certified EIR

Aesthetic impacts are discussed in Section IV.B, Aesthetics, of the Certified EIR. The Certified EIR included mitigation measures to reduce impacts. Nonetheless, impacts associated with aesthetics were concluded to be significant and unavoidable. The Subsequent Addenda did not alter these significance findings. A summary of the analysis from Section 7.1.1, Aesthetics, is provided below.

Scenic Vistas (Views/Visual Access)

The Certified EIR concluded that impacts associated with scenic vistas would be significant and unavoidable to visual focal points in the area. The Certified EIR concluded the Approved Project would not further obstruct views to the south (from commercial and residential properties to the north), as STAPLES Center and the Los Angeles Convention Center already obstruct these views. However, views of the STAPLES Center and the Los Angeles Convention Center would be obstructed from northern vantage points by the Project. Therefore, the Certified EIR conservatively concluded the Approved Project would result in significant and unavoidable impacts with respect to views/visual access. No mitigation measures were identified in the Certified EIR for this impact.

Scenic Resources within a Scenic Highway

There are no designated state scenic highways in the vicinity of the Project Site. Thus, no significant impacts would occur. However, the Certified EIR evaluated impacts to the segment of the Harbor Freeway (I-110) between Martin Luther King, Jr. Boulevard and the Hollywood Freeway (US-101) interchange, which was designated as a Scenic Highway (city route) in the City's adopted 1979 Scenic Highway Plan, in acknowledgement of the views of the downtown high-rise urban core. The Approved Project could become a prominent feature visible from the freeway, even considering that the Project would be within the foreground of the freeway viewshed only briefly. Therefore impacts to the

previously designated local scenic highway were concluded to be significant and unavoidable in terms of the scenic resource of the downtown urban core. No mitigation measures were identified in the Certified EIR for this impact.

Conflict with Regulations Governing Scenic Quality (Visual Quality)

As noted above, Appendix G of the CEQA Guidelines has been updated. This question now focuses on potential visual quality impacts in non-urban areas and for urban areas focuses on consistency of the project with relevant regulations regarding scenic quality. The Project Site is located in an urban area as such analysis of visual quality is no longer applicable. With regard to consistency with regulations regarding scenic quality, the Certified EIR concluded that the proposed development is consistent with applicable General Plan Framework policies regarding the Downtown Center including policies regarding the provision of visual amenities and pedestrian accommodations. The overall development program would result in the elimination of existing paved parking lots and warehouse buildings which do not present exceptional visual qualities and is consistent with standards established by the Framework for high-quality development design. The unifying design features and landscaping would follow the *Downtown Strategic Plan's* recommendation to create "pedestrian-friendly" streets, in particular by addressing pedestrian linkages along Figueroa, 11th and 12th Streets, and Olympic Boulevard. Project design features would also be compatible with the *South Park Development Strategies and Design Guidelines* regarding maintenance of view corridors, use of unifying design elements, improvement of pedestrian areas, and landscaping of street and building edges. As such, Approved Project impacts associated with consistency with regulations regarding scenic quality would be less than significant.

The analysis below provides a summary of the visual character impacts identified in the Certified EIR based on the version of Appendix G of the CEQA Guidelines that was in effect at the time the Certified EIR was prepared.

Construction

The proposed temporary covered walkways along the public streets adjoining the LASED, along with other temporary construction barriers, could potentially serve as targets for graffiti and other unattractive visual features if not properly monitored, which could result in a significant impact to visual quality during construction. With implementation of the Approved Project's adopted Mitigation Measure IV.B.1-1 to maintain temporary construction barriers in a visually attractive manner, this significant impact would be reduced to a less than significant level.

Operation

While the Approved Project would result in an intensification of development, unifying design elements, including signage, lighting, landscaping, and hardscape features, would be employed to complement the existing STAPLES Center and Los Angeles Convention Center, thus further defining the area as a special downtown sports and entertainment district. The height and bulk of the Approved Project would be compatible with the height and bulk envisioned in the City's plans for this area of downtown Los Angeles. The Project would also establish sign standards and guidelines and install new signage. Project signage would be consistent with the applicable plans and regulations, would complement STAPLES Center and Convention Center and would contribute to a sense of place reflecting the unique identity of the area and the creation of a major public outdoor "gathering place." However, as the Project would introduce substantial signage to the visual environment, impacts to visual quality were concluded to be significant and unavoidable. No mitigation measures were identified in the Certified EIR for the signage impact, although Mitigation Measure IV.B.1-2 would address streetscape improvements.

Light and Glare

Since construction activities would be screened from view by temporary barriers, the potential for light or glare impacts would be reduced during construction. Nighttime construction lighting would be focused downward or shielded, oriented toward the Project Site and away from sensitive receptors. Therefore, the Certified EIR concluded that no significant light or glare impacts would occur during construction of the Approved Project.

With regard to operational lighting impacts, the Approved Project would introduce new sources of nighttime illumination including proposed signage, which would collectively increase ambient light levels within the LASED and in the vicinity. However, Approved Project lighting would include shielding to minimize lighting impacts affecting adjacent sensitive uses and roadways. Nevertheless, while Approved Project illumination would be consistent with applicable plans and regulations and would contribute to pedestrian safety through lighting of public walkways, plazas, and parking lots, the increase in illumination from the Approved Project would result in a substantial increase in nighttime illumination. To address impacts, Mitigation Measures IV.B.2-1 and IV.B.2-2 were included to establish lighting plans and standards for building light and glare and pedestrian lighting design. Nonetheless, the Certified EIR concluded nighttime illumination impacts would be significant and unavoidable.

With regard to glare, the Approved Project would be constructed of materials that produce minimal amounts of glare. In addition, any glass or reflective surface used on building façades would either have low-reflectivity, be treated with a non-glare coating, or would be sufficiently screened to prevent off-site glare impacts. Approved Project lighting also would not create glare upon nearby roadways, freeways, residences, and other

sensitive uses. Therefore, as set forth in the Certified EIR, Approved Project impacts associated with glare would be less than significant.

Shade/Shadow

Although there is no specific Appendix G question relating to shade and shadow impacts, at the time of preparation of the Certified EIR, the City analyzed the issue of shade/shadow as it pertains to the blockage of direct sunlight by on-site buildings, which affects routinely usable outdoor spaces that have expectations for sunlight. For the Olympic West subarea, the Certified EIR assumed a maximum building height of 150 feet over the whole area, even though the maximum supplemental height limitation would only be applied to up to 20 percent of the subarea, for conservative analysis. Potential shading impacts would be reduced with implementation of the Approved Project's Design Guidelines and Mitigation Measure IV.B.3-1 related to shade (e.g., reducing the height of Approved Project structures, setting the maximum height portion of Approved Project structures away from the affected shade-sensitive uses, or stepping back the roofs for buildings within the Olympic East, Olympic North, and Figueroa South development areas). However, it would not be feasible to reduce all shading impacts to a less than significant level and still be consistent with the functions and uses anticipated to occur within the LASED. Thus, the Certified EIR concluded that a significant and unavoidable shading impact would occur during winter.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated above, subsequent to the preparation of the Certified EIR, changes to the regulatory framework addressing aesthetics analyses in environmental documents have occurred. Specifically, Senate Bill 743 (SB 743), which became effective on January 1, 2014, adds Public Resources Code Section 21099(d)(1), which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Pursuant to Public Resources Code Section 21099, the Modified Project would meet this criteria. Thus, any aesthetic impacts that might be identified for the Modified Project would not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Nonetheless, for informational purposes only and to provide a thorough assessment of all aspects of the Modified Project, an analysis of the Modified Project's potential impacts regarding aesthetics is provided below.

Question (a)—Scenic Vistas (Views/Visual Access): Based on the Certified EIR, visual resources identified on and adjacent to the LASED include the Los Angeles Convention Center, the historic Variety Arts Center, Petroleum Building and Hotel Figueroa, STAPLES Center, Gilbert Lindsay Plaza, and streetscaping and landscaping associated with buildings and public rights-of-way.

As described above, the southern portion of the Olympic West subarea (Development Sites 1a and 1b) would be redeveloped with parking and a Hotel and Conference Center Expansion, as well as new signage. For the Olympic West subarea, the Certified EIR and LASED identified a maximum building height of 100 feet, with up to 20 percent of the site reaching a building height of 150 feet. The new hotel tower would be 37 stories, including a podium of up to approximately 70.5 feet and a tower up to approximately 420 feet. In addition, an architectural beacon would extend 38 feet above a 24-foot screening element on the rooftop. The Conference Center Expansion would have a total height of up to 90 feet. As shown in Figure 7 on page 32, the new uses would be visually integrated with adjacent uses by utilizing a compatible architectural design. The proposed new hotel tower would be oriented in the same direction as the existing JW Marriott Tower and would be shorter in height. While development of the proposed hotel tower may reduce existing views from certain vantage points within the immediate site vicinity, street-level views are already limited by the existing parking structure and JW Marriott Tower, and views of the aforementioned visual resources would continue to be available from a multitude of vantage points. Thus, although the height of the proposed hotel tower would exceed the currently permitted tower height within Development Site 1a, such an increase would not substantially adversely affect a scenic vista or block views of visual resources in the surrounding area.

Overall, similar to the Approved Project, implementation of tower features as part of the Hotel Expansion would have a beneficial effect on the viewshed by providing a visual linkage to the downtown high-rises and would help to visually define the LASED by increasing its visibility relative to the surrounding area. Therefore, the Modified Project would not result in a new impact relative to visual access or increase the Approved Project's significant visual access impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda. In any event, impacts related to visual access and scenic vistas would not be considered significant in accordance with SB 743.

Question (b)—Scenic Resources within a Scenic Highway: As discussed in the Certified EIR, the segment of the Harbor Freeway located immediately west of the LASED was previously designated by the 1979 Scenic Highways Plan and the City in the Central City Community Plan as a scenic freeway due to the availability of northbound views of the downtown skyline and the San Gabriel Mountains in the distance.¹⁰ However, the City's more recently adopted Mobility Plan 2035 does not recognize the Harbor Freeway as a scenic highway.¹¹ In addition, no State-designated Scenic Highways are in the vicinity of the LASED, and therefore the Modified Project would have no impact on any state scenic highway.

¹⁰ *City of Los Angeles, Central City Community Plan, General Plan Land Use Map, July 7, 2009.*

¹¹ *Mobility Plan 2035, Map A5, Citywide General Plan Circulation System, September 2016.*



While the Hotel and Conference Center Expansion would be visible from the Harbor Freeway corridor, as under the Approved Project, such views would be intermittent in nature due to the presence of other mid- and high-rise development in the immediate area, landscaping along the freeway, and of short duration due to automobile speeds. In addition, the Hotel and Conference Center Expansion would not damage any scenic resources such as historic buildings or substantial landscape features. As such, the Modified Project would not involve new significant impacts or substantially more severe impacts associated with development near a scenic highway. In any event, impacts related to scenic highways would not be considered significant in accordance with SB 743.

Conflict with Regulations Governing Scenic Quality (Visual Quality):

Consistency of Project with Regulations Regarding Visual Quality (Per updated Appendix G of the CEQA Guidelines)

Similar to the Approved Project, the proposed development is consistent with applicable General Plan Framework policies regarding the Downtown Center associated visual amenities and pedestrian accommodations. The development program would continue to result in the elimination of existing paved parking lots and buildings which do not present exceptional visual qualities and is consistent with standards established by the Framework for high-quality development design. While previous regulations governing scenic quality for the Approved Project in the downtown area have since been superseded by new standard, such as the *Downtown Design Guide*, the underlying goals of creating “pedestrian-friendly” streets, and improved building design have carried forward. The Hotel and Conference Center Expansion would also be consistent with these new standards, as it would create a high-quality, distinct architectural design with pedestrian-oriented features to further create synergy and pedestrian activity between the LASED and Convention Center areas.

The Hotel and Conference Center Expansion Project also would comply with relevant scenic quality requirements of the amended LASED Specific Plan, including those pertaining to height, open space, landscaping, and pedestrian linkages. In particular, height would be compatible with the adjacent towers with appropriate spacing, and the proposed open space areas, such as rooftop terraces, would include a minimum 15-percent planted area. In addition, proposed ground level access to the JW Marriott West Tower and the Conference Center Expansion would facilitate a pedestrian linkage to the Expansion Project Site via Chick Hearn Court, as set forth in the LASED. In addition, the Expansion Project would also incorporate Mitigation Measure IV.B.1-2 to address streetscape improvements.

Overall, impacts associated with consistency with scenic regulations would be less than significant. Such impacts would be within the envelope of impacts addressed in the in the Certified EIR and Subsequent Addenda.

Analysis of Visual Quality

As discussed above, Appendix G of the CEQA Guidelines was recently modified such that an analysis of visual character is only required for non-urban projects. Nonetheless, for purposes of providing a comparative analysis with the Certified EIR, an analysis of visual quality associated with the Modified Project is provided herein. Similar to the Approved Project, visual quality impacts during construction of the Modified Project may result from the temporary creation of construction sites, tree removal, and the potential occurrence of graffiti on construction barriers. However, the types and amount of construction activities that would occur under the Modified Project would be generally similar to those anticipated as part of the Approved Project. Furthermore, the Modified Project would include the replacement of any street trees to be removed in accordance with the requirements and specifications of the LASED Streetscape Plan. The Modified Project would also include the same mitigation measure to protect against the unauthorized placement of materials on any temporary construction barriers. Therefore, with the implementation of the Approved Project's Mitigation Measure IV.B.1-1, visual quality impacts during construction of the Modified Project would similarly be reduced to a less than significant level. Such impacts would be within the envelope of impact analysis addressed in the in the Certified EIR and Subsequent Addenda.

Similar to the Approved Project, completion of the Modified Project would alter the visual character of the LASED and surrounding area by introducing a new hotel tower and conference center uses above the existing parking structure within Development Site 1a. However, these uses are permitted by the LASED Specific Plan, already exist in the LASED, and essentially would be an extension of the existing hotel and conference center uses located in the Olympic West and Olympic East development areas. The height of the proposed hotel would provide an appropriate transition from the height of the existing JW Marriott Hotel tower, which stands at 54 stories, and the residential towers of the Metropolis project, which are 54 and 40 stories, respectively, and the 23-story Courtyard/Residence Inn hotel by Marriott. In addition, the design of the proposed pedestrian bridges would be compatible with the adjoining buildings to enhance overall visual character and building composition, while functionally integrating the bridges into the overall architecture of the buildings. The Hotel and Conference Center Expansion would be contemporary in architectural style and character and would complement the existing LASED development, including STAPLES Center and the Los Angeles Convention Center, and would feature similar signage, lighting, landscape, and hardscape.

The Modified Project would also modify existing sign standards and guidelines and install new signage. An increase in overall signage of 8,862 square feet within Specific Plan Sign District B is proposed. New wall and identification signs would be provided. Certain signs would also be removed and relocated, including the Staples Center Marquee sign which would be removed and integrated into the southwest corner of the Conference Center Expansion. Approximately 9,200 square feet of Freeway Edge Signs would also

replace the existing 6,000 square feet of Freeway Edge Signs. The new Freeway Edge Signs would be modernized, with a unified theme, and architecturally integrated into the building design. The revised signage program would complement the STAPLES Center and Convention Center and would contribute to a sense of place reflecting the unique identity of the area.

Based on the above, potential impacts related to visual quality would be within the envelope of impact established in the Certified EIR and Subsequent Addenda and would not be considered significant in accordance with SB 743.

Question (d)—Light and Glare: With regard to light and glare, the Modified Project would include the development of similar uses as the Approved Project. In addition, with the Land Use Equivalency Transfers proposed as part of the Modified Project, the amount of development would be within that permitted for the Approved Project. Therefore, the types and amount of construction activities occurring under the Modified Project generally would be similar to those anticipated for the Approved Project. As with the Approved Project, any lighting necessary for nighttime construction activities associated with the Modified Project would be focused downward or shielded and would be oriented toward the construction work areas, away from adjacent sensitive residential receptors. Construction activities associated with the Modified Project also would not be anticipated to generate substantial glare that would cause a hazard or clear visual nuisance to adjacent sensitive uses. Additionally, similar to the Approved Project, temporary construction barriers would be used around the construction sites, which would reduce the potential for light and glare. Therefore, light and glare impacts during construction of the Modified Project would also be less than significant. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

The existing parking structure within Olympic West currently generates a minimal amount of light and glare, primarily as a result of vehicle headlights and parking lot/structure lighting and signage. Under redevelopment of the site, and similar to the Approved Project, the amount of ambient lighting would increase within the LASED as compared to existing conditions since the Modified Project would introduce new sources of nighttime lighting associated with the proposed hotel, convention center uses, and signage. In addition, the Modified Project's increase in maximum building height within Development Site 1a would incrementally, but not substantially, increase the height of illumination sources within this area of the LASED. However, the proposed uses would be consistent with the uses permitted within the LASED and would be an extension of the existing surrounding uses. Additionally, given the Land Use Equivalency Transfer proposed as part of the Modified Project, the overall level of illumination would be substantially the same as foreseen under the Approved Project since the total floor area to be developed would not change. Although the Modified Project would result in a limited increase in total signage area, this increase would not result in a substantial increase in lighting associated with

signage. Also, while the existing LASED Specific Plan currently has no specific limits for nighttime illumination from signage, the amendments to the LASED Specific Plan would set new nighttime illumination standards for new signage at a maximum of 300 candelas/m² with the exception of signage along Figueroa Street (including the corner of Figueroa Street and Olympic Boulevard). Additionally, all lighting would be implemented in conformance with the LASED Specific Plan, the City's General Plan Framework Element, and other applicable policies. Like the Approved Project, the Modified Project would also be subject to Mitigation Measures IV.B.2-1 and IV.B.2-2 which require the submittal of lighting plans and which set certain standards for building light and glare as well as for pedestrian lighting design. Therefore, the Modified Project would not increase the severity of impacts identified in the Certified EIR and Subsequent Addenda, and impacts would be within the envelope of impacts identified in the Certified EIR and Subsequent Addenda. Nevertheless, lighting impacts would not be considered significant in accordance with SB 743.

With regard to glare, the construction and architectural design of the Modified Project would be consistent and compatible with the overall construction and design of buildings within the LASED and surrounding uses. As such, like the Approved Project, the Modified Project would include materials that produce glare. Similar to the Approved Project, the Modified Project would also be subject to the lighting and glare standards identified in Mitigation Measure IV.B.2-2, so any glass or reflective surface to be used on building façades would either have low-reflectivity, would be treated with a non-glare coating, or would be screened to prevent off-site glare impacts. Additionally, the Approved Project's lighting standards from the above-mentioned mitigation measures that prohibit the generation of glare affecting nearby roadways, freeways, residences, and other sensitive uses would apply to the Modified Project. Thus, as with the Approved Project, the Modified Project would result in a less than significant impact with regard to glare. Such impacts would be within the envelope of impacts addressed in the Approved Project and Certified EIR. Nonetheless, glare impacts would not be considered significant in accordance with SB 743.

With regard to shade/shadow, the shading from development up to a building height of 150 feet within the Olympic West development area was previously evaluated in the shading analysis within the Certified EIR. While the Modified Project would increase the height of development within Development Site 1a to 420 feet, the proposed JW Marriott West Tower would be shorter than the existing hotel tower located on Development Site 2 to the northeast within the Olympic East development area. Thus, the shadows created by the JW Marriott West Tower, particularly those during the afternoon during the winter when shadows are the longest, would be within the same general shadow footprint already cast by the existing JW Marriott Tower. In addition, as demonstrated in the shadow diagrams provided in Appendix B, shading associated with the Modified Project would be within the same general geographic footprint as compared with the Certified EIR and would not shade sensitive uses for more than the specified thresholds. Thus, the Modified Project's shading

impacts would be within the envelope of impacts set forth in the Approved Project and the Certified EIR. Nevertheless, shading impacts would not be considered significant in accordance with SB 743.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

In accordance with the recent passage of SB 743, the Modified Project would not result in any significant impacts associated with aesthetics. As such, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to aesthetics. Any New Information Requiring New Analysis or Verification?

In accordance with the recent passage of SB 743, Modified Project impacts associated with aesthetics are less than significant. Thus, there is no new information that is available that could result in any new or substantially more severe impacts related to aesthetic resources, and a review of new or additional feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

The following mitigation measures set forth in the Certified EIR and the associated Mitigation Monitoring and Reporting Program (MMRP) to address aesthetic impacts shall be implemented as part of the Modified Project. Note that Mitigation Measure IV.B.3-1, which addresses shade/shadow impacts from properties in other subareas, does not pertain to the Olympic West subarea and thus is not applicable to the Hotel and Conference Center Expansion. No additional mitigation measures are required as no new significant aesthetic impacts would result from implementation of the Modified Project.

Aesthetics—Visual Quality

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

achieve light colored surfaces, to the extent feasible for Project development. (IV.B.1-2)

Aesthetics—Light and Glare

3. The Applicant shall prepare a Lighting Plan in coordination with the Department of City Planning to establish lighting standards and guidelines. (IV.B.2-1)
4. ~~To the extent feasible and consistent with the functions and uses of the Project, the~~ The following mitigation measures shall be addressed in the design of the Project's facilities. (IV.B.2-2)
 - a. Pedestrian-level lighting shall be used adjacent to Olympic Boulevard and Figueroa, 11th, 12th, and Flower Streets.
 - b. Floodlights shall be located so as to minimize impacts onto sensitive receptors.
 - c. The Applicant shall coordinate with the Bureau of Street Lighting as to whether the streetlights shall be refurbished and/or reinstalled to preserve the character of the community, in addition to providing adequate lighting to motorists and pedestrians.
 - d. All new lighting shall be designed to minimize glare and to prevent light impacts upon adjacent sensitive receptors.
 - e. The use of highly reflective building materials for the exterior walls of the Project structures shall be minimized.
 - f. Use high performance glass with high shading coefficient and low reflectivity, such as Heat Mirror or Low E type glass.
 - g. Architectural and/or landscape screening elements shall be incorporated into project design so as to minimize glare impacts on adjacent sensitive receptors.
 - h. Parking facilities exits shall be located and designed so as to minimize glare impacts from vehicle headlights on adjacent sensitive receptors.

Aesthetics—Shade/Shadow

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

Conclusion

In accordance with SB 743, potential aesthetic impacts associated with the Modified Project would not be significant. Nonetheless, the analysis provided above demonstrates

that no new significant impacts or more severe impacts relative to aesthetic resources would occur as a result of the Modified Project. Therefore, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.2. Agriculture and Forest Resources (Agricultural Resources)

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AGRICULTURE AND FORESTRY					
RESOURCES: Would the project:					
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	No	No	No	No
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	No	No
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	Not Analyzed	No	No	No	No
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	Not Analyzed	No	No	No	No
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

Impacts to agricultural resources were evaluated in the Initial Study for the Approved Project, which is included as Appendix A to the Draft EIR, and in Subsequent Addenda. The Initial Study and Subsequent Addenda did not identify any impacts under thresholds (a), (b), and (e). Thresholds (c) and (d) were not analyzed in the Certified EIR or Subsequent Addenda as these were not included as Appendix G questions of the CEQA

Guidelines at the time. However, the Project Site does not contain forest land or timberland, and thus no impacts associated with these thresholds would occur.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) through (e)—Agricultural and Forest Resources: No agricultural or forest resources including farmland, forest land, or related operations are present in the LASED. In addition, the LASED is not zoned for any agriculture, forest land, or timberland. As these conditions continue to apply under the Modified Project, , the Modified Project would not result in any impacts related to agricultural or forest resources and would, therefore, also not create any new significant impacts nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Forest land and timberland were just recently made part of the CEQA Checklist, and thus, were not addressed in the Certified EIR or Subsequent Addenda. Nonetheless, as set forth above, there would be no impacts to forest land and timberland under both the Approved Project and Modified Project. As such, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to agricultural resources.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to agricultural and forest resources. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new agricultural or forest resources have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any impacts to agricultural or forest resources, a review of new or additional feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.3. Air Quality

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AIR QUALITY: Would the project:					
(a) Conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant	No	No	No	No
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Significant and Unavoidable	No	No	No	Yes
(c) Expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant	No	No	No	No
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

The Approved Project's air quality impacts were addressed in Section IV.E, Air Quality, of the Certified EIR, in the Initial Study included as Appendix A to the Certified EIR, and in Subsequent Addenda.

Consistency with Applicable Air Quality Plans

The Certified EIR and Subsequent Addenda examined the consistency of the Approved Project with the AQMP. As discussed below, the Approved Project and Subsequent Addenda would not cause or contribute to new air quality violations. In addition, the Approved Project and Subsequent Addenda were determined to not exceed the assumptions utilized in preparing the AQMP (e.g., population, housing and employment growth projections which AQMP forecasted emission levels are based). Based on this information, the Certified EIR and Subsequent Addenda concluded that the Approved

Project would be consistent with applicable SCAQMD and Southern California Association of Governments (SCAG) air quality policies.

Criteria Pollutants

Construction

As discussed in the Certified EIR and Subsequent Addenda, construction of the Approved Project would generate pollutant emissions from the following activities: (1) site preparation (grading/excavation); (2) travel by construction workers to and from the site; (3) delivery and hauling of construction materials and supplies to and from the site; (4) fuel combustion by on-site construction equipment; and (5) the application of architectural coatings and other building materials that release reactive organic compounds. Based on the phases of construction and other worst-case assumptions, daily construction emissions associated with the Approved Project would exceed the South Coast Air Quality Management District's (SCAQMD) significance thresholds for carbon monoxide (CO), reactive organic compounds (ROC),¹² nitrogen oxides (NO_x), and daily emissions of particulate matter less than 10 microns in diameter (PM₁₀). The Approved Project would also exceed quarterly thresholds for CO, ROC, and NO_x, and would not exceed the SCAQMD's significance thresholds for quarterly PM₁₀ or sulfur oxides (SO_x) during construction. The Fifth Addendum increased the overall amount of building construction within the Olympic North Subarea by approximately 5.6 percent in comparison to the Original Project evaluated in the Certified EIR. However, pollutant emissions and fugitive dust from site preparation and construction activities were concluded to be similar on a daily basis, as the duration and not the intensity of these activities would increase compared to the Original Project. While construction emissions would be slightly more than those of the Original Project over the construction period, impacts during maximum conditions, those used for measuring significance, would be similar to those of the Original Project. Therefore, construction air quality impacts were concluded to be similar to the Original Project. Mitigation Measures IV.E-1 through IV.E-16 provided in the Certified EIR would reduce these impacts, but not to a less than significant level. As such, the Certified EIR and Subsequent Addenda concluded that the Approved Project would result in significant and unavoidable impacts on regional air quality during construction.

Operation

During operation of the Approved Project, traffic and other pollutant sources (e.g., resulting from the consumption of energy) would result in regional emissions of NO_x, CO, ROC, and PM₁₀ that would exceed SCAQMD regional significance thresholds. The

¹² Subsequent to completion of the Certified EIR, SCAQMD changed the pollutant Reactive Organic Compounds (ROC) to Volatile Organic Compounds (VOC). For purposes of this analysis, the two terms are interchangeable.

Approved Project would not exceed the SCAQMD's significance thresholds for sulfur oxides (SO_x) during operation. The Fifth Addendum increased the overall amount of commercial floor area within the Olympic North Subarea by approximately 5.6 percent in comparison to the Original Project evaluated in the Certified EIR. In comparison to the Original Project, weekday daily trips decreased by 2.0 percent, but increased by 0.6 percent on weekends. The change in trips would not substantially decrease/increase project emissions under the Approved Project. The increase in the amount of commercial square footage development within the LASED, would also slightly increase future stationary operational emissions (e.g., landscaping equipment). Overall, the Fifth Addendum concluded that operational air quality impacts would be similar as the Approved Project. Mitigation Measures IV.E-17 and IV.E-18 provided in the Certified EIR would reduce these impacts, but not to a less than significant level. As such, the Certified EIR and Subsequent Addenda concluded that operation of the Approved Project would result in a significant and unavoidable impact on regional air quality.

Sensitive Receptors

With regard to localized construction impacts, construction activity at the Olympic North properties had the greatest potential for impacts on nearby residential sensitive receptors, with the closest receptor located at the corner of Francisco Street and Olympic Boulevard. Impacts from construction activities on other sensitive receptors, further from the LASED would be much less due to the dispersion properties of particulate matter. The Approved Project was forecasted to have a maximum PM₁₀ concentration increase of 1.95 µg/m³ at the corner of Francisco Street and Olympic Boulevard. In comparison to the 2.5 µg/m³ PM₁₀ significance threshold, the Certified EIR and Subsequent Addenda determined that the Approved Project would result in a less than significant localized PM₁₀ impact on all sensitive receptors including, but not limited to, nearby residential receptors as well as the Tenth Street and Norwood Street Schools.

Regarding localized air quality impacts during operation, the Certified EIR and Subsequent Addenda demonstrated that sensitive receptors in the area would not be significantly affected by localized CO emissions generated by traffic attributable to the Approved Project. Therefore, localized air quality impacts related to mobile source emissions were concluded to be less than significant.

Odors

The Initial Study included as Appendix A to the Draft EIR concluded that no odor impacts would result from the Approved Project. Subsequent Addenda did not alter these significance conclusions.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Consistency with Applicable Air Quality Plans: As detailed below, construction and operation of the Modified Project would not generate emissions beyond those set forth under the Approved Project and in the Certified EIR. In addition, the Modified Project would incorporate or implement the same land uses, design features, regulatory requirements, and mitigation measures as the Approved Project, which collectively would reduce air quality emissions. As such, the Modified Project also would be consistent with applicable SCAQMD and SCAG air quality policies, and impacts would be less than significant. Therefore, the Modified Project would not create any new significant impacts related to consistency with air quality plans nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Question (b)—Criteria Pollutants:

Construction

An analysis of proposed construction activities associated with the Hotel and Conference Center Expansion was conducted and is provided in Table 4 on page 45. As shown in Table 4, the Hotel and Conference Center Expansion would result in significant regional NO_x emissions that would be reduced to less than significant levels with incorporation of mitigation measures. Proposed construction activities would primarily occur within the Olympic West Subarea and, therefore, a comparison of pollutant emissions under the Approved Project within this subarea was also included in Table 4. As shown therein, construction peak daily emissions associated with the Hotel and Conference Center Expansion would be less than the peak daily pollutant emissions considered for the Olympic West Subarea under the Approved Project.

Overall, when considering other Subareas of LASED, site preparation and construction activities would be similar to the Approved Project on a daily basis during the most intense construction phase. However, pollutant emissions would be anticipated to be less under the Modified Project largely due to future year construction equipment and vehicles (e.g., haul and delivery trucks) that would emit less pollution in future years due to more stringent emissions control regulations. Therefore, impacts during the most intense construction activities, which are used for measuring significance, would be less than those analyzed in the Certified EIR and Subsequent Addenda. Thus, similar to the conclusions of the Certified EIR, construction emissions would not exceed the SCAQMD's significance thresholds for quarterly PM₁₀ or SO_x during construction. Although the Modified Project would implement the same construction mitigation measures, as applicable, that were identified for the Approved Project, impacts related to both daily and quarterly emissions of CO, ROC/VOC, NO_x, and to daily PM₁₀ during construction would continue to be significant

**Table 4
Maximum Daily Regional Construction Emissions Associated with Hotel and Conference Center Expansion^a
(pounds per day)**

Pollutant Emissions	VOC	NO _x	CO	SO _x	PM ₁₀ ^b	PM _{2.5} ^b
Unmitigated Regional Emissions—Hotel and Conference Center Expansion						
2020	23	187	177	<1	32	15
2021	46	172	178	<1	31	14
2022	47	120	192	<1	32	12
2023	11	66	97	<1	15	6
Maximum Regional Daily Emissions	47	187	192	<1	32	15
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(28)	87	(358)	(149)	(118)	(40)
Exceed Threshold?	No	Yes	No	No	No	No
Mitigated Regional Emissions—Hotel and Conference Center Expansion						
2020	13	94	184	<1	22	8
2021	39	88	184	<1	25	8
2022	40	57	200	<1	27	8
2023	7	30	101	<1	13	4
Maximum Regional Daily Emissions	40	94	200	<1	27	8
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(35)	(6)	(350)	(149)	(135)	(47)
Exceed Threshold?	No	No	No	No	No	No
Comparison of Hotel and Conference Center Expansion to Approved Project (Olympic West Subarea)—Mitigated Regional Construction Emissions						
Approved Project (Olympic West) ^{c,d}	42	302	231	18	30	11
Modified Project (Hotel and Conference Center Expansion)	40	94	200	<1	27	8
Over/(Under)	(2)	(208)	(31)	(18)	(3)	(3)

^a Emission quantities are rounded to “whole number” values. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the calculation worksheets that are presented in Appendix C of this Addendum.

^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

^c Appendix D of the LASED Project Certified EIR.

^d PM_{2.5} emissions were not calculated in the LASED Project Certified EIR. Therefore, PM_{2.5} were calculated based on the ratio of PM_{2.5} and PM₁₀ emissions provided in the CalEEMod modeling conducted for the Modified Project.

Source: Eyestone Environmental, 2020.

should overlapping construction with other subareas occur. Therefore, like the Approved Project, the Modified Project would result in significant and unavoidable impacts to regional air quality during construction. Accordingly, the Modified Project would not create any new significant air quality impacts nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Operation

An analysis of proposed operational activities associated with the Hotel and Conference Center Expansion under the Modified Project was conducted and is provided in Table 5 on page 47. As shown in Table 5, the Hotel and Conference Center Expansion would result in less than significant regional operational air pollutant impacts in comparison to SCAQMD significance thresholds. Pollutant operational emissions associated with the Hotel and Conference Center Expansion in comparison to the office uses under the Approved Project that are being allocated for the Hotel Expansion is also provided. As shown in Table 5, the Hotel and Conference Center Expansion would result in an increase in emissions in comparison to the approved office uses. As shown in Table 5, area and energy source emissions are similar, but there is an increase in mobile source emissions as a result of the increase in daily trips. In comparison to the regional operational emissions identified in the Certified EIR, the Modified Project would increase daily emissions by approximately 0.2 percent for VOC, 0.9 percent for NO_x, 0.5 percent for CO, 0.2 percent for SO₂, 0.8 percent for PM₁₀, and 0.9 percent for PM_{2.5}. The overall emissions under the Modified Project in comparison the emissions identified in the Certified EIR would not represent a substantial increase in emissions. Accordingly, like the Approved Project, the Modified Project would result in a significant impact with respect to CO, ROC/VOC, NO_x, and PM₁₀ operational emissions. Likewise, the Modified Project would not exceed the SCAQMD's significance thresholds for SO_x during operation. Furthermore, the Modified Project would implement the same operational mitigation measures, as applicable, identified for the Approved Project. Therefore, like the Approved Project, the Modified Project would result in significant and unavoidable impacts on regional air quality during operation. As such, the Modified Project would not involve any new significant impacts related to operational air quality or result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Cumulative Impacts

Based on the above, the Modified Project also would not involve any new significant impacts related to a cumulatively considerable increase in air emissions nor substantially increase a previously identified significant impact.

**Table 5
Estimate of Regional Operational Emissions Associated with the Hotel and Conference Center Emissions^a**

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Hotel and Conference Center Expansion Emissions						
Area	13	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	3	3	<1	<1	<1
Mobile	5	23	65	<1	21	6
Total Emissions	19	27	68	<1	21	6
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(36)	(28)	(482)	(150)	(129)	(49)
Exceed Threshold?	No	No	No	No	No	No
Reallocated Office Uses						
Area	13	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	2	1	<1	<1	<1
Mobile	4	19	55	<1	18	5
Total Emissions	17	20	56	<1	18	5
Increase/(Decrease) in Emissions Relative to Reallocated Office Uses	2	6	12	<1	3	1
Comparison to Approved Project						
Approved Project Emissions^{b,c}	880	674	2,546	18	337	95
Percent Increase/(Decrease) with Modified Project	0.2%	0.9%	0.5%	0.2%	0.8%	0.9%
<p><i>Numbers may not add up exactly due to rounding.</i></p> <p>^a The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix C (CalEEMod Output) of this Addendum.</p> <p>^b Table 16 of the LASED Project Certified EIR or Appendix D of the LASED Project Certified EIR.</p> <p>^c PM_{2.5} emissions were not calculated in the LASED Project Certified EIR. Therefore, PM_{2.5} were calculated based on the ratio of PM_{2.5} and PM₁₀ emissions provided in the CalEEMod modeling conducted for the Modified Project.</p> <p>Source: Eyestone Environmental, 2020.</p>						

Question (c)—Sensitive Receptors:

Construction

Localized pollutant emissions during construction would be similar to the Approved Project and the Certified EIR as the distance to sensitive receptors and the maximum

intensity of grading activities on a daily basis would not substantially change, regardless of the changes to the land uses on the Olympic West subarea proposed under the Modified Project. As with the Approved Project and the Certified EIR, the Modified Project would therefore result in a less than significant localized PM₁₀ impact on all sensitive receptors. In addition, the remaining construction that would occur under the Modified Project would be more distant from sensitive receptors than the other portions of the Approved Project that have already been developed.

Operation

With regard to operation, in comparison to the Certified EIR, the Modified Project would result in a reduction of 511 weekday P.M. peak-hour trips (approximately 14 percent) and an increase of 69 Saturday evening peak-hour trips (or 1.3 percent). Since local CO hotspots are directly proportional to increases in vehicular traffic and the local CO impacts were well below the ambient air quality standards for the Certified EIR, sensitive receptors in the Project area are not anticipated to be significantly impacted by CO emissions related the Modified Project. Therefore, the Modified Project would not involve any new significant localized air quality impacts or increase the less-than-significant impacts identified in the Certified EIR.

Overall, the Modified Project would not result in any new significant localized air quality impacts or substantially increase a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (d)—Odors: With regard to construction, similar to the Approved Project, the Modified Project would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. In addition, the proposed hotel and conference center uses are already permitted under the Approved Project and are not land uses associated with odor complaints, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. As no odor impacts would occur, the Modified Project would not create any new significant impacts related to odors nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts in the Certified EIR.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Subsequent to completion of the Certified EIR, SCAQMD promulgated PM_{2.5} significance thresholds. This Addenda provides calculation of PM_{2.5} emissions associated with the proposed modification under the Modified Project and compares the emissions to

the SCAQMD significance thresholds. As PM_{2.5} emissions were not calculated in the Certified EIR, PM_{2.5} emissions were calculated based on the ratio of PM_{2.5} and PM₁₀ emissions provided in the CalEEMod modeling conducted for the Modified Project. As shown above, PM_{2.5} impacts would be similar to PM₁₀ impacts, in which regional construction and operational impacts would be significant and unavoidable for both the Approved and Modified Project. Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to air quality.

Any New Information Requiring New Analysis or Verification?

Other than the more stringent emission regulations that are now in place, there is no new information of substantial importance that has become available relative to air quality impacts. No substantial changes in the environment related to air quality beyond those anticipated as part of the Approved Project have occurred since certification of the Certified EIR, and no new air quality conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe air quality impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address air quality impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant air quality impacts would result from implementation of the Modified Project.

Construction—Land Clearing/Earth-Moving

1. The Applicant shall secure any necessary permits from the SCAQMD. (IV.E.1)
2. Non-toxic soil stabilizers shall be applied according to manufacturers' specifications or vegetation shall be planted on all inactive construction areas (i.e., previously graded areas inactive for 10 days or more and not scheduled for additional construction activities within 12 months) to the extent feasible. (IV.E.2)
3. Exposed pits (i.e., gravel, soil, dirt) with five percent or greater silt content shall be watered twice daily, enclosed, covered, or treated with non-toxic soil stabilizers according to manufacturers' specifications. (IV.E.3)
4. All other active sites shall be watered at least twice daily. (IV.E.4)

5. All grading activities shall cease during second stage smog alerts and periods of high winds (i.e., greater than 25 mph) if soil is being transported to off-site locations and cannot be controlled by watering. (IV.E.5)
6. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer). (IV.E.6)
7. A construction relations officer shall be appointed by the Applicant to act as a community liaison concerning on-site construction activity, including resolution of issues related to fugitive dust generation. (IV.E.7)
8. Diesel-fueled on-site generators shall not be used during construction of the Project. (IV.E.8)

Construction—Paved Roads

9. All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite, or shall be paved. (IV.E.9)
10. Streets shall be swept if visible soil material has been carried onto adjacent public paved roads. (IV.E.10)
11. Construction equipment shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary. (IV.E.11)

Construction—Unpaved Roads

12. Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce offsite transport of fugitive dust from all unpaved staging areas and unpaved road surfaces. (IV.E.12)
13. Traffic speeds on all unpaved roads shall not exceed 15 mph. (IV.E.13)

Construction—Construction Equipment

14. The Applicant shall use low emission vehicles to the extent technologically and economically feasible. This may include vehicles using alternative fuels, low sulfur diesel, diesel with particulate traps, methanol, or electricity. (IV.E.14)
15. The Applicant shall implement the use of low emission technology to the extent technologically and economically feasible. (IV.E.15)
16. The Applicant shall comply with applicable Proposition 65 notice requirements in the event that construction activities utilize toxic materials, or cause toxic materials to be released into the air, including if toxics are identified in the fugitive dust. (IV.E.16)

Operation

- 17. In order to reduce the long-term mobile source emissions associated with the Project, the Applicant shall continue to implement transportation systems management and demand management measures and comply with SCAQMD Rule 2202, which applies to all employers who employ 250 or more persons on a full- or part-time basis at a single worksite. This rule, which aims to reduce volatile organic compounds (VOCs), NOx, and CO, provides employers a menu of options that they can choose from to reduce emissions related to employee commutes. (IV.E.17)
- 18. The Applicant shall provide alternative refueling stations within the Project at a ratio of one per 1,000 parking spaces distributed throughout the Project as the parking is developed. (IV.E.18)

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.4. Biological Resources

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or More Severe Impacts?	Any New Circumstances Involving New Significant Impact or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
BIOLOGICAL RESOURCES: Would the project:					
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact	No	No	No	No
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact	No	No	No	No
(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	No	No	No	No

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No Impact	No	No	No	No
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	No	No	No	No
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

Questions (a) through (f)—Biological Resources: Impacts to Biological Resources were analyzed in the Initial Study, which is included as Appendix A to the Draft EIR, and in Subsequent Addenda. In general, the Certified EIR stated that the LASSED is essentially void of natural vegetation and wildlife, that on-site vegetation is generally comprised of ornamental landscaping, and no special plant or animal status species exist on-site. Further, the area does not contain any sensitive natural communities, wetlands, or wildlife corridors. Development would also not conflict with any preservation or conservation plans or policies. The Certified EIR therefore concluded that no impacts to biological resources would occur. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) through (f)—Biological Resources: The Modified Project would continue to result in no impacts to biological resources. The LASSED continues to be located in an urbanized area developed with dense urban land uses, associated parking, ornamental trees, and landscaping designed as streetscape amenities rather than natural habitat. As such, the same lack of biological resources within the area continues to exist under the Modified Project, and therefore the Modified Project would not affect preservation and conservation efforts for flora, fauna, and habitat. In addition, the LASSED continues to not be located in or adjacent to any riparian area and is not identified in the City of Los Angeles General Plan as a natural, conservation, or open space resource. No other adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other

approved, local, regional, or state habitat conservation plan applies to the Project Site. Furthermore, the LASED continues to not contain any natural hydrologic features or federally protected wetlands as defined by Section 404 of the Clean Water Act. Additionally, the LASED continues to not function as a wildlife corridor, and no bodies or courses of water exist on-site to provide habitat for fish.

In addition, any street trees to be removed as part of the Modified Project would be replaced in accordance with the LASED Streetscape Plan. Development as part of the Hotel and Conference Center Expansion would require the removal of 11 street trees; however, none of the existing trees are protected tree species, and new street trees and on-site landscaping would be installed as part of development on the Hotel and Conference Center Expansion site. Furthermore, removal of any mature trees that could potentially provide nesting sites for migratory birds would be conducted in accordance with the Migratory Bird Treaty Act and the California Department of Fish and Game Code. Impacts related to street tree removal and the City's tree preservation ordinance would be less than significant.

Based on the above, the Modified Project would not create any new significant impacts related to biological resources nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to biological resources.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to biological resources. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new biological resources have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, the Modified Project would not result in any new or substantially more severe impacts related to biological resources; thus, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.5. Cultural Resources

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
CULTURAL RESOURCES: Would the project:					
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	Less Than Significant	No	No	No	No
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	Less Than Significant	No	No	No	Yes
(c) Disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant	No	No	No	Yes

Impact Determination in the Certified EIR

Questions (a) through (c)—Historic Resources, Archeological Resources, and Human Remains: Impacts to historical resources were addressed in Section IV.L, Architectural/Historic Resources, of the Certified EIR and in Subsequent Addenda. As discussed therein, there are no historical resources located within the LASED. Three properties in the LASED vicinity were concluded to be eligible or potentially eligible for federal, state, or local designation as historical resources under CEQA, specifically the Variety Arts Center, Petroleum Building, and Hotel Figueroa. As evaluated in the Certified EIR, construction activities would not result in significant impacts to these historical resources as they would not be removed or altered, and construction activities would be sufficiently distant from the structures. As such, there would be less than significant impacts to and historical resources. Nonetheless, the Certified EIR included a mitigation measure (Mitigation Measure IV.L-2) to further protect historic resources, by requiring that new construction adjacent to the Variety Arts Center respect its historic character.

Impacts to archaeological and paleontological resources and human remains were analyzed in the Initial Study, which is included as Appendix A to the Draft EIR, and in Subsequent Addenda. Such impacts were determined to be less than significant, as the LASED had been previously graded and developed and did not contain any known archeological resources, paleontological resources, or human remains. Nonetheless, the Certified EIR included a mitigation measure (Mitigation Measure IV.L-1) to ensure that in the event of inadvertent discovery, any potential impacts to archaeological resources, paleontological resources, and other cultural materials would remain less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Historical Resources: Similar to the Approved Project, the Modified Project would result in less than significant impacts to historical resources. The Modified Project would primarily involve the continued development of Development Site 1a of the Olympic West subarea of the LASED, which was evaluated in the Certified EIR. As described above, there are no historical resources within the LASED, including the Hotel and Conference Center Expansion site (where some Approved Project development has already occurred). As such, the Modified Project would not involve the removal or alteration of any historical resources. In addition, the Modified Project, like the Approved Project, would not result in significant impacts to the off-site Variety Arts Center, Petroleum Building, or Hotel Figueroa during construction or operation. As such, the Modified Project would not create any new impacts to identified historical resources nor increase the severity of previously identified impacts. In particular, changes to the Approved Project, which primarily include increased height and a reallocation of floor area for the development of the Hotel and Conference Center Expansion on Development Site 1a, would not inhibit visual access to the three historical resources, as Site 1a is outside of the Figueroa North subarea (the area adjacent to the Variety Arts Center) and also not near the Petroleum Building or Hotel Figueroa. Therefore, the Hotel and Conference Center Expansion would not be subject to Mitigation Measure IV.L-2, as it is not applicable. Thus, as with the Approved Project, impacts to historical resources would be less than significant under the Modified Project. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Questions (b) and (c)—Archaeological Resources and Human Remains: Similar to the Approved Project, the Modified Project would result in less than significant impacts to archaeological resources and human remains. The Hotel and Conference Center Expansion site has been previously disturbed and developed and the Modified Project would not increase the anticipated depth of excavation than that of the Approved Project. As previously discussed in the Certified EIR and Subsequent Addenda, there are no known archaeological resources or human remains located in the LASED or in the Olympic West subarea. In addition, the Modified Project, including the Hotel and

Conference Center Expansion, would implement Mitigation Measure IV.L-1, which would ensure that any impacts associated with the inadvertent discovery of archaeological resources and other cultural materials such as human remains, as well as paleontological resources (addressed below in Section 7.1.7, Geology and Soils, Question (f) based on the City's current Environmental Checklist Form) would remain less than significant. Such impacts would be within the envelope of impacts addressed in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cultural resources.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to cultural resources. No substantial changes in the environment related to cultural resources have occurred since publication of the Certified EIR, and no new cultural resources have been identified in the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, since the Modified Project would not result in any new or substantially more severe impacts related to cultural resources, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

The following mitigation measure set forth in the Certified EIR and the associated MMRP to address cultural resource impacts would be implemented as part of the Modified Project. Note that Mitigation Measure IV.L-2 in the Certified EIR would not apply to the Hotel and Conference Center Expansion portion of the Modified Project, as development on the site is not located within the Figueroa North subarea and is not adjacent to the Variety Arts Center. No additional mitigation measures are required as no new significant cultural resource impacts would result from implementation of the Modified Project.

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

alternatives, to mitigate impacts. Work can only resume in that area with the approval of the City of Los Angeles and the paleontologist and/or archaeologist. (IV.L-1)

2. New construction adjacent to the Variety Arts Center shall respect its historic character through conformance with the Secretary of Interior’s Standard for Treatment of Historic Properties. (IV.L-2)

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.6. Energy

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR’s Mitigation Measures Addressing Impacts
ENERGY: Would the project:					
(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Not Addressed ^a	No	No	No	No
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Not Addressed ^a	No	No	No	No

^a The Certified EIR did not expressly analyze impacts related to energy as this topic was not included in Appendix G of the CEQA Guidelines at the time. However, energy was generally addressed in Section VII. Significant Irreversible Changes of the Certified EIR in terms of any potential long-term commitment of energy resources, including electricity, natural gas, and petroleum-based fuels, to determine whether a significant irreversible environmental change would occur as a result.

Impact Determination in the Certified EIR

Questions (a) and (b)—Energy Consumption and Energy Regulation: The Certified EIR did not expressly analyze impacts related to energy as this topic was not included in the Appendix G of the CEQA Guidelines at the time. However, energy was generally addressed in Section VII. Significant Irreversible Changes of the Certified EIR in terms of any potential long-term commitment of energy resources, including electricity, natural gas, and petroleum-based fuels, to determine whether a significant irreversible environmental change would occur as a result. The Certified EIR stated that development

within the LASED would consume energy resources such as electricity and natural gas, as well as petroleum-based fuels required for the increased number of vehicle-trips to be generated. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of development, and the existing, finite supplies of these natural resources would be incrementally reduced. The Certified EIR noted that increased consumption is not significant when compared with existing energy consumption levels citywide. While operation of development within the LASED was determined to represent a long-term commitment of non-renewable resources, such consumption was considered consistent with anticipated growth and urban changes in Los Angeles. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As indicated above, the 2019 update to the CEQA Guidelines includes a new section addressing energy within Appendix G of the CEQA Guidelines. The applicable questions, detailed above, are addressed below for the Modified Project, as the City currently relies on the Appendix G questions as thresholds of significance.

Question (a)—Energy Consumption: Under the Modified Project, potential impacts associated with the wasteful, inefficient, or unnecessary consumption of energy resources during project construction and operation would be less than significant. Like the Approved Project, the Modified Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline.

Construction activities under the Modified Project would be similar to those of the Approved Project as construction activity was anticipated within all subareas throughout the LASED, and the intensity or duration of construction would not change under the Modified Project. During construction, electricity would be consumed to convey water for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Electricity from these construction activities would be limited given that construction activities in general would be intermittent, as would the use of heating and cooling equipment. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction-related electricity consumption is anticipated to represent a small fraction of operational usage and would not occur in a wasteful, inefficient, or unnecessary manner. In addition, electricity would be supplied to the construction sites by existing electrical infrastructure and would not affect other services.

Construction activities typically do not involve the consumption of natural gas. However, like the Approved Project, Modified Project construction would require the consumption of energy in the form of petroleum-based fuels associated with the use of

off-road construction vehicles and equipment on-site, as well as construction worker travel to and from the Modified Project Site, and delivery and haul truck trips (collectively, on-road vehicles). Such fuel usage would be temporary and variable depending on specific construction activities. As with electricity, fuel consumption during construction would be relatively negligible and would not occur in a wasteful, inefficient, or unnecessary manner. Accordingly, the Modified Project would not have a meaningful effect on regional energy consumption during the construction period, similar to the Approved Project.

Operationally, the Modified Project would not increase the intensity of operation as presented under the Approved Project. Rather, the Modified Project would reallocate office floor area from Development Site 12 to hotel uses within Development Site 1a through the equivalency program established for the LASED. Therefore, there is no change to the overall envelope and scope of development as allowed under the Approved Project. During Modified Project operations, energy would be consumed for multiple purposes, including but not limited to: heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy also would be consumed during operations related to water usage/conveyance, solid waste disposal, and vehicle trips. As shown in Table 6 on page 60, the Hotel and Conference Expansion would result in a reduction in electricity use, but an increase in natural gas usage in comparison to the office land use under the Approved Project. Although the Modified Project would result in an increase in natural gas usage, the consumption would not be considered wasteful or inefficient since the hotel and conference center land uses would result in an approximant 30 percent reduction in energy consumption (e.g., natural gas) with implementation of Title 24 2019 standards instead of Title 24 2016 standards. Like the Approved Project, the Modified Project would comply with applicable requirements set forth in the California Building Energy Efficiency Standards (California Code of Regulations Title 24, Part 6) as well as the California Green Building Standards Code (Title 24, Part 11), commonly referred to as the CALGreen Code. However, new development under the Modified Project, such as the Hotel and Conference Center Expansion, would also be subject to more stringent energy and resource requirements of the building code than were in place at the time that the Approved Project was adopted. Compliance with these regulations would ensure electricity and natural gas usage would not occur in a manner that is wasteful, inefficient, or unnecessary. Moreover, the Modified Project's annual electricity and natural gas consumption is anticipated to represent a small fraction of future demand within the Los Angeles Department of Water and Power (LADWP) and Southern California Gas Company service areas, which, in any case, would be similar to that expected under the Approved Project.

Also during operation, Modified Project traffic would result in the consumption of petroleum-based fuels related to vehicular travel. As shown in Table 6, the Hotel and Conference Center Expansion would result in an increase in petroleum-based fuels related to vehicular travel in comparison to the office land use under the Approved Project. As discussed below in Section 7.1.17, Transportation, the LASED area is well-served by public

**Table 6
Comparison of Hotel and Conference Center Expansion to Office Uses Under Approved Project—Annual Net New Energy Use During Project Operation^a**

Source	Estimated Energy Demand		
	Office Land Use	Hotel and Conference Expansion	Difference
Electricity			
Building	6,638,130 kWh	3,989,220 kWh	-2,648,910 kWh
Water	1,436,380 kWh	213,204 kWh	-1,223,176 kWh
Total Electricity ^b	8,074,510 kWh	4,202,424 kWh	-3,872,086 kWh
Natural Gas			
Total Natural Gas ^b	5,050,752 cf	12,112,2863 cf	7,061,533 cf
Transportation (On-Road Vehicles and Off-Road Equipment)			
Gasoline	293,188 gal	336,994 gal	43,806 gal
Diesel	54,111 gal	62,196 gal	8,085 gal
Total Transportation ^c	347,299 gal	399,189 gal	51,891 gal
<hr/> <i>cf = cubic feet</i> <i>gal = gallons</i> <i>kWh = thousand kilowatt hours</i> ^a Detailed calculations are provided in Appendix C to this Addendum. Totals may not precisely add up due to rounding. ^b Electricity and natural gas estimates assume compliance with applicable CALGreen requirements. ^c Transportation fuel estimates include project characteristics consistent with CAPCOA guidance measures. Source: Eyestone Environmental, 2020.			

transit, which would be available to both residents, employees, patrons, and guests. In addition, similar to the Approved Project, the Modified Project reflects a number of characteristics related to location, land use, and design that would serve to reduce vehicular trips and vehicle miles traveled (VMT) as compared to standard trip generation rates. These include: increased land use density, which would serve to reduce the distance people travel for work or services; the introduction of a complementary mix of land uses in proximity to existing off-site hotel, convention center, retail/entertainment/restaurant, office/commercial, and residential uses, which would encourage non-automotive forms of transportation (i.e., walking and biking), thereby resulting in a corresponding reduction in transportation-related fuel consumption; sidewalks and a streetscape design intended to improve accessibility and connectivity while making the area more pedestrian-friendly and enhancing walkability; and location within an area with traffic calming measures (e.g., marked crosswalks, and count-down signal timers), which encourage people to walk or bike instead of using a vehicle and which are known to reduce

VMT.¹³ Furthermore, the Hotel and Conference Center Expansion portion of the Modified Project is specifically proposed to help meet Convention Center-related demand for hotel rooms and meeting space, and the proximity of these uses would reduce the need for off-site vehicular travel. As discussed in Section 7.1.17, below, the VMT associated with the Hotel and Conference Center Expansion would be below the per capita employment threshold set forth by LADOT. In addition, the LADOT VMT Calculator output (included in Appendix D) for the Hotel and Conference Center Expansion shows a 23-percent reduction in daily trips and corresponding gasoline and diesel fuels associated with the abundance of transit opportunities. As such, associated use of petroleum resulting from VMT from the Hotel and Conference Center Expansion would not be wasteful or inefficient. Overall, similar to the Approved Project, the Modified Project is not anticipated to involve fuel consumption that is wasteful, inefficient, or unnecessary.

Based on the above, impacts related to energy consumption would be less than significant. Furthermore, as with the Approved Project, the Modified Project would represent a long-term commitment of non-renewable resources, but such consumption would be consistent with anticipated growth and urban changes in Los Angeles. Accordingly, although this impact category was not specifically analyzed in the Certified EIR, such impacts would be less than significant.

Question (b)—Energy Regulations: Under the Modified Project, potential impacts associated with conflict with or obstruction of a state or local plan for renewable energy or energy efficiency would be less than significant. Under the Modified Project, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.¹⁴ With regard to transportation fuels, the Modified Project would comply with the California Air Resources Board's (CARB) anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation for trucks and equipment used during construction. Although these regulations are intended to reduce criteria pollutant emissions, compliance would also result in the efficient use of construction-related energy. During project operations, vehicles traveling to and from the LASED would comply with the federal Corporate Average Fuel Economy (CAFE) fuel economy standards, as required. In addition, as indicated above, the Modified Project would comply with applicable Title 24 and CALGreen Code requirements. Please refer to Table 7 on page 75 further below for additional regulatory measures that would further tighten standards and increase energy efficiency. Therefore, Modified Project construction and operational activities would comply with applicable energy standards and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Although not specifically analyzed in the

¹³ CAPCOA *Quantifying Greenhouse Gas Mitigation Measures*, p. 190.

¹⁴ *Energy Independence and Security Act of 2007*, Pub.L. 110-140.

Certified EIR, the Approved Project would have been subject to the same state and local plan standards and would not have conflicted with or obstructed plans for renewable energy or energy efficiency. Impacts would be less than significant.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

As discussed above, new circumstances since certification of the Certified EIR include the incorporation of energy as an analysis topic in Appendix G of the CEQA Guidelines. In addition, as discussed in more detail below in Section 7.1.8 Greenhouse Gases, new policies, regulations, and technologies relating to energy efficiency and vehicle fuel efficiency have come into effect since the time of the Certified EIR, which further reduce energy consumption for new developments. Furthermore, the introduction of new transit, bicycle, and pedestrian features throughout the downtown area (e.g., opening of the Metro Expo rail line, installation of the MyFig streetscape project, implementation of the 2010 Bicycle Plan, and other streetscape improvements), as well as densification of the area, have improved access to alternative modes of transportation and may further reduce VMT and the consumption of petroleum-based fuels. Overall, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy.

Any New Information Requiring New Analysis or Verification?

As discussed above, the more recent revisions to the CEQA Guidelines include energy as part of environmental topics to be addressed in Appendix G of the CEQA Guidelines. In addition, as discussed above, energy impacts of the Modified Project would be less than significant. As such, no new conditions or resources related to energy have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, since the Modified Project would not result in any new or substantially more severe impacts related to energy, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.7. Geology and Soils

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving:					
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	Less Than Significant With Mitigation	No	No	No	Yes
(ii) Strong seismic ground shaking?	Less Than Significant With Mitigation	No	No	No	Yes
(iii) Seismic-related ground failure, including liquefaction?	Less Than Significant	No	No	No	No
(iv) Landslides?	Less Than Significant	No	No	No	No
(b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant	No	No	No	No
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less Than Significant With Mitigation	No	No	No	Yes
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less Than Significant	No	No	No	No
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	No	No	No	No
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant	No	No	No	Yes

Impact Determination in the Certified EIR

Questions (a) through (e) Seismic Hazards, Soil Erosion and Topsoil, Ground Instability, Expansive Soils, and Support for Septic Tanks: Impacts with regard to geology and soils were addressed in Section IV.K, Geologic and Seismic Hazards, and Appendix A, Initial Study, of the Certified EIR. As discussed therein, the area is not within the Alquist-Priolo Fault Zone and no known active faults are located beneath the LASED. However, the LASED could be subject to moderate ground shaking typical of the general southern California area. The analysis in the Certified EIR concluded that development could expose people, property, or infrastructure to seismic hazards, although not to any greater extent than at other sites within the Central City area of the City. With implementation of the mitigation measures included in the Certified EIR (Mitigation Measures IV.K-1, IV.K-3, and IV.K-4), and adherence to applicable regulatory requirements including seismic standards and safety requirements, impacts related to fault rupture and ground shaking would be reduced to less than significant levels. Impacts associated with landslides and liquefaction would be less than significant as the LASED is not located within a designated landslide or liquefaction area. Subsequent Addenda confirmed the same determinations for the Approved Project.

As also discussed in the Certified EIR, a portion of the LASED (i.e., the Figueroa Central and Figueroa South development areas) is located inside the boundary of the State- and City-designated former Downtown Los Angeles Oil Field. Therefore, these areas could be prone to subsidence. However, with implementation of the mitigation measure (Mitigation Measure IV.K-2) included in the Certified EIR, potential impacts related to subsidence would be reduced to a less than significant level. Subsequent Addenda confirmed the same determination for the Approved Project.

As set forth in the Initial Study included as Appendix A of the Draft EIR, impacts associated with soil erosion and expansive soils were determined to be less than significant. In addition, the Initial Study determined that no impacts associated with septic tanks would occur as no septic tanks were proposed. Subsequent Addenda confirmed the same determinations for the Approved Project.

Question (f): Paleontological Resources: Impacts to paleontological resources were analyzed in the Initial Study, which is included as Appendix A to the Draft EIR. The Certified EIR determined that impacts would be less than significant, as the area had been previously graded and developed and did not contain any known paleontological resources. Nonetheless, the Certified EIR included a mitigation measure (Mitigation Measure IV.L-1) to ensure that in the event of inadvertent discovery, any potential impacts paleontological resources would remain less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Subsequent to completion of the Certified EIR, in 2015, the California Supreme Court, in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project.¹⁵ Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. In accordance with Appendix G of the CEQA Guidelines and the *CBIA v. BAAQMD* decision, a project would have a significant impact related to geology and soils if it would exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, seismic shaking, seismic-related ground failure, landslides, geologic instability or expansive soils.

Questions (a) and (c)—Seismic Hazards and Ground Instability: The Modified Project would not exacerbate existing hazardous environmental conditions that would result in potential hazardous impacts associated with ground shaking, fault rupture, liquefaction, landslides, or geologic instability, including subsidence. As the Modified Project would remain within the development areas analyzed in the Certified EIR and Subsequent Addenda, the geologic conditions associated with the Modified Project would remain the same as under the Approved Project. The Certified EIR indicated that no known active faults pass through any of the LASED Development Sites, and no Alquist-Priolo Earthquake Fault Zones cross the LASED. Review of California Department of Conservation’s recent maps confirms that the LASED, including the Hotel and Conference Center Expansion site, is not located within an earthquake fault zone and the closest active fault is the Hollywood Fault located approximately 4.8 miles to the north.¹⁶ However, portions of the LASED, including the Hotel and Conference Center Expansion are located in the Puente Hills Blind Thrust Zone.¹⁷ Similar to the Approved Project, the Modified Project would adhere to applicable seismic standards, safety requirements, and construction specifications, including Mitigation Measure V.K.1, which requires confirmation that no active faults are present. Thus, the Modified Project would not exacerbate existing environmental conditions by bringing people or structures into areas potentially susceptible

¹⁵ *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, Case No. S213478.

¹⁶ *California Geological Survey*, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed May 30, 2020.

¹⁷ *ZIMAS Parcel Profile Report*, <http://zimas.lacity.org/>, accessed May 30, 2020.

to substantial adverse effects, including fault rupture. Therefore, the Modified Project's impacts associated with surface fault rupture and ground shaking would be less than significant.

In addition, similar to the Approved Project, the Modified Project would not be located in an area designated as having landslide or liquefaction potential. Furthermore, changes to the Approved Project resulting in the Modified Project primarily focus on reallocation of floor area from Development Site 12 to Development Site 1a for the development of the Hotel and Conference Center Expansion. New development under the Hotel and Conference Center Expansion would not occur within the Figueroa Central or Figueroa South development areas, which have already been fully developed, and where potential for subsidence would occur and where mitigation would otherwise be required. Therefore, the Modified Project would not exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to potential substantial adverse effects related to liquefaction, landslides, or subsidence. Thus, impacts would be less than significant.

Overall, the Modified Project would not exacerbate existing hazardous environmental conditions that would result in potential hazardous impacts associated with ground shaking, fault rupture, liquefaction, landslides or subsidence. As such, the Modified Project would not create any new impacts with respect to geologic and seismic hazards, nor would the Modified Project increase the severity of any previously identified impacts. Such impacts would be within the envelope of impacts addressed in the Certified EIR and Subsequent Addenda.

Question (b)—Soil Erosion and Topsoil: Impacts associated with substantial soil erosion and loss of topsoil would be less than significant under the Modified Project. Whereas the Approved Project involved substantial grading throughout the LASED, the majority of which has since been substantially developed, development under the Modified Project would require more limited earthwork/excavation activities. As under the Approved Project, the Modified Project would implement standard erosion controls imposed during site preparation and grading activities, including Department of Building and Safety grading permit requirements and compliance with applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. As such, the potential for soil erosion during Modified Project operations would be relatively low and impacts would be less than significant. As such, the Modified Project would not create any new significant impacts related to soil erosion or the loss of topsoil nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Question (d)—Expansive Soils: Similar to the Approved Project, Modified Project impacts related to expansive soils would be less than significant. As development under

the Modified Project would occur within the same, previously evaluated areas (including the site of the Hotel and Conference Center Expansion), soil conditions would be the same. As with the Approved Project, if on-site soils are determined to have substantial shrink-swell potential, appropriate engineering solutions would be incorporated to avoid this potential. As such, the Modified Project would not exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to potential substantial adverse effects related to expansive soils and impacts would continue to be less than significant. Therefore, the Modified Project would not create any new significant impacts related to expansive soil nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Question (e)—Support for Septic Tanks: The Modified Project would not result in significant impacts associated with the use of septic tanks. The Approved Project is located within an area served by existing wastewater infrastructure. Similar to the Approved Project, the Modified Project’s wastewater demand, including the demand of the Hotel and Conference Center Expansion, would be accommodated by connections to the existing wastewater system. As such, the Modified Project would not require the use of septic tanks or alternative wastewater disposal systems. As with the Approved Project, no impact would occur. Therefore, the Modified Project would not create any new significant impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Question (f)—Paleontological Resources or Unique Geologic Features: The Modified Project would not result in significant impacts to paleontological resources or unique geologic features. As discussed in Section 7.1.5, Cultural Resources, above, the Certified EIR determined that impacts would be less than significant, as the area had been previously graded and developed and did not contain any known paleontological resources. Changes to the Approved Project, which include the development of the Hotel and Conference Center Expansion and development of most of the remaining floor area allocated to Development Site 12, do not change the previous soil conditions or paleontological conclusions of the Certified EIR. Specifically, the Project Site for the Hotel and Conference Center Expansion has been previously graded and is currently developed with the Olympic West parking garage which includes three subterranean levels. As such, there are no known paleontological resources or unique geologic features on-site. Nonetheless, the Hotel and Conference Center Expansion would implement Mitigation Measure IV.L-1 of the Certified EIR to ensure that any impacts to unknown paleontological resources would remain less than significant. Therefore, the Modified Project would not create any new significant impacts related to paleontological resources or unique geologic features, nor would the Modified Project result in a substantial increase in a previously

identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to geology and soils.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to geology and soils. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new conditions related to geology and soils have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any new or substantially more severe impacts related to geology and soils, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address geology and soils impacts would be implemented as part of the Modified Project. No additional mitigation measures are required as no new significant geology and soils impacts would result from implementation of the Modified Project.

Construction

1. A State-certified geologist shall review all excavations for evidence indicative of faulting, or seismically-induced ground deformation. If during grading, an active fault is determined to extend through the area, appropriate building setbacks from the fault line shall be established. (IV.K-1)

Operation

2. An assessment of the potential for subsidence at the Project Site shall be conducted as part of the geotechnical evaluation. (IV.K-2)
3. To assist in response to a seismic event, an emergency response and building specific evacuation plan for Project structures shall be developed in coordination with the Los Angeles Fire Department prior to the Certificate of Occupancy being granted by the City of Los Angeles. Such information shall be disseminated to employees to reduce the potential for human injury. (IV.K-3)

4. To assist in response to a seismic event, an emergency response and building specific evacuation diagram for Project structures shall be posted in each on-site building. Such signage shall be posted in appropriate locations to reduce the potential for injury to visitors and employees. (IV.K-4)

Paleontological Resources (*Note: This mitigation measure is also included in Section E, Cultural Resources, above.*)

If unknown paleontological, archaeological, and/or cultural materials are discovered during any grading or construction activity, work will stop in the immediate area. Upon such discoveries the contractor shall immediately notify the client and the City of Los Angeles. A paleontologist and/or archaeologist shall be consulted to determine the discovery’s significance and, if necessary, formulate a mitigation plan, including avoidance alternatives, to mitigate impacts. Work can only resume in that area with the approval of the City of Los Angeles and the paleontologist and/or archaeologist. (IV.L-1)

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.8. Greenhouse Gas Emissions

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or More Severe Impacts?	Any New Circumstances Involving New Significant Impact or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR’s Mitigation Measures Addressing Impacts
GREENHOUSE GAS EMISSIONS: Would the project:					
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Not Addressed ^a	No	No	No	No
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Not Addressed	No	No	No	No

^a Not analyzed in the Certified EIR, but addressed in Addenda No. 5 and Addenda No. 6 (Less Than Significant).

Impact Determination in the Certified EIR

Questions (a) and (b)—GHG Emissions and Regulatory Consistency: Initially the Certified EIR did not analyze impacts with respect to greenhouse gas (GHG)

emissions, as that was not an environmental impact category under CEQA at the time the document was prepared and certified. Subsequent addenda, however, did provide supplemental analysis and evaluated GHG impacts. In particular, the Fifth Addendum (dated August 2009) stated that the largest project-related GHGs were from mobile sources, and that mobile source GHGs are directly dependent on number of vehicle trips. Therefore, a decrease in the number of project-related vehicle trips would have a commensurate reduction in GHG. The Addendum outlined that development within the LASED promotes reductions in vehicle trips through strategies such as providing a mix of uses, providing improved access to public transit and alternative transportation modes, encouraging pedestrian and bicycle movement, and providing on-site recreation and open space. At the time, there was no formal guidance for quantifying GHG emissions. However, as concluded within the Addendum, the Approved Project would be consistent with the goals of Assembly Bill (AB) 32, the City's *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan), and relevant recommendations and strategies provided by the California Climate Action Team (CAT). Therefore, the Approved Project would not be considered to have a significant impact with respect to global climate change, either on a project-specific basis or relative to its contribution to a cumulative impact. The Sixth Addendum (dated January 2015) provided similar conclusions regarding GHG impacts.

Do Proposed Changes Involve New Significant Impacts?

Potential GHG impacts associated with the Modified Project would be less than significant. The primary change from the Approved Project associated with the Modified Project is the development of the Hotel and Conference Center Expansion, which reallocates allowable office floor area from the Olympic North subarea into equivalent hotel guest rooms into the Olympic West subarea. As the intensity of construction and the total amount of development within the entire LASED would remain relatively unchanged under the Modified Project, the amount of vehicle miles travelled, and greenhouse gas emissions would also remain relatively similar and would not significantly increase under the Modified Project. Therefore, the Modified Project, which includes the Hotel and Conference Center Expansion, would not result in new significant impact or substantially more severe impacts in terms of GHG generation. In addition, the conversion of office floor area to hotel uses from one development site to another within the LASED would not conflict with greenhouse gas reduction plans, policies, or regulations, as the Modified Project, like the Approved Project, would continue to not conflict with goals for smart-growth, density near transit, and reductions in vehicle miles travelled and associated emissions.

Since publication of the 2015 Addendum, the regulatory environment pertaining to GHG emissions has continued to evolve and expand upon previous plans and policies. While various actions have been taken and numerous plans/policies have been adopted at the state and local levels, the following summary focuses on those regulatory changes most pertinent to an evaluation of the Modified Project's impacts related to GHG emissions:

- In 2016, Senate Bill (SB) 32 updated Assembly Bill 32 (California Global Warming Solutions Act of 2006) to ensure the statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. SB 32, also increases renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Executive Order B-55-18 (September 2018) further establishes a goal to achieve carbon neutrality as soon as possible, but no later than 2045.
- In September 2018, SB 100 (100 Percent Clean Energy Act of 2018) provided a goal of achieving 50 percent renewable resources by the end of 2026 and 60 percent by the end of 2030. SB 100 also required that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by the end of 2045.
- To implement regional targets for reducing passenger vehicle greenhouse gas emissions established by SB 375 (approved in 2008, and last updated in March 2018), and by correlating land use and transportation planning, SCAG adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (SoCal Connect 2020–2045 RTP/SCS) on September 3, 2020.¹⁸ The RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the RTP/SCS draws a close connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more. The RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region’s High Quality Transit Areas (HQTAs).¹⁹
- The RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State’s GHG emission reduction goals. In December 2017, CARB adopted the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California’s 2030 Greenhouse Gas Target (2017 Update). The 2017 Update builds upon the successful framework established by the 2008 Climate Change Scoping Plan and the First Update to the Climate Change Scoping Plan:

¹⁸ SCAG, *Final 2020-2045 RTP/SCS*.

¹⁹ HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.

Building on the Framework (First Update; 2014) while identifying new, technologically feasible, and cost-effective strategies to ensure California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the State’s largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrains and reduces emissions at covered sources.²⁰

- In addition, the state and City building and energy codes, including Title 24 and the associated CALGreen Code as well as the Los Angeles Green Building Code, continue to be updated on a triennial basis, with continued improvements in and stricter requirements with respect to energy and water conservation and efficiency. As an example, the 2019 Title 24 Standards which went into effect on January 1, 2020, ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As described in the 2019 Title 24 Standards, they represent “challenging but achievable design and construction practices” that represent “a major step towards meeting the Zero Net Energy (ZNE) goal.”²¹ Nonresidential buildings are projected to use approximately 30 percent less energy due mainly to lighting upgrades.²²
- In April 2019, Mayor Eric Garcetti released the Green New Deal, a program of actions designed to create sustainability-based performance targets through 2050 designed to advance economic, environmental, and equity objectives. L.A.s Green New Deal is the first four-year update to the City’s first Sustainable City pLAN that was released in 2015. It augments, expands, and elaborates in even more detail L.A.’s vision for a sustainable future and it tackles the climate emergency with accelerated targets and new aggressive goals. Within the Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions and both short-term and long-term aspirations through the year 2050 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Specific targets include reducing vehicle miles traveled per capita by at least 13 percent by 2025, increasing trips made by walking, biking or transit by at least 35 percent by 2025, and that all new buildings be net carbon zero by 2030.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have the SCAQMD, CARB, California Air Pollution Control

²⁰ CARB, 2017 Update, November 2017, p. 6.

²¹ CEC, 2019 Building Energy Efficiency Standards.

²² CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.

Officers Association (CAPCOA), or any other state or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Modified Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Modified Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. The total GHG emissions associated with the Hotel and Conference Center Expansion were also quantified. The purpose of providing an estimate of these GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which requires a good-faith effort to describe, calculate, or estimate the amount of GHGs resulting from a Project. Additional purposes of the GHG emissions estimates are to demonstrate the reduction in the Modified Project's incremental contribution of GHG emissions that result from regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions, and to provide further justification that the Modified Project is consistent with plans adopted for the reduction or mitigation of GHG emissions. The significance of the Modified Project's GHG impacts is not based on the amount of GHG emissions resulting from the Modified Project.

The Governor's Office of Planning and Research (OPR) encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. On a statewide level, the 2008 Climate Change Scoping Plan and subsequent updates provide measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's 2020-2045 RTP/SCS contains measures to achieve VMT reductions required under SB 375. The City does not have a programmatic mitigation plan to tier from, such as a Greenhouse Gas Emissions Reduction Plan as recommended in the relevant amendments to the CEQA Guidelines. The City's Green New Deal is not an adopted plan or directly applicable to private development projects. However, the City's Green New Deal, a mayoral initiative, includes short-term and long-term aspirations pertaining to climate change and this analysis addresses consistency with these strategies and goals. Thus, if the Modified Project is designed in accordance with these policies and regulations, the Modified Project would result in a less than significant impact, because it would be consistent with overarching state regulations on GHG reduction (AB 32).

Questions (a) and (b)—GHG Emissions and Regulatory Consistency: Changes to the Approved Project resulting in the Modified Project primarily involve the development of the Hotel and Conference Center Expansion, which reallocates allowable office floor area from the Olympic North subarea into equivalent hotel guest rooms into the Olympic West subarea. As the intensity of construction and the total amount of development within the entire LASED would remain relatively unchanged under the Modified Project, the amount of construction equipment required, vehicle miles travelled, and greenhouse gas emissions during construction would also remain relatively similar under the Modified Project. Like the Approved Project, the Modified Project complies with or exceeds the performance-based standards included in the regulations outlined in the AB 32's 2008

Climate Change Scoping Plan and subsequent updates and SCAG's 2020-2045 RTP/SCS. As shown herein, the Modified Project would be consistent with the applicable GHG reduction plans and policies.

Provided in Table 7 on page 75 is an evaluation of applicable reduction actions/strategies outlined in the Climate Change Scoping Plan and subsequent updates that through implementation would indirectly reduce Project GHG emissions. As detailed therein, the Project would not conflict with the Climate Change Scoping Plan and subsequent updates, which are intended to reduce GHG emissions.

In 2018, CARB adopted a target reduction for the SCAG region of 19 percent for 2035 from passenger vehicle use. The Project would not conflict with requirements under the 2020–2045 RTP/SCS as the Hotel and Conference Expansion Project is an infill project within an existing urbanized area. This would concentrate new hotel and conference uses within a HQTAs. Project-related transportation emissions would be reduced by approximately 23 percent with implementation of applicable GHG reduction measures in comparison to the standard rates within the LADOT VMT model for a project within the City of Los Angeles. Specifically, the Project would introduce a complementary mix of land uses in proximity to existing off-site hotel, convention center, retail/entertainment/restaurant, office/commercial, and residential uses, which would encourage non-automotive forms of transportation (i.e., transit, walking and biking), thereby resulting in a corresponding reduction in transportation-related VMT and related GHG emissions. This reduction would be less than the reduction targets in the 2020–2045 RTP/SCS. Therefore, the Project would not conflict with SB 375 and the 2020–2045 RTP/SCS. In addition, the Modified Project does not conflict with the Mayor's Green New Deal policy directive, which supports State goals and regional plans. By utilizing the proposed Transfer of Floor Area and Environmental Equivalency Transfer to reallocate office floor area to equivalent hotel rooms on a different site within the LASED, the Modified Project would not increase the development density previously approved for the LASED. Furthermore, as discussed earlier, the Modified Project reflects a number of characteristics related to location, land use, and design that would serve to reduce vehicular trips and VMT, thereby reducing associated GHG emissions. These include: increased land use density, which would serve to reduce the distance people travel for work or services; the introduction of a complementary mix of land uses in proximity to existing off-site hotel, convention center, retail/entertainment/restaurant, office/commercial, and residential uses, which would encourage non-automotive forms of transportation (i.e., walking and biking), thereby resulting in a corresponding reduction in transportation-related fuel consumption; sidewalks and a streetscape design intended to improve accessibility and connectivity while making the area more pedestrian-friendly and enhancing walkability; location within an area with traffic calming measures (e.g., marked crosswalks, and count-down signal timers) that are

**Table 7
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan**

Mandatory Regulatory Compliance Measures
<p>Energy</p> <p>RPS Program and SB 2X: The California RPS program (Updated under SB 2X) requires both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50 percent renewables by 2030. In 2017, LADWP indicated that 29 percent of its electricity came from renewable resources in Year 2016.^a Electricity GHG emissions provided in Table 8 on page 78 assume that LADWP will receive at least 33 percent of its electricity from renewable sources by the year 2020 and 50 percent by the year 2030 (with a straight line interpolation for the Hotel and Conference Center Expansion buildout year of 2024) consistent with SB 350. The CalEEMod default carbon intensity for electricity generated by LADWP (pounds of CO_{2e} per MWh) is based on a year 2007 renewables portfolio of 8 percent and was therefore updated within CalEEMod to reflect the year 2024 renewables portfolio. Please note that under recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026 and, 60 percent by 2030, and 100 percent by 2045. The Modified Project complies with these percentage renewable requirements because the Modified Project is served by LADWP.</p> <p>The electricity-related GHG emissions provided in Table 8 on page 78 conservatively do not account for the additional 7-percent reduction that would be achieved by LADWP in year 2024 prior to buildout of the Hotel and Conference Center Expansion (difference between the 43 percent renewables assumed for the buildout year of 2024 and 50 percent required under SB 100 in year 2026) or 17-percent reduction achieved by LADWP in year 2030 (difference between the 43 percent renewables assumed for the buildout year of 2024 and 60 percent required under SB 100 in year 2030).</p> <p>SB 350: As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.</p> <p>Cap-and-Trade Program: As required by AB 32 and the <i>Climate Change Scoping Plan</i>, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electric service providers and not directly to land use development. That being said, the Modified Project would benefit from this regulatory program in that the GHG emissions associated with the Modified Project's electricity usage per year presented in Table 8 on page 78 would indirectly be covered by the Cap-and-Trade Program. Furthermore, the Cap-and-Trade Program also covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. While not quantified in this analysis, the Modified Project would benefit from this regulatory program in that the GHG emissions associated with the Modified Project's electricity and fuel usage would indirectly be covered by the Cap-and-Trade Program.</p>
<p>Mobile</p> <p>Advanced Clean Cars Program: In 2012, CARB approved the Advanced Clean Cars Program which establishes an emissions control program for model year 2017 through 2025 and increases the number of zero emission vehicles manufactured in the 2018 through 2025 model years. Standards under the Advanced Clean Cars Program apply to all passenger and light duty trucks within California and would indirectly be used by employees and deliveries to the Project. Mobile source GHG emissions provided in Table 8 on page 78 conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model default fleet mix for the Air Basin does not yet account for this regulation.</p> <p>The 2008 Climate Change Scoping Plan recommends additional mobile source strategies through the extension of the Advanced Clean Cars Program which are expected to increase GHG stringency on light duty autos and continue adding zero emission and plug in vehicles through 2030. CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the</p>

Table 7 (Continued)
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
<p>near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.^{b,c} Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the Modified Project would also indirectly benefit from these measures once adopted. However, the Modified Project's GHG emissions inventory conservatively does not account for GHG emissions reductions due to these measures.</p>
<p>Low Carbon Fuel Standard (LCFS): The current LCFS requires a reduction of at least 7.5 percent in the carbon intensity (CI) of California's transportation fuels by 2020. CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030.^d As discussed previously, the CalEEMod model does not take into account the more recent updates to LCFS. The Modified Project's emissions inventory conservatively does not take credit for additional GHG reductions due to the more recent LCFS requirements, but this additional 10-percent reduction in CI would indirectly reduce the Modified Project's mobile source emissions.</p>
<hr/> <p>^a CEC, <i>Annual Power Content Labels for 2017, LADWP, July 2018.</i></p> <p>^b CARB, <i>Advance Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acc/acc-mtr.htm, accessed February 5, 2020.</i></p> <p>^c CARB, <i>Advanced Clean Local Trucks (Last mile delivery and local trucks), ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks, accessed February 5, 2020.</i></p> <p>^d CARB, <i>LCFS Rulemaking Documents, www.arb.ca.gov/fuels/lcfs/rulemakingdocs.htm, accessed February 5, 2020.</i></p> <p>Source: Eyestone Environmental, 2020.</p>

known to reduce VMT by encouraging people to walk or bike instead of using a vehicle.²³ In addition, the proposed new hotel as part of the Hotel and Conference Center Expansion portion of the Modified Project would include on-site recreational and open space amenities, reducing the need for hotel guests to travel off-site. Furthermore, the Hotel and Conference Center Expansion is intended to help meet Convention Center-related demand for hotel rooms and meeting space, and the proximity of these uses would reduce the need for off-site vehicular travel. Moreover, the entire downtown area, including the LASED and the Olympic West subarea where the Expansion is proposed, is designated as an HQTAs and thus targeted for higher density development such as that proposed under the Modified Project.

Additionally, given the recent and continued expansion of the Expo Light Rail and its proximity to the LASED as well as other public transit improvement projects such as MyFigueroa and the implementation of the 2010 Bicycle Plan, it is anticipated that some

²³ CAPCOA *Quantifying Greenhouse Gas Mitigation Measures, p. 190.*

vehicle trips generated by the Approved Project, as well as the Modified Project, would now be reallocated to the public transit system, further reducing mobile source GHG emissions.

The Modified Project also would incorporate or support GHG reduction measures such as increasing renewable energy usage; reducing per capita water usage; promoting walking and biking to work, large events, and venues; promoting of high density uses close to major transportation stops; and various recycling and trash diversion goals. The benefits described above, combined with compliance with the Los Angeles Green Building Code and other relevant Title 24 requirements, would ensure that the Modified Project would be consistent with the various plans and policies designed to reduce GHG emissions and attain the reduction targets established in AB 32 and Executive Order S-3-05. Therefore, the Modified Project would not have a significant impact with respect to GHG emissions. As such, the Modified Project would not create any new significant impacts related to GHG emissions nor result in a substantial increase in a previously identified significant impact.

For informational purposes, an analysis of proposed operational activities associated with the modifications under the Modified Project was conducted and is provided in Table 8 on page 78. As shown in Table 8, the Hotel and Conference Center Expansion would result in a decrease of GHG emissions in comparison to the office uses removed under the Approved Project.

Any New Circumstances Involving New Impacts?

As discussed above, the Certified EIR did not analyze impacts with respect to GHG emissions, as that was not an environmental impact category under CEQA at the time the document was prepared and certified. The Fifth and Sixth Addenda, however, did provide supplemental analysis and evaluated GHG impacts. As concluded therein, the Approved Project and subsequent modifications would not conflict with greenhouse gas reduction plans, policies, or regulations and would not be considered to have a significant impact with respect to global climate change. The analysis provided above for the Modified Project is consistent with this conclusion. In addition, the analysis above includes more recent regulations and plans that have been developed to reduce GHG emissions. Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to GHG emissions.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to GHG emissions beyond the new guidance set forth in the updated Appendix G of the CEQA Guidelines and the regulatory requirements and guidance set forth by local, state and federal agencies. No substantial changes in the environment have occurred

Table 8
Comparison of Hotel and Conference Center Expansion to Approved Project (Removed Office Uses)—Annual GHG Emissions Summary^a
(metric tons of carbon dioxide equivalent [MTCO₂e])

Scope	Office Land Uses	Hotel and Conference Center	Difference
Area ^c	<1	<1	<1
Energy	2,334	1,914	-420
Mobile	3,505	4,062	556
Solid Waste	63	56	-7
Water/Wastewater	600	99	-500
Total Emissions	6,503	6,132	-371

^a CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix C of this Addendum. Totals may not add up due to rounding.
 Source: Eyestone Environmental, 2020.

since certification of the Certified EIR, and no new conditions related to GHG emissions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Rather, since preparation of the Certified EIR numerous regulations have been established to reduce GHG emissions from a development project. Finally, as determined above, the Modified Project would not result in any new or substantially more severe GHG emission impacts, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

Although mitigation measures specific to GHG emissions were not previously adopted, implementation of many of the adopted air quality and transportation mitigation measures would serve to reduce GHG impacts. The same mitigation measures recommended to reduce construction and operational air quality impacts, as well as mitigation measures to reduce vehicle miles travelled under the Approved Project, as set forth in the Certified EIR and the associated MMRP, would apply to the Modified Project.

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR

8.1.9. Hazards and Hazardous Materials

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS:					
Would the project:					
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant With Mitigation	No	No	No	Yes
(b) Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	Less Than Significant With Mitigation	No	No	No	Yes
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant	No	No	No	No
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less Than Significant	No	No	No	No
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No	No	No	No
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant	No	No	No	No
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

Impacts with regard to hazards and hazardous materials were analyzed in Section IV.G, Hazardous Materials, of the Certified EIR, in Subsequent Addenda, and in the Initial Study included as Appendix A to the Draft EIR.

Questions (a) through (d)—Routine Transport, Use, or Disposal of Hazardous Materials and Upset and Accident Conditions Due to a Hazardous Materials Release, including a Release in Proximity to Schools, and Listing on a Hazardous Materials Site:

Construction

The Certified EIR found that construction hazard impacts would be less than significant with mitigation or less than significant. The database search conducted for the Certified EIR found one address within the Olympic East development area of the LASED, which was identified as a small-quantity hazardous waste generator.²⁴ There was no mention of any violations or citations relative to this classification, and the business had been demolished (and has since been developed as part of the Approved Project). In addition, 96 properties within a 0.25-mile radius were included in the database report, 86 of which were solely underground storage tank (UST) or generator properties and only a few of which had any potential for contamination adjacent to the LASED. Excavation and earthwork activities associated with development in the LASED were determined to pose potential health risks related to the disturbance and potential release of soil and/or groundwater contaminants (specifically for three properties within the Figueroa South, Olympic East, and Olympic North development areas). However, with regulatory compliance and mitigation (Mitigation Measures IV.G-1 and IV.G-2), such impacts would be less than significant. In addition, Mitigation Measure IV.G-5 was included to address the inadvertent discovery of contaminated soils or hazardous materials during construction at any site within the LASED. Demolition activities within the LASED associated with the two existing structures (specifically located in the Figueroa Central development area) could release asbestos containing materials (ACM) or lead-based paints (LBP), but these impacts would be reduced to less than significant levels with mitigation (Mitigation Measure IV.G-3 and IV.G-4). Based on methane sampling results, no further investigation of subsurface methane accumulations was recommended or warranted, and related impacts were concluded to be less than significant. All other construction-related impacts were likewise concluded to be less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

Operation

Operation of development within the LASED would involve the use of small quantities of potentially hazardous materials such as cleaning solvents, detergents, and pesticides. However, all such materials would be stored, handled, and disposed of in accordance with applicable federal, state, and local regulations. As such, operations were

²⁴ *Small quantity generators are those who consistently produce less than 1,000 kg of hazardous waste in a given calendar month, per California Code of Regulations Section 66262.34.*

not found to pose any significant risks related to the accidental release of hazardous materials, and all operational impacts with regards to hazards were determined to be less than significant. With compliance with regulatory requirements, potential impacts to nearby schools would also be less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

Questions (e) through (g)—Safety Hazards Near an Airport, Interference with an Emergency Response or Evacuation Plan, and Wildland Fires: The Certified EIR determined hazard impacts related to airports, emergency response plans, and wildland fires would be less than significant or have no impact. The LASED is not located within an airport land use plan, within 2 miles of an airport, or within the vicinity of a private airstrip and therefore no significant impacts would occur in relation to airport hazards. In terms of emergency response plans, project implementation would result in the occasional closure of 11th Street (Chick Hearn Court) between the Harbor Freeway and South Figueroa Street to accommodate special events and pedestrian-oriented gatherings. This could impact then-existing evacuation routes and adopted emergency response plans. However, adherence to safety standards including those established by the Los Angeles Fire Department (LAFD) would ensure that there would be no substantive impact on an adopted emergency response or evacuation plan. The LASED is located in an urbanized area, with irrigated landscaping, and there are no wildlands in the surrounding vicinity. Therefore, there would be no impacts in terms of wildfire hazards. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Routine Transport, Use, or Disposal of Hazardous Materials: Modified Project Impacts related to the routine transport, use or disposal of hazardous materials during construction and operation would be less than significant with mitigation.

Construction

The changes to the Approved Project resulting from the Modified Project, include the reallocation of office floor area from the Olympic North subarea to an equivalent number of hotel rooms in the Olympic West subarea. These modifications would be consistent with the type of land uses and intensity of development currently permitted for the Approved Project. As the majority of the LASED subareas have already been developed, remaining earthwork activities for the Modified Project would be limited. In particular for the Hotel and Conference Center Expansion, grading and excavation would be limited as the majority of the development would occur above the existing Olympic West parking garage, which includes existing subterranean and above-ground levels. Therefore, the potential to routinely transport, use, and dispose of hazardous materials during this phase and remaining potential future phases of construction would be generally

the same as or less than what was previously evaluated for the Approved Project. In addition, with no net increase in total LASED floor area and no changes in the overall permitted uses, the Modified Project would not result in new or unforeseen building construction activities that could increase the use, handling, or transport of hazardous materials as compared to the Approved Project. Moreover, all potentially hazardous materials to be used during construction of the Modified Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including but not limited to those set forth by the federal and state Occupational Safety and Health Acts. Any associated risks would be adequately reduced to less than significant levels through regulatory compliance. Therefore, the Modified Project would not create any new impacts with respect to hazardous materials during construction nor would the Modified Project increase the severity of any previously identified impacts. Thus, as with the Approved Project, with compliance with existing regulations, as well as continued implementation of the adopted mitigation measures, as applicable, potentially significant impacts associated with hazardous materials would be reduced to less than significant levels. Such impacts would be within the envelope of impacts identified in the Certified EIR and Subsequent Addenda.

Operation

With regards to operation, the Modified Project would involve the same types of land uses as the Approved Project and thus would involve the routine transport, use, and disposal of the same types of hazardous materials. As the Modified Project would remain within the amount of floor area permitted in the LASED, the magnitude of hazardous materials used during operation also would be similar to that of the Approved Project. In addition, like the Approved Project, all potentially hazardous materials would be stored, handled, and disposed of properly in compliance with applicable regulations. As such, the Modified Project would not create any new impacts with respect to transport of hazardous materials during operation, nor would the Modified Project increase the severity of any previously identified impacts. Thus, similar to the Approved Project, the operational impacts of the Modified Project would be less than significant. Such impacts would be within the envelope of impacts addressed in the Certified EIR and Subsequent Addenda.

Question (b)—Upset and Accident Conditions Due to a Hazardous Materials

Release: Modified Project impacts associated with the potential risk of upset due to a hazardous materials release would be less than significant with mitigation. Based on the analysis within the Certified EIR and Subsequent Addenda, the potential for hazardous materials releases under the Approved Project was limited to the release of soil and/or groundwater contamination in conjunction with grading and excavation activities. Construction of the Modified Project, however, would involve only limited earthwork since the majority of the LASED subareas have already been developed. For the Hotel and Conference Center Expansion grading and excavation would be limited e as the majority of the development would occur above the existing Olympic West parking garage, which

includes existing subterranean and above-ground levels. Therefore, the potential to release hazardous materials during this phase and remaining potential future phases would be within the envelope of earthwork originally anticipated as part of the Approved Project. Accordingly, there would be no new potential for the release of soil and/or groundwater contamination. Additionally, no further investigation of subsurface methane accumulations was recommended or warranted in the Certified EIR. Therefore, similar to the Approved Project, implementation of the adopted mitigation measures in the Certified EIR would ensure that potential impacts related to the upset and accident conditions due to a hazardous materials release would be reduced to less than significant levels. Certain mitigation measures specific to soil remediation within the Olympic North subarea at 931 West Olympic Boulevard (IV.G-1 and IV.G-2), would not apply to the Hotel and Conference Center Expansion, while general mitigation regarding the inadvertent discovery of contamination (Mitigation Measure IV.G-5) would apply to the Hotel and Conference Center Expansion site, as well as any other site within the LASED. The Modified Project would not create any new significant impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, nor would the Modified Project result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Question (c)—Hazardous Emissions or Acutely Hazardous Materials Near a School: Modified Project impacts related to hazardous emissions or acutely hazardous materials near a school would be less than significant. Construction activities under the Modified Project would be limited as compared to the Approved Project, as the majority of the LASED subareas have already been fully developed. However, new development would occur as part of the Hotel and Conference Center Expansion in the Olympic West subarea. Two schools are located within 0.25 mile of the Hotel and Conference Center Expansion Project at Development Site 1a: the Bill Cruz Early Education Center at 1020 Valencia Street and Olympic Primary Center at 950 Albany Street, both of which are located west of the Harbor Freeway. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Modified Project would be typical of those used during construction and operation of similar commercial/mixed use developments, such as vehicle fuels, paints, cleaning solvents, and pesticides for landscaping. Therefore, the types of potentially hazardous materials used in connection with the Modified Project would be consistent with those currently used by existing development in the surrounding vicinity. Furthermore, all such materials would be handled, used, and stored in accordance with manufacturers' instructions and in compliance with applicable standards and regulations. Therefore, the Modified Project would not result in any new significant impacts related to hazards affecting nearby schools nor result in a substantial increase in a previously identified significant impact.

Question (d)—Hazardous Materials Sites: Modified Project impacts associated with listing on a hazardous site would be less than significant. Section 65962.5 of the

California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a collective database of hazardous waste sites and other contaminated sites compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred.

The database search conducted for the Certified EIR found one address within the Olympic East development area of the LASED, which was identified as a small-quantity hazardous waste generator.²⁵ There was no mention of any violations or citations relative to this classification, and the business had been demolished (and has since been developed as part of the Approved Project). In addition, 96 properties within a 0.25-mile radius were included in the database report, 86 of which were solely underground storage tank (UST) or generator properties and only a few of which had any potential for contamination adjacent to the LASED. Relative to the Olympic West development area within which the Hotel and Conference Center Expansion is located, subsurface investigations were previously conducted at six properties to collect and analyze soil vapor and soil samples. Testing included volatile organic compounds (VOCs), metals, petroleum hydrocarbons, and polychlorinated biphenyls (PCBs), all of which were either not detected, found in trace concentrations, or consistent with typical background concentrations. Accordingly, no further investigations were recommended, and no remediation activities were warranted.

Based on the above, similar to the Approved Project development within the Olympic West development area, construction of the Modified Project would not create a significant hazard to the public or the environment. Should any hazardous conditions be uncovered, associated risks would be adequately reduced to a less than significant level through compliance with regulatory requirements and implementation of any applicable mitigation measures. Therefore, the Modified Project would not create any new significant impacts related to a hazardous materials site identified pursuant to Government Code Section 65962.5 nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts identified in the Certified EIR and Subsequent Addenda.

Question (e)—Safety Hazards Near an Airport: Modified Project impacts associated with safety hazards near an airport would be less than significant. As discussed in the Initial Study, included as Appendix A of the Draft EIR, the LASED is not located within an area subject to an airport land use plan or within 2 miles of an airport. Therefore,

²⁵ *Small quantity generators are those who consistently produce less than 1,000 kg of hazardous waste in a given calendar month, per California Code of Regulations Section 66262.34.*

like the Approved Project, the Modified Project would not have the potential to result in an aviation safety hazard. The Modified Project would not create any new significant impacts related to aviation safety hazards nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (f)—Interference with an Emergency Response or Evacuation Plan:

Modified Project impacts associated with emergency response and evacuation would be less than significant. The Initial Study indicated that the occasional closure of 11th Street (Chick Hearn Court) for special events and gatherings could impact then-existing evacuation routes and adopted emergency response plans. However, adherence to safety standards including those established by the Los Angeles Fire Department (LAFD) would ensure that there would be no substantive impact on an adopted emergency response or evacuation plan. The Modified Project proposes the permanent closure of the Eleventh Street Pedestrian Area (Chick Hearn Court), which is already routinely closed. The permanent closure would be conducted in accordance with City standards, including those established by LADOT and LAFD to ensure that adequate emergency access remains available. The Modified Project would not involve any other new street closures aside from possible temporary lane closures during construction, which would have been foreseen as part of the Approved Project. If temporary lane closures are necessary, the remaining travel lanes would be maintained in accordance with traffic Mitigation Measure IV.F.1-1, which requires a Construction Management Plan be implemented to ensure adequate vehicular and pedestrian circulation and emergency access. In addition, traffic Mitigation Measure IV.F.1-25 requires implementation of a Traffic Control Plan that includes measures to address operational traffic flow and pedestrian safety with the closure of 11th Street. Therefore, the Modified Project would not create any new significant impacts related to the implementation of the City's emergency response plans nor result in a substantial increase in a previously identified significant impact.

Question (g)—Wildland Fires: Modified Project impacts associated with wildfires would be less than significant. The Initial Study (Section VII. Hazards and Hazardous Materials), included as Appendix A of the Draft EIR, concluded there would be no impact relative to wildland fires. The LASED is located in an urbanized area, and there are no wildlands in the surrounding vicinity. Landscaping in the area is irrigated and is not considered a fire hazard. Therefore, similar to the Approved Project, the Modified Project would not create any new significant impacts related to wildland fires nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to hazards and hazardous materials.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to hazards and hazardous materials. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new conditions related to hazards and hazardous materials have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, the Modified Project would not result in any new or substantially more severe hazards impacts, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

The following mitigation measure set forth in the Certified EIR and the associated MMRP to address hazards and hazardous materials impacts would be implemented as part of the Modified Project. No additional mitigation measures are required as no new significant hazards and hazardous materials impacts would result from implementation of the Modified Project.

It should be noted that Mitigation Measures IV.G-1 and IV.G-2 only apply to properties at 1240 South Figueroa Street, 844 Olympic Boulevard, and 931 Olympic Boulevard. These mitigation measures have been partially completed as part of the Approved Project. Development has already been completed on 1240 South Figueroa Street with the Circa mixed-use development and on 844 West Olympic Boulevard with LA Live, and therefore Mitigation Measures IV.G-1 and IV.G-2 have already been completed for those two properties. However, since development has not occurred at 931 West Olympic Boulevard, Mitigation Measures IV.G-1 and IV.G-2 would apply for the property should future development occur and have been modified as such.

Also, Mitigation Measures IV.G-3 and IV.G-4, requiring remediation for the safe removal of asbestos and lead-based paint during demolition of structures within the Figueroa Central subarea, have already been completed, as the Figueroa Central subarea structures have also already been demolished and the subarea is currently being developed

with the Oceanwide mixed-use project. Therefore, Mitigation Measures IV.G-3 and IV.G-4 from the Certified EIR are not applicable to the Modified Project and are not included herein.

1. In the event that previously undiscovered contaminated soil or hazardous materials are encountered at the Project Site during construction, identification and remediation procedures shall be developed in accordance with applicable federal, State, and City regulations, which would ensure that the potential for the risk of upset would be below a level of significance. (IV.G-5)
2. Further investigation by a registered environmental professional of the potential soil and/or groundwater contamination on 1240 South Figueroa Street (APN 5138-025-004), 844 West Olympic Boulevard (APN 5138-009-002), and 931 West Olympic Boulevard (APN 5138-005-008) shall be conducted in accordance with RWQCB, where applicable. Any required remedial action recommended by the registered environmental professional and approved by the RWQCB for any contamination discovered during these investigations shall be fully implemented and documented. (IV.G-1)
3. Coordination of ongoing remediation activities with proposed Project construction shall be performed to ensure that soil cleanup is not stopped or impeded. (IV.G-2)

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.10. Hydrology and Water Quality (Drainage and Surface Water Quality)

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or More Severe Impacts?	Any New Circumstances Involving New Significant Impact or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less Than Significant	No	No	No	Yes
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No Impact	No	No	No	No

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
(i) result in substantial erosion or siltation on- or off-site;	Less Than Significant	No	No	No	Yes
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Less Than Significant	No	No	No	Yes
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less Than Significant	No	No	No	Yes
(iv) impede or redirect flood flows?	Less Than Significant	No	No	No	No
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No Impact	No	No	No	No
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant	No	No	No	No

Impact Determination in the Certified EIR

Hydrology and water quality impacts were evaluated in Section IV.D, Drainage and Surface Water Quality and in the Initial Study (Appendix A to the Draft EIR) of the Certified EIR, and in Subsequent Addenda.

Questions (a) and (e)—Water Quality Standards:

Construction

With respect to water quality, as analyzed in the Certified EIR, grading activities associated with construction would temporarily increase the amount of suspended solids from surface flows derived from the LASED during a storm event due to sheet erosion of exposed soil. In addition, on-site water activities to reduce airborne dust could contribute marginally to increased sediment loading of surface runoff during dry weather conditions. However, in accordance with National Pollutant Discharge Elimination System (NPDES) permit requirements, the Approved Project would be required to prepare a Storm Water

Pollution Prevention Plan (SWPPP), which would include Best Management Practices (BMPs) to minimize sedimentation, prevent contamination of hazardous materials, and eliminate non-stormwater discharges. During construction, development would not violate any water quality standards or waste discharge requirements, nor would development impair the beneficial uses of receiving water. With implementation of BMPs and compliance with all relevant stormwater quality management programs, development of the LASED would result in less than significant impacts to surface and ground water quality during construction. In addition, with compliance with regulatory requirements, construction of the Approved Project would not conflict with water quality control plans or groundwater management plans. Subsequent Addenda confirmed the same determination for the Approved Project.

Operation

Operations would also increase the amount of contaminants in stormwater runoff as a result of the proposed land uses and the associated increase in automobile traffic. However, as stated in the Certified EIR, development within the LASED would be required to implement source control and treatment control BMPs as part of a Standard Urban Storm Water Mitigation Plan (SUSMP). With implementation of these BMPs, the Approved Project would not violate any water quality standards or waste discharge requirements, nor would the Approved Project impair the beneficial uses of receiving waters or result in significant impacts to water quality. Furthermore, by replacing the then-existing surface parking lots with urban land uses, the quantity of untreated urban contaminants in relation to existing Project uses would be reduced. As a result, less than significant impacts to water quality would occur during operations. In addition, with compliance with regulatory requirements, operation of the Approved Project would not conflict with water quality control plans or groundwater management plans. Nonetheless, the Certified EIR included a mitigation measure (Mitigation Measure IV.D-2) to ensure that impacts to surface water quality would remain less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

Question (b)—Groundwater Supplies or Groundwater Recharge: As stated in the Initial Study included as Appendix A of the Draft EIR, the development of the LASED would not involve any deep excavation that would have the potential to intercept existing aquifers, nor would it involve direct additions or withdrawals of groundwater. Therefore, project development within the LASED would not impact groundwater supplies or groundwater recharge. Subsequent Addenda confirmed the same determination for the Approved Project.

Question (c)—Alteration of Drainage Patterns: Based on the design calculations prepared as part of the Certified EIR, it was determined that the development of the LASED would not result in a significant change to then-existing hydrologic conditions during construction or operation. Furthermore, development would be designed to ensure that

hydrologic conditions before and after development would remain unchanged and that no increase in runoff over existing conditions would occur during construction or operation. In addition, since the LASED was fully paved at the time the Certified EIR was prepared, development of the LASED was determined to have a beneficial impact relative to surface water runoff by increasing the amount of pervious areas through landscaping. Development would also not alter drainage or increase surface runoff in a manner which would result in erosion, siltation, or flooding on- or off-site. In addition, drainage improvements would be able to accommodate run-off from the project site, and runoff water would therefore not exceed the capacity of the stormwater drainage system or provide substantial additional sources of polluted runoff. Therefore, a less than significant drainage impact during construction and operation was identified. Nonetheless, the Certified EIR included a mitigation measure (Mitigation Measure IV.D-1) to ensure that the LASED and surrounding properties would not be subject to increased flood hazard. Subsequent Addenda confirmed the same determination for the Approved Project.

Question (d)—Flood, Tsunami, Seiche and Other Inundation Hazards: As stated in the Initial Study included as Appendix A of the Draft EIR, the LASED is not subject to flooding during 100-year and 500-year storm events. Thus, no significant flooding of the site is anticipated. In addition, the LASED is not within a 100-year flood plain. Existing storm drains and flood control channels in the area are designed to accommodate a maximum storm event that would be expected to take place in the project area, so flood flows would not be impeded or redirected. In addition, there are no levees or dams in the area. Thus, Approved Project impacts associated with flood hazards, including inundation, would be less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

The project site is located approximately 15 miles from the ocean and other large bodies of water are not located in the vicinity. Therefore, the area is not subject to seiche or tsunami hazards. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Water Quality Standards: The Modified Project would not result in significant impacts associated with water quality.

Construction

As with the Approved Project, continued compliance with NPDES requirements and local regulations that require implementation of appropriate BMPs would ensure that construction activities associated with the Modified Project would not degrade the surface water quality of receiving waters to levels below standards considered acceptable by the

Los Angeles Regional Water Quality Control Board or other regulatory agencies, or impair the beneficial uses of the receiving waters. Therefore, construction of the Modified Project would not result in a violation of any water quality standards or waste discharge requirements and would not otherwise substantially degrade water quality. As with the Approved Project, construction-related impacts to surface water quality would be less than significant under the Modified Project.

Operation

During operation of the Modified Project, pollutants typically associated with urban uses, such as oil and grease, metals, fertilizers, pesticides, dirt from landscaped areas, and litter, would be produced, similar to the Approved Project. However, similar to the Approved Project, it is anticipated that the additional landscaping to be provided under the Modified Project would increase the amount of pervious area in the LASED. Therefore, like the Approved Project, the Modified Project would result in a reduced potential for urban pollutants to be conveyed into nearby storm drains during storm events. In addition, similar to the Approved Project, the Modified Project would be required to comply with SUSMP requirements during operation. Such requirements would include source control BMPs, treatment control BMPs, and requirements regarding erosion control. Therefore, similar to the Approved Project, compliance with such requirements and implementation of the adopted mitigation measure (Mitigation Measure IV.D-2) in the Certified EIR would ensure that impacts to surface water quality during operation would be less than significant under the Modified Project.

Based on the above, the Modified Project would not create any new significant impacts related to the violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, nor would the Modified Project result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impact analysis provided in the Certified EIR and Subsequent Addenda.

Question (b)—Groundwater Supplies or Groundwater Recharge: The Modified Project would not result in significant impacts associated with groundwater supplies or recharge. According to the Initial Study, the Approved Project would not involve any deep excavation with the potential to intercept existing aquifers, nor would it involve direct additions or withdrawals of groundwater. Similarly, the Modified Project would not require deep excavations, and earthwork would be both limited and within the scope of work originally anticipated as part of the Approved Project. As with the Approved Project, no impacts to groundwater would occur. Therefore, the Modified Project would not create any new significant impacts related to groundwater supplies nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Question (c)—Impacts to Existing Drainage Patterns: The Modified Project would not result in significant impacts related to drainage. Similar to the Approved Project, the existing drainage patterns on-site would be maintained, and stormwater flows would continue to be directed to the existing storm drain infrastructure within the adjacent streets under the Modified Project. With a net increase in pervious surface area associated with new landscaping, the Modified Project would also have a beneficial impact by promoting natural infiltration, similar to the Approved Project. Accordingly, the rate and amount of stormwater runoff would be reduced compared to existing conditions, as was anticipated under the Approved Project. Furthermore, since the rate and amount of stormwater runoff would not increase relative to existing conditions, the existing storm drain infrastructure would be adequate to accommodate the proposed uses. Thus, as with the Approved Project, drainage impacts under the Modified Project would be less than significant. Moreover, the Modified Project would implement the adopted mitigation measure to ensure that the surrounding properties would not be subject to increased flood hazard. As such, the Modified Project would not create any new significant impacts related to the alteration of existing drainage patterns in a manner that would result in substantial erosion, siltation, increased runoff, or flood flow changes, nor result in a substantial increase in a previously identified significant impact. Any impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Question (d)—Seiche, Tsunami or Other Inundation Hazards: The Modified Project would not result in significant impacts associated with seiche, tsunami or other inundation hazards. As discussed in the Initial Study for the Approved Project, the LASED is not subject to seiche, tsunami, or other inundation hazards. The Modified Project would be developed under the same conditions. Flooding as well as any related risk of pollutant release would not be expected. Therefore, the Modified Project would not create any new significant impacts related to inundation nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Question (e)—Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan: Please refer to the analysis of Questions (a) and (b) above addressing water quality and groundwater impacts. As discussed therein, the Modified Project would comply with existing water quality regulations and plans and would not create any new significant impacts related to water quality and groundwater nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the

Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to hydrology and water quality.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to hydrology or water quality. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new hydrology or water quality conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any new or substantially more severe hydrology or water quality impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address hydrology and water quality impacts would be implemented as part of the Modified Project. No additional mitigation measures are required as no new significant hydrology or water quality impacts would result from implementation of the Modified Project.

1. Prior to construction activities on any development area, the Applicant shall prepare a master erosion control plan for that developed area, which includes detailed flood control plans, for the City of Los Angeles Department of Public Works, Bureau of Engineering. The plans shall include hydrology/hydraulic calculations and drainage improvement plans, showing quantitatively how projected storm water runoff would not exceed existing design conditions. Such plans shall be reviewed and approved by the City prior to the issuance of building permits. (IV.D.1)
2. The Applicant shall construct catch basins, roof drains, and surface parking drains connecting directly to the existing storm drain system, and any other drainage improvements, as may be required by the Bureau of Engineering. (IV.D.2)

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.11. Land Use and Planning

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
LAND USE AND PLANNING: Would the project:					
(a) Physically divide an established community?	Less Than Significant	No	No	No	No
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No	No	No	No

Impact Determination in the Certified EIR

The analysis of land use impacts provided in Section IV.A, Land Use and the Initial Study (Appendix A of the Draft EIR), of the Certified EIR and in Subsequent Addenda considered whether the Approved Project would physically divide an established community, conflict with adopted applicable land use policies, plans, or regulations, and whether the Approved Project would be compatible with existing land uses.

Question (a)—Physically Divide an Established Community: As analyzed in the Initial Study (Draft EIR: Appendix A) of the Certified EIR, development of the previously predominately vacant LASED would help to merge the high-rise urban development north of the area with the specialized convention and sports venues located south of 11th Street, and continue the existing pattern of major visitor-serving land uses in this portion of the South Park area. Therefore, development within the LASED would not divide an established community and impacts would be less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

Question (b)—Conflict with Land Use Plan, Policy, or Regulation: As analyzed in the Certified EIR, development within the LASED would further the City's goals for the downtown area by developing a compatible mix of uses that would enliven the downtown area and provide entertainment and visitor-serving opportunities. Further, by locating such uses near existing transit facilities, including the Metro Blue Line, development within the LASED would support the City's goals to create a pedestrian-oriented, live/work community in downtown. It would also provide desired convention-related hotel and residential land uses to promote associated growth opportunities for the Los Angeles Convention Center and establish a focal point for special events within the Figueroa Corridor. Moreover, development would maximize the use of existing urbanized areas accessible to transit

through infill and redevelopment; implement redevelopment in and around an activity center and in an area needing redevelopment; and encourage local job development. Therefore, as evaluated in the Certified EIR, development would be consistent with and support the goals and policies set forth in SCAG's Regional Comprehensive Plan and Guide, the City of Los Angeles General Plan Framework, the Central City Community Plan, the Central Business Redevelopment Plan, the Downtown Strategic Plan, the South Park Development Strategies and Design Guidelines, the Figueroa Corridor Economic Development Strategy, and. In addition, it would not conflict with LAMC and Zoning Code provisions.

The Initial Study of the Certified EIR also noted that the LASED is highly urbanized, and that there are no applicable habitat or natural community conservation plans in place for the area.

Therefore, the Certified EIR found impacts to be less than significant, as development within the LASED would not conflict with applicable land use plans, policies, or regulations. Subsequent Addenda concluded that the Approved Project was consistent with these impact determinations.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Physically Divide an Established Community: The Modified Project would not result in significant impacts associated with the division of an established community. As previously described, the Modified Project involves the development of land uses already permitted in the LASED. Therefore, the Modified Project would not introduce land uses that were not previously anticipated as part of the Approved Project. Rather, the proposed uses would be an extension of the existing surrounding uses and would combine with existing adjacent development to create a well-designed, efficient, and balanced urban environment. In particular, the proposed Conference Center Expansion Site was already identified as a "holding area" for future Convention Center expansion in the Certified EIR. In addition, the design of the proposed structures would be compatible with the existing nearby hotel, retail/entertainment/restaurant, and Convention Center uses. Thus, as with the Approved Project, the Modified Project would result in less than significant impacts with regard to land use compatibility. As such, the Modified Project would not create any new impacts related to the division of an established community nor increase the severity of previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Question (b)—Conflict with a Land Use Plan, Policy, or Regulation: As demonstrated by the analysis below, the Modified Project would not result in significant impacts associated with conflict with a land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

SCAG Plans

The RTP/SCS is the current guidance document used to promote economic growth and livable communities. The RTP/SCS emphasizes sustainability and integrated planning and identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. As previously discussed, the RTP/SCS' overall land use pattern reinforces the trend of focusing new housing and employment in HQTAs. The entire downtown area, including the LASED and the Hotel and Conference Center Expansion site, is designated as an HQTA and thus targeted for higher density development such as that proposed under the Modified Project. The Modified Project would further support the goals and principles set forth in the RTP/SCS through the construction of development within an urban, infill area well served by transit; the introduction of new pedestrian connections and streetscape improvements designed to promote access and connectivity and enhance walkability; and the implementation of Transportation Demand Management strategies and amenities that encourage non-automotive forms of transportation. Therefore, the Modified Project would not conflict with any policies of the latest SCAG plan for the purpose of mitigating or avoiding an environmental effect.

Local Policy Plans and Regulations

General Plan Framework

As with the Approved Project, the Modified Project would further the General Plan Framework's land use objectives for the Downtown Center by continuing to provide entertainment and visitor-serving opportunities and promote the full economic potential of the Los Angeles Convention Center. In addition, similar to the Approved Project, the Modified Project would feature a high-quality design that would encourage nighttime uses, enhance public safety, and improve transit access. Specifically, the Hotel and Conference Center Expansion portion of the Modified Project would include a hotel tower design that would define the street edge and create an urban street wall that would be consistent with neighboring buildings and would contribute to the synergy of the existing JW Marriott Hotel and L.A. LIVE.

General Plan and Central City Community Plan

Like the Approved Project, the Modified Project would also support the objectives and policies of the Central City Community Plan, by promoting the Central City as a concentrated center of high-intensity urban activities, including entertainment, residential commercial, cultural, recreational, and appropriate industrial uses. Specifically, the Modified Project would support Policy 2-1.2 to maintain a safe, clean, attractive, and lively environment, as well as Policy 2-2.2 to encourage pedestrian-oriented and visitor-serving uses during the evening hours by providing a mix of uses that expand the existing hotel and conference center and enhance existing visitor-serving uses in the LASED and

surrounding area. Implementation of the LASED Specific Plan and the associated streetscape improvements, which would continue to occur as part of the Modified Project, is specifically identified in the Community Plan as a program to support Policy 2-2.2. In addition, the Modified Project would support Objective 2-3 to promote land uses in the Central City that address the needs of all downtown visitors for business, conventions, trade shows, and tourism as well as Policy 2-3.1 to support the development of a hotel and entertainment district surrounding the Los Angeles Convention Center/STAPLES Center with linkages to other areas of the Central City and the Figueroa Corridor. Again, implementation of the LASED Specific Plan is identified as a program to support this policy, which the Modified Project would directly help fulfill. The reallocation of office to hotel uses and floor area to the Olympic West subarea as part of the Modified Project would provide additional hotel rooms and convention center uses to serve residents, tourists, and regional visitors. The proposed hotel and conference center uses would complement the existing uses and amenities in the area and would promote tourism and use of the Los Angeles Convention Center and JW Marriott Conference Center facilities. Additionally, the Modified Project would support Objective 2-4 of the Central City Community Plan, which encourages a mix of uses to create an active 24-hour downtown environment for current residents and to foster increased tourism.

City Center Redevelopment Plan

As with the Approved Project, with the development of a variety of uses near existing transit facilities, including the Metro Blue Line, and the more recently expanded transit projects such as the Metro Expo Line extensions, MyFigueroa street improvement program, and new bicycle infrastructure, the Modified Project would continue to support the City's goals to create a pedestrian-oriented, live/work community in the downtown area. Moreover, the Modified Project would maximize the use of existing urbanized areas accessible to transit through infill and redevelopment; implement redevelopment in and around an activity center; and encourage local job development. The increased density that would occur under the Modified Project would also promote the LASED as a focal point for special events within the Figueroa Corridor.

Other Local Plans

A number of other plans that were previously analyzed in the Certified EIR are no longer in effect or have been superseded by other updated downtown plans and policies. These include the Downtown Strategic Plan, the South Park Development Strategies and Design Guidelines, and the Figueroa Corridor Economic Development Strategy. In general, these plans echoed and supported many of the same goals and objectives of the City's General Plan, Community Plan, and Redevelopment Plan, such as creating a vibrant and successful regional and entertainment center in downtown Los Angeles, by encouraging urban renewal and economic development, providing a synergistic mix of uses, and increasing employment and housing opportunities and pedestrian linkages near transit.

New plans that have since come into effect include the Downtown Design Guide, which encourages active ground-floor uses, pedestrian-oriented site design, and other guidance on urban form. The Modified Project would not conflict with these plans and policies, as the Modified Project, like the Approved Project, includes widened sidewalks, activated building frontages that support pedestrian activity, and appropriate landscaping. Therefore, similar to the Approved Project, the Modified Project would be consistent with and support the goals and policies set forth in the City of Los Angeles General Plan Framework, the Central City Community Plan, the City Center Redevelopment Plan, as well as the Downtown Design Guide. The Modified Project would also not conflict with any policies of local plans set for the purpose of mitigating or avoiding an environmental effect.²⁶

LASED Specific Plan

In addition to the applicable land use policies and plans discussed in the Certified EIR and evaluated above, development within the LASED is governed by the LASED Specific Plan, which enforces the maximum envelope of development permitted under the Approved Project through set environmental thresholds, as well as implements the Mitigation Monitoring and Reporting Program of the Certified EIR.

As a majority of the LASED Specific Plan has already been built out, or is in the process of construction, the only remaining sites within the LASED Specific Plan that can accommodate further development under the current Specific Plan and Certified EIR include Development Site 1a within the Olympic West subarea, and Development Site 12 within the Olympic North subarea. Figueroa North, which is outside the LASED Specific Plan, may also be developed. As discussed above, the Modified Project includes the Hotel and Conference Center Expansion comprised of 861 hotel rooms and 228,200 square feet of meeting and conference rooms on Development Sites 1a and 1b of the Specific Plan. The Modified Project also would provide for the reduction of 10 hotel guest rooms in the existing JW Marriott Hotel on Development Site 1, resulting in a net increase of 851 rooms under the Modified Project. The Hotel and Conference Center Expansion would be connected to the adjacent existing JW Marriott Conference Center to the north via two elevated pedestrian bridges. In addition, the existing parking structure would be partially demolished, signage would be removed and replaced, and the Eleventh Street Pedestrian Area would be vacated.

²⁶ *The LASED development area is currently located in the City Center Redevelopment Project area, which is governed by the Redevelopment Plan for the City Center Redevelopment Project adopted in 2002 (subsequent to completion of the Certified EIR). Accordingly, with regard to the Project, the City Center Redevelopment Plan effectively replaces the Redevelopment Plan for the Central Business District Redevelopment Project, which was addressed in the Certified EIR.*

The LASED Specific Plan establishes mechanisms and limitations for transferring floor areas and land uses within the Specific Plan area to facilitate its buildout. As previously indicated, to provide for the Hotel Expansion, the Modified Project would include an Environmental Equivalency Transfer, pursuant to Section 6 of the Specific Plan, to: (i) convert 231,564 square feet of office floor area permitted within Development Site 12 to 851 hotel rooms; and (ii) reallocate an additional approximately 332,136 square feet of office floor area and allocate 14,700 square feet of Convention Center Expansion floor area to the Hotel Expansion to achieve a total of 578,400 square feet of hotel floor area.²⁷ As noted above, an additional 10 hotel rooms would be relocated from the existing JW Marriott Hotel to the Hotel Expansion Project resulting in a total of 861 hotel rooms. The 10 hotel guest rooms removed from the existing JW Marriott Hotel would be replaced by approximately 3,500 square feet of ancillary meeting room space. With completion of the Environmental Equivalency Transfer and floor area reallocation, approximately 38,100 square feet of office floor area would remain permitted within Development Site 12. The Hotel Expansion Project also would include a Transfer of Floor Area, pursuant to Specific Plan Section 15, to transfer the above-referenced converted floor area from Development Site 12 to Development Site 1a.

The Conference Center Expansion uses proposed within Development Site 1a would be within the currently permitted Convention Center Expansion floor area of 250,000 square feet. Therefore, no changes to the permitted development within Development Site 1a are proposed as part of the Modified Project.

In addition, with implementation of the Modified Project, the LASED Specific Plan area would comprise approximately 5,827,3131 square feet consistent with the total permitted floor area.

As discussed above, the following modifications to the Specific Plan are proposed to provide for the Modified Project: increasing the permitted tower height up to 420 feet on Development Site 1a; permitting hotel uses on the Convention Center Expansion Parcel; creating regulations for the Eleventh Street Pedestrian Area upon its vacation; modifying certain signage provisions; modifying permitted alcohol service at the cinemas from beer and wine only to a full line of alcoholic beverages and to permit alcohol service within the Eleventh Street Pedestrian Area during special events; and other minor changes and

²⁷ As set forth in Section 5 of the LASED Specific Plan, any project which utilizes an Environmental Equivalency Transfer shall be reviewed by the Director of Planning to determine if it exceeds any of the environmental thresholds set forth in Appendix D of the LASED Specific Plan. If the project does not exceed any of the environmental thresholds set forth in Appendix D, the Director of Planning shall then review the project pursuant to the Project Permit Compliance Review. If the project does exceed any of the environmental thresholds set forth in Appendix D, additional environmental review shall be required. Accordingly, this Addendum comprises the required additional environmental review. Refer to Appendix F of this Addendum for the analysis required by Appendix D of the Specific Plan.

technical corrections. As discussed above in Section 7.1.1, Aesthetics, above, the proposed building height would be compatible with existing building heights project vicinity and the proposed uses and signage would be consistent with the existing uses and signage in the vicinity.

Specific changes to the signage program under the Modified Project include the following:

- Removal of 3,560 square-foot tri-vision and digital existing STAPLES Center marquee sign, which would be replaced with a new sign integrated into the architecture at the southwest corner of the Conference Center Expansion, with 2,350 square feet of LED signage facing the north and 2,350 square feet of LED signage facing the south for a total of 4,700 square feet. Amendments to the Specific Plan would be required to allow the replacement STAPLES Center marquee sign to extend above the roof line of the Conference Center expansion and to not count against the existing limit of 1,500 square feet of Electronic Message Display and Animated signage within the Olympic West Subarea.
- Replacement of four “V”-shaped Freeway Edge Signs, which would be removed from their locations in front of the west façade of the LA Live Lot W parking garage. The new Freeway Edge Signs (Signs C1, C2, and C3) would be 2,500 square feet, while Sign C4 would be 1,700 square feet for a total of 9,200 square feet. This would exceed the 8,700 square feet of Freeway Edge Signs allowed under the Specific Plan by 2.6 percent. The Specific Plan Amendment request includes a request to allow for this minor increased signage area for Freeway Edges to reflect the revised sign program for the Project. In addition, under the Specific Plan Section 16.C.8, Freeway Edge signs are permitted to be up to 65 feet in height as measured from grade. While the proposed replacement Freeway Edge Signs would have a maximum height of approximately 43 feet from the bottom to the top of the sign, to better incorporate these signs into the building architecture, they have been elevated higher into the curtain wall. Since the Specific Plan measures height of signs from grade, the proposed height to the top of these signs from grade would be 76.5’. This height increase would require a conforming amendment to this section of the Specific Plan.
- Other primary signage components under the Modified Project, all of which already are consistent with Specific Plan requirements, include 3,035 square feet of wall signs on the east façade of Hotel Expansion; 1,980 square feet of wall signs on the south façade of the Conference Center Expansion; and 1,995 square feet of building identification signs.

Other proposed amendments to the Specific Plan include non-substantive changes such text corrections, procedural changes, minor changes to alcohol licenses, and parking reductions. Pursuant to SB 743, a project’s aesthetic and parking impacts shall not be considered a significant impact on the environment. No other amendments to the Specific

Plan are necessary in connection with the Modified Project or Hotel and Conference Center Expansion. Therefore, with the approval of the proposed amendments to the LASED Specific Plan, the Modified Project, including the Hotel and Conference Center Expansion, would not conflict with any standards of the LASED Specific Plan for the purpose of mitigating or avoiding an environmental effect.

In addition, analysis of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Addendum. Section 7.1.1, Aesthetics, evaluates Project consistency with the Downtown Design Guide; Section 7.1.3, Air Quality, evaluates Project consistency with the Air Quality Management Plan; Section 7.1.8, Greenhouse Gas Emissions, evaluates Project consistency with the City's Green New Deal (Sustainable City pLAN 2019), Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); and the California Air Quality Updated Climate Change Scoping Plan. Section 7.1.14 Population and Housing, evaluates Project consistency with the RTP/SCS and Regional Housing Need Assessment; Section 7.1.17, Transportation and Traffic, evaluates the more focused traffic provisions of the City's General Plan Mobility 2035 Element, and the Los Angeles County Congestion Management Plan.

Based on the above, the Modified Project would be consistent with existing land use plans, policies and regulations adopted for the purpose of mitigating or avoiding an environmental effect. Thus, the Modified Project would not create any new significant impacts related to a conflict with any applicable land use plan, policy or regulation nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

As set forth above, while there have been changes to the various land use plans that guide development of the Project Site, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to land use and planning.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to land use and planning. No substantial changes in the environment related to land use and planning beyond the construction of anticipated development have occurred since publication of the Certified EIR, and no new conditions related to land use have been

identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe land use impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.12. Mineral Resources

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
MINERAL RESOURCES: Would the project:					
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	No	No	No	No
(b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

Questions (a) and (b)—Loss of Availability of Mineral Resources: The Initial Study, which is included as Appendix A to the Draft EIR, determined that development within the LASED would not result in impacts to mineral resources. The LASED is not located on a site where significant mineral deposits are present or where it is judged that there is a high likelihood for their presence to exist. In addition, the area is not delineated as a mineral resource recovery site in the General Plan Framework for the City of Los Angeles. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) and (b)—Loss of Availability of Mineral Resources: As indicated in the Initial Study, the LASED does not include sites where significant mineral deposits are present or any mineral resource recovery sites. Furthermore, the LASED is not designated as an existing mineral resource extraction area by the State of California or the U.S. Geological Survey.²⁸ Additionally, the area is not designated for mineral extraction land use. There are no active wells or drilling within the LASED and none are proposed as part of the Modified Project; moreover, implementation of the Modified Project would not impede such activities elsewhere outside of the LASED. Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. No impacts to mineral resources would occur. In addition, similar to the Approved Project, development of the Modified Project would occur within a developed area that has been previously disturbed. Therefore, the Modified Project would not create any new significant impacts related to mineral resources nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to mineral resources.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to mineral resources. No substantial changes in the environment related to mineral resources have occurred since certification of the Certified EIR, and no new mineral resources have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any mineral resource impacts, a review of feasible mitigation measures is not required.

²⁸ *California Geological Survey/U.S. Geological Survey, 2008 Minerals Yearbook, California, July 2012; www.usgs.gov/centers/nmic/mineral-industry-california. Accessed February 14, 2020.*

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.13. Noise

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
NOISE: Would the project result in:					
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Significant and Unavoidable	No	No	No	Yes
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant	No	No	No	No
(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

The Approved Project's noise impacts were evaluated in the Initial Study included as Appendix A to the Draft EIR and Section IV.H, Noise, of the Certified EIR, and in Subsequent Addenda.

Question (a)—Noise in Excess of Standards:

Construction

As discussed in the Certified EIR, construction would have the potential to exceed 75 A-weighted decibels (dBA) within 500 feet of off-site residential uses.²⁹ Specifically, impacts to residential receptors associated with construction on the Olympic North, Olympic East, Figueroa North, and Figueroa South properties would be significant. Construction noise would not exceed thresholds at the nearest school site closest to the Olympic West subarea. Mitigation measures were identified to reduce construction-related noise impacts (Mitigation Measures IV.H-1 through IV.H-7). However, even with implementation of mitigation, the Certified EIR concluded that construction-related noise impacts would be significant and unavoidable. Subsequent Addenda confirmed the same determination for the Approved Project.

Operation

The Certified EIR evaluated potential operational noise impacts associated with the following noise sources: traffic; events; parking structures; parking lots; hotel/retail/office uses; residential uses; mechanical equipment; and rail transit.

Regarding traffic noise, the Certified EIR concluded that traffic-related noise generation levels would result in a significant impact at sensitive land uses located along portions of Francisco Street for both weekday and Saturday traffic. Mitigation measures were identified to reduce operational traffic noise impacts (Mitigation Measure (IV.H-9)); nonetheless, the Approved Project was concluded to result in significant and unavoidable operational noise impacts associated with traffic.

Additionally, the Certified EIR determined that potential noise impacts related to events would be temporary and less than significant with implementation of mitigation (Mitigation Measure IV.H-7). Potential noise impacts associated with parking structures, parking lots, the proposed hotel/retail/office and residential uses, mechanical equipment, and from any new rail traffic were determined to be less than significant. Nonetheless, a mitigation measure was included to further reduce operational noise impacts to nearby residential receptors resulting from parking lots in the Olympic and Figueroa properties (Mitigation Measure IV.H-8). Subsequent Addenda confirmed the same determination for the Approved Project.

²⁹ *Sound pressure is measured and quantified using a logarithmic ratio, the scale of which gives the level of sound in decibels (dB). The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this human, frequency-dependent response, the A-weighted system is used to adjust measured sound levels. The A-weighted sound level is expressed as "dBA."*

Question (b)—Groundborne Vibration and Noise: As stated in the Initial Study of the Certified EIR, construction could temporarily cause groundborne vibrations or groundborne noise levels to occur in the project area. However, any such impacts would be temporary and consistent with levels generally associated with construction activity. In addition, no impact would occur during operation. Therefore, construction and operation of the Approved Project would have less than significant impacts. Subsequent Addenda confirmed the same determination for the Approved Project.

Question (c)—Exposure of People to Airport Noise: As stated in the Initial Study of the Certified EIR, the LASED is not located within an airport land use plan or within 2 miles of a public airport. In addition, there is no private airstrip in the vicinity. Therefore, no significant impacts would be expected as part of the Approved Project. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts?

Question (a)—Noise in Excess of Standards: The Modified Project would not result in new significant impacts or a substantial increase already identified significant impacts associated with noise standards.

Construction

As previously described, the Modified Project would develop the same types of land uses as the Approved Project, though in a different mix and at slightly different locations as originally planned. Thus, the Modified Project would not introduce any land uses that were not previously anticipated as part of the Approved Project. Accordingly, the proposed modifications to the Approved Project would not change the types of construction activities anticipated within the LASED. However, as a majority of the LASED has been fully developed, new construction activity would likely be limited to the Olympic West subarea for the Hotel and Conference Center Expansion, as well as part of any future development allocated for the Olympic North subarea, or transferred to another subarea within the Specific Plan. As such, construction activities and resulting noise levels under the Modified Project would be similar compared to the Approved Project and would likely continue to be significant for off-site residential uses within 500 feet of the Olympic North, Olympic East, Figueroa North, and Figueroa South subareas of the LASED. There are new sensitive receptors that have been developed in the Project vicinity subsequent to preparation of the Certified EIR and Subsequent Addenda. These receptors would experience construction noise levels consistent with those for the receptors identified in the Certified EIR. In addition, as with the Approved Project, the Modified Project would implement mitigation measures to address construction-related noise impacts. However, as with the Approved Project, construction-related noise impacts would be significant and unavoidable. Nonetheless, the Modified Project would not create any new significant impacts related to construction noise nor result in a substantial increase in a previously identified significant

impact. As such, construction noise impacts under the Modified Project would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Operation

As detailed in Section 7.1.17, Transportation, of this Addendum, the overall number of weekday P.M. peak-hour trips with implementation of the Modified Project would be less than that estimated for the Approved Project, while the number of Saturday evening peak-hour trips would increase by 1.6 percent over the 2007 Fourth Addendum estimate. This equates to an increase of 82 trips distributed throughout the study area.³⁰ These changes to vehicle trips are a result of the conversion of office floor area from Development Site 12 to hotel floor area, as office uses generate more trips during weekdays, but hotels generate more trips on weekends. As previously discussed, the proposed uses would represent an extension of the land uses within the LASED and the existing surrounding uses. On an overall basis, the volume and distribution of traffic under the Modified Project would be comparable to those of the Approved Project. Therefore, similar to the Approved Project, the Modified Project could generate traffic-related noise levels that would result in a significant and unavoidable impact at sensitive land uses located along portions of Francisco Street north of Olympic Boulevard. The Modified Project would therefore implement the same operational mitigation measures (Mitigation Measures IV.H-8 and IV.H-9), as applicable, that were identified for the Approved Project. Therefore, traffic noise levels would not change substantially from those previously predicted, and impacts would be significant and unavoidable, similar to the Approved Project. As such, the Modified Project would not result in a new significant and unavoidable impact with respect to operational traffic noise or substantially worsen the significant and unavoidable impact previously identified in the Certified EIR and Subsequent Addenda.

The Modified Project would also implement similar mitigation as the Approved Project to address noise associated with events and parking areas. The Modified Project would not introduce mechanical equipment within the proposed buildings that would be out of character with the existing surrounding uses or those contemplated in the Certified EIR and Subsequent Addenda. Therefore, noise levels associated with mechanical equipment would be comparable to those evaluated in the Certified EIR and Subsequent Addenda. Lastly, the Modified Project does not propose substantial differences in residential uses or rail transit extensions or improvements. Therefore, the Modified Project would not result in a new significant impact or worsen the less than significant operational noise impacts associated with events; parking structures; parking lots; hotel/retail/office uses; residential

³⁰ *It should also be noted that modifications to the project which were included in the 2007 Fourth Addendum resulted in a net increase of trips greater than those under the Approved Project, but the 2007 Fourth Addendum determined that the impacts were still within the envelope of impacts analyzed in the Certified EIR.*

uses; mechanical equipment; and new rail traffic identified in the Certified EIR and Subsequent Addenda. As such, operational noise impacts under the Modified Project would be within the envelope of impacts identified in the Certified EIR and Subsequent Addenda.

Question (b)—Groundborne Vibration and Noise: The Modified Project would not result in significant impacts associated with groundborne vibration or noise. According to the Initial Study for the Approved Project, construction activities could generate temporary groundborne vibration and noise, which would be consistent with levels typically associated with construction. Groundborne vibration attenuates rapidly with distance from the source such that impacts are only experienced within short distances of the source. As the Modified Project would involve similar construction activities as the Approved Project, similar typical and temporary groundborne vibration and noise would occur, and such impacts would be less than significant. Therefore, the Modified Project would not create any new significant impacts related to groundborne vibration or noise nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Question (c)—Exposure of People to Airport Noise: The Modified Project would not result in impacts associated with exposure of people to airport noise. Similar to the Approved Project, the Modified Project Site is not located within an airport land use plan, within 2 miles of an airport, or within the vicinity of a private airstrip. Therefore, the Modified Project would not create any new significant impacts related to excessive noise levels associated with a public or private use airport nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to noise impacts. No substantial changes in the environment related to noise have occurred since certification of the Certified EIR beyond those already anticipated in the Certified EIR (i.e., changes in noise levels due to the development of previously approved uses), and no new noise sources or receptors have been identified within the vicinity of the

Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe noise impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address noise impacts would be implemented as part of the Modified Project. Note that Mitigation Measure IV.H-10 pertains to the operations of the Central Plaza and thus would not be applicable to the Hotel and Conference Center Expansion portion of the Modified Project. No additional mitigation measures are required as no new significant noise impacts would result from implementation of the Modified Project.

Construction

1. On-site construction activity that generates noise in excess of 75 dBA at a distance of 50 feet shall be limited to between 7:00 A.M. and 9:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturdays, unless the City extends such hours. (IV.H-1)
2. The Los Angeles Unified School District shall be provided with a construction schedule. (IV.H-2)
3. All construction equipment shall be in proper operating condition and fitted with standard factory silencing features. (IV.H-3)
4. Sound blankets shall be used on all construction equipment for which use of sound blankets is technically feasible. (IV.H-4)
5. If noise levels from construction activity are found to exceed 75 dBA at the property line of an adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor. (IV.H-5)
6. All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible. (IV.H-6)
7. The Applicant shall notify residents within 800 feet of the Project construction site and, in addition, will post a notice in a local newspaper as part of the Construction Management Plan notifying residents of construction activity. (IV.H-7)

Operation

8. Entrances and exits from parking lots in the Olympic and Figueroa Properties parking areas shall be located to minimize impact on residential, motel, or hotel units. (IV.H-8)

9. As part of the *South Park Area Parking and Circulation Management Plan (PCMP)*, an operational traffic plan shall be implemented which minimizes the amount of Project-generated traffic passing by sensitive receptors by providing traffic control personnel to direct departing vehicles along corridors that will have the least impact on sensitive receptors in the area. (IV.H-9)
10. All events in the Central Plaza that would involve the use of public address systems shall be required to obtain a permit from the City for operating amplified sound and speech equipment. (IV.H-10)

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.14. Population and Housing

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
POPULATION AND HOUSING: Would the project:					
(c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less Than Significant	No	No	No	No
(d) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

The population, housing, and employment impacts associated with the Approved Project were evaluated in Appendix A, Initial Study, and Section IV.C, Population, Housing and Employment, of the Certified EIR, and in Subsequent Addenda.

Question (a)—Population Growth:

Construction

The Certified EIR concluded that construction impacts on residential population growth would be less than significant. As evaluated in the Certified EIR, approximately 4,296 workers would be employed during construction.³¹ However, these construction workers would not be anticipated to relocate closer to the construction site as the length of time spent at a specific job is limited. Therefore, housing and population impacts related to construction workers would be less than significant. Subsequent Addenda concluded that the Approved Project was consistent with these impact determinations.

Operation

The Certified EIR concluded that operational impacts on population growth would be less than significant. As analyzed in the Certified EIR, population and housing growth would be anticipated as a result of new residential units, residents, and jobs. This growth was concluded to be within the growth projected for the Central City Community Plan area and the City of Los Angeles SCAG subregion. consistent This growth would also be consistent with the policy initiatives included within the various planning documents which oversee housing and economic development within this area of the City (i.e., the Central City Community Plan, South Park Design Guidelines, and SCAG's Regional Comprehensive Plan and Guide). Implementation would also not directly or indirectly result in substantial unplanned population growth in the area. Thus, the Certified EIR determined that the population, housing, and employment impacts would be less than significant. Subsequent Addenda concluded that although the Approved Project would generate a greater number of residential units, residents, and jobs, the Approved Project would nonetheless be consistent with these impact determinations.

Question (b)—Displacement of People and Housing: The Certified EIR concluded that no impacts associated with displacement of population or people would occur. As analyzed in the Certified EIR, development of the LASED would not remove and/or displace any businesses or residents, as the area was primarily developed with surface parking lots, low-rise warehouses, and mechanical buildings. In addition, land acquisition would not involve the acquisition of any housing. Therefore, no impacts would occur related to the displacement of people or housing. Subsequent Addenda concluded that the Approved Project was consistent with these impact determinations.

³¹ *The Certified EIR, which analyzed a total development of 4.0 million square feet within the LASED, concluded that 4,296 construction jobs would be generated. While the Approved Project increased the amount of development within the LASED, the subsequent documentation for that additional development retained the EIR's forecast of construction jobs. The same approach is used herein for the Modified Project; thus, it is assumed that construction of all permitted uses under the Modified Project would generate an estimated 4,296 construction jobs.*

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Population Growth:

Construction

As with the Approved Project, impacts on population growth under the Modified Project would be less than significant. Construction of the Modified Project would create temporary construction-related jobs. However, as a majority of the LASED has been fully developed, new construction activity would likely be limited to the Olympic West subarea for the Hotel and Conference Center Expansion, as well as part of any future development allocated for the development of floor area assigned to the Olympic North or Figueroa North subareas. In addition, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Modified Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Modified Project and, therefore, no new permanent residents would be generated during construction of the Modified Project. As such, similar to the Approved Project, housing and population growth impacts related to construction of the Modified Project would be less than significant. Therefore, the Modified Project would not create any new significant impacts related to construction-related population growth or housing, nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Operation

As a majority of the LASED has been fully developed, changes to the allocation of the Approved Project land uses to provide for the Modified Project would be limited. Remaining development in the LASED is limited to the Olympic West subarea for the Hotel and Conference Center Expansion, which includes hotel, commercial, and conference center uses, as well as part of any future office development allocated for the Olympic North subarea, and for office, residential, and commercial floor area allocated for the Figueroa North subarea.

As discussed above, the Modified Project includes the conversion of 231,564 square feet of office floor area from the Olympic North subarea to 851 hotel guest rooms in Olympic West subarea, the reallocating 10 existing JW Marriott hotel guest rooms to the new hotel (the existing rooms would be converted to meeting space), reallocating 14,700 square feet of Convention Center Uses to the new hotel, as well as the reallocation of 332,136 square feet of office floor area from Olympic North to Olympic West to accommodate floor area for the hotel. With the land use allocations, the Hotel and

Conference Center Expansion would include a hotel with 861 rooms and 578,400 square feet of floor area, as well as 228,200 square feet of conference center floor area that would be within the permitted 250,000 square feet of floor area already approved for the Project Site. These land use changes under the Modified Project do not involve the development and operation of any new residential uses and thus would not directly contribute to increased population growth or housing development within the LASED. It is anticipated that similar to the Approved Project, the proposed conversion from office to hotel uses under the Modified Project would include a range of full-time and part-time positions that would typically be filled by persons already residing in the region and who generally would not relocate their households due to such employment opportunities. As such, the Modified Project would be unlikely to create an increased direct or indirect demand for additional housing in the area, and would therefore not induce a substantial amount of unplanned population growth.

With regard to employment, as shown in Table 9 on page 114, with implementation of the Modified Project, the LASED is estimated to generate approximately 5,459 on-site jobs, which is a decrease of 1,324 on-site jobs relative to the Approved Project, which anticipated approximately 6,784 on-site jobs. Nonetheless, as with the Approved Project, the Modified Project would continue to improve the balance between jobs and housing and would have a beneficial effect on employment in the downtown area. Furthermore, the Modified Project would not cause a substantial alteration in the location, distribution, density or growth rate of employment for the area and would not conflict with the basic goals or growth expectations set forth in the City's or SCAG's plans. Thus, as with the Approved Project, direct population growth, housing and employment impacts associated with the Modified Project would be less than significant.

Given the urban setting of the LASED and the availability of existing infrastructure and roadways, development would also not result in the urbanization of an undeveloped area or the extension of major infrastructure. Also, no major infrastructure changes are anticipated under the Modified Project. Therefore, similar to the Approved Project, development of the Modified Project would not result in the urbanization of an undeveloped area or the extension of major infrastructure which may result in substantial indirect population growth. Based on the above, the Modified Project would not create any new impacts with respect to direct or indirect population growth nor would the Modified Project increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Question (b)—Displacement of People and Housing: Similar to the Approved Project, the Modified Project would not have impacts on the displacement of people and housing. As a majority of the LASED has been fully developed, remaining development in the LASED is limited to the Olympic West subarea for the Hotel and Conference Center Expansion and to the remaining floor area allocated within the Olympic North and

**Table 9
Estimated Employment Generation under Approved Project and Modified Project**

Use	Development (sf)	Employee Generation Rate (sf/employee) ^a	Total Employment (persons)
LASED under Approved Project^b			
Convention Center Expansion	250,000	500	500
Cinema	127,327	486 ^b	262
Hotel and Ballroom	1,554,327	909	1,710
Office	847,600	292	2,903
Retail/Entertainment/Restaurant	684,783	486 ^c	1,409
Total LASED (non-residential area) under Approved Project	3,464,037		6,784
LASED under Modified Project^b			
Convention Center Expansion	235,300	500	471
Cinema	127,327	486 ^c	262
Hotel and Ballroom	2,132,727	909	2,346
Office	283,900	292	972
Retail/Entertainment/Restaurant	684,783	486 ^c	1,409
Total LASED (non-residential area) under Modified Project	3,464,037		5,459
<p><i>sf = square feet</i></p> <p>^a <i>Generation factors provided in the LASED Final EIR, May 2001, except as otherwise noted.</i></p> <p>^b <i>The Figueroa North development area is located within the LASED but outside of the LASED Specific Plan area. After Certification of the LASED EIR, separate CEQA documentation was prepared for the Figueroa North development area and development was approved separate from the LASED Project. Half of the Figueroa North parcel has been developed with residential and commercial uses and the remainder is entitled for educational uses and student housing. As such, this area is not included in these totals.</i></p> <p>^c <i>Generation factor derived from weighted average of the retail, entertainment, and restaurant factors.</i></p> <p><i>Source: Eyestone Environmental, 2020.</i></p>			

Figueroa North subareas. Similar to the Approved Project, these potential development areas are currently developed with non-residential uses or parking (surface and structured). As remaining development under the Modified Project would not involve the displacement of any existing housing or residents, it would also not involve the need for replacement housing elsewhere. Therefore, similar to the Approved Project, development under the Modified Project would not remove and/or displace any residents or housing. Therefore, no impacts would occur related to the displacement of people or housing. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to population and housing.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to population and housing impacts. No substantial changes in the environment related to population, housing, and employment have occurred since certification of the Certified EIR, and no new population, housing, or employment conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe population, housing, or employment impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.15. Public Services

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<p>PUBLIC SERVICES: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other</p>					

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
performance objectives for any of the public services:					
(e) Fire protection?	Less Than Significant with Mitigation	No	No	No	Yes
(f) Police protection?	Less Than Significant with Mitigation	No	No	No	Yes
(g) Schools?	Less Than Significant with Mitigation	No	No	No	No ^a
(h) Parks?	Significant and Unavoidable	No	No	No	Yes
(i) Other public facilities?	Less Than Significant	No	No	No	No

^a As indicated in the Certified EIR, the payment of required development fees pursuant to Government Code Section 65995 would constitute full mitigation.

Impact Determination in the Certified EIR

The Approved Project's impacts to public services were evaluated in Section IV.I.1, Fire; Section IV.I.2, Police; Section IV.I.3, Schools; and Section IV.I.4, Parks and Recreation, of the Certified EIR and in Subsequent Addenda.

Question (a)—Fire: The Certified EIR determined that with implementation of mitigation measures, impacts to fire protection services during construction would be reduced to a less than significant level. As discussed in the Certified EIR, traffic disruptions during construction would be temporary and would not be anticipated to significantly affect emergency access or response. Furthermore, mitigation measures included in the Certified EIR (Mitigation Measures IV.I.1-1 and IV.I.1-2) would ensure that LAFD access would remain clear and unobstructed during construction. Subsequent Addenda confirmed this determination for the Approved Project.

After mitigation, the Certified EIR concluded that impacts to fire flow service during operation would be less than significant. Subsequent Addenda confirmed the same determination for the Approved Project. During operation, new land uses would increase the need for LAFD services. Due to the increased demand for fire services, potential delays for LAFD access during post-event periods, and infrastructure requirements,

mitigation measures identified in the Certified EIR (Mitigation Measures IV.1.1-3 through IV.1.1-18) would be implemented. These mitigation measures would ensure adequate fire flows, enforce adequate fire service access, provide accommodations for fire apparatus, and install appropriate fire infrastructure such as fire hydrants.

Question (b)—Police: With implementation of mitigation measures set forth in the Certified EIR, construction impacts to police services would be reduced to less than significant levels. Subsequent Addenda confirmed the same determination for the Approved Project. As discussed in the Certified EIR, construction traffic would have temporary and minor impacts in terms of traffic delays. However, construction may result in temporary and limited lane closures. Although emergency access and response times would not be significantly affected due to the temporary and limited nature of the closures along roadways, mitigation measures were included to address impacts (Mitigation Measures IV.1.2-1 and IV.1.2-2). The Certified EIR also includes a mitigation measure (Mitigation Measure IV.1.2-3) that would require security features on each Project Site to prevent theft and ensure that such impacts would be less than significant.

The Certified EIR concluded that the increase in demand for police protection services during operation would be less than significant with mitigation. Subsequent Addenda confirmed the same determination for the Approved Project. Specifically, during operation, new development would generate an increased need for police protection services on-site and off-site to accommodate increased density and entertainment uses throughout the area on a regular basis, and during intermittent high-density/high-occupancy events within the LASED or at STAPLES Center. In accordance with Mitigation Measures IV.1.2-4 through IV.1.2-11 and IV.1.2-13, security features would be implemented that would include private on-site security, adequate outdoor and parking lot lighting, appropriate landscape design, coordination with the LAPD, and development of an Emergency Procedures Plan. These security features would reduce the impact on police services to a less than significant level. In addition, traffic during events at STAPLES Center could potentially disrupt emergency access and cause delays for emergency responses within the Project Site. However, implementation of Mitigation Measure IV.1.2-12 would reduce this impact to a less than significant level.

Question (c)—Schools: The Certified EIR concluded that impacts associated with schools would be less than significant. As analyzed in the Certified EIR, new development would directly generate a new student population associated with proposed residential uses and indirectly generate students associated with non-residential (i.e., employment-generating) uses. However, the Applicant would pay the required development fees, as part of regulatory compliance, pursuant to Government Code Section 65995. The payment of these development fees constitutes full mitigation of school impacts, and thus impacts would be less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

Question (d)—Parks and Recreation: The Certified EIR concluded that impacts associated with parks and recreation would be significant and unavoidable. As analyzed in the Certified EIR, construction-related impacts to parks and recreation facilities would be less than significant because it is not foreseeable that transient construction workers would utilize off-site parks in the Project vicinity. However, operational impacts from the new residential population would result in the increased use of existing neighborhood, community, and regional parks and recreational facilities. While new development would satisfy the City's open space requirements as set forth in the LAMC and would pay in-lieu fees under the Quimby Act to offset the demand for park facilities, the Department of Recreation and Parks standard of four acres per 1,000 residents would not be met. Therefore, it was concluded that even with mitigation, a significant and unavoidable impact on parks and recreational facilities would occur. While Subsequent Addenda increased the number of residents utilizing park areas, the Addenda confirmed the same determination for the Approved Project.

Question (e)—Other Public Services (Roads): With regard to roads, the Certified EIR concluded that wear and tear on City streets resulting from additional traffic is not expected to be excessive or beyond normal requirements. In addition, new development would generate additional property tax revenues, which would contribute to public funding available for facility maintenance. The Applicant would also implement specified roadway improvements as required by the Traffic Study. As such impacts associated with roads would be less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Fire Protection: Similar to the Approved Project, the Modified Project impacts to fire protection services would be reduced to a less than significant level after mitigation. Similar to the Approved Project, construction activities associated with the Modified Project could potentially impact the provision of LAFD services in the Project vicinity due to temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic associated with the movement of construction equipment haul trucks, and construction worker traffic. The Modified Project would also implement Mitigation Measures IV.I.1-1 and IV.I.1-2 set forth in the Certified EIR to ensure that LAFD emergency access remains clear and unobstructed and that construction activities are coordinated with the LAFD to ensure adequate LAFD services, response and access are maintained. Like the Approved Project, the Modified Project would also comply with all LAFD code and ordinance requirements during construction. As such, similar to the Approved Project, the Modified Project would not result in construction-related impacts to fire protection services that would require new or physically altered facilities, the construction of which could cause significant impacts, in order to maintain acceptable LAFD response times, service levels or other performance objectives. Impacts under the

Modified Project would be less than significant with mitigation and such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda. Regarding operation, as described above, operational changes from the Approved Project to the Modified Project include the reallocation and conversion of office uses from Development Site 12 (Olympic North subarea) to hotel uses on Development Site 1a (Olympic West subarea) as part of the Hotel and Conference Center Expansion. The Hotel and Conference Center Expansion would include the development of previously approved but as-yet-unbuilt convention center related uses within the permitted Convention Center Expansion area as allowed for Development Site 1a. Some remaining office, residential, and commercial uses and floor area rights would still remain in the Olympic North and Figueroa North subareas under the Modified Project, similar to the Approved Project. Therefore, based on similar land uses and overall floor areas, the Modified Project would result in a generally similar demand for fire protection services as the Approved Project during operation.³²

Generally, emergency vehicle access would continue to be provided along public roadways. As with the Approved Project, during post-event periods at STAPLES Center and the Los Angeles Convention Center, traffic congestion could potentially cause significant delays in LAFD emergency response times into the LASED. Similar to the Approved Project, fire flow requirements for the Modified Project would be determined by the LAFD during final review of all site plans, which may include the upsizing of water lines and the installation of additional hydrants, and additional measures such as installation of automatic fire sprinklers and supplemental fire protection devices. Like the Approved Project, due to the increased demand for fire services, potential delays for LAFD access during post-event periods, and infrastructure requirements, Mitigation Measures IV.I.1-3 through IV.I.1-18 set forth in the Certified EIR would be implemented. These mitigation measures would ensure adequate fire flows, enforce adequate fire service access, provide accommodations for fire apparatus, and install appropriate fire infrastructure such as fire hydrants.

Furthermore, as with the Approved Project, the Modified Project would be served by multiple fire stations located approximately 1 mile from the Project area and would continue to be within the response distances set forth in the LAMC. The nearest fire station with engine and truck companies (i.e., Fire Station No. 10) is located approximately 0.6 mile from the LASED and within the response distances established in the LAMC. Additionally, two other LAFD fire stations were identified as being located within 1.1 miles of the LASED,

³² *Given that an Environmental Equivalency Transfer is proposed to convert and reallocate office floor area to hotel floor area as part of the Modified Project, it is acknowledged that the operational characteristics of office and hotel uses differ and may result in differences in demand for fire protection. However, both of these land uses were included and evaluated as part of the Approved Project, and thus on an overall basis, the demand for fire protection generated by the Modified Project would not vary substantially from that previously identified.*

which help to accommodate the intermittent high-density/high-occupancy loads during major sports and entertainment events. Thus, as with the Approved Project, with implementation of Mitigation Measures IV.1.1-1 through IV.1.1-18 set forth in the Certified EIR, the Modified Project would not result in impacts to fire protection services that would require new or physically altered facilities, the construction of which could cause significant impacts, in order to maintain acceptable LAFD response times, service levels or other performance objectives. Therefore, the Modified Project would not create any new impacts with respect to fire protection services, nor would the Modified Project increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Question (b)—Police Protection: Similar to the Approved Project, the Modified Project impacts to police protection services would be reduced to a less than significant level after mitigation. Similar to the Approved Project, construction activities associated with the Modified Project could potentially impact the provision of LAPD services in the Project vicinity due to construction-related temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic associated with the movement of construction equipment, hauling of soils and construction materials to and from the Project Site, and construction worker traffic. However, like the Approved Project, the Modified Project would implement Mitigation Measures IV.1.2-1 through IV.1.2-3 during construction to ensure that emergency access remains clear and unobstructed and that security features are implemented. Therefore, similar to the Approved Project, with implementation mitigation measures, the Modified Project would not result in construction-related impacts to police protection services that would require new or physically altered facilities, the construction of which could cause significant impacts, in order to maintain acceptable LAPD response times, service levels or other performance objectives. Accordingly, the Modified Project would not create any new police protection impacts during construction nor increase the severity of previously identified impacts. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

As discussed above, based on similar land uses and overall floor areas, the Modified Project would increase the demand for police protection services to a generally similar extent as the Approved Project.³³ However, as the Modified Project does not include the development of residential uses, the Modified Project would not directly affect the officer to resident ratio or the crimes per resident ratio. As with the Approved Project,

³³ *Given that an Environmental Equivalency Transfer is proposed to convert and reallocate office floor area to hotel floor area as part of the Modified Project, it is acknowledged that the operational characteristics of office and hotel uses differ and may result in differences in demand for police protection. However, both of these land uses were included and evaluated as part of the Approved Project, and thus on an overall basis, the demand for police protection generated by the Modified Project would not vary substantially from that previously identified.*

the Modified Project would implement Mitigation Measures IV.I.2-4 to IV.I.2- 13, which require coordination with LAPD and adequate emergency access, and include security features, such as private on-site security, security cameras, and adequate parking lot lighting. These measures t would minimize the potential for crime on-site and reduce the demand for additional police protection services. As with the Approved Project, with implementation of the mitigation measures, the Modified Project would not result in impacts to police protection services that would require new or physically altered facilities, the construction of which could cause significant impacts, in order to maintain acceptable LAFD response times, service levels or other performance objectives. Therefore, the Modified Project would not create any new impacts with respect to police protection services, nor would the Modified Project increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Question (c)—Schools: Similar to the Approved Project, the Modified Project would result in less than significant impacts on schools. The Modified Project would not increase the number of residential units permitted within the Approved Project and therefore would not cause a direct increase in the number of students generated from local residents as compared to the Approved Project. Based on the projected reduction in employment as compared to the Approved Project (see Table 9 on page 114) and the student generation rates set forth in the Certified EIR (which are based on the total number of jobs), the indirect number of students that could potentially occur under the Modified Project is anticipated to be less than that of the Approved Project Nonetheless, as with the Approved Project, the number of students generated by the Modified Project that could attend Los Angeles Unified School District (LAUSD) schools serving the Project Site could exceed school capacities. However, as with the Approved Project, the Modified Project would pay the required development fees pursuant to Government Code Section 65995 as part of regulatory compliance. The payment of these development fees constitutes full mitigation of school impacts, and thus impacts under the Modified Project, like the Approved Project, would be less than significant. As such, the Modified Project would not create any new impacts with respect to schools, nor would the Modified Project increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Question (d)—Parks: Similar to the Approved Project, the Modified Project would result in significant and unavoidable impacts on parks. Similar to the Approved Project, construction-related impacts to parks and recreation facilities would be less than significant under the Modified Project because it is not foreseeable that transient construction workers would utilize off-site parks in the Project vicinity, During operation, the demand for parks and recreational services is primarily a function of the amount of residential development in an area, as an area's residents are considered the primary users of parks and recreation facilities. The Modified Project does not include any development of new residential uses aside from the previous residential uses already anticipated under the Approved Project.

Additionally, the Modified Project would reduce on-site employment when compared with the Approved Project and the new employment opportunities would be expected to be filled, at least in part, by employees already residing in the vicinity of the Project Site who already utilize nearby existing parks and recreational facilities. Furthermore, similar to the Approved Project, the Applicant would implement Mitigation Measure IV.I.3-1 which provides for new open spaces. However, like the Approved Project, the in-lieu fees paid under the Modified Project would not meet the Department of Recreation and Parks planning standard of four acres per 1,000 residents. Thus, as with the Approved Project, the impacts of the Modified Project associated with the potential demand for parks facilities and the need for the construction of new park facilities that could cause significant impacts would be significant and unavoidable. Notwithstanding, the Modified Project would not create any new impacts with respect to parks and recreation, nor would the Modified Project increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Question (e)—Other Public Services: Similar to the Approved Project, the Modified Project would result in less than significant impacts on other public services. Like the Approved Project, Modified Project operations could require special traffic management services associated with events and could affect the maintenance of local roadways. However, wear and tear on City streets resulting from Modified Project traffic is not expected to be excessive or beyond normal requirements. In addition, Modified Project development would generate additional property tax revenues which would contribute to public funding available for roadway maintenance. The Applicant would be required to implement all required roadway improvements in accordance with City standards. As such, impacts associated with other public services such as roads and any associated construction impacts would be less than significant. The Modified Project would not create any new impacts with respect to other public services nor increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to public services.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to public services impacts. No substantial changes in the environment related to public services have occurred since certification of the Certified EIR, and no new conditions related to public services have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe impacts to public services, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address public services impacts would be implemented as part of the Modified Project. All of the below mitigation measures, except for Mitigation Measure IV.I.1-13, which relates only to residential uses, would also specifically apply to the Hotel and Conference Center Expansion. No additional mitigation measures are required as no new significant public services impacts would result from implementation of the Modified Project.

Fire—Construction

1. The Applicant shall ensure that during construction, LAFD access will remain clear and unobstructed. (IV.I.1-1)
2. Proposed roadway modifications shall be reviewed by the LAFD to assure adequate access to the Project site and adjacent uses. (IV.I.1-2)
3. The DWP shall conduct a flow test prior to the issuance of building permits to determine whether the existing water system meets fire flow requirements imposed by the Fire Department for the Project. The Applicant shall undertake and complete those required improvements identified by the DWP, as a result of findings of the flow test. (IV.I.1-3)

Fire—Operations

4. The Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the *Fire Protection and Fire Prevention Plan Element*, as well as the *Safety Element*, both of which are elements of the General Plan of the City of Los Angeles. (IV.I.1-4)
5. The Applicant shall submit definitive plans and specifications to the LAFD and requirements for necessary permits shall be satisfied prior to commencement of any portion of the Project. (IV.I.1-5)
6. The Project shall provide access for LAFD apparatus and personnel to and into all structures shall be required. At least two different ingress/egress roads for each area, which will accommodate major fire apparatus and provide for

- major evacuation during emergency situations, shall be required. Additional vehicular access may be required by the LAFD, where buildings exceed 28 feet in height. (IV.I.1-6)
7. The Applicant shall submit plans that show proposed access road(s) and turning area(s) for LAFD approval. (IV.I.1-7)
 8. Project development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549. (IV.I.1-8)
 9. Project design shall use standard cut-corner on all street corners to permit easy turning access for LAFD vehicles. (IV.I.1-9)
 10. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of an LAFD aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. (IV.I.1-10)
 11. Fire lanes, where required, and dead-ending streets shall terminate in a cul-de-sac or other approved turning area. No fire lane or dead ending street shall be greater than 700 feet in length, or secondary access shall be required. (IV.I.1-11)
 12. All access roads, including fire lanes, shall be maintained in an unobstructed manner, and removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code. (IV.I.1-12)
 13. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance, or exit of individual units. (IV.I.1-13)
 14. To accommodate an LAFD apparatus, if necessary, the minimum outside radius of paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway. (IV.I.1-14)
 15. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet, unless otherwise approved by LAFD. (IV.I.1-15)
 16. No building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. (IV.I.1-16)
 17. Adequate off-site public and on-site private fire hydrants may be required. Their number and location are to be determined after the LAFD's review of the Project's plot plan. The maximum distance between fire hydrants on roads and fire lanes in a regional commercial area is 300 feet. (IV.I.1-17)
 18. The Applicant shall coordinate with the South Park Event Coordinating Committee to address issues relating to vehicle and pedestrian flows during

major events and to identify measures for ensuring LAFD access to the Project site, parking lots, and the immediate vicinity during the pre-event and post-event periods. (IV.1.1-18)

Police

1. The Applicant shall ensure that during construction, LAPD access will remain clear and unobstructed. (IV.1.2-1)
2. Proposed roadway modifications shall be reviewed by the LAPD to assure adequate access to the Project and adjacent uses. (IV.1.2-2)
3. The Applicant shall provide security features on the construction site(s), such as guards, fencing, and locked entrances. (IV.1.2-3)
4. The Applicant shall submit plot plans for all proposed development to the Los Angeles Police Department's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented to the extent feasible. (IV.1.2-4)
5. The Applicant shall file building plans with the LAPD Central Area Commanding Officer. Plans shall include access routes, floor plans, and any additional information that might facilitate prompt and efficient police response. (IV.1.2-5)
6. Alarms and/or locked gates shall be installed on doorways providing public access to commercial facilities. (IV.1.2-6)
7. Landscaping shall not be planted in a way that could provide cover for persons tampering with doors or windows of commercial facilities, or for persons lying in wait for pedestrians or parking garage users. (IV.1.2-7)
8. Additional lighting shall be installed where appropriate, including on the Project Site and in parking garages, as determined in consultation with the LAPD. (IV.1.2-8)
9. Safety features shall be incorporated into project design to assure pedestrian safety, assist in controlling pedestrian traffic flows, and avoid pedestrian/vehicular conflicts on-site. Safety measures may include provision of security and traffic control personnel; approved street closures for special events or peak pedestrian activity; clearly designated, well-lighted pedestrian walkways on-site; special street and pedestrian-level lighting; physical barriers (e.g., low walls, landscaping), particularly around the perimeter of the parking garages, to direct pedestrians to specific exit locations that correspond to designated crosswalk locations on adjacent streets; guide signs for Project Site-bound pedestrians approaching the site from the Pico Blue Line Metro station; and provision of an on-site bus passenger drop-off facility. (IV.1.2-9)
10. The Applicant shall develop and implement a new or modified Security Plan to minimize the potential for on-site crime and the need for LAPD services. The plan would outline the security services and features to be implemented, as determined in consultation with the LAPD. The following shall be included in the plan (IV.1.2-10):

- a. Provision of an on-site security force that would monitor and patrol the Project Site. During operational hours, security officers shall perform pedestrian, vehicular, and/or bicycle patrols;
 - b. Implementation of a video camera surveillance system and/or a closed-circuit television system;
 - c. Additional security features shall be incorporated into the design of proposed parking facilities, including “spotters” for parking areas and ensuring the availability of sufficient parking either on- or off-site for all building employees and anticipated patrons and visitors;
 - d. Security lighting incorporating good illumination and a minimum of dead space in the design of entryways, seating areas, lobbies, elevators, service areas, and parking areas to eliminate areas of concealment. Security lighting shall be full cutoff fixtures which minimize glare from the light source and provide light downward and inward to structures to maximize visibility;
 - e. Provision of lockable doors at appropriate Project entryways, offices, retail stores, and restaurants;
 - f. Installation of alarms at appropriate Project entryways and ancillary commercial structures;
 - g. The City shall approve all businesses desiring to sell or allow consumption of alcoholic beverages through specific plan regulation or issuance of one or more Conditional Use Permits;
 - h. Accessibility for emergency service personnel and vehicles into each structure, and provision to the Central Area Commanding Officer of detailed diagram(s) of the Project Site, including access routes, unit numbers, and any information that would facilitate police response; and
 - i. In addition, security procedures regarding initial response, investigation, detainment of crime suspects, LAPD notification, crowd and traffic control, and general public assistance shall be outlined in the Security Plan. The plan would be subject to review by the LAPD, and any provisions pertaining to access would be subject to approval by the Los Angeles Department of Transportation.
11. The Applicant shall develop and implement an Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by the LAPD, and any provisions pertaining to access would be subject to approval by the City of Los Angeles Department of Transportation. (IV.1.2-11)
 12. The Applicant shall coordinate with the South Park Event Coordinating Committee to address issues relating to vehicle and pedestrian flows during major events and to identify measures for ensuring LAPD access to the Project site, parking lots, and the immediate vicinity during the pre-event and post-event periods. (IV.1.2-12)

13. The Applicant shall complete an annual assessment of off-site Project-related crime, in coordination with the LAPD, subject to the approval of the City Planning Department, and in response develop and implement additional security measures. (IV.I.2-13)

Schools

No mitigation measures are required.

Parks and Recreation

1. The Project shall incorporate project design features such as plazas, terraces and paseos that encourage access to a variety of open space uses for residents and visitors to the Project Site. (IV.I.4-1)

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.16. Recreation

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
RECREATION:					
(j) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Significant and Unavoidable	No	No	No	Yes
(k) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less Than Significant	No	No	No	No

Impact Determination in the Certified EIR

Questions (a) and (b)—Recreational Facilities: As discussed in Section IV.I.4, Parks and Recreation, of the Certified EIR, impacts related to the demand for parks and recreational facilities were determined to be significant and unavoidable. As discussed in detail in Section 7.1.15, Public Services of this Addendum, the new residential population from development of the LASED would result in the increased use of existing neighborhood, community, and regional parks and recreational facilities. While new

development would satisfy the City's open space requirements as set forth in the LAMC and would pay in-lieu fees under the Quimby Act to offset the demand for park facilities, the in-lieu park fees collected would not be sufficient to meet the Department of Recreation and Parks standard of four acres per 1,000 residents. Therefore, it was concluded that a significant and unavoidable impact on parks and recreational facilities would occur. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) and (b)—Recreational Facilities: Similar to the Approved Project, the Modified Project would result significant and unavoidable impacts on recreational facilities. As discussed above, the Modified Project does not include any development of new residential uses in addition to those previously analyzed in the Approved Project and thus would not directly generate new or additional demand for recreational facilities. Further, indirect demand for recreational facilities would be reduced when compared to that of the Approved Project due to a reduction in employment. As the majority of the LASED subareas have already been fully developed, new development under the Modified Project would be limited. The Hotel and Conference Center Expansion would include a total of approximately 45,130 square feet of open space. Hotel guests would be expected to primarily use on-site recreational facilities and amenities, including the Level 5 pool deck with a variety of gathering spaces and an outdoor track (totaling 42,925 square feet), an outdoor terrace on Level 3 (1,275 square feet) and a roof terrace (930 square feet). As such, any use of off-site facilities related to the Hotel and Conference Center Expansion would be limited and would not be anticipated to result in substantial physical deterioration. Development of office area for the Olympic North subarea was previously contemplated under the previous Certified EIR, and office uses are not required to develop additional open space areas per Code. Given that recreational facilities would be included as part of the Modified Project, impacts associated with their construction are addressed throughout this Addendum. Like the Approved Project and as discussed herein, the Modified Project would also result in certain significant impacts, although such impacts would not necessarily be attributable to the development of recreational facilities in and of themselves. In any event, the Modified Project would not create any new impacts with respect to the construction of recreational facilities, nor would the Modified Project increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a

substantial increase in the severity of previously identified significant effects related to parts and recreation.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to recreation impacts. No substantial changes in the environment related to recreation have occurred since certification of the Certified EIR, and no new recreational facilities have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts related to recreation. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe recreation impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As previously discussed, the following mitigation measures set forth in the Certified EIR and the associated MMRP to address park and recreation impacts would be implemented as part of the Modified Project. Refer to Section 7.1.15, Public Services, above. No additional mitigation measures are required as no new significant recreation impacts would result from implementation of the Modified Project.

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address park and recreation impacts would be implemented as part of the Modified Project. No additional mitigation measures are required as no new significant recreation impacts would result from implementation of the Modified Project.

1. The Project shall incorporate project design features such as plazas, terraces and paseos that encourage access to a variety of open space uses for residents and visitors to the Project Site. (IV.I.4-1)
2. The Applicant shall pay or guarantee to pay required fees to the City of Los Angeles Recreation and Parks Department for the purpose of providing future parks and open space in the Central City area. (IV.I.4-2)

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.17. Transportation

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRANSPORTATION: Would the project:					
(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Significant and Unavoidable	No	No	No	Yes
(b) Prior Threshold: Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? ^a	Significant and Unavoidable	No	No	No	Yes
(b) New Threshold: Conflict or be inconsistent with CEQA Guidelines 15064.3, subdivision (b)? ^a	N/A	No	No	No	No
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less Than Significant	No	No	No	No
(d) Result in inadequate emergency access?	Less Than Significant	No	No	No	No

^a This Checklist Question within Appendix G of the CEQA Guidelines has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to the use of VMT as the methodology for evaluating traffic impacts. However, the Certified EIR was based on the previous level of service (LOS) methodology. Thus, the analysis includes both LADOT's previously adopted LOS methodology to provide a comparative analysis with the Certified EIR as well as a VMT analysis in accordance with the more recent CEQA Guidelines Section 15064.3 and LADOT's Transportation Assessment Guidelines.

Impact Determination in the Certified EIR

Transportation impacts associated with the Approved Project were evaluated in Section IV.F, Transportation/Circulation and the Initial Study included in Appendix A of the Draft EIR, and in Subsequent Addenda.

Question (a)—Circulation System:

Performance of the Roadway System

Construction

The Certified EIR concluded that construction-related traffic impacts would be significant and unavoidable. The Certified EIR concluded that since most construction

traffic would arrive and depart during off-peak hours, the impact on peak-hour traffic would be negligible. In addition, although certain streets and sidewalks may be temporarily and partially closed to complete utility improvements, no street or sidewalk closures, other than the temporary and full closure of 12th Street for the realignment of 12th Street between Figueroa and Flower Streets, would result in a significant and unavoidable impact.³⁴ With the implementation of the adopted mitigation measures (Mitigation Measures IV.F.1-1 and IV.F.1-2) for the implementation of a Construction Management Plan and for the relocation/modification of the existing Highway Advisory Radio system for the STAPLES Center if required due to construction, significant impacts related to the circulation system during construction would be reduced to a less than significant level, with the exception of the 12th Street closure. Mitigation measures were also included to address pedestrian safety during construction for Tenth Street Elementary School (Mitigation Measures IV.F.3-2 through IV.F.3-5). In addition, the Initial Study noted that the development would be required to comply with all adopted City ordinances, regulations, and policies regarding alternative transportation modes, and no significant impacts would occur related to alternative transportation. Subsequent Addenda confirmed the same determination for the Approved Project, although it was also noted that the 12th Street closure had already been completed and would therefore no longer be a significant and unavoidable construction impact.

Operation

The Certified EIR for the LASED estimated that development of the LASED would generate 3,612 weekday P.M. peak-hour trips and 5,181 Saturday evening peak-hour trips. Based on the number of trips, the distribution of those trips, and level of service conditions, the Certified EIR concluded that 17 intersections would be significantly impacted during the weekday P.M. peak hour and 10 intersections would be significantly impacted during the Saturday evening peak hour. However, with implementation of Mitigation Measures IV.F.1-3 through IV.F.1-9 and IV.F.1-11 through IV.F.1-24, significant impacts would be reduced to 15 intersections during the weekday P.M. peak hour and 8 intersections during the Saturday evening peak hour. Numerous modifications to the LASED have been approved since preparation of the Certified EIR, and the associated land use changes and reallocations have altered the trip generation estimates associated with the LASED. The Approved Project would ultimately result in fewer P.M. peak-hour trips (3,541 trips) and greater Saturday evening peak-hour trips (5,214 trips). With respect to weekday P.M. peak-hour trips, the Certified EIR estimate remains higher than those calculated in the various addenda, and thus the Certified EIR provides the most conservative analysis of weekday traffic impacts. However, the greatest estimate of Saturday evening peak period trips was 5,227 trips, as analyzed in the 2007 Fourth Addendum. The 2007 Addendum

³⁴ *As this realignment has been completed, the temporary construction-related significant impact associated within the realignment is no longer relevant to the Modified Project.*

found that the increase in the Saturday evening peak-hour trip volume of 46 trips would represent an increase of less than 1 percent and would not create any new significant traffic impacts or substantially worsen the impacts previously identified in the Certified EIR.

In addition, residential street impacts could potentially occur on 11th Street east of Burlington Avenue and on 12th Street east of Burlington Avenue and between Valencia Street and Albany Street, requiring the implementation of Mitigation Measure IV.F.1-10 for the implementation of a Neighborhood Traffic Management Plan to address the impacts.

The Certified EIR also considered the regular temporary closure of 11th Street (now Chick Hearn Court) between Georgia Street and Figueroa Street during the Saturday P.M. peak period . As evaluated therein, the closure of 11th Street would result in eight significantly impacted intersections after implementation of mitigation but would also have a beneficial impact to the residential neighborhoods on the west side of the Harbor Freeway by redirecting traffic to major arterials. Without the 11th Street closure, the Certified EIR concluded that five significant intersection impacts would occur with implementation of the mitigation measures. Additionally, implementation of the Mitigation Measure IV.F.1-20 would alleviate poor traffic conditions on Olympic Boulevard during closures of 11th Street.

Although the Approved Project would result in fewer vehicle PM peak-hour trips and greater Saturday peak-hour trips than those analyzed in the Certified EIR and the 2007 Fourth Addendum, Subsequent Addenda confirmed the same roadway impact determinations for the Approved Project.

Consistency with Plans and Policies Regarding the Transportation System

The Certified EIR estimated that on-site development would generate 695 transit trips during the weekday P.M. peak hour and 575 transit trips during the Saturday evening peak hour. These trips would be accommodated by the abundance of public transit facilities within the Project vicinity. As discussed in the Certified EIR, these trips would result in less than significant impacts to the local transit system and to associated plans and policies regarding public transit.

In addition, with regard to pedestrian facilities, all of the major intersections along the key pedestrian routes are controlled by traffic signals and would provide safe intersection crossings. Therefore, the pedestrian system was expected to accommodate the anticipated operational pedestrian volumes and impacts with regard to pedestrian safety and associated plans and policies were found to be less than significant. Overall, the Approved Project is a mixed-use project within an infill area with a mix of synergistic uses that reduce vehicle trips. The Approved Project would support pedestrian activity and is located in close proximity to an abundance of public transit opportunities and bicycle facilities. As such, the Approved Project would support the City's and SCAG's long-range

plans related to the transportation system and use of alternative forms of transit. Therefore, the Approved Project would not result in significant impacts associated with plans and policies regarding the transportation system. Subsequent Addenda confirmed the same determination for the Approved Project.

Question (b)—Conflict with a Congestion Management Plan: With regard to impacts associated with the Congestion Management Plan (CMP), the Certified EIR concluded that significant impacts would occur at two CMP Freeway monitoring locations along the SR-110 segment south of US-101 and along the SR-110 segment at Alpine Street. The Certified EIR concluded that no mitigation measures are available to reduce the impacts on these CMP freeway locations to a less than significant level. As such, impacts on these two locations would remain significant and unavoidable.

On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached for the County of Los Angeles to be exempt from the CMP. As such, the provisions of the CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents, including this Addendum.

Question (c)—Design Hazards or Incompatible Uses: As stated in the Initial Study, Appendix A of the Draft EIR, development of the LASED does not involve any unusual safety design features and will utilize downtown streets for access. Development of the project would therefore not expose people to significant safety hazards, nor are any incompatible uses proposed that would cause significant safety hazards. Subsequent Addenda confirmed the same determinations for the Approved Project.

Question (d)—Emergency Access: As discussed above, with implementation of mitigation measures and compliance with regulatory requirements, the Certified EIR concluded that adequate emergency access for both police and fire services would be available during construction and operation of the LASED Project. Subsequent Addenda confirmed the same determinations for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The following analysis is based on the Traffic Analysis for the Modified Project prepared by The Mobility Group, dated September 4, 2019, and VMT Memorandum dated May 5, 2020, both of which are included in Appendix D of this Addendum. A copy of

LADOT's Assessment Letter of the Traffic Analysis is also included in Appendix D of this Addendum.

Question (a)—Circulation System:

Performance of the Roadway System

Construction

Similar to the Approved Project, construction under the Modified Project would result in a less than significant impact after mitigation in terms of the circulation system. As previously described, the Modified Project would develop the same types of land uses as the Approved Project, though in a different mix by reallocating previous office floor area to hotel uses from Development Site 12 to Development Site 1a and reallocating 14,700 square feet of Convention Center uses to Hotel Uses within Development Site 1a. Thus, the Modified Project would not introduce any land uses that were not previously anticipated as part of the Approved Project. In addition, with the Land Use Equivalency Transfer proposed as part of the Modified Project, the amount of development would be within the envelope permitted for the Approved Project. Therefore, the types and amount of construction activities, as well as street and sidewalk closures, that would occur under the Modified Project would be generally similar to those anticipated for the Approved Project. As such, under the Modified Project, most construction traffic would continue to arrive and depart during off-peak hours, and the impact on peak-hour traffic would be negligible, similar to the Approved Project. In addition, the significant and unavoidable impact identified in the Certified EIR relating to the temporary and full closure of 12th Street for the realignment of 12th Street between Figueroa and Flower Streets, would no longer occur, as the 12th Street realignment has already been implemented. Furthermore, with the implementation of the Approved Project's recommended mitigation measures for construction management and pedestrian safety (Mitigation Measures IV.F.1-1 and IV.F.1-2 and IV.F.3-2 through IV.F.1-5), impacts related to roadways and pedestrian facilities during construction of the Modified Project would also be reduced to less than significant levels. As such, the Modified Project would not create any new impacts to traffic nor increase the severity of previously identified impacts. These impacts would be within the envelope of impacts set forth in the Certified EIR, as well as within the impacts studied for the Approved Project in Subsequent Addenda.

Operation

Similar to the Approved Project, operation under the Modified Project would result in significant and unavoidable impacts after mitigation in terms of the circulation system. As noted above, the Approved Project would generate 3,541 weekday P.M. trips and 5,214 Saturday evening peak-hour trips. As discussed in the Traffic Analysis, the Modified Project would generate approximately 3,101 weekday P.M. peak-hour trips and

5,296 Saturday evening peak-hour trips. Therefore, the Modified Project would result in a reduction of 440 weekday P.M. peak-hour trips and an increase of 82 Saturday evening peak-hour trips (or 1.6 percent) compared to the Approved Project. Since the Modified Project would result in a limited increase in the number of trips during the Saturday evening peak hour, further analysis was conducted to determine whether this increase could potentially result in new significant traffic impacts or substantially worsen the previously identified significant impacts.³⁵ The Traffic Analysis focused on 18 intersections in the vicinity of the Modified Project (shown in Figure 1 of the Traffic Analysis) that were considered to be the most likely for potential additional impacts because of their proximity to the Olympic West development area. The Traffic Analysis also considered the existing roadway configuration at all intersections.

The Traffic Analysis used the same methodology and thresholds as the intersection analysis conducted in the Certified EIR, except that it: (1) updated the existing traffic volumes at the subject intersections; (2) updated future with and without conditions to year 2022; and (3) evaluated the effects of the proposed permanent closure of Chick Hearn Court between Georgia Street and Figueroa Street. The Traffic Analysis found that the additional Saturday evening peak-hour trips would cause a small increase in the intersection volume/capacity ratio at certain intersections. However, in no case would the Level of Service (LOS) change, and the incremental changes in volume/capacity ratio would not meet the significance thresholds (e.g., would not affect the previous significance conclusions). Therefore, the Modified Project would not create any new impacts with respect to intersections during operation, nor would the Modified Project noticeably increase the severity of any previously identified impacts.

The Certified EIR identified no significant impacts to freeway off-ramps. The Modified Project would generate fewer trips in the P.M. peak hour and an incremental increase (1.3 percent) in Saturday trips. In addition, as the traffic analysis identified no new intersection impacts, the Modified Project would not create a new impact with respect to freeway off-ramps.

The residential street impacts on 11th Street east of Burlington Avenue and on 12th Street east of Burlington Avenue and between Valencia Street and Albany Street identified in the Certified EIR would remain with the Modified Project. However, as discussed above, the incremental increase (1.3 percent) in Saturday trips under the

³⁵ *The Traffic Analysis also conducted further intersection weekday P.M. peak-hour level of service analysis at the 18 intersections just to confirm that no new significant impacts or substantially more severe significant impacts would occur given the increase in existing traffic volumes at the intersections since preparation of the traffic analyses in the Certified EIR and addenda. This analysis confirmed that there would be no new significant impacts or substantially more severe significant impacts during the weekday P.M. peak hour (in fact, LOS would improve at some intersections).*

Modified Project would not create a new impact with respect to residential streets, nor would the Modified Project increase the severity of the previously identified significant impacts.

As discussed above, the Modified Project would provide for the permanent closure of 11th Street (Chick Hearn Court), which is already routinely closed. The Certified EIR identified that the closure of 11th Street (Chick Hearn Court) outside of the weekday A.M. and P.M. peak periods would not result in significant level of service traffic impacts, and at the same time would have a beneficial impact to the residential neighborhoods on the west side of the Harbor Freeway by redirecting traffic to major arterials. The traffic analysis for the Modified Project included the permanent closure of 11th Street (Chick Hearn Court). Additionally, implementation of the mitigation measures identified for the intersections impacted during the P.M. peak and Saturday evening peak periods under the Modified Project would also serve to alleviate poor traffic conditions on Olympic Boulevard associated with closure of 11th Street. The analysis concluded the Modified Project would not create any significant impacts.

As such, roadway impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Consistency with Plans and Policies Regarding the Transportation System

Similar to the Approved Project, the Modified Project would have less than significant impacts in terms of consistency with transportation plans and policies. The Modified Project is also subject to the provisions of several adopted policies, plans and programs that are intended to enhance the performance and safety of public transit, bicycle and pedestrian facilities, and reduce vehicle miles traveled, which has the effect of transferring passengers from their automobiles to alternative modes of transportation. These include including the RTP/SCS, Mobility Plan 2035, Community Plan, and the Downtown Design Guide. These are implemented through site-specific zoning and numerous regulations that shape the physical form of the City so-as to create development patterns and population distributions that are conducive to the support of public transit. Consistent with these plans, policies and regulatory measures, the Modified Project's location and design support the provision of increased density in proximity to a large array of public transit, including rail and bus services, as well as bike lanes and a high quality pedestrian network, thereby supporting the use of alternative modes of transportation. Furthermore, as discussed in detail in the Traffic Study included as Appendix D, the transit system would have sufficient capacity to accommodate the incremental increase in transit trips resulting from the Modified Project.

In addition, the Modified Project would not reduce sidewalks widths, eliminate or modify any of the signalized crosswalks, or result in changes to the traffic management and pedestrian management measures, currently being implemented in the area. The Modified

Project would also increase the width of the sidewalk on the north side of Chick Hearn Court immediately west of Georgia Street for the Hotel and Conference Center Expansion, where a sidewalk bulb out would extend the sidewalk by 21 feet. This would result in a 36-foot sidewalk which would facilitate pedestrian access to the JW Marriott West Tower, the Conference Center Expansion, and the Olympic West parking garage. As such, the Modified Project would provide adequate pedestrian safety, create continuity of public spaces, and encourage pedestrian activity in a location with access to an abundance of public transit facilities. The Modified Project would also not impact the existing bicycle facilities within the Project vicinity.

Overall, by providing development within an infill area with safe pedestrian and bicycle routes that is well-served by public transit facilities, the Project is consistent with the applicable plans and programs regarding the transportation system and would not conflict with their implementation. Therefore, as with the Approved Project, potential impacts associated with conflict with plan and policies regarding the transportation system under the Modified Project would be less than significant. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Former Question (b)—Impacts Related to Conflicts with a Congestion Management Plan: .As discussed above, on July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds for withdrawal had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.

Nonetheless, as discussed above, the Modified Project would not increase the number of weekday P.M. peak-hour trips over the total number of trips estimated for the Approved Project in the Certified EIR and Subsequent Addenda. Therefore, the Modified Project would not create any new significant impacts related to CMP impacts nor result in a substantial increase in a previously identified significant impact.

New Question (b)—Conflicts with CEQA Guidelines Section 15064.3, subdivision (b): As discussed above, CEQA Guidelines Section 15064.3 is a new provision included in the 2019 update to the CEQA Guidelines which pertains to VMT-based analysis of transportation impacts. Such an analysis was not performed for the Approved Project, as it was not required at the time the Certified EIR or any of the former addenda were prepared.

CEQA Guidelines Section 15064.3(b)(1) states that “generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.”

The entire LASED is well served by existing transit, including: 38 local and limited stop Metro bus routes within approximately 0.75 mile; Metro's Blue and Exposition Line rail systems, with the nearest station located approximately 0.5 mile from the Modified Project Site at Flower Street north of Pico Boulevard (Pico Station); and the DASH Bus System, which serves the Figueroa Corridor. In addition, the RTP/SCS designates all of the LASED as an HQTAs, and the City's ZIMAS system confirms the Modified Project Site's location within a transit priority area, as defined in the City's ZI File No. 2452. As discussed earlier, the Modified Project would support the goals and principles set forth in the RTP/SCS through the construction of development within an urban, infill area well served by transit; the introduction of new pedestrian connections and streetscape improvements designed to promote access and connectivity and enhance walkability; and the provision of bicycle parking and other amenities that encourage non-automotive forms of transportation.

On July 30, 2019, the City of Los Angeles adopted a new CEQA methodology and thresholds for evaluating the transportation impacts of a project based on VMT, as set forth by the updates required by CEQA Guidelines Section 15063.4. The Approved Project was approved in 2010, before the new CEQA guidelines for VMT analysis were introduced. Nonetheless, a comparative analysis of VMT has been prepared and is included in Appendix D of this Addendum. Specifically, the analysis compares the VMT of the hotel room expansion component of the Modified Project to that of the 563,700 square feet of office floor area of the Approved Project that it would replace, as this is the only change between the Modified Project and Approved Project from a VMT standpoint. The analysis demonstrates that with applying the VMT impact criteria established by LADOT, the approved office floor area under the Approved Project would not have a significant Work VMT per Capita impact. In addition, the hotel expansion under the Modified Project, with project design features to reduce trips consistent with the LASED TDM Plan would also not exceed the threshold for significance and there would be no significant VMT impact. Therefore, VMT impacts of the Modified Project would be within the scope of impacts of the Approved Project.

Question (c)—Design Hazards or Incompatible Uses: Similar to the Approved Project, the Modified Project would have less than significant impacts in terms of design hazards. Like the Approved Project, the Modified Project's design does not include hazardous features. The roadways adjacent to the Modified Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and development of the Modified Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed curb extension at Chick Hearn Court and Georgia Street would ensure that pedestrian and vehicle visibility would not be impaired by the proposed building's projection over a portion of the sidewalk. Furthermore, the proposed uses would be compatible with the surrounding uses. Therefore, the Modified Project would not create any new significant impacts related to hazards or incompatible uses nor result in a substantial increase in a previously

identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Question (d)—Emergency Access: Similar to the Approved Project, implementation of the Modified Project would result in less than significant impacts. The Modified Project would not result in the closure of any evacuation route designated in an adopted emergency response or evacuation plan. To the extent feasible, construction activities and staging areas would not physically block any streets or impair access to and around Development Site 1a or any adjacent properties. Additionally, as previously discussed, all access routes, including fire lanes, would be maintained at all times, consistent with LAFD requirements. Therefore, the Modified Project would not create any new significant impacts related to emergency access nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to transportation.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to transportation impacts. No substantial changes in the environment related to transportation beyond those anticipated as part of the Approved Project have occurred since certification of the Certified EIR, and no new transportation conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe transportation impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address transportation impacts would be implemented as part of the Modified Project. No additional mitigation measures are required as no new significant transportation impacts would result from implementation of the Modified Prot.

Short-Term Construction Traffic

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

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

Prior to full implementation of mitigation measures in this section, the Construction Management Plan should consider the use of temporary operational techniques (e.g., coning, temporary/changeable signs, etc.), as appropriate to the circulation needs of particular events. (IV.F.1-1)

Operation

1. NB SR-110 off-ramp/9th Street. The Applicant shall coordinate with Caltrans and LADOT to develop and install signage to the northbound SR-1-10 freeway to direct traffic to exit south of the 9th Street off-ramp. (IV.F.1-9).
2. The Applicant shall enhance connections and linkages to transit. This will particularly include physical linkages to the Metro Blue Line Station at Flower Street/Pico Boulevard, as well as directional signage to bus and rail lines, and the provision of landscaped bus stops with passenger amenities such as benches and shaded areas. (IV.F.1-11)
3. The Applicant shall participate in the existing South Park Event Parking & Circulation Management Plan, and the ongoing traffic management activities coordinated by the South Park Event Coordination Committee. (IV.F.1-21)

Parking

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

6. The Project shall participate in the South Park Event Coordinating Committee, to coordinate parking management issues. (IV.F.2-4)

Pedestrian Safety

7. The Applicant shall develop a Construction Management Plan, which shall provide for the coordination of construction areas and safe pedestrian movement throughout the Project area such that adequate and safe pedestrian access is maintained to STAPLES Center, the Convention Center, and surrounding land uses during construction. (IV.F.3-1)
8. The Applicant shall coordinate with the Los Angeles Unified School District to provide crossing guards along identified pedestrian routes to the Tenth Street Elementary School in the vicinity of the construction site during construction activities. (IV.F.3-2)
9. Haul routes shall be established which minimize construction vehicle traffic passing by Tenth Street Elementary School. (IV.F.3-3)
10. Construction vehicles shall be prohibited from staging in front of either Los Angelitos Children’s Center or Tenth Street Elementary School. (IV.F.3-4)
11. The Los Angeles Unified School District’s Transportation Branch shall be provided with a construction schedule and shall be notified of the commencement of project construction. During construction, the Los Angeles Unified School District shall also be notified of any planned lane closures in the vicinity of the Project. (IV.F.3-5)

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.18. Tribal Cultural Resources

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or More Severe Impacts?	Any New Circumstances Involving New Significant Impact or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR’s Mitigation Measures Addressing Impacts
TRIBAL CULTURAL RESOURCES:					
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native					

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
American tribe, and that is:					
(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Not Analyzed	No	No	No	No
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Not Analyzed	No	No	No	No

Impact Determination in the Certified EIR

Question (a)—Tribal Cultural Resources: The Certified EIR, including prior addenda did not analyze impacts with respect to tribal cultural resources as this topic was not an environmental impact category under CEQA at the time the documents were prepared and certified. Within the Certified EIR, tribal cultural resources were generally evaluated within the context of historic and archaeological resources and human remains, including those interred outside of formal cemeteries. As discussed above in Section 7.1.5, Cultural Resources, impacts to these types of resources were determined to be less than significant in the Initial Study. Nonetheless, the Certified EIR included a mitigation measure to ensure that in the event of inadvertent discovery of cultural materials (Mitigation Measures IV.L-1), such impacts would remain less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

Per AB 52, for projects for which a notice of preparation (NOP) of a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of the project if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation within 30 days of receipt of formal notification by the lead agency. As the NOP for the Certified EIR was filed in 2000, it was not subject to this requirement.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Tribal Cultural Resources: The Modified Project's impacts on tribal cultural resources would be less than significant. While the previous Certified EIR and addenda more broadly analyzed impacts to historic and archeological resources and human remains, updated language in the CEQA Guidelines Checklist has now more specifically defined tribal cultural resources as features that have cultural value to a California Native American tribe and those that meet certain criteria for eligibility as historic resources. Based on the Sacred Lands File search and tribal consultation conducted for another nearby Project, there are no documented tribal cultural resources within the Project vicinity.³⁶ Similar to the Approved Project, development of the Modified Project would occur within a developed area that has been previously disturbed. As the majority of the LASED has already been fully developed, new development under the Modified Project would be limited, and would either be part of the Hotel and Conference Center Expansion in the Olympic West subarea, or part of limited future office development allocated to the Olympic North subarea. Construction of the Modified Project would also be within the envelope of earthwork originally anticipated as part of the Approved Project. In particular, the depth of excavation and grading associated with the Hotel and Conference Center Expansion would be reduced when compared with that anticipated in the Certified EIR. Accordingly, there would be no new potential for the discovery of tribal cultural resources. As discussed above in Section 7.1.5, Cultural Resources of this Addendum, general impacts to cultural resources would be less than significant under the Modified Project, although the Modified Project would be subject to the same mitigation measure for inadvertent discovery or resources as the Approved Project, to ensure such impacts would remain less than significant.

As the Modified Project is not a new development proposal but rather represents modifications to the Approved Project and given that this Addendum is tiered off the original Certified EIR, a new NOP was not required under CEQA. Therefore, the Modified Project is not subject to AB 52 requirements.

Thus, the Modified Project would not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts would be less than significant. The Modified Project would not create any new impacts to cultural resources nor increase the severity of any previously identified impacts. Such impacts would be within the envelope of cultural resource impacts set forth in the Certified EIR and Subsequent Addenda.

³⁶ *Draft EIR for the Figueroa Centre Project published by the City of Los Angeles, May 2019.*

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to tribal cultural resources.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to tribal cultural resources. No substantial changes in the environment relative to tribal cultural resources have occurred since certification of the Certified EIR, and no new tribal cultural resources have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, the Modified Project would not result in any new or substantially more severe impacts related to tribal cultural resources, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

Please refer to the mitigation measure detailed in Section 7.1.5, Cultural Resources, of this Addendum (IV.L-1), which states that if unknown cultural materials are discovered during any grading or construction activity, work will stop in the immediate area, and an appropriate program would be designed to address the inadvertent discovery of cultural materials. This mitigation measure would continue to be implemented as part of the Modified Project.

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.19. Utilities and Service Systems

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less Than Significant	No	No	No	Yes
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Significant and Unavoidable	No	No	No	Yes
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant	No	No	No	Yes
(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less Than Significant	No	No	No	Yes
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less Than Significant	No	No	No	Yes

Impact Determination in the Certified EIR

The Approved Project's impacts with regard to utilities and service systems were addressed in Section IV.J.1, Water; Section IV.J.2, Sewer; and Section IV.J.3, Solid Waste, of the Certified EIR and in Subsequent Addenda.

Question (a)—New or Expanded Water, Wastewater Treatment, or Storm Water Drainage, Electric Power, Natural Gas, or Telecommunications Facilities:

Water and Wastewater Facilities

The Certified EIR concluded that water and wastewater impacts would be less than significant. As discussed in the Certified EIR and Subsequent Addenda, the existing local infrastructure system was anticipated to be adequate to provide for the LASED development-related increase in water and wastewater demand associated with the Approved Project. However, development of the LASED was anticipated to require some upsizing or replacement of water lines. General construction impacts related to air quality, transportation and noise from construction of infrastructure were analyzed in IV.E, Air Quality; IV.F, Transportation; and IV.H, Noise, of the Certified EIR. In addition, Mitigation Measures were included to ensure compliance with City infrastructure requirements and for a Construction Management Plan for any temporary lane closures due to infrastructure work (Mitigation Measures IV.J.2-1, IV.J.2-2, and IV.J.2-4). Therefore, impacts to local water distribution, as well as wastewater facilities would be less than significant. Subsequent Addenda confirmed the same determination for the Approved Project.

Storm Water Drainage Facilities

The Certified EIR concluded that storm water drainage facility impacts would be less than significant. As discussed above in Section 7.1.10, the Certified EIR determined that development of the LASED would not result in a significant change to then-existing hydrologic conditions during construction or operation. Furthermore, development would be designed to ensure that hydrologic conditions before and after development would remain unchanged and that no increase in runoff over existing conditions would occur during construction or operation. In addition, since the LASED was fully paved at the time the Certified EIR was prepared, development of the LASED was determined to have a beneficial impact relative to surface water runoff by increasing the amount of pervious areas through landscaping. In addition, drainage improvements would be able to accommodate run-off from the project site, and runoff water would therefore not exceed the capacity of the stormwater drainage system. Therefore, a less than significant drainage impact during construction and operation was identified. Nonetheless, the Certified EIR included a mitigation measure (Mitigation Measure IV.D-1) to ensure that the LASED and surrounding properties would not be subject to increased flood hazard. Subsequent Addenda confirmed the same determination for the Approved Project.

Electric Power and Natural Gas Facilities

As discussed above in Section 7.1.6. Energy, the Certified EIR did not expressly analyze impacts related to electricity or natural gas as this topic was not included in Appendix G of the CEQA Guidelines at the time. However, energy was generally addressed in Section VII. Significant Irreversible Changes of the Certified EIR. The Certified EIR stated that development within the LASED would consume energy resources such as electricity and natural gas and that the increased consumption would not be

significant when compared with existing energy consumption levels citywide. Based on the location of the Approved Project within an infill area already served by existing electrical and natural gas infrastructure facilities, the Approved Project would not be expected to result in significant impacts to electrical and natural gas facilities.

Telecommunication Facilities

The Certified EIR did not analyze impacts related to telecommunications as this topic was not included in Appendix G of the CEQA Guidelines at the time. Nonetheless, under the Approved Project, installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. In addition, installation of new telecommunications infrastructure would be within the scope of the construction impacts already analyzed in the Certified EIR and would be addressed by implementation of the Construction Management Plan. Thus, impacts would be expected to be less than significant.

Question (b)—Water Supply: The Certified EIR concluded that water supply impacts would be significant and unavoidable. As discussed in the Certified EIR, during construction, water would be used primarily for dampening fill material and dust control. The Certified EIR concluded that water demand during construction would result in less than significant impacts with regard to existing service, water lines, and facilities.

During operation, the Certified EIR anticipated the consumption of approximately 1,660,140 gpd gallons per day (gpd) of water. In addition, in accordance with the previous modifications to the Approved Project that included increases in floor area that were addressed in Subsequent Addenda, the Approved Project is anticipated to consume approximately 1,961,391gpd of water, as shown in Table 10 on page 148, or an approximately 18 percent increase. Although the water demand would constitute a small portion of the regional water demand, the increase in water demand over existing conditions was determined to be significant, despite the implementation of mitigation measures for water conservation and fire flow testing as identified in the Certified EIR (Mitigation Measures IV.J.1-1 through IV.J.1-4). Therefore, as concluded in the Certified EIR and in Subsequent Addenda, impacts regarding water supply for the Approved Project would be significant and unavoidable.

Question (c)—Wastewater Infrastructure Capacity: The Certified EIR concluded wastewater infrastructure impacts would be less than significant. Construction activities for the Approved Project would result in a temporary and incremental increase in wastewater generation as a result of construction workers on-site. However, such use would be temporary and nominal when compared with the wastewater generated by an occupied permanent building. In addition, construction workers would typically utilize portable

Table 10
Estimated Water Demand under Approved Project and Modified Project^a

Use	Development	Demand Rate (gpd/unit) ^b	Total (gpd)
LASED Under Approved Project			
Convention Center Expansion	250,000 sf	1.488	372,000
Cinema	7,100 seats	6	42,600
Hotel	1,577 rms	156	246,012
Hotel Meeting/Ballroom Area ^c	155,433 sf	0.852	132,429
Office	847,600 sf	0.216	183,082
Residential	1,376 du	192	264,192
Retail/Entertainment/Restaurant	684,783 sf	1.053	721,076
Total LASED Under Approved Project		—	1,961,391
LASED Under Modified Project			
Convention Center Expansion	235,300 sf	1.488	350,126
Cinema	7,100 seats	6	42,600
Hotel	2,428 rms	156	378,768
Hotel Meeting/Ballroom Area ^c	213,273 sf	0.852	181,709
Office	283,900 sf	0.216	61,322
Residential	1,376 du	192	264,192
Retail/Entertainment/Restaurant	684,783 sf	1.053	721,076
Total LASED Under Modified Project		—	1,999,794^d
Net Change			38,403^d
<p><i>du = dwelling unit;</i> <i>gpd/unit = gallons per day per unit</i> <i>rms = rooms</i> <i>sf = square feet</i></p> <p>^a The Figueroa North development area is located within the LASED but outside of the LASED Specific Plan area. After Certification of the LASED EIR, separate CEQA documentation was prepared for the Figueroa North development area and development was approved separate from the LASED Project. Half of the Figueroa North parcel has been developed with residential and commercial uses and the remainder is entitled for educational uses and student housing. In addition, Modified Project does not include any changes to Figueroa North. Therefore, Figueroa North has not been included in these calculations.</p> <p>^b Water consumption rates based on 120 percent of wastewater generation rates provided in the LASED Final EIR, May 2001.</p> <p>^c Under the Approved Project, Hotel Meeting/Ballroom floor area was estimated to be 10 percent of the total Hotel and Ballroom floor area detailed in the LASED Specific Plan.</p> <p>^d Subsequent to certification of the EIR for the LASED, the City of Los Angeles adopted the Green Building Code. The Los Angeles Green Building Code requires newly constructed non-residential high-rise buildings to install plumbing fixtures and fittings that will reduce the overall use of potable water within the building by 20 percent. This reduction is conservatively not included in this table.</p> <p>Source: Eyestone Environmental, 2020.</p>			

restrooms, which would not contribute to wastewater flows to the City's wastewater system. In the event there is an increase in wastewater flow during construction, this increase would be limited and would be within the capacity of the wastewater facilities that currently serve the Project Site. Thus, as concluded in the Certified EIR, no significant sewer impacts were anticipated. Subsequent Addenda confirmed the same determination under the Approved Project.

Based on the amount and types of land uses proposed, the Certified EIR estimated wastewater generation at buildout at approximately 1,383,450 gpd. In addition, in accordance with the previous modifications to the Approved Project that included increases in floor area that were addressed in Subsequent Addenda, operation of the Approved Project is anticipated to generate approximately 1,634,835 gpd of wastewater, as shown in Table 11 on page 150. Thus, the Approved Project wastewater generation increased by approximately 18 percent when compared with the project as evaluated in the Certified EIR. As discussed in the Certified EIR and Subsequent Addenda, the existing sewer lines and trunk sewer surrounding the LASED were found to have available capacity to accommodate sewage generated, as would the Hyperion Wastewater Treatment Plant. Thus, less than significant impacts regarding sewage would occur. Nonetheless, mitigation measures would be implemented to ensure that wastewater generation would be reduced to the maximum extent feasible (Mitigation Measure IV.J.2-3). Subsequent Addenda confirmed the same determination for the Approved Project.

Questions (d) and (e)—Solid Waste Capacity and Regulations: The Certified EIR concluded solid waste impacts would be less than significant. As discussed in the Certified EIR, demolition and construction building debris wastes would be generated during construction due to the demolition of warehouse and mechanical buildings. As stated in the Certified EIR, the Applicant would minimize the amount of construction and demolition waste to the extent possible and would implement on-site sources separation of these materials for recycling, including the practice of on-site grinding of concrete and asphalt paving for use as a new base materials throughout the LASED. Therefore, as concluded in the Certified EIR, construction activities would result in less than significant impacts with regard to solid waste disposal capacity. Subsequent Addenda confirmed the same determination for the Approved Project.

The Certified EIR estimated the generation of 31,170 pounds of solid waste per day, or 5,414 tons per year prior to diversion. In addition, in accordance with the previous modifications to the Approved Project that included increases in floor area that were addressed in Subsequent Addenda, as shown in Table 12 on page 151, operation of the Approved Project is anticipated to generate an estimated 24,890 pounds of solid waste per day, or approximately 4,542 tons per year. This would be approximately 19 percent less than the daily amount estimated in the Certified EIR. As discussed in the Certified EIR, this waste would likely be disposed of at landfills located within, as well as outside of,

**Table 11
Estimated Wastewater Generation under Approved Project and Modified Project^a**

Use	Development	Generation Rate (gpd/unit) ^b	Total (gpd)
LASED under Approved Project			
Convention Center Expansion	250,000 sf	1.24	10,000
Cinema	7,100 seats	5	35,500
Hotel	1,577 rms	130	205,010
Hotel Meeting/Ballroom Area ^c	155,433 sf	0.71	110,357
Office	847,600 sf	0.18	152,568
Residential	1,376 du	160	220,160
Retail/Entertainment/Restaurant	684,783 sf	0.878	601,239
Total LASED under Approved Project		—	1,634,835
LASED under Modified Project			
Convention Center Expansion	235,300 sf	1.24	291,772
Cinema	7,100 seats	5	35,500
Hotel	2,428 rms	130	315,640
Hotel Meeting/Ballroom Area ^c	213,273 sf	0.71	151,424
Office	283,900 sf	0.18	51,102
Residential	1,376 du	160	220,160
Retail/Entertainment/Restaurant	684,783 sf	0.878	601,239
Total LASED under Modified Project		—	1,666,837^d
Net Change under Modified Project			32,002
<p><i>du = dwelling unit</i> <i>gpd/unit = gallons per day per unit</i> <i>rms = rooms</i> <i>sf = square feet</i></p> <p>^a <i>The Figueroa North development area is located within the LASED but outside of the LASED Specific Plan area. After Certification of the LASED EIR, separate CEQA documentation was prepared for the Figueroa North development area and development was approved separate from the LASED Project. Half of the Figueroa North parcel has been developed with residential and commercial uses and the remainder is entitled for educational uses and student housing. In addition, Modified Project does not include any changes to Figueroa North. Therefore, Figueroa North has not been included in these calculations.</i></p> <p>^b <i>Wastewater rates based on rates provided in the LASED Final EIR, May 2001.</i></p> <p>^c <i>Under the Approved Project, Hotel Meeting/Ballroom floor area was estimated to be 10 percent of the total Hotel and Ballroom floor area detailed in the LASED Specific Plan.</i></p> <p>^d <i>Subsequent to certification of the EIR for the LASED, the City of Los Angeles adopted the Green Building Code. The Los Angeles Green Building Code requires newly constructed non-residential high-rise buildings to install plumbing fixtures and fittings that will reduce the overall use of potable water within the building by 20 percent. This reduction is conservatively not included in this table.</i></p> <p><i>Source: Eyestone Environmental, 2020.</i></p>			

Table 12
Estimated Solid Waste Generation under Approved Project and Modified Project^a

Use	Development	Generation Rate (pounds/unit) ^{b,c}	Total (pounds/day)
LASED under Approved Project			
Convention Center Expansion	250,000 sf	5/1,000 sf	1,250
Cinema	7,100 seats	1/seat	7,100
Hotel	1,577 rms	2/room	3,154
Hotel Meeting/Ballroom Area	155,433 sf	5/1,000 sf	777
Office	847,600 sf	6/1,000 sf	5,086
Residential	1,376 du	4/du	5,504
Retail/Entertainment/Restaurant	684,783 sf	2.948/1,000 sf	2,019
Total LASED under Approved Project		—	24,890
LASED under Modified Project			
Convention Center Expansion	235,300 sf	5/1,000 sf	1,177
Cinema	7,100 seats	1/seat	7,100
Hotel	2,428 rms	2/room	4,856
Hotel Meeting/Ballroom Area ^b	213,273 sf	5/1,000 sf	1,066
Office	283,900 sf	6/1,000 sf	1,703
Residential	1,376 du	4/du	5,504
Retail/Entertainment/Restaurant	684,783 sf	2.948/1,000 sf	2,019
Total LASED under Modified Project		—	23,425
Net Change under Modified Project			(1,465)
<p><i>du = dwelling unit</i> <i>rms = rooms</i> <i>sf = square feet</i> <i>() = indicates negative number</i></p> <p>^a <i>The Figueroa North development area is located within the LASED but outside of the LASED Specific Plan area. After Certification of the LASED EIR, separate CEQA documentation was prepared for the Figueroa North development area and development was approved separate from the LASED Project. Half of the Figueroa North parcel has been developed with residential and commercial uses and the remainder is entitled for educational uses and student housing. In addition, Modified Project does not include any changes to Figueroa North. Therefore, Figueroa North has not been included in these calculations.</i></p> <p>^b <i>Solid waste rates provided in the LASED Final EIR, May 2001 with the exception of the combined rate for retail/entertainment/restaurant uses, which was from the August 2006 Addendum.</i></p> <p>^c <i>Under the Approved Project, Hotel Meeting/Ballroom floor area was estimated to be 10% of the total Hotel and Ballroom floor area detailed in the LASED Specific Plan.</i></p> <p><i>Source: Eyestone Environmental, 2020.</i></p>			

Los Angeles County. Estimated solid waste generated would continue to be met by the remaining landfill capacity. In addition, development within the LASED would implement

source reduction, recycling, and diversion measures, which would serve to reduce the amount of waste disposed of at area landfills.

It was concluded in the Certified EIR that development of the LASED would have a less than significant impact with regard to the remaining disposal capacity of available landfill facilities or their anticipated closure dates. As a result, the development would result in a less than significant impact regarding solid waste. Nonetheless, mitigation measures (Mitigation Measures IV.J.3-1 through IV.J.3-1) were included to ensure waste reduction goals would be achieved through recycling programs, the inclusion of trash compaction facilities, and yard waste management. Subsequent Addenda confirmed the same determination for the Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—New or Expanded Water, Wastewater Treatment, or Storm Water Drainage, Electric Power, Natural Gas, or Telecommunications Facilities:

Water Facilities

As set forth in the Water Report included as Appendix E, similar to the Approved Project, the Modified Project's impact to water facilities would be less than significant. With regard to water infrastructure, as discussed above, the Certified EIR and Subsequent Addenda concluded that with incorporation of the proposed mitigation measures, LADWP infrastructure would sufficiently accommodate the water demand generated by the Approved Project. The Modified Project would result in an estimated 1,999,794 gpd of water demand, as shown in Table 10 on page 148. This would represent an approximate 2 percent increase in water demand when compared with the Approved Project. However, the water demand for the Modified Project does not account for the more recent Los Angeles Green Building Code, which requires newly constructed non-residential high-rise buildings to install plumbing fixtures and fittings that will reduce the overall use of potable water within the building by 20 percent. When applying the 20 percent reduction to the Hotel and Conference Center Expansion, the Modified Project would result in a reduction in water demand of 2.8 percent when compared with the Approved Project. In addition, the Modified Project would continue to implement the same mitigation measures related to water as the Modified Project that include implementation of water conservation features as well as confirmation from LADWP that adequate infrastructure capacity exists prior to construction of the Modified Project. Therefore, it is anticipated that the existing water infrastructure would be sufficient to serve the lower water demand of the Modified Project.

Development of the LASED was anticipated to require upsizing or replacement of water lines and additional flow tests would be required during development to determine if additional infrastructure is needed to accommodate proper Fire Department fire flows.

Impacts related to the construction of infrastructure, such as impacts to air quality, transportation and noise from were analyzed in IV.E, Air Quality; IV.F, Transportation; and IV.H, Noise, of the Certified EIR and the Subsequent Addenda. In addition, Mitigation Measures were included to ensure compliance with City infrastructure requirements and for a Construction Management Plan for any temporary lane closures due to infrastructure work (Mitigation Measures IV.J.1-1, IV.J.1-3, IV.J.1-4, and IV.J.2-4). The Modified Project would implement the same mitigation measures.

Based on the above, the Modified Project would not create any new significant impacts related to water infrastructure nor result in a substantial increase in a previously identified significant impact. These impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Wastewater Facilities

Similar to the Approved Project, the Modified Project's impact to wastewater facilities would be less than significant. Like the Approved Project, construction activities for the Modified Project would result in a temporary and incremental increase in wastewater generation as a result of construction workers on-site. The resulting wastewater flows are anticipated to be similar to those of the Approved Project since the maximum daily construction activities of the Modified Project would be similar to the Approved Project. In addition, as with the Approved Project, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. As such, any increase in flows to the public sewer system would be limited and within the capacity of the wastewater facilities that currently serve the Project Site. Thus, similar to the Approved Project, wastewater impacts during construction of the Modified Project would be less than significant.

As shown in Table 11 on page 150, the Modified Project would generate an estimated 1,666,837 gpd of wastewater, which is approximately 32,002 gpd (or approximately 2 percent) more than the Approved Project. As such, the Modified Project would result in an incremental increase in wastewater generation compared to the Approved Project. Given the limited increase in wastewater generation of 2 percent compared to the Approved Project and the previous conclusion that existing sewer infrastructure would have adequate capacity to serve the Approved Project, it is anticipated that the Modified Project's incremental increase likewise could be accommodated. In addition, as shown in the Wastewater Technical Report includes as Appendix E, BOS has indicated that the sewer system should be able to accommodate the total flow from the Hotel and Conference Center Expansion. Furthermore, the same mitigation measures set forth in the Certified EIR would be implemented that address water conservation and ensure that any infrastructure improvements required by the Department of Public Works would be implemented. Impacts related to the implementation of wastewater infrastructure, such as impacts to air quality, transportation and noise from were analyzed in IV.E, Air

Quality; IV.F, Transportation; and IV.H, Noise, of the Certified EIR and the Subsequent Addenda. In addition, Mitigation Measures were included to ensure compliance with City infrastructure requirements and for a Construction Management Plan for any temporary lane closures due to infrastructure work (Mitigation Measures IV.J.2-1, IV.J.2-2, and IV.J.2-4).

Based on the above, the Modified Project would not create any new significant impacts related to wastewater infrastructure nor result in a substantial increase in a previously identified significant impact. These impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Storm Water Drainage Facilities

As discussed above in Section 7.1.10, Hydrology and Water Quality (Drainage and Surface Water Quality), threshold question (c), the existing storm drain infrastructure would be adequate to accommodate the proposed uses. Thus, the Modified Project would not result in the relocation or construction of new or expanded storm water drainage infrastructure which could cause significant environmental effects. As with the Approved Project, drainage impacts under the Modified Project would be less than significant.

Electric Power, Natural Gas, and Telecommunications Facilities

As discussed above in Section 7.1.6, Energy, threshold question (a), compliance with the California Building Energy Efficiency Standards and CALGreen Code would ensure electricity and natural gas usage would not occur in a manner that is wasteful, inefficient, or unnecessary. With the exception of specific building connections, existing infrastructure in the LASED is expected to be able to accommodate the Modified Project's electricity and natural gas demands, since any major improvements necessary to support overall site development were previously undertaken in conjunction with initial construction of the Approved Project.³⁷ Similarly, existing telecommunications facilities in the area would be adequate. Accordingly, the Modified Project would not result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities which could cause significant environmental impacts.

In summary, the Modified Project would not create any new significant impacts related to utility infrastructure facilities nor result in a substantial increase in a previously

³⁷ *Given that an Environmental Equivalency Transfer is proposed to convert and reallocate office floor area to hotel floor area as part of the Modified Project, it is acknowledged that the operational characteristics of office and hotel uses differ and may result in differences in demand for electricity and natural gas. However, both of these land uses were included and evaluated as part of the Approved Project, and thus on an overall basis, the energy demand generated by the Modified Project would not vary substantially from that previously identified.*

identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Question (b)—Water Supply: Similar to the Approved Project, the Modified Project's impact to water supply would be significant and unavoidable. Similar to the Approved Project, a short-term demand for water would occur during construction of the Modified Project in association with dust control, concrete mixers, truck cleanout, cleaning of equipment, and other short-term related activities. These activities would occur periodically through buildout of the Modified Project and would be temporary in nature. The amount of water used during construction would vary depending on the conditions of soils, weather, size of the construction site, and site-specific operations but would be anticipated to be similar to that required by the Approved Project since the maximum daily construction activities of the Modified Project would be similar to the Approved Project. Therefore, like the Approved Project, water demand during construction of the Modified Project would result in less than significant impacts with regard to water supply and existing service, water lines, and facilities. As such, the Modified Project would not create any new significant impacts related to water supply during construction nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

The Modified Project water demand is anticipated to consume approximately 1,999,794 gallons per day (gpd) of water as shown in Table 10 on page 148. This would represent an incremental increase of approximately 2 percent when compared with the water demand from the Approved Project. However, the Modified Project's water demand is overestimated because the consumption rates listed in Table 10 do not account for water conservation features that are now required by the City per the Los Angeles Green Building Code. As discussed above, subsequent to certification of the Certified EIR, the City adopted the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), which requires newly constructed non-residential and high-rise residential buildings to reduce indoor water use by at least 20 percent. When applying the 20 percent reduction to the Hotel and Conference Center Expansion, the Modified Project would result in a reduction in water demand of 2.8 percent when compared with the Approved Project. Notwithstanding, as the City is largely dependent on external water sources, there is no certainty that long-term water supplies would be available on a regional basis. While the Modified Project's water demand would constitute a small portion of the regional water demand, similar to the Approved Project, impacts to water supply during operation of the Modified Project would be considered significant. The Modified Project would not create any new significant impacts related to water supply during operation nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Question (c) Wastewater Treatment Capacity: Similar to the Approved Project, the Modified Project's impact to water treatment capacity would be less than significant. As discussed above and shown in Table 11 on page 150, the Modified Project would generate an estimated 1,666,837 gpd of wastewater, which is approximately 32,002 gpd (or approximately 2 percent) more than the Approved Project. As discussed above, when accounting for water conservation now required by the Green Building Code for the Hotel and Conference Center Expansion, an estimated 5.4 percent reduction in the wastewater generation would be anticipated under the Modified Project as compared to the Approved Project. Given the previous conclusion that existing wastewater treatment system would have adequate capacity to serve the Approved Project, it is anticipated that the Modified Project's generation likewise could be accommodated. Furthermore, the Hyperion Service Area and the Hyperion Treatment Plant have sufficient capacity to accommodate the Project as both the system and the plant are operating well below their current design capacity. As such, The Modified Project would not create any new significant impacts related to wastewater treatment capacity nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Questions (d) and (e)—Impacts Related to Solid Waste Capacity and Regulations: Similar to the Approved Project, the Modified Project's impact to solid water treatment would be less than significant. Similar to the Approved Project, demolition and construction wastes would be generated during construction of the Modified Project. As described above, the Modified Project would not increase the total permitted floor area within the LASED. Accordingly, the Modified Project would not increase the amount of construction activity or the associated volume of construction debris. Thus, the Modified Project is anticipated to generate a similar amount of construction debris as the Approved Project. In addition, as with the Approved Project, construction and demolition waste would be minimized and recycled to the extent practicable and would be conducted in compliance with waste reduction policies and regulations. As such, similar to the Approved Project, solid waste impacts regarding capacity and compliance with regulations during construction of the Modified Project would be less than significant. The Modified Project would not create any new significant impacts related to solid waste nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

During operation of the Modified Project, the proposed modifications to the approved development program would change the estimated amount of solid waste generated within the LASED. Specifically, as shown in Table 12 on page 151, the Modified Project would generate an estimated 23,423 pounds per day of solid waste, which is 1,467 pounds or approximately 5.9 percent (less than the Approved Project. As with the Approved Project, the waste generated by the Modified Project would likely be disposed of at landfills located within, as well as outside of, Los Angeles County, Similar to the Approved Project, the estimated solid waste generated by the Modified Project would continue to be met by the

remaining existing landfill capacity, and source reduction, recycling, and diversion measures would be implemented as part of the Modified Project to reduce the amount of waste disposed of at area landfills. Therefore, impacts to solid waste during operation of the Modified Project similarly would be less than significant. The Modified Project would not create any new significant impacts related to solid waste nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to utilities.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to utilities and service systems. No substantial changes in the environment related to utilities and service systems have occurred since certification of the Certified EIR, and no substantial new utilities or service systems have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any new or substantially more severe impacts related to utilities and service systems, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address impacts to utilities would be implemented as part of the Modified Project. No additional mitigation measures are required as no new significant hazards and hazardous materials impacts would result from implementation of the Modified Project.

Water

1. The Project and occupants shall adhere to all applicable DWP rules and regulations. The DWP shall be consulted regarding feasible water conservation features, including xeriscape practices (e.g. use of drought-tolerant landscaping and drip irrigation systems), which can be incorporated into the design of the Project. All necessary infrastructure improvements shall be constructed to meet the requirements of the DWP. (IV.J.1-1)

2. Automatic sprinkler systems shall be set to irrigate landscaping during morning or evening hours to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation. (IV.J.1-2)
3. The DWP shall conduct a flow test prior to the issuance of certificates of occupancy to determine whether the existing water system meets fire flow requirements imposed by the Fire Department for the Project. The Applicant shall undertake and complete those required improvements identified by the DWP as a result of findings of the flow test. (IV.J.1-3)
4. The Applicant shall obtain a DWP Letter of Service prior to issuance of building permits. (IV.J.1-4)

Sewer

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

Solid Waste

1. Prior to the issuance of building permits, a Recycling and Resource Recovery Plan shall be prepared to coordinate resource conservation and recycling for the Project. Prior to implementing this plan, it shall be reviewed and approved by the City of Los Angeles Department of Public Works, Solid Resources Citywide Recycling Division. The plan shall include the following (IV.J.3-1):
 - a. A recycling program shall be designed to reduce the amount of solid waste going to landfills, in line with the City's goals and continued efforts towards a Citywide 50 percent waste reduction rate over 1990 waste diversion levels.
 - b. Measures for maximizing the recycling of demolition and construction debris, including a proposed layout for source separation of materials and recycling bins at the Project site and utilization of prospective contractor(s) specializing in demolition and construction waste management shall be implemented, to the extent feasible.

- c. Recycling bins and chutes shall be provided at appropriate locations to promote the recycling of paper, metal, glass, and other recyclable materials.
 - d. An education/outreach program for all Project employees shall be instituted to reduce the output of solid waste through recycling and reduction of waste at the source.
 - e. Promote recycling to patrons.
2. Trash compaction facilities shall be provided in all occupied structures, where deemed feasible. (IV.J.3-2)
 3. Yard waste management techniques shall be incorporated into the maintenance of the Project, including use of drought tolerant plants and mulching or composting of regular landscape maintenance waste where appropriate. (IV.J.3-3)

Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.20. Wildfire

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Not Analyzed	No	No	No	No
(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Not Analyzed	No	No	No	No
(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Not Analyzed	No	No	No	No

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Not Analyzed	No	No	No	No

Impact Determination in the Certified EIR

Questions (a) through (d)—Wildfires: The Certified EIR and Subsequent Addenda for the Approved Project did not directly evaluate the wildfire questions listed above as they were not included in Appendix G of the CEQA Guidelines at the time of preparation. However, the Initial Study, Appendix A to the Draft EIR, did generally address risks associated with wildland fires. As discussed above in Section 7.1.9, Hazards and Hazardous Materials, threshold question (g), the Initial Study concluded there would be no impact relative to wildland fires, as the LASED is located in an urbanized area, and there are no wildlands in the surrounding vicinity.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 2019 update to the CEQA Guidelines includes a new section addressing wildfires within Appendix G of the CEQA Guidelines. The applicable questions, detailed above, are addressed below for the Modified Project.

Questions (a) through (d)—Wildfires: The LASED is not located in or near a state responsibility area nor does it include land classified as a very high fire hazard severity zone. The LASED is located in a fully developed, urbanized area, and there are no wildlands in the surrounding vicinity. Landscaping in the area is irrigated and is not considered a fire hazard. Therefore, like the Approved Project, the Modified Project would not result in any impacts related to wildfires.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a

substantial increase in the severity of previously identified significant effects related to wildfire.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to wildfire impacts. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new wildfire conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any new or substantially more severe impacts related to wildfire, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, the Modified Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.21. Cumulative Impacts

Impact Determination in the Certified EIR

The original Certified EIR included an examination of the effects of cumulative development in the downtown Los Angeles area through the year 2008, which was the original Project buildout date. The following cumulative impacts were determined to be significant and unavoidable: aesthetics (visual quality, light and glare, and shading), air quality, noise (construction-related, operational traffic), public services (police), parks and recreational facilities, operational traffic, and water supply. The Subsequent Addenda did not alter these significance determinations.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

While the specific geographic context for the cumulative impact analysis of each of the issues addressed above may vary, many types of impacts, particularly those related to construction, are typically localized and thus largely limited to the immediate vicinity. In each of the analyses provided above, impacts associated with the Modified Project would be within the envelope of impacts evaluated in the Certified EIR and the Subsequent

Addenda, and as such, the Modified Project's contribution to potential cumulative impacts would remain unchanged from that previously evaluated. Therefore, the cumulative impact conclusions set forth in the Certified EIR and the Subsequent Addenda would not change as a result of the Modified Project. Accordingly, the Modified Project would not result in any new significant cumulative impacts, nor would it substantially increase the severity of any significant cumulative impacts previously identified in the Certified EIR or the Subsequent Addenda.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Although incremental development has occurred within and around the LASED area, such development has largely occurred in a manner that is consistent with the Community Plan and the cumulative development previously anticipated and analyzed within the Certified EIR. There are no substantial changes to the environmental setting which would alter the determinations of the Certified EIR with respect to buildout of the LASED area or relative to cumulative impacts. As such, there are no new circumstances involving new significant cumulative impacts or substantially more severe cumulative impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to cumulative impacts. While ongoing development throughout the general Project area has taken place, no substantial changes in the environment affecting this analysis have occurred since certification of the Certified EIR. Finally, the Modified Project would not result in any new or substantially more severe cumulative impacts, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As indicated above, the Modified Project would implement the previously adopted mitigation measures set forth in the Certified EIR, as applicable. Accordingly, Project-specific impacts would be reduced to the maximum extent possible, thus reducing the Modified Project's contribution to cumulative impacts.

Conclusion

Based on the above, the Modified Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

8.1.22. Mandatory Findings of Significance

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
MANDATORY FINDINGS OF SIGNIFICANCE:					
(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Significant and Unavoidable	No	No	No	No
(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	Significant and Unavoidable	No	No	No	Yes
(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Significant and Unavoidable	No	No	No	Yes

Impact Determination in the Certified EIR

The environmental issues addressed in the Mandatory Findings of Significance were analyzed in a combination of the Initial Study and the Certified EIR. As summarized above, the Approved Project would result in significant and unavoidable impacts with respect to aesthetics (visual quality, views/visual access, lighting, and shading), regional air quality during construction and operation, construction-related noise, operational traffic noise, parks and recreational facilities, operational traffic (LOS), and water supply. As such, the Approved Project's significant impacts would have the potential to degrade the quality of the environment, cause cumulatively considerable impacts, and result in environmental effects which would cause substantial adverse effects on human beings.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) through (c)—Mandatory Findings of Significance: Like the Approved Project and as evaluated in the analyses throughout this Addendum, the Modified Project would result in significant and unavoidable impacts with respect to views/visual access, lighting, and shading), regional air quality during construction and operation, construction-related noise, operational traffic noise, parks and recreational facilities, operational traffic (related to LOS and not VMT), and water supply.³⁸ As such, similar to the Approved Project, the Modified Project's significant impacts would have the potential to degrade the quality of the environment, cause cumulatively considerable impacts, and result in environmental effects which would cause substantial adverse effects on human beings. However, these impacts would be the same as foreseen under the Approved Project; the Modified Project would not create any new significant impacts nor result in a substantial increase in a previously identified significant impact. As such, all of the Modified Project's impacts would be within the envelope of impacts set forth in the Certified EIR and Subsequent Addenda.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the environmental topics covered in the Mandatory Findings of Significance.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to the environmental topics covered in the Mandatory Findings of Significance. No substantial changes in the environment have occurred since certification of the Certified EIR beyond those contemplated therein, and no new conditions relative to the environmental topics covered in the Mandatory Findings of Significance have been identified that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any new or substantially more severe impacts related to the environmental topics covered in the Mandatory Findings of Significance, a review of feasible mitigation measures is not required.

³⁸ *As discussed above, the Approved Project resulted in significant impacts related to aesthetics. However, in accordance with SB 743, which was adopted subsequent to preparation of the Certified EIR and Subsequent Addenda, aesthetic and parking impacts of the Modified Project are less than significant.*

Addendum Conclusion

As demonstrated by the discussion above, impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR and Subsequent Addenda. No substantial changes would occur with respect to the circumstances under which the Modified Project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new information of substantial importance has become available relative to any of the environmental topic categories that would result in new or more severe significant environmental impacts. In addition, the relevant mitigation measures included as part of the Certified EIR would continue to be implemented under the Modified Project and under the Hotel and Conference Center Expansion as applicable. As all of the impacts would be within the envelope of impacts analyzed in the Certified EIR and Subsequent Addenda, none of the conditions described in PRC Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Supplemental or Subsequent EIR would occur. Additionally, there are no known mitigation measures or Project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the Certified EIR. Therefore, the Modified Project would not create any potential adverse impacts beyond those evaluated in the Certified EIR. As such, the preparation of an addendum that amends the Project Description in the Certified EIR to include the Modified Project is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.