



Joint Analysis for the Convention Center Expansion and Modernization Project and JW Marriott Hotel and Conference Center Expansion Project

Project Locations: Convention Center Expansion and Modernization Project: 1201 S. Figueroa Street (1111–1301 S. Figueroa Street, 1206 W. Pico Boulevard, 1211 W. Pico Boulevard, 1260 S. LA Live Way, 740–1110 Chick Hearn Court, 751 W. 12th Street, Assessor Parcel Number (APN) 5138016908, APN 5138016909), Los Angeles, California 90015. **JW Marriott Hotel and Conference Center Expansion Project:** Los Angeles Sports and Entertainment District

Community Plan Area: Central City

Council District: 9—Price; 14—De León

Project Description: Convention Center Expansion and Modernization Project: As described in detail in the Addendum to the Convention and Event Center Project Environmental Impact Report (EIR), the Convention Center Expansion and Modernization Project includes an amendment to the Convention and Event Center Specific Plan and previously approved entitlements (the “Approved Convention Center Project”), to allow for the development of a New Hall Building including 700,000 square feet of new floor area with new exhibit hall space, meeting room space, a multi-purpose hall, and pre-function/lobby, support and food service space, for a total of approximately 3,050,000 square feet of floor area on a 68-acre site. The building height would vary with a maximum height of 150 feet, which would not exceed the height of the existing 165-foot South Hall Lobby Tower. The Convention Center modernization also includes the renovation of existing floor area within the existing Concourse Building and South Hall, as well as the partial demolition of the South Hall as needed to connect the building with the New Hall. Additional site improvements include renovation of Gilbert Lindsey Plaza, development of the “Pico Passage” where portions of the New Hall would be constructed above Pico Boulevard, demolition of the existing Bond Street surface lot and construction of a new parking garage at Bond Street with an elevated driveway bridge connecting to the existing Cherry Street garage, construction of a new West Hall lobby and an elevated pedestrian bridge linking the lobby to the JW Marriott Hotel and Conference Center Expansion, additional landscape, streetscape and circulation improvements, and implementation of a comprehensive signage program. **JW Marriott Hotel and Conference Center Expansion Project:** As described in detail in the Eighth Addendum to the Los Angeles Sports and Entertainment District EIR, the JW Marriott Hotel and Conference Center Expansion Project includes an amendment to the Los Angeles Sports and Entertainment District Specific Plan and previously approved entitlements (the “Approved LASED 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). The proposed Specific Plan amendment and related entitlements (the “Modified Project”) include: (1) permitting hotel uses on the Development Site 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 (9) modifying standards for a street vacation for the Eleventh Street Pedestrian Area.

PREPARED FOR:

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City of Los Angeles

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JOINT ANALYSIS FOR THE CONVENTION CENTER EXPANSION AND MODERNIZATION PROJECT AND JW MARRIOTT HOTEL AND CONFERENCE CENTER EXPANSION PROJECT

1. Introduction

This document has been prepared in connection with two separate yet related projects involving the expansion of the Los Angeles Convention Center (“Convention Center Expansion and Modernization Project”) and expansion of the JW Marriott Hotel at LA LIVE (“JW Marriott Hotel and Conference Center Expansion Project”), which are across the street from one other. The two projects are independent from an entitlement perspective, and each represents modifications to projects that each have their own underlying approvals and prior environmental review under CEQA. Each project has its own Applicant. The Applicant for the Convention Center Expansion and Modernization Project is the City of Los Angeles Department of Convention & Tourism Development. AEG Plenary Conventions Los Angeles LLC (which is a joint venture of AEG and Plenary Group USA Ltd.) (“APCLA”), will assist the City in the expansion and modernization of the Convention Center by means of a public–private partnership with the City and AEG. AEG is the Applicant for the JW Marriott Hotel and Conference Center Expansion Project.

To analyze the environmental impacts under CEQA of each Project, the City is preparing an Addendum to each project’s respective underlying Certified EIR, the 2012 Convention and Event Center Project EIR and the 2001 Los Angeles Sports and Entertainment District (LASED) Project EIR and seven Subsequent Addenda (collectively the “Certified EIRs”). See the Addendum to the Convention and Event Center EIR for a detailed description of the Convention Center Expansion and Modernization Project and an analysis demonstrating that the impacts of the Convention Center Expansion and Modernization Project are within the impact envelope set forth in the Convention and Event Center EIR. See the Eighth Addendum to the LASED EIR for a detailed description of the JW Marriott Hotel and Conference Center Expansion Project and an analysis demonstrating that the impacts of the JW Marriott Hotel and Conference Center Expansion Project are within the impact envelope set forth in the LASED EIR.

The City and AEG Plenary Conventions Los Angeles LLC (which is a joint venture of AEG and Plenary Group UST Ltd.) (“AEG”) have entered into an Exclusive Negotiating Agreement, which may result in a series of transactions that would result in the development of each Project in approximately the same timeframe. Given the overlapping

timeframe and the adjacency of the two projects, this document, which is to be incorporated into the EIR Addendum for each Project, analyzes the combined impacts that could result from development of these two related, yet distinct, projects. While these projects remain separate and the level of development under each already was contemplated to occur and always could have occurred simultaneously under each underlying set of approvals, to provide a conservative analysis, this document provides a joint analysis (“Joint Analysis”) demonstrating how the environmental impacts of concurrent development have already been accounted for.

For purposes of this Joint Analysis, and consistent with the terminology used in the EIR Addenda, the originally approved Convention and Event Center Project and LASED Project (including subsequent amendments) are collectively referred to as the “Approved Projects,” while the Convention Center Expansion and Modernization Project and Modified LASED Project that includes the JW Marriott Hotel and Conference Center Expansion Project are referred to as the “Modified Projects.” In addition, when referred to collectively, the proposed Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project are referred to as the “Proposed Development Projects.” Provided below is an overview of the Modified Projects followed by a Joint Analysis of the combined impacts of the two projects.

2. Background and Overview of Modified Projects

2.1 Convention Center Expansion and Modernization Project

An Addendum to the EIR for the Convention and Event Center Project, which was certified by the City of Los Angeles (“City”) in October 2012 (ENV-2011-585-EIR, SCH No. 2011031049) (the “Certified EIR”), has been prepared. The Convention and Event Center EIR is comprised of the Draft EIR and Final EIR. The Convention and Event Center EIR analyzed the Convention and Event Center Project as well as cumulative impacts from other nearby related projects, including development under the Approved LASED Project. The Addendum for the Convention Center Expansion and Modernization Project analyzes proposed modifications to the Convention and Event Center Project and demonstrates that all of the environmental impacts associated with the Convention Center Expansion and Modernization Project would be within the envelope of impacts set forth in the Convention and Event Center EIR.

As described in more detail in Section 4.3 of the Addendum to the Convention and Event Center EIR, the Convention and Event Center Project included: (1) construction of an event center intended to host a National Football League team on the site of the existing West Hall (“Event Center”); (2) construction of replacement exhibit and meeting hall space to modernize and expand the Convention Center (the “New Hall”); and (3) development of other site improvements.

The City of Los Angeles Department of Convention & Tourism Development, is proposing to expand and modernize the Convention Center and make other improvements by means of a public-private partnership with the City and AEG. The Convention Center Expansion and Modernization Project builds upon previous efforts to expand and modernize the Convention Center. The Convention Center Expansion and Modernization Project includes a net increase of approximately 700,000 square feet of floor area that would include 193,500 square feet of new exhibit hall floor area, 60,000 square feet of meeting room floor area, 98,500-square feet of multi-purpose floor area, 10,000 square feet of outdoor terrace event space, and up to approximately 338,000 square feet of pre-function/lobby space, support space, and food service space.

Table 1 on page 4 provides a development summary for existing conditions, buildout under the Convention and Event Center Project and buildout under the Convention Center Expansion project. The following provides a summary of the Project components, which are described in more detail in Section 4.4 of the Addendum to the Los Angeles Convention and Event Center EIR:

- Construction of the New Hall built in part over Pico Boulevard and directly connecting the Convention Center's existing South and West Halls. The New Hall would include a new lobby off Pico Boulevard, new high-quality convention center exhibit hall space, multi-purpose space, meeting room space, exterior event space, and support space .
- Construction of a new West Hall Lobby and a pedestrian bridge across Chick Hearn Court to connect the Convention Center to the proposed JW Marriott Hotel Expansion (not a part of the Modified Project).
- Renovation of Gilbert Lindsay Plaza to provide improved multi-use open spaces and enhanced pedestrian connections.
- Development of a new parking garage at Bond Street to replace the existing Bond Street Surface Lot (the "Bond Street Garage") along with a driveway bridge over Pico Boulevard connecting the Bond Street Garage to the existing Cherry Street Garage.
- Implementation of additional enhancements, including "Pico Passage," relocation of bus arrival facilities, realignment of back-of-house service areas, and implementation of a comprehensive signage program.

These components of the Convention Center Expansion and Modernization Project Expansion Project are largely already permitted under the existing entitlements, subject to additional approvals that include a General Plan Amendment to the Central City Community Plan, an amendment to the Specific Plan, a Vesting Zone and Height District Change, amendment to the Sign District, and airspace and street vacations. The

Table 1
Development Summary—Los Angeles Convention and Event Center Project and Proposed Modifications

Use	Floor Area (square feet) ^a		
	Existing	Approved Project	Modified Project
Convention Center	1,538,671	1,576,470	2,238,671
Event Center	0	1,750,000	0
STAPLES Center	811,108	811,108	811,108
Total	2,349,779	4,137,578	3,049,779

^a Floor area as defined by Section 12.03 of the LAMC, except that under the Existing Specific Plan outdoor areas, including, without limitation, pedestrian bridges, above grade balconies and terraces, and eating areas on all floors, shall not count as floor area.

Source: City of Los Angeles, Draft Environmental Impact Report for the Convention and Event Center Project, SCH No. 2011031049, March 2012, and Eyestone Environmental, August 2019.

Convention Center Expansion and Modernization Project also includes requests to revise the existing entitlements to reflect the modifications to the Convention and Event Center Project, as well as other modifications to reflect that the Event Center will not be constructed, and the West Hall will not be demolished as part of the Convention Center Expansion and Modernization Project.

2.2 JW Marriott Hotel and Conference Center Expansion Project

An Eighth Addendum to the EIR for the Los Angeles Sports and Entertainment District (“LASED EIR”) (ENV-2000-3577-EIR, State Clearinghouse No. 2000091046), which was certified by the City of Los Angeles (City) on September 4, 2001, has been prepared. In the years following certification of the LASED EIR, several modifications were made to the LASED Project. These modifications were addressed in seven subsequent addenda to the EIR. Therefore, the LASED EIR, as referred to herein, comprises the Draft EIR, Final EIR, and all previous addenda to the LASED EIR. The Eighth EIR Addendum for the JW Marriott Hotel and Conference Center Expansion Project analyzes additional proposed modifications to the development program for the LASED, as shown in Table 2 on page 5 and summarized below, and as detailed more fully in Section 5 of the EIR Addendum for the JW Marriott Hotel and Conference Center Expansion Project.

The majority of development within the LASED is governed by the LASED Specific Plan. 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

Table 2
Development Summary—Los Angeles Sports and Entertainment District (LASED) Project and
Modified LASED Project with JW Marriott Hotel and Conference Center Expansion

Use	Floor Area (square feet) ^{a,b}	
	Approved Project	Modified Project
Convention Center Expansion Uses (e.g., Conference Center uses)	250,000	235,300
Cinema	127,327	127,327
Hotel and Ballroom	1,554,327 (1,577 rm)	2,132,727 (2,428 rm)
Office	847,600	283,900
Residential	2,363,276 (1,376 du)	2,363,276 (1,376 du)
Retail/Entertainment/Restaurant	684,783	684,783
Total	5,827,313^b	5,827,313^b

du = dwelling units
rm = rooms

^a Floor area as defined by Section 12.03 of the LAMC, except that under the Existing Specific Plan outdoor areas, including, without limitation, pedestrian bridges, above grade balconies and terraces, and eating areas on all floors, shall not count as floor area.

^b In addition, the Figueroa North development area is located within the LASED, as studied in the EIR, 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 above totals do not include floor area from Figueroa North.

Source: Eyestone Environmental, August 2019.

restrictions and conditions are followed. These exchanges are outlined in the LASED Specific Plan Equivalency Matrix and discussed further below.

As discussed further in Section 5 of the EIR Addendum for the JW Marriott Hotel and Conference Center Expansion Project, modifications to the LASED 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 located within the southern 3.1-acre portion of the 6.5-acre Olympic West development area. Specifically, the proposed development includes the expansion of the existing JW Marriott Los Angeles L.A. LIVE hotel (JW Marriott Hotel) and JW Marriott Conference Center complex. The Hotel Expansion component includes a new 37-story hotel tower with 861 guest rooms and 9,900 square feet of hotel-related retail and restaurant uses totaling 578,400 square feet of floor area. As part of the Project, there would be a 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 Hotel Expansion.¹ The Conference Center Expansion component would include approximately 228,200 square feet floor area for meeting and conference rooms, multi-purpose space, and ancillary uses located above the Olympic West Parking Structure. The JW Marriott Hotel and Conference Center Expansion Project also 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 LASED area would include the future permanent vacation of the Eleventh Street Pedestrian Area, which is already routinely closed for events.

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, In addition, as permitted by the LASED Specific Plan, 14,700 square feet of Convention Center Expansion Use floor area would be allocated to the Hotel Expansion. Specific Plan Amendments would be required to increase the maximum permitted tower height on Development Site 1a to 420 feet to allow for the Hotel Expansion, and to allow for convention-supportive hotel uses to be permitted on the Convention Center Expansion Parcel. Since the Convention Center Expansion Parcel is currently already permitted for development of 250,000 square feet of Convention Center Expansion Uses the proposed 228,200 square feet of such uses for the Convention Center Expansion, along with the additional 14,700 square feet of such uses for the Hotel Expansion, are within the envelope of development already permitted by the LASED Specific Plan. Table 2 on page 5 provides a development summary for existing conditions, buildout under the LASED Project and buildout under the Modified LASED Project, including the Hotel and Conference Center Expansion. See Section 6 of the Addendum for the JW Marriott Hotel and Conference Center Expansion Project for a full project description.

¹ *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.*

3. Joint Analysis

The following provides a comparative evaluation of the environmental effects associated with concurrent construction and operation of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project with the environmental impacts set forth in the Certified EIR. Specifically, it is determined in the following analysis whether the Projects would result in new cumulative impacts or substantially more severe cumulative impacts than those identified for the Approved Projects in the Certified EIRs. For organizational purposes, the bolded references to “Questions” below are to the questions in the latest (2019) version of State CEQA Guidelines Appendix G (Environmental Checklist).

3.1 Aesthetics

As noted in both Addenda, subsequent to preparation of the Certified EIR, SB 743 added Public Resources Code Section 21099(d), 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.” The Proposed Development Projects are employment center projects located within a transit priority area. Thus, for purposes of CEQA any combined aesthetic impacts of the Proposed Development Projects would not be significant. Nonetheless, for informational purposes only and to provide a thorough assessment of the combined impacts of the Proposed Development Projects, an analysis of the Proposed Development Project’s combined impacts regarding aesthetics is provided below.

Question (a)—Impacts to Scenic Vistas: The Certified EIRs both concluded that the Approved Projects would result in significant and unavoidable impacts with respect to views/visual access.

Similar to the Approved Projects, the Proposed Development Projects would include new development with building heights that would be similar to existing building heights in Downtown Los Angeles. Development under both sets of projects would be more visible and take up a greater proportion of the field of view from some of the public vantage points in the area, and development would appear denser. From most of the public vantage points in the area, expansive sky views would continue to be available of the Marriott/Ritz tower, Downtown skyline, and San Gabriel Mountains to the north. In addition, the linear extent of the development would be substantially less under the Proposed Development Projects owing to substantially less net floor area under the Convention Center Expansion and Modernization Project. Thus, while building heights would be taller under the Proposed Development Projects than under the Approved Projects, the degree of the impacts would not be substantially more severe. Hence, the Proposed Development

Projects would not result in cumulative impacts to scenic vistas beyond those already set forth in the Certified EIRs.

Question (b)—Impacts to Scenic Resources within a State-Designated Scenic Highway: There are no designated state scenic highways in the vicinity of the Project Site. The LASED EIR evaluated impacts to the segment of the Harbor Freeway (I-110) near the Project Site, which was designated as a Scenic Highway (city route) in the City's adopted 1979 Scenic Highway Plan. As the Approved LASED Project and other related projects could become a prominent feature visible from the freeway, project and cumulative aesthetic impacts were concluded by the LASED EIR to be significant and unavoidable. Note that the 1979 Scenic Highway Plan has been superseded by the Mobility Plan that does not designate the I-110 as a scenic highway. The Convention and Event Center EIR concluded that project and cumulative impacts to a scenic highway designated by the Central City Community Plan would be significant and unavoidable.

However, as there are no designated state scenic highways near the Project Sites, the Proposed Development Projects would not result in new significant impacts to scenic resources within a state-designated scenic highway or increase the scenic resources impacts of the Approved Project. Hence, the Proposed Development Projects would not result in cumulative impacts to scenic resources within a state-designated highway beyond those already set forth in the Certified EIRs.

Question (c)—Impacts to Conflict with Regulations Governing Scenic Quality (Visual Quality): Both Certified EIRs concluded that impacts associated with visual character/quality would be significant and unavoidable and cumulatively significant, specifically related to signage and lighting.

As discussed in detail in the Addenda, the CEQA Checklist was recently modified such that an analysis of visual character is only required for non-urban projects and this question is now focused on consistency with regulations regarding scenic quality. As discussed in both Addenda, the Proposed Development Projects would be consistent with regulations regarding scenic quality including the standards established by the General Plan Framework for high-quality development design, the goals of creating “pedestrian friendly streets” set forth by the Downtown Design Guide, and the standards set forth in the respective Specific Plans (as amended by the Proposed Development Projects) that address open space, landscaping, height, bulk and pedestrian linkages. Both Proposed Development Projects would also promote the goals of the Citywide Design Guide that address Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. Therefore, the Proposed Development Projects would not result in cumulative visual character impacts related to consistency with relevant regulations regarding scenic quality.

Question (d)—Light/Glare and Shade/Shadow Impacts:**Light and Glare**

The Certified EIR for the LASED Project concluded no significant light or glare impacts would occur during construction of the Project and that significant and unavoidable lighting impacts would occur as a result of nighttime illumination associated with operation of the Project. The Certified EIR for the Convention and Event Center Project concluded that the increase in nighttime illumination from both construction and operation of the Project would result in a significant and unavoidable impact. Cumulative lighting impacts were also determined to be significant under both Certified EIRs.

As with the Convention and Event Center Project, the Convention Center Expansion and Modernization Project may request extended hours permits to allow construction activities to occur until midnight. As such, significant impacts from construction lighting and glare may still occur. However, impacts would be reduced due to the reduction in construction activities. Similar to the LASED Project, construction light and glare impacts are not anticipated from the JW Marriott Hotel and Conference Center Expansion Project, as temporary construction barriers would be used around the construction sites and nighttime construction lighting would be focused downward or shielded, oriented toward the Project Site and away from sensitive receptors. As main construction activities for the Convention Center Expansion would occur over 1,000 feet south of the Hotel Expansion site, the likelihood for construction light spillover or glare between the two projects would be minimal. As such, construction activities associated with the Proposed Development Projects combined would not result in an increase in the severity of cumulative impacts that were already identified.

With regard to operational light and glare, both the Approved Projects and the Proposed Development Projects would include building facade accent lighting, signage lighting, pedestrian lighting, street lights, security lighting, parking structure lighting, vehicle headlights and light from the interior of the proposed buildings. Both Projects would implement the applicable project design features and mitigation measures set forth in the respective EIRs. Impacts would be less under the Proposed Development Projects owing to: (1) substantially less net new building floor area and thus less associated stationary and traffic lighting and glare; and (2) the removal of the Event Center and associated special event lighting and glare. As such, the Proposed Development Projects would not result in cumulative light and glare impacts beyond those already set forth in the Certified EIRs.

Shade/Shadow

As indicated in the Certified EIRs, the Approved Projects would not cast any new or additional shadows on any of the identified sensitive uses during the winter solstice, summer solstice, fall equinox, or spring equinox such that significant shade/shadow impacts would occur.

Under the Convention Center Expansion and Modernization Project, the building height would vary with a maximum height of 150 feet, which would not exceed the height of the existing 165-foot South Hall Lobby Tower. However, the height would exceed the 90-foot height set forth under the Convention and Event Center Project. With regard to the JW Marriot Hotel and Conference Center Expansion, the new hotel tower would have a height of up to 420 feet with an architectural beacon that would extend 38 feet above a 24-foot screening element on the rooftop. Thus, the building height would be greater than currently permitted for Development Site 1a, but within the range of height permitted within other subareas of the LASED. The new buildings would cast less total shadow area due to substantially less total floor area under the Convention Center Expansion and Modernization Project. As with the Approved Projects, the Proposed Development Projects would not shade any shadow-sensitive uses for more than the specified thresholds. Furthermore, given their distances from one another and the presence of intervening buildings, the Proposed Development Projects would not result in combined shading impacts to off-site sensitive uses. As such, the Proposed Development Projects would not result in cumulative shade/shadow impacts beyond those already set forth in the Certified EIRs.

3.2 Agricultural and Forestry Resources

Questions (a) through (e)—Impacts to Agricultural and Forest Resources: Project and cumulative impacts associated with agricultural and forestry resources were determined to be less than significant in both Certified EIRs.

As indicated in the Certified EIRs, the Project Sites of the Approved Projects do not contain agriculture or forestry resources (e.g., farmland, forest land, and timberland) or related operations, nor are they zoned for agriculture, forest land, or timberland use. As the boundaries of the Project Sites of the Modified Projects are the same as those of the Approved Projects, or are subsets thereof, the same is true of the Modified Projects. Therefore, as with the Approved Projects, the Modified Projects would not result in impacts to agricultural and forestry resources and would not result in cumulative agricultural and forestry resources impacts.

3.3 Air Quality

Question (a)—Consistency with Applicable Air Quality Plans: The Certified EIRs for both the LASED Project and the Convention and Event Center Project concluded that impacts associated with consistency with applicable air quality plans would be less than significant.

As detailed below, construction and operation of the Proposed Development Projects would not generate emissions beyond those set forth in the respective Certified EIRs. In addition, the Proposed Development Projects would incorporate the same land uses, project design features, regulatory requirements, and applicable mitigation measures that collectively would reduce air quality emissions as under the Approved Projects. As such, the Proposed Development Projects also would be consistent with applicable SCAQMD and SCAG air quality policies, and the combined impacts of the Proposed Development Projects 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. Therefore, the Proposed Development Projects would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

Question (b)—Criteria Pollutants: Both the federal and state governments have established ambient air quality standards for outdoor concentrations of various pollutants in order to protect the public health and welfare. These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted for them. The national and state standards have been set at levels considered safe to protect public health. Due to their regional context for analysis, the SCAQMD directs that if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. The Certified EIRs and Addenda determined that project and cumulative air quality impacts associated with construction and operation of the Approved Projects would be significant and unavoidable.

Construction

Like the Approved Projects, the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would result in pollutant emissions and fugitive dust from site preparation and construction activities. Pollutant emissions from proposed combined construction activities of the Projects were analyzed. As shown below in Table 3 on page 12, the combined impacts of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would result in the following: (1) daily regional emissions of CO, PM₁₀, PM_{2.5}, and SO_x, that are less than significant; and (2) daily regional emissions of

Table 3
Maximum Daily Regional Construction Emissions of Associated with Convention Center Expansion and JW Marriott Hotel and Conference Center Expansion Projects (pounds per day)^a

Pollutant Emissions	VOC	NO _x	CO	SO _x	PM ₁₀ ^b	PM _{2.5} ^b
Unmitigated Regional Emissions						
2020	41	334	321	<1	49	24
2021	100	363	400	<1	65	33
2022	93	247	352	<1	48	20
2023	11	66	97	<1	15	6
Maximum Regional Daily Emissions	100	363	400	<1	65	33
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	25	263	(150)	(149)	(85)	(22)
Exceed Threshold?	Yes	Yes	No	No	No	No
Mitigated Regional Emissions						
2020	23	165	338	<1	33	12
2021	80	157	419	<1	40	14
2022	78	105	374	<1	39	12
2023	7	30	101		13	4
Maximum Regional Daily Emissions	80	165	419	<1	13	4
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	5	65	(131)	(149)	(110)	(41)
Exceed Threshold?	Yes	Yes	No	No	No	No
Comparison of Combined Convention Center Expansion and JW Marriott Expansion Projects to Approved Project Certified EIRs – Mitigated Regional Construction Emissions						
Convention and Event Center Project ^c	77	406	881	<1	77	27
LASED Project ^d	550	1,497	1,343	90	168	59
Approved Project Certified EIRs (lowest of peak daily emissions)	77	406	881	<1	77	59
Convention Center Expansion and JW Marriott Expansion Projects	80	165	419	<1	13	4
Over/(Under)	4	(241)	(462)	(<1)	(64)	(55)
<p>^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 A of this Joint Analysis.</p> <p>^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.</p> <p>^c Table IV.F.1-15 of the Convention and Event Center Project Certified EIR.</p> <p>^d Table 15 of the LASED Project Certified EIR.</p> <p>^f 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 Convention and Event Center</p>						

Table 3 (Continued)
Maximum Daily Regional Construction Emissions of Associated with Convention Center Expansion and JW Marriott Hotel and Conference Center Expansion Projects
(pounds per day)

Pollutant Emissions	VOC	NO _x	CO	SO _x	PM ₁₀ ^b	PM _{2.5} ^b
<i>Certified EIR.</i> <i>Source: Eyestone Environmental, 2019.</i>						

VOC and NO_x that are potentially significant before mitigation. With implementation of the proposed project design features and mitigation measures provided in the Certified EIRs and Addenda that would remain applicable to the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project, regional construction emissions from the Projects would be reduced. As shown in Table 3 on page 12, the combined impacts of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would eliminate the temporary significant unavoidable air quality impacts for regional CO under the Approved Projects, but VOC and NO_x emissions would remain significant and unavoidable, as under the Approved Projects. Accordingly, the combined impacts of the Proposed Development Projects would not create any new significant construction-related air quality impacts, nor would they result in a substantial increase in a previously identified significant impact. Therefore, the combined impacts of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

Operation

Similar to the Approved Projects, operational regional air pollutant emissions associated with the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion) would be generated by vehicle trips to and from the Project Site, the on-site consumption of electricity and natural gas, and area sources (e.g., on-site landscape equipment). As shown in Table 4 on page 14, the combined impacts of the Proposed Development Projects would result in the following: (1) daily regional emissions of VOC, CO, PM₁₀, PM_{2.5}, and SO_x that are less than significant; and (2) daily regional emissions of NO_x that are potentially significant before mitigation. With implementation of the proposed project design features and mitigation measures provided in the Certified EIRs and Addenda that would remain applicable to the Modified Projects, operational regional NO_x emissions from the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would still be significant (e.g., would still exceed the SCAQMD daily threshold for NO_x after implementation of feasible mitigation measures). However, the

Table 4
Unmitigated Maximum Daily Regional Operational Emissions of Convention Center Expansion and JW Marriott and Conference Center Expansion Projects^a
(pounds per day)

Emission Source	VOC	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Convention Center and JW Marriott Projects Emissions						
Convention Center Expansion Project	30	82	316	3	16	5
JW Marriott Hotel and Conference Center Expansion Project	19	27	68	<1	21	6
Total Convention Center and JW Marriott Emissions	49	109	384	3	37	11
SCAQMD Significance Thresholds	55	55	550	150	150	55
Over/(Under)	(6)	59	(166)	(147)	(113)	(44)
Exceed Threshold?	No	Yes	No	No	No	No
Comparison of Modified Projects to Approved Project Certified EIRs Emissions						
Convention and Event Center Project—Certified EIR ^b	151	554	3,716	17	215	77
LASED Project—Certified EIR ^c	880	674	2,546	18	337	121 ^d
Approved Projects—Certified EIRs (Total)	1,031	1,228	6,262	35	552	198
Modified Project (Convention Center Expansion project)	30	82	316	3	16	5
Modified LASED Project with JW Marriott Hotel and Conference Center Expansion	233	394	1,162	4	303	86
Modified Projects (Total)	263	476	1,478	7	319	91
Over/(Under)	(768)	(752)	(4,784)	(28)	(233)	(107)
<p>^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 A of this Joint Analysis.</p> <p>^b Table IV.F.1-7 of the Convention and Event Center Project Certified EIR.</p> <p>^c Table 16 of the LASED Project Certified EIR.</p> <p>^d PM_{2.5} emissions were not calculated in the Los Angeles Sports and Entertainment District Certified EIR. Therefore, PM_{2.5} were calculated based on the ratio of PM_{2.5} and PM₁₀ emissions provided in the Convention and Event Center Certified EIR.</p> <p>Source: Eyestone Environmental, 2020.</p>						

combined impacts of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would not result in significant unavoidable air quality impacts for regional VOC, CO, PM₁₀ and PM_{2.5}. In addition, as

shown in Table 4 on page 14, buildout of the Modified LASED Project (including the JW Marriot Expansion) and the Convention and Event Center Project would not result in any new significant operational air quality impacts, nor would they result in a substantial increase in a previously identified significant impact. Therefore, the Modified Projects would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

Question (c)—Air Quality Impacts to Sensitive Receptors: The Convention Center EIR and the LASED EIR concluded that potential localized air quality impacts would be significant and unavoidable.

An analysis of localized pollutant emissions from combined construction and operational activities under the Proposed Development Projects is provided below.

Construction

As shown below in Table 5 on page 16, the combined impacts of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would result in less than significant peak daily localized emissions of CO and PM₁₀ at off-site sensitive receptors, but peak daily localized emissions of NO_x and PM_{2.5} that are potentially significant before mitigation. As shown in Table 5, with implementation of mitigation measures and project design features, localized construction emissions from these Projects would be reduced to a less than significant level. Thus, the combined impacts of the Proposed Development Projects would eliminate the temporary significant unavoidable air quality impacts for localized hourly NO_x (e.g., NO₂) emissions that would occur under the Certified EIRs.

Operation

With regard to concurrent operational impacts associated with localized emissions, as shown in Table 6 on page 17, the combined impacts of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would result in less than significant maximum localized emissions of NO_x, CO, PM₁₀, and PM_{2.5} at off-site sensitive receptors. In addition, with the exception of localized CO emissions, the combined operational-related air quality impacts under the Convention Center Expansion and Modernization Project and the Modified LASED Project (with the JW Marriot Hotel and Conference Center Expansion Project) would be less than those under the Certified EIRs.

Based on the above, the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project combined would not involve any new significant localized air quality impacts, nor would they result in a substantial increase in a previously identified significant impact. In addition, buildout of the

Table 5
Maximum Daily Localized Construction Emissions of Convention Center and JW Marriott Expansion Projects
(pounds per day)^a

Localized Emissions	NO _x	CO	PM ₁₀ ^b	PM _{2.5} ^b
Unmitigated Localized Emissions				
2020	266	234	22	16
2021	315	300	42	26
2022	217	236	10	10
2023	53	62	2	2
Maximum On-Site Emissions	315	300	42	26
SCAQMD Localized Significance Thresholds ^c	108	2,651	53	15
Over/(Under)	207	(2,351)	(11)	11
Exceed Threshold?	Yes	No	No	Yes
Mitigated Localized Emissions				
2020	97	251	6	4
2021	103	321	14	8
2022	75	258	2	2
2023	17	66	<1	<1
Maximum On-Site Emissions	103	321	14	8
SCAQMD Localized Significance Thresholds ^c	108	2,651	53	15
Over/(Under)	(5)	(2,330)	(39)	(7)
Exceed Threshold?	No	No	No	No
Comparison of Convention Center Expansion and JW Marriott Expansion Projects to Approved Project EIRs Mitigated Localized Construction Emissions				
Approved Project EIRs ^{d,e,f}	179	246	42	14
Proposed Convention Center and JW Marriott Expansion Projects	103	321	14	8
Over/(Under)	(76)	(75)	(28)	(6)
<p>^a Calculation worksheets that are presented in Appendix A of this Joint Analysis.</p> <p>^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.</p> <p>^c SCAQMD LSTs based on SRA 1, 5 acre active site area, and 76 meter (250 feet) receptor distance.</p> <p>^d Table IV.F.1-15 of the Convention and Event Center Project Certified EIR.</p> <p>^e Maximum daily localized emissions were not provided in the Los Angeles Sports and Entertainment District Certified EIR and, therefore, Approved Project localized construction emissions only reflect emissions from the Convention and Event Center Approved Project. This methodology results in a more conservative analysis because the Modified Convention Center and JW Marriott Expansion Projects together would still result in less emissions than the Convention and Event Center Approved Project alone.</p> <p>^f Dispersion modeling performed for the Los Angeles Sports and Entertainment District Certified EIR concluded that localized construction PM₁₀ impacts were less than significant.</p> <p>Source: Eyestone Environmental, 2019.</p>				

Table 6
Unmitigated Maximum Daily Localized Operational Emissions of Convention Center Expansion and
JW Marriott and Conference Center Expansion Projects^a
(pounds per day)

Emission Source	NO _x	CO	PM ₁₀	PM _{2.5}
Convention Center and JW Marriott Emissions				
Convention Center Expansion Project	26	118	1	1
JW Marriott Hotel and Conference Center Expansion	4	3	1	<1
Total Convention Center and JW Marriott Project Emissions	30	131	2	1
SCAQMD Significance Thresholds	108	2,651	13	4
Over/(Under)	(78)	(2,520)	(11)	(3)
Exceed Threshold?	No	No	No	No
Comparison of Modified Projects to Approved Project EIRs Emissions				
Convention and Event Center Project-Certified EIR ^b	34	256	7	6
Los Angeles Sports and Entertainment District – Certified EIR ^{c,d}	211	48	56	48 ^e
Approved Project Certified EIRs (Total)	245	304	63	54
Modified Project (Convention Center Expansion)	26	118	1	1
Modified LASED Project with JW Marriott Expansion	43	204	4	4
Modified Projects (Total)	69	322	5	5
Over/(Under)	(176)	18	(58)	(49)
<p>^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 A of this Joint Analysis.</p> <p>^b SCAQMD LSTs based on SRA 1, 5-acre active site area, and operational emissions at a receptor distance of 76 meters (250 feet).</p> <p>^c Table IV.F.1-7 of the Convention and Event Center Project Certified EIR.</p> <p>^d Table 16 of the LASED Project Certified EIR.</p> <p>^e PM_{2.5} emissions were not calculated in the Los Angeles Sports and Entertainment District Certified EIR. Therefore, PM_{2.5} were calculated based on the ratio of PM_{2.5} and PM₁₀ emissions provided in the Convention and Event Center Project Certified EIR.</p> <p>Source: Eyestone Environmental, 2019.</p>				

Modified LASED Project with the JW Marriott Hotel and Conference Center Expansion together with the Convention Center Expansion and Modernization Project would also not

result in new significant localized air quality impacts. Therefore, the Modified Projects would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

Question (d)—Odors: With regard to construction, similar to the Approved Projects, the Proposed Development Projects 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, with regard to odors arising out of the operation of these projects, the proposed hotel and convention center uses are already permitted under the Approved Projects 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 Proposed Development Projects would not create any new significant impacts related to odors, nor would they result in a substantial increase in a previously identified significant impact. Therefore, the Proposed Development Projects would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

3.4 Biological Resources

Both Certified EIRs concluded that project and cumulative impacts on biological resources would be less than significant.

Questions (a) through (f)—Impacts to Biological Resources: As indicated in the Certified EIRs, the Projects Sites are 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. The Project Sites do not contain natural areas, riparian habitat, or water features. In addition, the Project Sites are not located in or adjacent to any riparian area or in an area 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 plans apply to the Project Sites. The Project Sites also do not contain natural hydrologic features or federally protected wetlands as defined by Section 404 of the Clean Water Act, do not contain water bodies or water courses that provide habitat for fish, and do not function as wildlife corridors.

Although some trees would be removed as part of the Proposed Development Projects, none of these trees are protected tree species. 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. In addition, street trees to be removed would be replaced in accordance with City requirements. The Proposed Development Projects would thus not

result in significant cumulative biological resources impacts and impacts would be within the impact envelope set forth in the Certified EIRs.

3.5 Cultural Resources

Question (a)—Impacts to Historical Resources: The Convention and Event Center EIR concluded that while there are no designated historical resources on the Project Site, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall and to the extent that the related projects would affect a historical resource, cumulative impacts would also be potentially significant. The LASED EIR concluded that there are no historical resources within the Project Site, no physical or indirect impacts would occur to nearby historic properties after mitigation, and no significant cumulative impacts to historical resources would occur.

The Convention Center Expansion and Modernization Project would retain rather than demolish the West Hall. In addition, since there are no historical resources within the JW Marriot Hotel Expansion Project Site no cumulative impacts from the two Projects would occur. Therefore, the Proposed Development Projects would not result in cumulative historical resources impacts beyond those already set forth in the Certified EIRs.

Questions (b) and (c)—Impacts to Archaeological Resources and Human Remains: Both Certified EIRs concluded that no significant cumulative impacts to archaeological resources or human remains would occur.

No listed archaeological resources or human remains have been recorded at the Project Sites. In addition, should such resources be inadvertently discovered, the Convention Center Expansion and Modernization Project and the JW Marriot Hotel Expansion Project would implement mitigation measures set forth in the MMRP that address inadvertent discovery within the LASED. Therefore, the Proposed Development Projects would not result in cumulative impacts to archaeological resources and human remains beyond those already set forth in the Certified EIRs.

3.6 Energy

Questions (a) and (b)—Impacts Related to Energy Consumption and Energy Regulation: The Certified EIRs both concluded that cumulative impacts associated with energy would be less than significant.

Electricity from construction activities associated with the Proposed Development Projects would be limited given that construction activities in general would be intermittent, as would the use of heating and cooling equipment. Construction-related electricity consumption from both Projects would 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 within the Proposed Development Project areas and would not affect other services. With regard to construction-related petroleum-based fuels use, such fuel usage would be temporary and variable depending on specific construction activities. Fuel consumption during construction would be relatively negligible and would not occur in a wasteful, inefficient, or unnecessary manner. In addition, fuel consumption would be reduced due to the use of more modern truck fleets and equipment that are more fuel efficient than that used at the time the Certified EIRs were prepared. Accordingly, construction of the Proposed Development Projects would not result in cumulative energy impacts beyond that set forth in the Certified EIRs.

With regard to operation, like the Approved Projects, the Proposed Development Projects 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 CALGreen Code. Compliance with these more recent and more stringent regulations would ensure electricity and natural gas usage would not occur in a manner that is wasteful, inefficient, or unnecessary. The Projects would therefore also not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Accordingly, operation of the Proposed Development Projects would not result in cumulative energy impacts beyond that set forth in the Certified EIRs.

3.7 Geology and Soils

Questions (a) through (e)—Impacts Related to Geology and Soils: Both Certified EIRs concluded that cumulative impacts associated with geology and soils would be less than significant.

Impacts related to geology and soils are site specific and do not affect off-site areas. In addition, development on each Project Site would be subject to uniform site development and construction standards, including the requirements specified by the LAMC and the CBC. Mitigation measures set forth in the Certified EIRs would ensure that these requirements are implemented. As such, the Proposed Development Projects would thus not result in significant cumulative geology and soils impacts.

Question (f)—Impacts Related to Paleontological Resources: Both Certified EIRs concluded that cumulative impacts associated with paleontological resources would be less than significant.

Both Project Sites are located within Downtown Los Angeles, are currently developed with highly urbanized uses, and would be built on portions of site that have underlying soils that have been disturbed, and do not contain observed geologic features that have been identified as having the potential to yield vertebrate paleontological resources. Nonetheless, the Convention and Event Center EIR and LASSED EIR included mitigation measures should paleontological resources be inadvertently discovered. These mitigation measures would continue to be implemented by the Proposed Development Projects. Furthermore, the paleontological resources impacts of each of the Proposed Development Projects would be specific to each of the Project Sites and would not contribute to the impacts on the other. Therefore, the Proposed Development Projects would not result in cumulative paleontological impacts beyond those set forth in the Certified EIRs.

3.8 Greenhouse Gas Emissions

Questions (a) and (b)—Impacts Related to GHG Emissions and Regulatory Consistency: As set forth in CEQA Guidelines Section 15130(f), the effects of GHG emissions are by their very nature cumulative and should be analyzed in the context of CEQA’s requirements for cumulative impact analysis. As such, cumulative GHG impacts were addressed in the Convention and Event Center EIR and the Addenda to the LASSED EIR. The Convention and Event Center EIR concluded that cumulative impacts associated with GHG emissions would be less than significant. The Addenda to the LASSED EIR also concluded that cumulative impacts associated with GHG emissions would be less than significant.

Like the Approved Projects, the Proposed Development Projects have been designed with a number of features that would be consistent with the goals of AB 32, Sustainable City pLAN/L.A.’s Green New Deal, and applicable recommendations and strategies set forth in policy and guidance documents (2016–2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS), etc.), as well as the California Green Building Code. The Proposed Development Projects would not exceed the development density previously approved for the Project Sites by the Convention and Event Center and LASSED Projects. Furthermore, the Proposed Development Projects would continue to include the intensification of density on an urban infill site in close proximity to transit, would include pedestrian improvements, and would include complementary mixes of uses, all of which would reduce vehicular trips, VMT, and associated GHG emissions.²

The Proposed Development Projects also would incorporate or support measures detailed in the 2019 Sustainable City pLAN (LA Green New Deal), such as: increasing

² CAPCOA *Quantifying Greenhouse Gas Mitigation Measures*, p. 190.

renewable energy usage; reducing per capita water usage; promoting walking and biking to work; promoting 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, Title 24 and other regulatory requirements, would result in consistency of the Proposed Development Projects with the various plans and policies designed to reduce GHG emissions.

Lastly, because the Proposed Development Projects together would include substantially less net new floor area than the Approved Projects together, they would generate less construction- and operations-related GHG emissions. Therefore, like the Approved Projects, the Proposed Development Projects would have less than significant GHG impacts even before implementation of the mitigation measures identified in the Certified EIRs and EIR Addenda, and would not result in cumulative GHG impacts beyond those already set forth in the Certified EIRs.

3.9 Hazards and Hazardous Materials

The Certified EIRs concluded that cumulative impacts associated with hazards and hazardous materials would be less than significant.

Construction and operation of one or both projects would: (1) increase the acquisition, use, handling and storage of hazardous materials on-site which could increase the possibility for exposure of people and the environment to hazardous materials; (2) generate small quantities of additional hazardous waste requiring disposal at facilities permitted to accept such waste; (3) result in the alteration, renovation, and/or demolition of buildings that may contain ACMs, LBPs, and grease interceptors/clarifiers; (4) result in the removal of electrical equipment that may contain PCBs; (5) result in the potential to encounter contaminated soil, underground storage tanks (USTs), and abandoned oil wells associated with both listed and potentially unknown/unlisted hazardous materials/waste sites; and (6) result in construction of operation of new urban uses within a designated Methane Zone. However, as with the Approved Projects, implementation of mitigation measures and compliance with existing regulations during construction and operation would reduce hazardous risks such that impacts would be less than significant. In addition, construction traffic associated with both Projects would conform to Construction Traffic Management Plans and access standards to allow adequate emergency access on roadways near and between the two Project Sites. Furthermore, both sets of projects do not include the types of uses (e.g., oil refineries, manufacturing facilities, wastewater treatment plants, etc.) that would use large amounts of hazardous materials. In addition, for both Projects, there would be no impact relative to wildland fires, as the Project Sites are located in an urbanized area, and there are no wildlands in the surrounding vicinity. In addition, less hazardous materials use, transport, and disposal would occur under the Proposed Development Projects than under the Approved Projects owing to substantially

less net new development under the Convention Center Expansion and Modernization Project. Therefore, the Proposed Development Projects would not result in cumulative impacts associated with hazards and hazardous materials beyond those already set forth in the Certified EIRs.

3.10 Hydrology and Water Quality

Question (a)—Violation of Water Quality Standards or Waste Discharge Requirements: The Certified EIRs concluded that impacts associated with water quality would be less than significant.

As with the Approved Projects, construction of the Proposed Development Projects would: (1) implement site-specific SWPPPs which would specify BMPs to be used during construction to reduce or eliminate the discharge of potential pollutants from stormwater runoff to the maximum extent practicable; and (2) comply with City grading permit regulations which require standard measures, plans (including wet weather erosion control plans if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion. Therefore, as with the Approved Projects, construction of the Proposed Development Projects would not violate water quality standards or waste discharge requirements with implementation of the proposed mitigation measures/PDFs, and impacts would be less than significant. In fact, surface water quality impacts during construction would be expected to be less under the Proposed Development Projects owing to substantially less new development and less demolition, and thus less grading and construction activities, than the Approved Projects. Therefore, construction of the Proposed Development Projects would not result in cumulative water quality impacts beyond those already set forth in the Certified EIRs.

Similar to the Approved Projects, operation of the Proposed Development Projects would be required to comply with SUSMP and LID requirements during operation (e.g., source and treatment control BMPs, erosion control, etc.). Therefore, as with the Approved Projects, impacts to surface water quality during operation of the Proposed Development Projects would be less than significant with implementation of the proposed mitigation measures and project design features. In fact, surface water quality impacts during operation would be expected to be less under the Proposed Development Projects owing to less new development, on-site activities, and motor vehicle use than under the Approved Projects. Therefore, operation of the Proposed Development Projects would not result in cumulative water quality impacts beyond those already set forth in the Certified EIRs.

Question (b)—Impacts to Groundwater Supplies/Recharge: The Certified EIRs concluded that impacts associated with groundwater would be less than significant. As with the Approved Projects, the Proposed Development Projects would include the development of new impervious surfaces, and would not require direct extraction of groundwater during

construction or operation. Furthermore, because excavation depths would be substantially less under the Proposed Development Projects (specifically, under the Convention Center Expansion and Modernization Project), than under the Approved Projects, the potential need for temporary construction dewatering would be less under the Proposed Development Projects. Therefore, similar to the Approved Projects, the Proposed Development Projects would result in less than significant impacts to groundwater supplies and groundwater recharge. As such, the Proposed Development Projects would not result in cumulative groundwater impacts beyond those already set forth in the Certified EIRs.

Question (c)—Existing Drainage Patterns: Hydrology/Drainage. The Certified EIRs concluded that construction of the Approved Projects would not substantially alter the existing drainage pattern (including through the alteration of a stream or river), substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, or create or contribute runoff water that would exceed the capacity of stormwater drainage systems, and impacts would be less than significant. Nonetheless, the LASED EIR included a mitigation measure to further reduce impacts.

According to the September 4, 2020, Combined Stormwater Addendum Report prepared for the Convention Center Expansion and JW Marriott Hotel and Conference Center Expansion Projects (Combined Stormwater Technical Report) included as Appendix B of this Joint Analysis, the Proposed Development Projects would not increase impervious surfaces at the Project Sites beyond either existing conditions or the anticipated Approved Projects conditions. Also according to the Combined Stormwater Addendum Report, the Proposed Development Projects would result in an average stormwater runoff flow rate from the Project Site during the 50-year storm event that is slightly less than both existing conditions and Approved Project conditions, with both Projects resulting in a zero percent increase in flow from existing conditions. In addition, as with the Approved Projects: (1) runoff from the Project Sites under the Proposed Development Projects would continue to follow the same discharge paths and drain to the same outlet pipes as under existing conditions, thus maintaining existing drainage patterns; (2) the Proposed Development Projects would adhere to SUSMP and LID requirements, including implementation of BMPs to ensure that no increase in flows from existing conditions would result; (3) the Proposed Development Projects would not require off-site storm drain improvements or on-site detention since existing peak flow rates would not increase; and (4) the existing off-site storm drain system would be adequate to accommodate the stormwater runoff associated with the combined Proposed Development Projects. Thus, as with the Approved Projects, the Proposed Development Projects would not substantially alter the existing drainage pattern, substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, or create or contribute runoff water that would exceed the capacity of stormwater drainage systems, and impacts under both sets of projects would be less than significant. Therefore, the Proposed Development Projects would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

Question (d)—Inundation: The Certified EIRs and Addenda concluded that impacts associated with inundation would be less than significant. With regard to flood hazards, inundation, seiche and tsunami, the Project Sites are not located in a Federal Emergency Management Agency (FEMA) or City of Los Angeles designated 100- or 500-year flood plain, with only a small portion of the existing Venice Boulevard Garage for the Convention Center being in an area subject to inundation by a seiche or tsunami. However, the risk of flooding by a seiche or dam failure is considered low. Thus, similar to the Approved Projects, the Proposed Development Projects would not release pollutants due to inundation by floodwaters or a tsunami or seiche, and impacts under both sets of projects would be less than significant. Therefore, the Proposed Development Projects would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

Question (e)—Conflict with a Water Quality Control Plan or Sustainable Groundwater Management Plan: The Certified EIRs and Addenda concluded that impacts associated with water control and management plans would be less than significant. Similar to the Approved Projects, with regard to consistency of the Proposed Development Projects with the applicable Water Quality Control Plan and Sustainable Groundwater Management Plan, existing regulations are in place to ensure compliance with such plans. Such regulations include City of Los Angeles grading permit, LID, SWPPP, and SUSMP requirements. In addition, as discussed above, PDFs are included to ensure that the required SWPPP and SUSMP requirements are implemented. Furthermore, the Proposed Development Projects would not increase stormwater runoff flows from the Project Sites. Thus, impacts under the combined Proposed Development Projects would be consistent with the applicable water quality control plan, and impacts would be less than significant. Therefore, the Proposed Development Projects would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

3.11 Land Use and Planning

The Certified EIRs concluded that cumulative land use impacts would be less than significant.

Question (a)—Physically Divide an Established Community: The Proposed Development Projects would not introduce new land uses that do not presently exist in the area, and the existing relationships between on- and off-site land uses would generally be maintained. In addition, development would largely reflect existing on-site development patterns with regard to uses, heights and density. The Proposed Development Projects also represent infill development that is consistent with the existing land use designations. Given these characteristics, the location of the Project Sites, and the nature of the nearby surrounding uses including the adjacent freeways, no existing neighborhood or community would be physically disrupted, divided, or isolated. Thus, as with the Approved Projects, the Proposed Development Projects would result in less than significant cumulative

impacts with regard to physical division of an established community. As such, the Proposed Development Projects would not result in cumulative impacts related to the physical division of an established community beyond those set forth in the Certified EIRs.

Question (b)—Conflict with a Land Use Plan, Policy, or Regulation: As discussed in the Addenda, the Proposed Development Projects would generally be consistent with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. These plans include SCAG’s 2016–2040 RTP/SCS, the General Plan Framework, the Central City Community Plan, LAMC Zoning regulations, and the applicable Specific Plans. As such, the Proposed Development Projects would not result in cumulative land use impacts associated with consistency with land use plans.

3.12 Mineral Resources

Questions (a) and (b)—Loss of Availability of Mineral Resources and Resource Sites: Both Certified EIRs concluded that no significant cumulative impacts associated with mineral resources would occur as a result of the Approved Projects.

The Proposed Development Project sites are currently developed with urban uses, do not contain existing mineral resource activities, are not located within an area containing significant mineral deposits (i.e., Mineral Resource Zone 2 Areas—MRZ-2),³ and are zoned for urban uses. Therefore, the Proposed Development Projects would not result in the loss of availability of either a known mineral resource or a locally-important mineral resource recovery site. The Proposed Development Projects would not result in significant impacts related to mineral resources and would not result in cumulative mineral resources impacts beyond those already set forth in the Certified EIRs.

3.13 Noise

Question (a)—Noise in Excess of Standards: The Convention and Event Center EIR concluded that construction (on-site and off-site) and operation (on-site and off-site) of the Approved Project would result in significant cumulative noise impacts. The LASED EIR concluded that cumulative construction noise impacts would be significant to the extent that other residential uses were located within 500 feet of the Project Site. Cumulative operational noise impacts associated with traffic along portions of Francisco Street for both weekday and Saturday traffic were also determined to be significant in the LASED EIR.

³ *Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits, Los Angeles City Planning Department, Citywide Division.*

The Certified EIRs both concluded that, to the extent other related projects would affect sensitive receptors that are located within 500 feet of the Project Site, cumulative construction noise impacts would occur and would be significant and unavoidable. The Project Sites of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project are located within 500 feet of many of the same sensitive receptors, including within 500 feet of one another. As such, consistent with the Approved Projects, these Projects would generate cumulative construction noise impacts in the event the construction activities occur simultaneously. As the LASED Project was an identified related project for the Convention and Event Center Project EIR cumulative noise analysis, these noise impacts were already addressed in the Convention and Event Center EIR and determined to be significant and unavoidable. Specifically, the two projects could together contribute to a cumulative impact on the nearby noise sensitive receptors at the Ritz Hotel and Residences and Marriott Hotel at L.A. LIVE and the hotel use on Figueroa Street, north of Olympic Boulevard. Both the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would continue to implement the applicable noise mitigation measures set forth for the Approved Projects. However, when compared with the Approved Convention and Event Center Project, the Convention Center Modernization and Expansion Project would result in a substantial reduction in overall construction activities and the footprint of construction activities would be reduced. Also, the Convention Center Modernization and Expansion Project is no longer pursuing demolition of West Hall and construction of an Event Center, and main construction activities with the most noise-producing construction equipment will be focused along Pico Boulevard, or about 1,000 feet from the Hotel and Conference Center Expansion. As such, cumulative construction noise impacts would be less due to the larger separation distance. In addition, with a substantial reduction in grading under the Convention Center Expansion and Modernization Project, the haul trucks and associated haul truck noise would be substantially reduced when compared with that set forth in the Convention and Event Center EIR. As such, the combined impacts of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project during construction would not generate cumulative noise impacts beyond that established in the Certified EIRs.

With regard to operation, the cumulative noise impacts associated with operation of the Proposed Development Projects would be reduced when compared with that expected for the Approved Projects. Specifically, the outdoor event center with special events would not be constructed under the Convention Center Expansion and Modernization Project. In addition, the combined traffic levels and associated traffic noise would be reduced due to the elimination of the event center. As such, the Proposed Development Projects would not generate cumulative operational noise impacts beyond those set forth for the Approved Projects.

Question (b)—Groundborne Vibration and Groundborne Noise Levels: The Certified EIRs and Addenda for both Approved Projects concluded that cumulative vibration impacts would be less than significant. With regard to vibration, due to the rapid attenuation characteristics associated with vibration, combined vibration impacts associated with construction and operation of the Proposed Development Projects would not be significant at the sensitive receptors in the vicinity of the Project Sites. In addition, when compared with the Convention and Event Center Project, the Convention Center Expansion and Modernization Project would result in reduced off-site vibration from construction activities due to the reduced construction footprint, reduction in overall construction equipment used on-site and reduction in grading. As such, the Proposed Development Projects would not generate cumulative vibration impacts beyond that set forth for the Approved Projects.

Question (c)—Exposure of People to Airport Noise: Both Certified EIRs concluded that no significant cumulative impacts associated with exposure to airport noise would occur as a result of the Approved Projects. As with the Approved Project, the Modified Project Sites are not located within an area subject to an airport land use plan, within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip. Accordingly, the Proposed Development Projects would result in no impact with respect to the exposure of persons to excessive airport or aircraft noise levels. As such, the Proposed Development Projects would not generate cumulative airport noise impacts beyond those set forth for the Approved Projects.

3.14 Population and Housing

Both Certified EIRs concluded that cumulative impacts associated with population and housing would be less than significant.

Question (a)—Inducement of Unplanned Population Growth: As with the Approved Projects, most, if not all, of the construction and permanent jobs associated with the Proposed Development Projects would be filled by individuals already residing in the area. Furthermore, as with the Approved Projects, the Proposed Development Projects would be located in a highly developed area with an established network of roads and other urban infrastructure such that they would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. In addition, because the Convention Center Expansion and Modernization Project would include a reduction in overall square footage when compared with the Approved Project, fewer new permanent employees would be generated. Thus, combined impacts of the Proposed Development Projects associated with unplanned growth inducement would be less than significant. Therefore, the Proposed Development Projects would not generate cumulative growth inducement impacts beyond that set forth in the Certified EIRs.

Question (b)—Population and Housing Displacement: The Project Sites do not include any housing. Hence, as with the Approved Projects, the Proposed Development Projects would not result in population or housing displacement, requiring the development of replacement housing elsewhere. Therefore, no significant cumulative impacts associated with housing displacement would occur as a result of implementation of the Proposed Development Projects.

3.15 Public Services

Both Certified EIRs concluded that cumulative impacts associated with fire protection, schools, and libraries would be less than significant. The LASED EIR concluded that cumulative impacts associated with police protection, and parks and recreation would be significant and unavoidable. The Convention and Event Center EIR concluded that cumulative impacts associated with police protection and parks would be less than significant.

Question (a)—Fire Protection: During construction, both Proposed Development Projects would implement the project design features and/or mitigation measures specified in the Certified EIRs. These features and measures include implementation of transportation management plans throughout the construction process to minimize disruptions to through traffic flow, redistribution of traffic to alternate routes, and ensuring that emergency vehicle access is maintained at all times. The transportation management plans for each Development Project would take into account the other. In addition, both Proposed Development Projects would be reviewed by the LAFD to ensure that the Proposed Development Projects would be constructed in accordance with LAFD requirements.

As both Proposed Development Projects are located within the existing urban area of the city, they would be located within an acceptable distance to one or more existing fire stations. Both Proposed Development Projects would also implement the project design features and/or mitigation measures specified in the Certified EIRs. These project design features and mitigation measures would require that both Proposed Development Projects be subject to review by LAFD for compliance with building and site design standards related to fire life safety, and that both Proposed Development Projects coordinate with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land use involved. Additionally, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according

to the priorities at the time. Thus, the Proposed Development Projects would not result in cumulative 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.

Question (b)—Police Protection: With regard to police protection, both Proposed Development Projects would continue to implement the applicable mitigation measures and project design features set forth in the Certified EIRs. These measures include security fencing, security lighting, security guards and provisions for emergency access during construction. During operation, these measures include coordination with LAPD, implementation of proper lighting, specific features to address pedestrian safety, and implementation of security, emergency procedures and circulation plans. In addition, the Event Center, which generated a need for special law enforcement, traffic control and crowd control, would no longer be developed under the Convention Center Expansion and Modernization Project, and the exchange from office to hotel uses under the JW Marriott Hotel and Conference Center Expansion Project would not substantially increase the need for police protection services. Furthermore, consistent with the *City of Hayward v. Board of Trustees of the California State University* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs that may become necessary to achieve the required level of service. Overall, with implementation mitigation measures, the Proposed Development Projects would not result in cumulative 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.

Questions (c), (d), and (e)—Schools, Parks, and Other Public Facilities/Libraries: The Proposed Development Projects do not include any residential uses that would generate a demand for schools, parks or libraries. In addition, as discussed above, most, if not all, of the construction and permanent jobs associated with the Proposed Development Projects would be filled by individuals already residing in the area. As such, the Proposed Development Projects would not result in a substantial demand for schools, parks or libraries generated by new employees relocating to the Project vicinity. Thus, the Proposed Development Projects would not result in cumulative impacts to schools, parks or library services that would require new or physically altered facilities, the construction of which could cause significant impacts, in order to maintain acceptable service levels or other performance objectives.

3.16 Transportation

Question (a)—Impacts to the Circulation System: The following analysis of combined impacts of the Proposed Development Projects to the circulation system is based on the Joint Analysis for the Combined JW Marriott Expansion Project and the Los Angeles Convention and Event Center Expansion and Modernization Project prepared by The Mobility Group in December 2019 and included as Appendix C.

Construction

Haul Routes

The haul route for the JW Marriott Hotel and Conference Center Expansion Project would use Chick Hearn Court to the Blaine Street and 11th Street freeway ramps to/from the Harbor Freeway. Haul trucks for demolition and excavation would operate over a five-week period and a separate nine-week period. The haul routes for the Convention Center Expansion and Modernization Project would use LA Live Way to the 11th Street and Blaine Street freeway ramps to/from the Harbor Freeway and could also use Pico Boulevard off-ramps to LA Live Way. Haul trucks for demolition and excavation would operate over an eight-week period. In addition, in accordance with required mitigation measures, both Projects would implement the measures within their respective construction traffic management plans that would ensure adequate access is provided and would include safety provisions. Thus, the combined impacts of these Projects would not cause any new significant cumulative impacts.

Truck Trips

The trucks for the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would take similar routes to and from the Harbor Freeway ramps at 11th Street & Blaine Street, and could occur at the same time of the year. Trucks would not travel in the P.M. peak hour, so there would be no P.M. peak-hour impacts. In the A.M. peak hour, there could be a peak time of about four months when there would be a combined total of 16 trucks per hour or 64 passenger car equivalent (PCE) trips. This would represent about 4 percent of the existing A.M. peak-hour traffic volumes on LA Live Way. There could be a six-month period when the combined truck total would be 11 trucks per hour or 48 PCE, which would constitute 3 percent of existing traffic volumes on LA Live Way. At other times—for approximately 12 months—the combined total would be approximately 6 trucks per hour or 24 PCE trips which would represent 1 percent of existing traffic volumes. These trips would not occur at the same time as the haul trips. These trip totals for both the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would be slightly less than those identified in the Convention and Event Center EIR. While the LASED EIR did not quantify construction truck trips, the JW Marriott

Hotel and Conference Center Expansion Project Addendum concluded that the types and amount of construction activities that would occur under the Modified Project would be generally similar to those anticipated for the Approved Project under the LASED EIR. The majority of trips for the Proposed Development Projects would occur outside the peak-hour periods during times of lower traffic volumes, and would not occur in the P.M. peak hour. As they would constitute a very small proportion (1 percent to 4 percent) of existing traffic volumes on LA Live Way for a temporary period, it is concluded that trucks would not create a significant impact. It is possible however that during times of events at the Convention Center, STAPLES Center and the Microsoft Theater, trucks could cause some inconvenience to traffic operations in the area of the Project Sites. The Construction Traffic Management and Control Plan that would be prepared for both the Proposed Development Projects would address such times and reduce any such impacts to a less than significant level.

Overall, the truck trip total for both Projects would be less than in the Approved Project Convention and Event Center EIR and the overall construction activities for both Projects would be similar to that anticipated within the LASED EIR. In addition, implementation of a Construction Traffic Management and Control Plan for both Proposed Development Projects would reduce any temporary impacts to a less than significant level. Thus, the combined impacts of the Proposed Development Projects would not cause any new significant impacts.

Construction Workers

While the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would operate on separate and different construction schedules, there would be periods of overlapping activity. The highest period of combined construction workers would be for about 9 months, with up to 1,600 workers on-site on both Project Sites. A secondary period of about 7 months would see about 900 combined workers on the two sites. Worker trips would occur outside the peak hours, before the A.M. peak hour, and before the P.M. peak hour.

The Convention and Event Center EIR conducted a similar analysis in terms of worker volume and reached the same conclusion. The Convention and Event Center EIR identified a potential workforce ranging from 1,200 to 2,270 workers per day and identified that worker trips would not cause significant impacts as they would occur outside the peak hours. The highest number of workers at certain times for the Convention Expansion and Modernization Project is within this range. The Certified EIR did identify potential temporary significant localized traffic impacts during shift changeovers at intersections adjacent to off-site parking locations, and programs to encourage higher use of transit and ridesharing and a program of effective worker parking management to minimize any such potential impacts. The Convention Center Expansion and Modernization Project and the

JW Marriott Hotel and Conference Center Expansion Project would implement a similar program. While the LASED EIR did not perform a quantified analysis of construction worker vehicle trips, it likewise reached the conclusion that such worker trips would not cause significant impacts, since they would occur outside of peak hours. The combined impacts of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would therefore not cause any new significant cumulative impacts.

Street Closures

Construction of the JW Marriott Hotel and Conference Center Expansion Project would result in the closure of the west sidewalk and curb lane on Georgia Street north of Chick Hearn Court for about 28 months. One southbound lane would be retained. The north sidewalk and curb lane on Chick Hearn Court between Georgia Street and LA Live Way would also be closed for 28 months. Two westbound lanes would be retained. The east sidewalk and curb lane on LA Live Way north of Chick Hearn Court would also be closed for 28 months. One northbound lane would be retained. Chick Hearn Court between Figueroa Street and LA Live Way would remain open during construction. As traffic lanes would remain open in both directions on all streets, no traffic diversions would be necessary. A Construction Traffic Control Plan would be developed to coordinate and implement the closures, and there would be no significant traffic impacts caused by construction. Since the closures for the JW Marriott Hotel Expansion Project would not geographically overlap with or be adjacent to closures for the Convention Center Expansion and Modernization Project, which would occur in a different area to the south, as discussed below, the closures for the two projects would not combine to create greater impacts than would result from implementation of each project individually.

During construction of the Convention Center Expansion Project, Pico Boulevard would be closed between Figueroa Street and LA Live Way for 18–24 months, and South Hall Drive would be closed for an 11-month period between Pico Boulevard and Bond Street/Convention Center Drive. LA Live Way would remain open with all traffic lanes at all times. Construction of the JW Marriott Hotel Expansion would not require the closure of any streets. As noted above, it would however close one traffic lane on Chick Hearn Court between Georgia Street and LA Live Way, one traffic lane on LA Live Way north of Chick Hearn Court, and one traffic lane on Georgia Street north of Chick Hearn Court. All streets would remain open to existing traffic flow directions, and therefore traffic impacts would be less than significant. The LASED EIR concluded that traffic lane closures would be temporary and not significant, with the one exception of 12th Street during its realignment between Figueroa Street and Flower Street. However, that realignment was completed so it is no longer relevant to this analysis.

Since the closures for the Convention Center Expansion and Modernization Project would not geographically overlap with or be adjacent to closures for the JW Marriott Hotel and Conference Center Expansion Project, which would occur in a different location to the north, the closures for the two projects would not combine to create greater impacts than would result from implementation of each project individually. However, the closures due to the Convention Center Expansion and Modernization Project could temporarily result in increased travel time and delays or decreased level of service on those streets and lead to temporary significant impacts, similar to the conclusions stated in the Convention and Event Center EIR. The Convention Center Expansion and Modernization Project would prepare a comprehensive Construction Traffic Management and Control Plan to address the diversion of traffic from Pico Boulevard. This would be coordinated with, and approved by, LADOT. It would also address overlapping construction activities with the JW Marriott Hotel and Conference Center Expansion Project. While these measures would reduce the impacts of street closures for the Convention Center Expansion and Modernization Project, they would not eliminate the impacts, so it is concluded that significant temporary impacts would remain during construction of the Convention Center Expansion and Modernization Project (closure of Pico Boulevard lanes), as was concluded by the Convention and Event Center EIR.

In summary, since the temporary street closures for the Proposed Development Projects would not overlap with or be adjacent to one another, the closures for the two projects would not combine to create greater impacts than would result from implementation of each project individually. The potentially significant temporary impacts identified for the combined Proposed Development Projects are therefore within the scope of the potentially significant temporary impacts identified in the underlying EIRs for each of the Proposed Development Projects.

Other Potential Temporary Lane Closures

During construction, there may be additional temporary lane closures that may occur for both the Proposed Development Projects, although for only certain hours or certain intermittent days. For both Proposed Development Projects, these would occur for specific construction needs and would be accomplished with temporary traffic cones and/or traffic barricades. As these would occur for only short periods of time, would occur outside of the peak periods, and they would be subject to a Construction Traffic Control Plan that would be prepared for each Project, these combined impacts would be less than significant.

Both the LASED EIR and the Convention and Event Center EIR concluded that construction impacts from temporary lane closures would be less than significant. The combined impacts of the Proposed Development Projects would not cause any new significant impacts.

Sidewalk Closures and Pedestrian Circulation

The two Proposed Development Projects would close certain sidewalks adjacent to the construction areas of each Project, which would not geographically overlap or be adjacent. During construction of the JW Marriott Hotel and Conference Center Expansion Project, there would remain alternate sidewalk options for pedestrians on Chick Hearn Court (south side) and Georgia Street (east side). Temporary closure of the sidewalks described above would not cause significant impacts. Sidewalk closures during construction for the Convention Center Expansion and Modernization Project would also not be significant, as a temporary sidewalk would be maintained on Pico Boulevard. Both the LASED EIR and Convention and Event Center EIR concluded that pedestrian impacts from temporary closures would be less than significant. Moreover, the sidewalk closures of the Proposed Development Projects would not be adjacent or overlap with one another. There would therefore be no new significant cumulative impacts on pedestrians due to the construction of both projects.

Transit Impacts

There is no transit service on Chick Hearn Court or LA Live Way adjacent to the JW Marriott Hotel Expansion site, so construction would not cause any impacts to transit. In addition, there would also be no significant impacts to transit caused by the Convention Center Expansion Project because alternate transit routes would exist within one to three blocks. There would therefore be no significant impacts from concurrent construction of the two projects. Both the LASED EIR and the Convention and Event Center EIR concluded that transit impacts from temporary closures would be less than significant. The combined impacts of the Proposed Development Projects would not cause any new significant impacts.

Convention Center, STAPLES Center, and LA Live Access

Construction of the JW Marriott Hotel Expansion would not impact access to the Convention Center, STAPLES Center or LA Live, as all existing parking driveways would remain open or nearby alternatives would be available, and sidewalk routes for pedestrians would also remain open and available. Similarly, construction of the Los Angeles Convention Center Expansion and Modernization Project would not impact access to these facilities for the same reasons. There would therefore be no significant impacts from concurrent construction of the two Proposed Development Projects. Both the LASED EIR and the Convention and Event Center EIR concluded that impacts to Convention Center, STAPLES Center and LA Live access would be less than significant. The combined impacts of the Proposed Development Projects would not cause any new significant impacts.

Pico Union Impacts

The JW Marriott Hotel and Conference Center Expansion Project would not involve any street closures, so it is unlikely that there would be any traffic diversion through the Pico Union Neighborhood. Temporary lane closures similarly would not cause traffic diversions. While the Convention Center Expansion Project would involve some temporary street closures, it would include measures in its Construction Traffic Management and Control Plan to minimize any potential impacts from that project on the Pico Union area. That plan would be coordinated with the JW Marriott Hotel Expansion construction program. With the implementation of such a plan to cover both projects, it is expected traffic impacts to the Pico Union neighborhood due to construction would be less than significant.

The LASED EIR concluded that there would be no significant neighborhood impacts. The Convention and Event Center EIR concluded that with a Pico Union Neighborhood Construction Traffic Management Plan, traffic impacts in the Pico Union Neighborhood would be less than significant. With fewer trips expected for the Convention Center Expansion and Modernization Project than for the Convention and Event Center Project, there would no longer be the need for a specific Pico Union Neighborhood Construction Traffic Management Plan. However, the Convention Center Expansion Project Construction Traffic Management and Control Plan would include measures to address Pico Union. With this, the JW Marriott Hotel and Conference Center Expansion Project and the Convention Center Expansion and Modernization Project would not combine to cause any new significant impacts.

Construction Mitigation

As set forth in both of the Certified EIRs, the Los Angeles Convention and Event Center Expansion and Expansion would prepare a Construction Traffic and Parking Management and Control Plan. The JW Marriott Hotel and Conference Center Expansion Project would also prepare a Construction Traffic and Parking Management and Control Plan. These plans would be coordinated with one another and LADOT.

Construction Impacts after Mitigation

With implementation of the Construction Traffic and Parking Management and Control Plans, the combined construction impacts of the Convention Center Expansion and Modernization Project and the JW Marriott Hotel and Conference Center Expansion Project would be reduced to a less than significant level, with the exception of the temporary impacts from the closure of Pico Boulevard during construction which would remain as temporary significant impacts during construction, as with the Approved Project under the Convention and Event Center EIR. Therefore, the combined impacts of the Projects would

not result in cumulative construction-related traffic impacts beyond those already set forth in the Certified EIRs.

Operational Impacts

The Certified EIR for the Convention and Event Center Project concluded that cumulative traffic impacts would occur with respect to level of service at intersections, freeway segments, freeway ramps, and CMP freeway monitoring locations. Cumulative impacts associated with CMP arterial monitoring stations and transit were determined to be less than significant. The Certified EIR for the LASED Project concluded that significant cumulative traffic impacts would occur.

The analysis for the JW Marriott Hotel and Conference Center Expansion Project and the Convention and Event Center Expansion and Modernization Project used consistent methodologies and each of the analyses in the Addenda included the other project in evaluating impacts. Each Addendum therefore addressed the cumulative impact of the JW Marriott Hotel and Conference Center Expansion Project and the Convention Center Expansion and Modernization Project being developed together.

The JW Marriott Hotel and Conference Center Expansion Project Addendum analysis identified no new significant traffic impacts in either the Weekday P.M. Peak Hour or the Saturday Evening Peak Hour—the study periods for the underlying LASED EIR. The JW Marriott Hotel Expansion would generate fewer trips in the P.M. Peak Hour than the Approved LASED Project because of the changes in land use. JW Marriott Hotel and Conference Center Expansion Project would generate slightly more trips in the Saturday Evening peak hour. However, an additional analysis showed it would not create any new significant traffic impacts, and the increases in V/C ratios would be very small—and in some cases would be reductions in V/C ratios due to the redistribution of trips from the Olympic North Parcel to the Olympic West parcel.

As set forth in the Certified EIR for the Convention and Event Center, with implementation of project design features and mitigation measures, operation of the Convention and Event Center Project would result in significant unavoidable impacts at four intersections in the Sunday Day Pre-Event Hour, at 20 intersections in the Sunday Day Post-Event Hour, at 28 intersections in the Saturday Day Pre-Event Hour, at 42 intersections in the Saturday Day Post-Event Hour, at 72 intersections in the Weekday Evening Pre-Event Hour, and at 6 intersections in the Weekday Evening Post-Event Hour. The Convention Center Expansion and Modernization Project Addendum determined this Project would create two significant impacts in the A.M. Peak Hour and four significant impacts in the P.M. Peak Hour. The impacted locations would be Figueroa Street & Pico Boulevard, Figueroa Street & Venice Boulevard, Flower Street & Pico Boulevard, and Flower Street & Venice Boulevard. While mitigation measures would reduce the impacts at

these locations, they would not mitigate them to a less than significant level, so significant impacts would remain. However, these impacts would be substantially reduced when compared with those set forth in the Certified EIR for the Convention and Event Center.

As such, the combined impacts of the JW Marriott Hotel and Conference Center Expansion Project and the Convention Center Expansion and Modernization Project are not anticipated to lead to additional significant traffic impacts not disclosed in the separate analyses for the two projects and would not result in cumulative operational traffic impacts beyond those already set forth in the Certified EIRs.

Former Question (b)—Impacts Related to Conflicts with a Congestion Management Plan: As indicated above, the Los Angeles Convention and Event Center EIR concluded that cumulative CMP impacts would be significant and unavoidable and the LASED EIR concluded that traffic impacts would be significant and unavoidable. As discussed in the Addenda, CMP analysis is no longer included in City of Los Angeles environmental documents.

Nonetheless, while the JW Marriott Hotel and Conference Center Expansion Project would result in a slightly greater Saturday evening peak-hour trips than assumed for the hotel site in the Certified LASED EIR, the Convention Center Expansion and Modernization Project would include over one million square feet less new development than assumed in the Certified Convention and Event Center EIR and would generate substantially less peak-hour traffic. This would translate into less combined CMP impacts under the Proposed Development Projects than under the Approved Projects. Therefore, the Proposed Development Projects would not result in cumulative CMP impacts beyond those already set forth in the Certified EIRs.

New Question (b)—Impacts Related to Conflicts with CEQA Guidelines Section 15064.3, subdivision (b): In response to Senate Bill 743, CEQA Guidelines Section 15064.3 was added to the 2019 update to the CEQA Guidelines pertaining to VMT-based analysis of transportation impacts. Such an analysis was not performed for the Approved Projects, as it was not required at the time the Certified EIRs were prepared. However, VMT analyses for the JW Marriott Hotel and Conference Center Expansion and Convention Center Expansion and Modernization Project were included in the Addenda. A development project would have a cumulative VMT impact if it were deemed inconsistent with SCAG's RTP/SCS, the regional plan to reach state air quality and GHG reduction targets. Based on the LADOT's Transportation Assessment Guidelines, a Project that does not result in a significant VMT impact would be in alignment with the RTP/SCS and, therefore, would also have no cumulative VMT impact. As set forth in the Eighth Addendum to LASED EIR, the VMT associated with the Hotel and Conference Center Expansion would be below the per capita employment threshold set forth by LADOT. As

such, combined VMT impacts would be less than significant. Furthermore, as set forth in the Addendum to the Convention and Event Center EIR, the VMT under the Convention Center Expansion and Modernization Project would be considerably less than the VMT under the Convention and Event Center Project.

In addition, 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.” As discussed in the Addenda, the Project Sites are well served by existing transit. They are located in downtown Los Angeles, which is the hub of the regional transit system in the Los Angeles area. The Project Sites are approximately five blocks from the 7th Street/Metro Center Station at Figueroa Street & 7th Street, which serves the Metro Red/Purple, Blue and Expo Lines, and approximately one block from the Pico Station at Flower Street & Pico Boulevard, which serves the Blue and Expo Lines. The Project Area (defined as the area within 0.25 mile of the Modified Project Sites) is currently served by seven local and inter-city transit operators, including multiple rail and approximately two dozen. In addition, the 2016–2040 RTP/SCS designates the area in which the Project Sites are located in an High Quality Transit Area (HQTA) and the City’s ZIMAS system confirms the Project Sites are located within a Transit Priority Area (TPA) as defined in the City’s ZI No. 2452. Furthermore, the Proposed Development Projects would support the goals and principles set forth in the 2016–2040 RTP/SCS through the construction of convention center and hotel uses 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. Lastly, the two Proposed Development Projects would provide complementary land uses, and would be designed to connect via a pedestrian bridge, which along with their location in close proximity to transit and within an HQTA and TPA, would reduce motor vehicle use and increase alternative travel modes. Hence, the Proposed Development Projects combined, would support local and regional plans to reduce VMT.

Question (c)—Impacts Related to Design Hazards or Incompatible Uses: Like the Approved Projects, the design of the JW Marriott Hotel and Conference Center Expansion Project and the Convention and Event Center Expansion and Modernization Project would not include hazardous features. The roadways adjacent to the Project Sites are part of the grid-patterned urban roadway network and contain no sharp curves or dangerous intersections. Furthermore, the Proposed Development Projects, like the Approved Projects, would neither alone nor together result in roadway design hazards or incompatible uses. Lastly, similar to the Approved Projects, the site plans of the Proposed Development Projects would undergo City review to ensure compliance with applicable development standards, including but not limited to street, driveway, parking, lighting, and line-of-site standards, which have been formulated to avoid significant design hazards.

Therefore, the Proposed Development Projects combined would not create any new significant cumulative impacts related to hazards or incompatible uses, and would not contribute to cumulative traffic safety impacts beyond those already set forth in the Certified EIRs.

Question (d)—Impacts to Emergency Access: Like the Approved Projects, the JW Marriott Hotel and Conference Center Expansion Project and the Convention and Event Center Expansion and Modernization Project would provide adequate emergency access during construction and operation through compliance with LAMC design/access requirements and implementation of the required Construction Traffic and Parking Management and Control Plans. Therefore, the Proposed Development Projects combined would not create any new significant cumulative emergency access impacts, and would not contribute to cumulative emergency access impacts beyond those already set forth in the Certified EIRs.

3.17 Tribal Cultural Resources

Question (a)—Impacts to Tribal Cultural Resources: As discussed above in Section 3.5, Cultural Resources, no archaeological resources or human remains listed in the National Register, California Register, or local registers of cultural resources have been recorded at the Project Sites. Hence, neither the Approved Projects nor the Proposed Development Projects would affect such listed resources. However, as with the Approved Project, excavation and grading activities associated with construction of the Proposed Development Projects could potentially disturb any unrecorded archaeological resources and/or human remains that may be present below the ground surface, and thus could potentially impact tribal cultural resources. Still, as with the Approved Projects, the impacts of the Proposed Development Projects on tribal cultural resources impacts would be less than significant with implementation of the mitigation measures for the inadvertent discovery of archaeological resources and human remains, as identified in Section 3.5 above. In addition, the Convention Center Expansion and Modernization Project would include shallower excavations and substantially less excavation than the Approved Convention and Event Center Project. Furthermore, the impacts of each of the Proposed Development Projects on tribal cultural resources would be specific to each of the Project Sites and would not contribute to the impacts on the other. Therefore, as with the Approved Projects, the Proposed Development Projects would not result in new significant cumulative impacts related to tribal cultural resources and would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

3.18 Utilities and Service Systems

Questions (a)—Impacts Related to Water, Wastewater, Electricity, Natural Gas, and Telecommunications Infrastructure:

Water Infrastructure

The Certified EIR for both Approved Projects concluded that impacts on water infrastructure during construction would be less than significant, and with mitigation, operational impacts would be less than significant.

The following analysis is based, in part, on a Combined Water System Technical Memorandum for the Convention Center Expansion Project and JW Marriott Hotel and Expansion Project (Combined Water Technical Memorandum) prepared by KPFF Consulting Engineers dated September 3, 2020. The Combined Water Technical Memorandum is included as Appendix D of this Joint Analysis.

Similar to the Approved Projects, the Proposed Development Projects would include construction activities associated with connections and upgrades to existing infrastructure. As with the Approved Projects: construction activities associated with the connections and upgrade under the Proposed Development Projects would primarily be confined to trenching along the upgrade alignment, would be temporary, and would not substantially interfere with vehicle and pedestrian access and flow with implementation of the required Construction Management Plans. Hence, the cumulative construction-related water infrastructure impacts of the Proposed Development Projects would be less than significant.

With regard to impacts to water infrastructure during operation, the Proposed Development Projects, like the Approved Projects, would generate daily domestic water demand that would need to be supplied from the local domestic water infrastructure system. The Certified EIRs concluded that the existing system would be adequate to serve the each of the Approved Projects with implementation of the project design features and mitigation measures outlined in the Certified EIRs. These project design features and mitigation measures included upsizing a segment of the existing 8-inch water main in Pico Boulevard between L.A. Live Way and Figueroa Street to a 12-inch water main for the Convention and Event Center, implementing water conservation features, performance of flow tests to confirm adequacy of available fire flow, etc. As indicated in the Combined Water Technical Memorandum, the Proposed Development Projects combined would collectively generate 283,507 gallons per day (gpd) with a peak water demand of 5,215 gallons per minute (gpm). With the system upgrades described above that include upgrade of the main in Pico Boulevard to 12 inches, the water system in the vicinity would have sufficient capacity to accommodate the fire and domestic water flows for both Proposed Development Projects. In addition, the Modified LASER Project together with the LACC Expansion Project would generate substantially less water demand than the Approved Projects as evaluated in the Certified EIRs and would comply with the same water conservation requirements and implement the same project design features and

mitigation measures. As such, the cumulative operational water infrastructure impacts and water supply impacts of the Proposed Development Projects would be less than significant.

Based on the above, the Proposed Development Projects would not result in new significant cumulative impacts related to water infrastructure during either construction or operation, and would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

Wastewater Infrastructure

Both Certified EIRs concluded that cumulative impacts associated with wastewater would be less than significant.

The following analysis is based, in part, on a Combined Wastewater Addendum Technical Memorandum for the Convention Center Expansion and JW Marriott Hotel and Conference Center Project (Combined Wastewater Technical Memorandum) prepared by KPFF Consulting Engineers dated September 14, 2020, and included as Appendix E of this Joint Analysis.

Like the Approved Projects, construction activities for the Proposed Development Projects would result in a temporary and incremental increase in wastewater generation as a result of construction workers on-site. The resulting wastewater flows would be anticipated to be less under the Proposed Development Projects owing to substantially less net new floor area and associated construction activities than under the Approved Projects. In addition, as with the Approved Projects, construction workers under the Proposed Development Projects would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system in the Project vicinity. 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 Sites.

Similar to under the Approved Projects, construction activities associated with infrastructure upgrades and connections under both projects would primarily be confined to trenching for the sewer lines that connect the individual buildings to the City's existing in-street infrastructure, would be relatively short-term in duration, and would cease once installation is complete. Hence, as with the Approved Projects, wastewater infrastructure construction impacts under the Proposed Development Projects would be less than significant.

With regard to impacts to wastewater conveyance infrastructure during operation, the Proposed Development Projects, like the Approved Projects would generate wastewater requiring conveyance by the local sewer system. The Certified EIRs concluded

that the existing local sewer system would be adequate to serve the Approved Projects with compliance with applicable regulations and implementation of the project design features and mitigation measures outlined in the Certified EIRs (e.g., detailed gauging and evaluation as part of the normal permit process to identify specific sewer connection points, designing sewer connections that conform with Department of Public Works standards, and reducing water demand and thus wastewater generation). As indicated in the Combined Wastewater Technical Memorandum prepared by KPFF, the Proposed Development Projects would collectively generate 283,507 gpd of wastewater. As discussed in the Combined Wastewater Technical Memorandum prepared by KPFF and included as Appendix E of this Joint Analysis, BOS has indicated that the LACC Expansion Project and Hotel and Conference Center Expansion Project would discharge to two separate sewer infrastructure systems. Therefore, combined impacts associated with the Proposed Development Projects would not occur. In addition, the Modified LASED Project combined with the LACC Expansion Project would result in less wastewater demand when compared with the combined LASED and Convention and Event Center Projects evaluated in the Certified EIRs. Furthermore, the JW Marriott Hotel and Conference Center Expansion Project and the Convention and Event Center Expansion and Modernization Project would comply with the same wastewater regulations and implement the same project design features and mitigation measures as the Approved Projects. Therefore, as with the Approved Projects, the cumulative impacts of the JW Marriott Hotel and Conference Center Expansion Project and the Convention and Event Center Expansion and Modernization Project on wastewater conveyance infrastructure would be less than significant.

Based on the above, the JW Marriott Hotel and Conference Center Expansion Project and the Convention and Event Center Expansion and Modernization Project would not result in new significant cumulative impacts related to wastewater conveyance infrastructure during either construction or operation, and would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

Electricity and Natural Gas Infrastructure

The Certified EIR concluded that Convention and Event Center construction impacts on natural gas supplies and infrastructure would be less than significant. In addition, the Certified EIR concluded that with implementation of a mitigation measure requiring natural gas infrastructure upgrades for the Event Center, Convention and Event Center impacts would be less than significant. The LASED Certified EIR did not expressly analyze impacts related to electricity or natural gas as this topic was not included in the CEQA Checklist at the time. However, energy was generally addressed in Section VII, Significant Irreversible Changes of the LASED EIR. Based on the location of the LASED 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.

Annual electricity and natural gas consumption under both Proposed Development Projects would represent only a small fraction of future demand within the Los Angeles Department of Water and Power (LADWP) and Southern California Gas Company service areas. In addition, the consumption of energy would be substantially reduced with the removal of the Event Center under the Convention Center Expansion and Modernization Project. Accordingly, the Proposed Development Projects would not result in cumulative energy and natural gas impacts beyond that set forth in the Certified EIRs.

Telecommunications Infrastructure

The Certified EIRs did not address telecommunications as this issue was recently added to Appendix G of the CEQA Guidelines. Nonetheless, the Proposed Development Projects would not result in significant cumulative impacts associated with telecommunications as the Project vicinity already contains a telecommunications network and all telecommunications connections and facilities would be implemented in accordance with regulatory requirements.

Question (b)—Water Supply: The Certified EIR for the LASED Project took the very conservative position that Project operation would result in significant unavoidable cumulative water supply impacts because there was no certainty that long-term water supplies would be available on a regional basis. The Certified EIR for Convention and Event Center Project, on the other hand, concluded that Convention and Event Center Project operation would result in less than significant cumulative water supply impacts because: (1) the Water Supply Assessment (WSA) prepared by LADWP for the Convention and Event Center Project determined that adequate future water supplies would be available during normal, single-dry and multiple years to serve the Project through at least 2035 (the planning horizon of the City's Urban Water Management Plan at the time); and (2) the Convention and Event Center Project would implement all required and proposed water conservation requirements/features.

The following analysis is based, in part, on a Combined Water Technical Memorandum for the Modified Projects prepared by KPFF Consulting Engineers dated September 3, 2020. The Combined Water Technical Memorandum is included as Appendix D of this Joint Analysis.

Similar to the Approved Projects, a short-term demand for water would occur during construction of the Proposed Development Projects 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 Proposed Development Projects and would result in water demand that would be substantially less than that needed for operation. The amount of water used during construction would be less than required for construction of the Approved Projects owing to substantially less new

development and demolition under the Convention Center Expansion and Modernization Project. Therefore, the combined water demand during construction of the Proposed Development Projects would not result in cumulative impacts related to water supply.

As discussed in detail in the Combined Water Technical Memorandum prepared by KPFF, with regard to water demand during operation, the Modified LASED Project and LACC Project combined would result in approximately 357,176 less gpd of domestic water demand than the Approved Projects evaluated in the Certified EIRs owing to substantially less new development since the Event Center would not be developed. Furthermore, subsequent to certification of the Certified EIRs, 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 by: (1) using water-saving fixtures or flow restrictions; and/or (2) demonstrating a 20-percent reduction in baseline water use. The Modified Projects would also continue to implement the relevant project design features and mitigation measures included in the Certified EIRs that promote water conservation. Furthermore, the cumulative water demand projections in WSAs and the Urban Water Management Plan are based on buildout under existing zoning. Because both of the Proposed Development Projects would be consistent with existing zoning, the combined operational water supply impacts of the Proposed Development Projects would be less than significant. Regardless of the significance determination, the cumulative impacts of the Modified Projects on operational water demand would be substantially lower than those associated with the Approved Projects.

Based on the above, the Modified Projects would not result in cumulative water supply impacts beyond those already set forth in the Certified EIRs.

Wastewater Infrastructure—Treatment

Similar to the Approved Projects, operation of the Proposed Development Projects would generate wastewater requiring treatment at the Hyperion Treatment Plant (HTP). According to the Convention and Event Center EIR, the HTP has an existing capacity of 450 mgd and a remaining capacity of 88 mgd such that the HTP has adequate treatment capacity to serve the Approved Projects. The same would be true of the Proposed Development Projects, which would generate substantially less wastewater due to the removal of the Event Center. Furthermore, both Projects would implement measures to reduce water demand and thus wastewater generation, and both would install grease interceptors and clarifiers to pre-treat the wastewater before being discharged to the local sewer system. Thus, as with the Approved Projects, Modified Project operational impacts on wastewater treatment infrastructure would be less than significant. As such, the Proposed Development Projects would not result in new significant cumulative impacts

related to wastewater treatment infrastructure, and would not result in cumulative impacts beyond those already set forth in the Certified EIRs.

Question (d)—Impacts Related to Solid Waste Capacity: The Convention and Event Center EIR concluded that cumulative impacts associated with solid waste would be significant and unavoidable, and the LASED EIR concluded that cumulative impacts associated with solid waste would be less than significant.

Inert landfill capacity available to the City of Los Angeles is approximately 1,710 tons per day. As indicated in the Certified EIRs, the Convention and Event Center Project would dispose of 1.41 tons per day of construction debris and the LASED Project would result in even less daily construction debris. As such, construction debris from the Approved Projects combined would represent a fraction of the inert landfill capacity available during construction. With the removal of the Event Center, the Proposed Development Projects would result in a reduction in overall construction activities and construction waste when compared with the Approved Projects. As such, no new cumulative impacts associated with solid waste would result from construction of the Proposed Development Projects.

As set forth in the Addenda, operation of the Modified LASED Project would generate approximately 23,425 pounds per day of solid waste and operation of the Convention Center Expansion and Modernization Project would generate approximately 325 tons of solid waste per year (approximately 1,781 tons per day). The amount of solid waste that would be generated by the Modified LASED Project would be reduced by approximately 1,467 pounds per day of solid waste when compared with the Approved LASED Project and the solid waste generated by the Convention Center Expansion and Modernization Project would be substantially reduced by approximately 7,741.7 tons per year when compared with the Approved Convention and Event Center Project due to the elimination of the Event Center. In addition, both Proposed Development Projects would continue to implement the project design features and mitigation measures set forth in the Certified EIRs to reduce solid waste disposed of at landfills. The County will also continue to address landfill capacity through the preparation of annual County Integrated Waste Management Plans (CIWMPs). In addition, the CIWMP 2017 Annual Report (published in 2019) indicates that the City has more than adequate Class III disposal capacity through at least 2032 (the planning horizon of the CIWMPs).⁴ As such, no new cumulative operational solid waste impacts would occur as a result of combined operation of the Modified Projects.

Question (e)—Solid Waste Reduction Plans: The Certified EIR and Addenda for both Approved Projects concluded that construction would not conflict with solid waste

⁴ *Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan—2017 Annual Report, April 2019.*

policies and objectives and would be less than significant. Similar to the Approved Projects, each Proposed Development Project would implement a demolition and construction debris recycling plan for all buildings constructed, with the explicit intent of requiring recycling during all phases of site preparation and building construction. The implementation of these practices would ensure that the construction phase of each Project is consistent with the solid waste objectives and policies of the Countywide Integrated Waste Management Summary Plan, the Countywide Siting Element, the Source Reduction and Recycling Element for the Unincorporated Portions of Los Angeles County, the County of Los Angeles Green Building Standards, the City of Los Angeles Solid Waste Management Policy Plan, the City of Los Angeles Source Reduction and Recycling Element, the City of Los Angeles Solid Waste Integrated Resources Plan, the City General Plan Framework Element, the City Solid Resources Infrastructure Strategy Facilities Plan, the RENEW LA Plan, and City of Los Angeles Municipal Code. Thus, the combined Modified Project construction would result in a less than significant impact with regard to implementation of the City and County solid waste management policies and programs.

The Certified EIRs and Addenda analyzing operation of both Approved Projects concluded there would be less than significant solid waste policy impacts. Similar to the Approved Projects, operation of the Proposed Development Projects would include on-site recycling facilities in accordance with regulatory requirements. Additionally, each Development Project would implement source reduction, recycling, and diversion measures, to reduce solid waste generation. As a result, the Proposed Development Projects would promote source reduction and recycling, consistent with AB 939 and the City's SWIRP, Framework Element, RENEW LA Plan, Green LA Plan, and the LA Green Building Code. Therefore, the combined Proposed Development Projects would not conflict with solid waste policies and objectives. Impacts associated with solid waste policies and objectives would be less than significant

3.19 Wildfire

The Certified EIRs both concluded that no significant cumulative impacts associated with wildfire would occur.

Question (a)—Impacts Related to Adopted Emergency Response Plans and Emergency Evacuation Plans: See the discussion under Section 3.9, Hazards and Hazardous Materials, above. As indicated therein, the Proposed Development Projects, like the Approved Projects, would not interfere with the implementation of adopted emergency response or emergency evacuation plans. Therefore, like the Approved Projects, the Proposed Development Projects would result in less than significant cumulative impacts with respect to such plans and would not result in new cumulative impacts beyond those already set forth in the Certified EIRs.

Questions (b) through (d)—Impacts Related to Wildfires: The Project Sites of the Approved Projects are not located in or near a state responsibility area, nor do they include land classified as a very high fire hazard severity zone.^{5,6} The Project Sites are 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, the Proposed Development Projects would not result in significant cumulative impacts with respect to wildfire, and would not result in cumulative wildfire impacts beyond those already set forth in the Certified EIRs.

⁵ California Board of Forestry and Fire Protection, *State Responsibility Map—Los Angeles Area*, <https://bofdata.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/>, accessed August 8, 2019.

⁶ City of Los Angeles, *Fire Hazard Severity Zones*, <https://geohub.lacity.org/datasets/fire-hazard-severity-zones?geometry=-118.383%2C34.009%2C-117.729%2C34.108>, accessed August 8, 2019.