ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT

FOR THE LOS ANGELES MEMORIAL COLISEUM RENOVATION PROJECT

State Clearinghouse No. 1990011065

PREPARED FOR:

The Los Angeles Memorial Coliseum Commission

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I. Introduction/Background

This document is the Second Addendum to the Environmental Impact Report (EIR) prepared for the Los Angeles Memorial Coliseum Renovation Project (State Clearinghouse No. 1990011065), which was certified by the Los Angeles Memorial Coliseum Commission (LAMCC) in December 2003. As discussed below, following certification of the EIR, several modifications were proposed for the Los Angeles Memorial Coliseum Renovation Project. These modifications were addressed in the Addendum to the Los Angeles Memorial Coliseum Renovation Project EIR for the Coliseum District Specific Plan Overlay dated May 1, 2006 (First Addendum). The First Addendum to the Los Angeles Memorial Coliseum Renovation Project EIR was approved by the LAMCC (as Lead Agency) on May 2, 2006, and subsequently relied upon and approved by the City Planning Commission (as a responsible agency) in conjunction with the approval of the modified Los Angeles Memorial Coliseum Renovation Project, Coliseum District Specific Plan Overlay, and Development Agreement between the City of Los Angeles and the LAMCC on May 16, 2006 ("Approved Project"). In addition, a Mitigated Negative Declaration (MND) addressing further amendments to the Coliseum District Specific Plan with a focus on changes to signage was adopted by the LAMCC and determined adequate by the City of Los Angeles in 2009.

The Certified EIR, as referred to herein, comprises the Draft EIR, Final EIR, and the First Addendum to the EIR. In addition, all references within this Second Addendum to the Approved Project reflect the Los Angeles Memorial Coliseum Renovation Project as evaluated in the EIR and as modified by the First Addendum and other approvals.

As discussed below, the University of Southern California (USC) is currently proposing further modifications to the Approved Project. In accordance with the California Environmental Quality Act (CEQA), this Addendum analyzes the proposed modifications to the Approved Project to determine whether such modifications would result in any new significant environmental impacts that were not identified in the Certified EIR or a substantial increase in the severity of impacts set forth in the Certified EIR or otherwise require preparation of a supplemental or subsequent EIR.

The Draft EIR for the Los Angeles Memorial Coliseum Renovation Project evaluated the renovation of the Los Angeles Memorial Coliseum (Coliseum), which included primarily reducing the maximum seating capacity from 92,500 seats to 78,000 seats, the addition of 200 luxury suites, and the construction of two approximate 20,000-square-foot ancillary structures for retail or office use, a 19,000-square-foot press box, and approximately 35,000 square feet of new concession-related facilities. The First Addendum evaluated modifications to the Los Angeles Memorial Coliseum Renovation Project, including changes to the architectural design, the establishment of a Coliseum District Specific Plan (CDSP) to govern the development and operation of the Coliseum under a proposed lease agreement between the Los Angeles Memorial Coliseum Commission and the National Football League, the adoption of a signage plan, and approval of the sale and service of alcoholic beverages for on-site consumption. The 2006 Addendum also analyzed an increase in the size of the press box from 19,000 square feet to 25,000 square feet and an additional 4,000 square feet of ancillary structures in addition to the two 20,000-square-foot ancillary structures for retail or office use. Subsequent to completion of the 2006 Addendum, a Development Agreement between the City of Los Angeles and LAMCC was approved in August, 2006. In addition, following the adoption of an MND by the LAMCC in 2009, the City determined the MND was adequate and approved additional modifications to the Coliseum District Specific Plan. Such modifications focused on revisions to the signage regulations, includinga reduction in signage from 385,000 square feet to 44,000 square feet, and a reduction in the CDSP boundaries from 160 acres to 85 acres. As part of the 2009 approval, the City also permitted the demolition of the perimeter fence bordering the Peristyle area of the Coliseum; the addition of accessory structures and the utilization of the Peristyle plaza for ancillary uses such as retail, restaurant, broadcasting, and office uses; improvements to the operational systems of the Coliseum and the physical plant; and other structural and operational modifications to Coliseum facilities.

In 2008, USC signed a long-term lease with the Los Angeles Memorial Coliseum Commission for use of the Coliseum. The lease agreement, as amended in 2013, provides for renovations to the Coliseum and management of the Coliseum by USC. USC proposes the renovation of the Coliseum as previously contemplated in the Certified EIR with some modifications. Specifically, proposed modifications to the Approved Project primarily include a reduction in the number of luxury suites from 200 suites to 44 suites, reducing the size of the press box from approximately 25,000 square feet to 17,400 square feet, reducing concession-related facilities from approximately 35,000 square feet to 24,500 square feet, and reducing ancillary structures from 44,000 square feet (two 20,000-square-foot structures and 4,000 square feet of ancillary structure) to 18,000 square feet. The proposed modifications also include the addition of 24 outdoor loge boxes and 1,065 outdoor club seats. In addition, with the proposed modifications, the reduction in the maximum seating capacity from 92,500 seats to 78,000 seats previously contemplated in the Certified EIR would continue to be implemented. The proposed modifications to the

Approved Project described herein are collectively referred to in this Addendum as the Modified Project.

II. CEQA Authority for an Addendum

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

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

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

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

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

As demonstrated by the analysis herein (refer to Section IV, Comparative Analysis of Modified Project Impacts, below), the Modified Project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Therefore the modifications resulting from the Modified Project do not meet the standards for a Subsequent or Supplemental EIR pursuant to CEQA Guidelines Section 15162.

III. Project Description

A. Project Location

The Coliseum, which is a National Historic Landmark, is located at 3939/3911 South Figueroa Street and occupies a 27.4-acre parcel of land within the central portion of the 160-acre Exposition Park adjacent to the University Park Campus of USC. Exposition Park houses the Coliseum, the Los Angeles Memorial Sports Arena, the California Science Center, the Dr. Theodore T. Alexander Jr. Science Center School, the California African American Museum, the Los Angeles County Natural History Museum, the Exposition Park Rose Garden, the Wallis Annenberg Building, and the Expo Center, which includes a swim stadium, recreation center, senior citizen center, amphitheater, and pre-school. Exposition Park is bounded by Exposition Boulevard to the north, Figueroa Street to the east, Martin Luther King Jr. Boulevard to the south, and Vermont Avenue to the west.

As shown in the aerial photograph provided in Figure 1 on page 6, the Los Angeles Memorial Coliseum Renovation Project area includes the Coliseum and the immediately surrounding area contained within an oval formed by a 10-foot-high chain link and steel bar fence surrounding the Coliseum structure at a point approximately 100 feet from the base of the stadium's exterior wall. The Coliseum is generally bounded by Exposition Park Drive to the north, South Coliseum Drive to the east, the Expo Center and parking lots to the south, and Bill Robertson Lane (formerly Menlo Avenue) on the west. Regional access to the Project Site is provided by the Harbor Freeway (Interstate 110), located approximately 0.1 mile east of the Coliseum. Major arterials serving the Coliseum include Vernon Avenue, Martin Luther King, Jr. Boulevard, and Exposition Boulevard in the east-west direction; and Vermont Avenue, Figueroa Street, Hoover Street, and Flower Street in the north-south direction.

B. Approved Project

As summarized above, the Approved Project provided for the renovation of the Coliseum, which included primarily reducing the maximum seating capacity from 92,500 seats to 78,000 seats, the addition of 200 luxury suites, and the construction of two approximate 20,000-square-foot ancillary structures for retail or office use, a 25,000-square-foot press box, and approximately 35,000 square feet of new concession-related facilities. A more detailed overview of the proposed design and various components of the Approved Project is provided below.

(1) Approved Project Design

The Approved Project design included reconstructing the interior of the Coliseum to provide for the development of separate seating levels and amenities for general, club, and luxury suite ticket holders. A summary description of the separate levels, from lowest to highest elevation, is provided by the following:

- Conceptual Plan Field Level—This level would consist of the playing field, new underground locker facilities, loading dock, commissary, staff lockers and stadium operations offices, press interview and workrooms, marshalling areas/ dressing rooms for cheerleaders, officials and talent, and other field support areas.

- Lower Club Level—This level would contain approximately 38 rows (46 in the west end zone) of general seating on the north sideline and end zones and club seating on the south sideline.

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Figure 1
Aerial of Existing Coliseum and Surrounding Area

Source: DLR Group, 2016.

- Plaza/Main Concourse/Lower Suite Level—This level would provide restrooms and food court concessions to serve the lower seating level. In addition, suites would be provided along the north and south sides of this level directly behind, and raised above, the lower bowl seating area. On the south side of this level would be the second level of the lower club seating. Outside the stadium and adjacent to the club seating would be a garden area that would be available to club patrons for outdoor dining and socializing. At the east end of the Coliseum, on the north and south sidelines, entrances for the club and suite patrons would be provided.

- Mid-Suite Level—This level would include additional suites located directly above the suites proposed on the Main Concourse Level.

- Club Level—This level would include restrooms and vendor concessions and would primarily function as a lobby to access approximately 15 rows of club level seating.

- Upper Suite/Press Level—This level would include suites directly above the Club Level on the north and south sides of the Coliseum bowl and the proposed 25,000-square-foot press box. This level would provide space for concessions, restrooms, catering, and other general services to the upper suites.

- Upper Concourse Level—This level would include concessions, restrooms, and all other vending and support spaces necessary to serve the upper deck seating patrons.

In addition to the new seating and service levels, the Approved Project proposed to maintain the existing west end zone seating. With the Approved Project, the interior of the Coliseum would continue to feature the Peristyle as the dominant element in the east end of the bowl and the Peristyle would remain intact. At the west end zone, the upper portion of the existing bowl would be retained as well as the access stairs. The ticket booth located within the Coliseum's northeastern-most corner would also be retained. The color video board, black-and-white matrix boards, and sound clusters that are attached to the top of the Peristyle would be removed.

Under the Approved Project design, the existing exterior wall of the Coliseum would remain virtually intact, with some alterations. The Peristyle end of the Coliseum would remain intact. The adjacent Coliseum Commission office structure would also remain, if feasible. The Approved Project also proposed that the existing stairs and tunnels remain unmodified at the west end zone only and that the stairs and tunnels along the sidelines no longer be used. On the exterior perimeter, the existing stairs and tunnel portals would remain in place wherever possible although they would not be functional. The existing openings in the exterior wall of the Coliseum would remain intact and cleared of any miscellaneous piping, wiring, and glazing. The existing openings along the sidelines may

be glazed and air conditioning may be provided. The new infill walls would be setback from the face of the building and may be glazed with non-reflective glass and minimal metal framing. The upper portion of the infill wall would be louvered to provide locations for air intakes and exhaust vents minimizing the need for openings in the existing concrete wall. The concrete brackets and upper seating tiers that provide the cornice to the existing wall would also remain, except in the four locations for the free-standing exit stairs. The original exterior lighting fixtures would be reused or recreated where feasible. The new press facilities would be integrated into the upper suite level and would require removal of the press box that currently extends above the exterior wall of the seating bowl. The existing earth berm against the exterior wall would remain largely intact, with modifications to accommodate access and exiting requirements at the north and south sidelines. Open-air exit stairs or ramps may be provided along the north side and along the south side of the Coliseum structure. These exiting structures would be freestanding with walkways connecting to the floors served by the stairs or ramps, but would otherwise act as independent structures detached from the historic fabric of the Coliseum structure.

In addition to renovating the Coliseum, the Approved Project includes the removal, replacement, or reconfiguration of some or all of the existing out-buildings surrounding the Coliseum structure, including the construction of two approximately 20,000-square-foot structures and 4,000 square feet of concession buildings to support ancillary retail or office uses. The buildings would include 2-story structures (concession structures to be 1-story) with an architectural design that is compatible with other recent structures that have been built or are under construction in Exposition Park. These structures are planned to be generally located in the southeast area of Exposition Park between the Coliseum and the Sports Arena.

(2) Access, Circulation, and Parking

The existing pedestrian access from the outlying parking areas off-site would remain substantially the same under the Approved Project. In addition, the existing perimeter fence bordering the Peristyle area of the Coliseum would be removed or relocated, providing increased general public open space areas immediately surrounding the Coliseum façade. Pedestrian access to the subsurface locker rooms and operations area would be via the existing service driveway, which extends from the grade level to the field level, and by stairs and elevators from the main concourse to the service level. Direct access to the field from the locker rooms and service building would be through field vomitories at the east and west ends of the stadium. Escalators, passenger elevators and freight elevators would be installed on each floor level, including elevators for freight use, disabled accessibility, fire protection, security/first aid (shared), and press usage. Service access by the way of freight elevators to all levels would be located in the northwest and southwest quadrants.

Vehicular access to the field from the exterior of the stadium would continue to be provided via the existing service drive and tunnel from Robertson Lane (formerly Menlo Avenue). The new television truck parking area would be located along the east side of the security building at ground level.

Generally, the existing parking arrangement(s) at the Coliseum as part of the Approved Project would remain unchanged except at the southwest quadrant, east of the security building, which would be utilized for media truck and player parking. The Approved Project would provide approximately 21,980 parking spaces during Coliseum events via parking structures and lots located at the Coliseum, Exposition Park, and USC.

(3) Lighting and Signage

As part of the Approved Project, the existing field lighting located on posts outside the Coliseum walls would be removed and replaced. New lighting would be installed in the roof structures and angled toward the field. The existing sound system would be replaced with a new distributed sound system designed to provide intelligible coverage of all ticketed seats within the stadium, as well as to the press box and several other public areas.

The Approved Project also proposed a new scoreboard at the west end of the Coliseum. The scoreboard would be a free standing structure anchored into the ground with four support beams that would attach to the existing wall of the stadium. The beams would be anchored into the existing historic fabric of the stadium wall consistent with the Secretary of the Interior's Standards, and in the event the score board was to be removed in the future, the historic fabric of the existing historic structure would not be impacted. The scoreboard would be located on the interior of the stadium and would have off-site advertising on the exterior facing Exposition Park. Two rim signs were also proposed on the north and south walls of the stadium. The rim signs are generally characterized as roof top signs and could be dismantled without harming the historic fabric of the stadium wall.

(4) Approved Project Construction and Operations

Construction of the Approved Project is expected to occur over an approximate 30- to 36-month period of continuous construction activities. Based upon preliminary estimates, approximately 600,000 cubic yards of earth and approximately 40,000 to 50,000 cubic yards of building material/debris are estimated to be excavated and removed from the site during construction.

The Approved Project would not result in an increase in the number of events. With completion of the Approved Project, the existing event schedule would continue.

C. Modified Project

As discussed above, proposed modifications to the Approved Project primarily include a reduction in the number of luxury suites from 200 suites to 44 suites, reducing the size of the press box from approximately 25,000 square feet to 17,400 square feet, reducing concession-related facilities from approximately 35,000 square feet to 24,500 square feet, and reducing ancillary structures from 44,000 square feet (two 20,000-square-foot structures and 4,000 square feet of ancillary structure) to 18,000 square feet. The proposed modifications also include the addition of 24 outdoor loge boxes and 1,065 outdoor club seats. With the proposed modifications, the reduction in the maximum seating capacity from 92,500 seats to 78,000 seats previously contemplated in the Certified EIR would continue to be implemented. As described below, the Modified Project would be implemented through approval of the Renovation Plan by LAMCC, an amendment to the Coliseum District Specific Plan, and approval of Project Permit Compliance Review by the City of Los Angeles.

(1) Modified Project Design

Similar to the Approved Project design, the Modified Project would be designed to include separate seating levels and amenities for the various ticket holders. These various seating levels and amenities would be provided within an approximately 25,000-square-foot concourse/addition within the interior of the Coliseum. To provide for this addition, two concession stands, one electrical equipment building, and the existing press box within the Coliseum would be removed. Conceptual renderings and sections depicting the Modified Project are provided in Figure 2 through Figure 6 on pages 11 through 15. Improvements within the various levels, from lowest to highest elevation, are as follows:

- Service Level—This level would include back of house spaces needed for the operation of the Coliseum. The main function of this sub-grade level would be to accommodate the kitchen and associated commissary space. The kitchen at the service level would be the main production kitchen for food service provided at the premium seating levels. The premium seating levels would be connected by a single freight elevator. Other spaces on this level would include mechanical, electrical, plumbing, and telecom equipment rooms that would serve the new construction.

- Yard Level—This area would be located at the existing yard level and would provide circulation and concessions stands for the seating on the south stadium sideline. The concourse would be located within the footprint of the existing concourse and would be built under the new premium seating floor plates. The concourse would be an unconditioned space that would be used for fan circulation and assembly. The existing tunnels would continue to provide access

Field side view of the new South Stadium addition

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Figure 2
Conceptual Rendering of Concourse Addition

Source: DLR Group, 2016.

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Figure 3
Conceptual Rendering of Coliseum with Modified Project Improvements

Source: DLR Group, 2016.

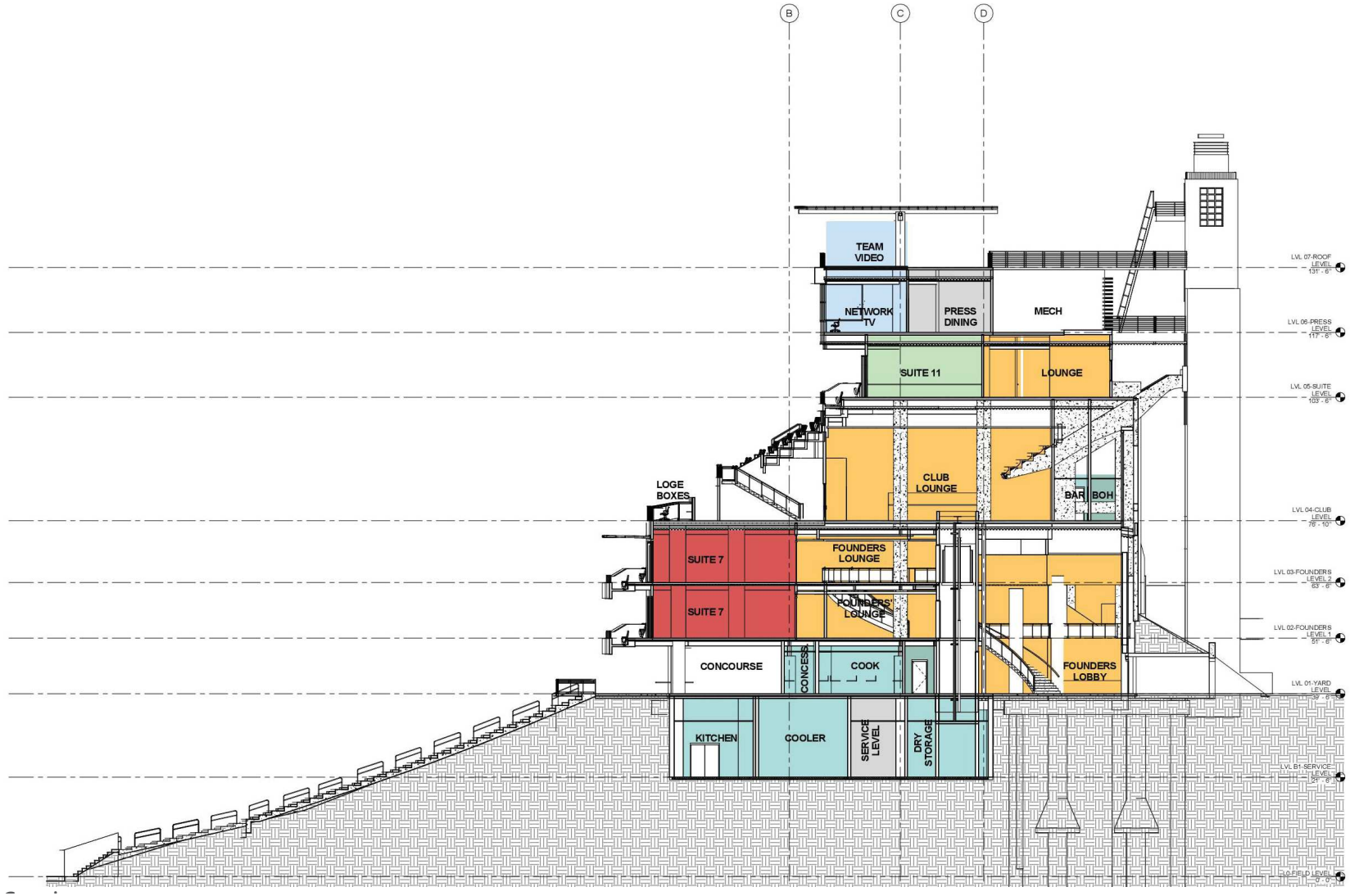

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Figure 4
Section of Concourse/Addition

Source: DLR Group, 2016.

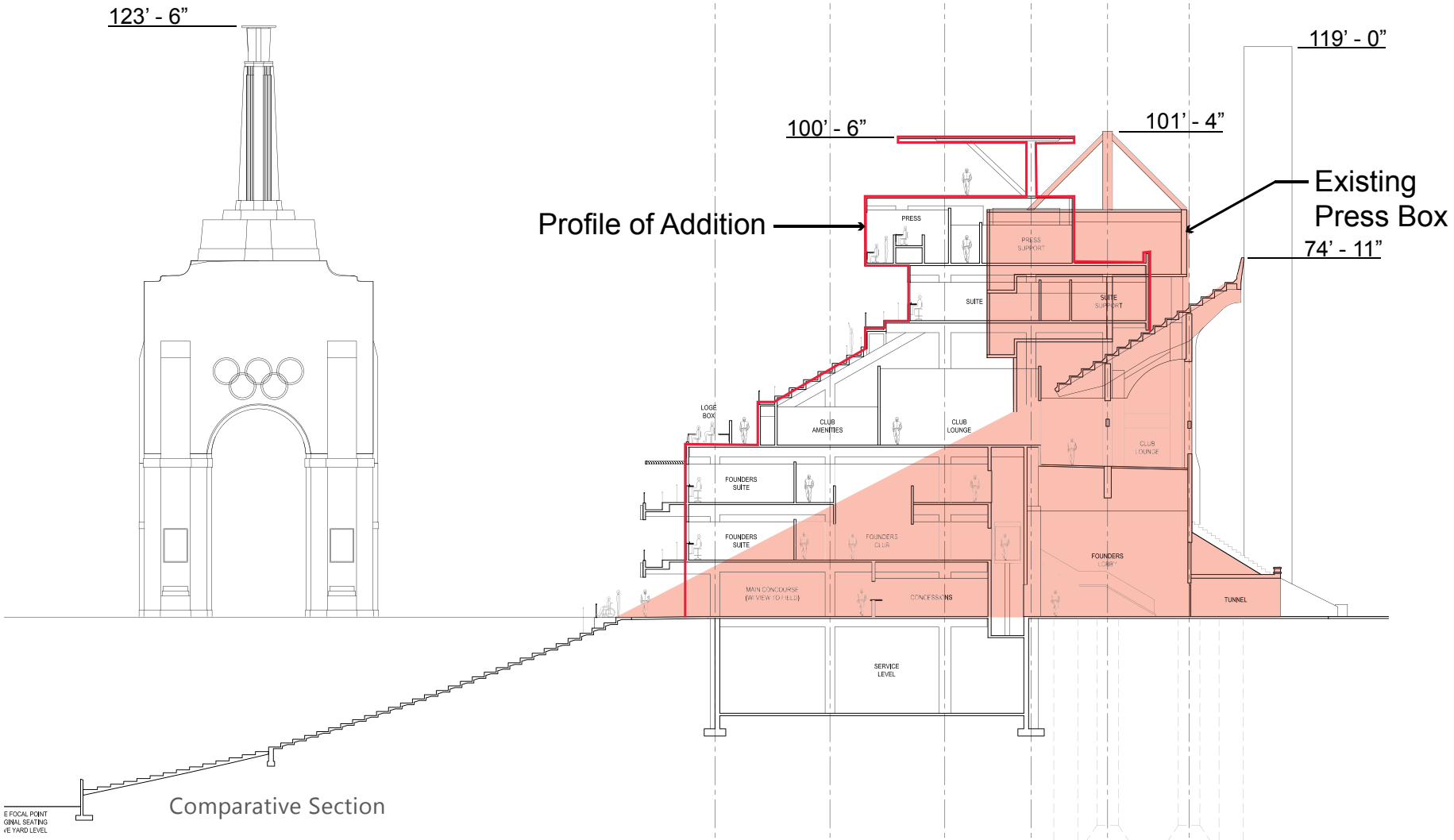

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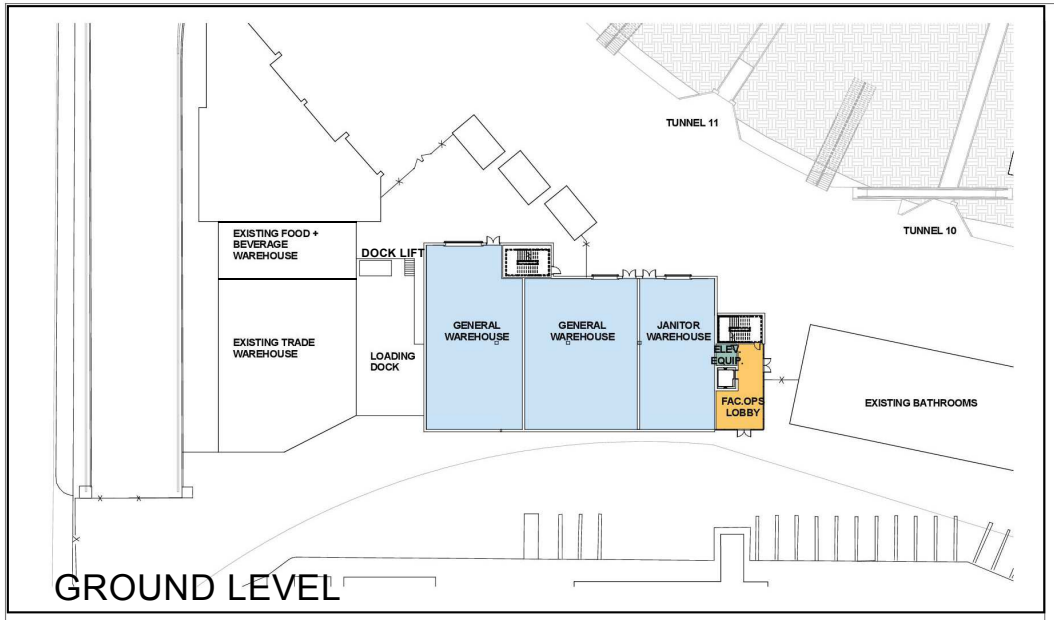
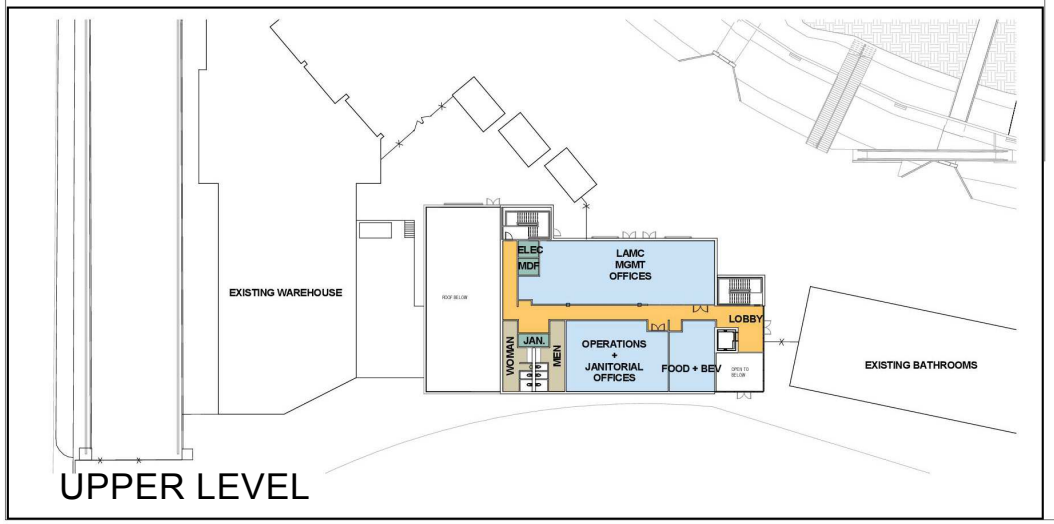
Figure 5
Existing versus Proposed Section Diagram

Source: DLR Group, 2016.





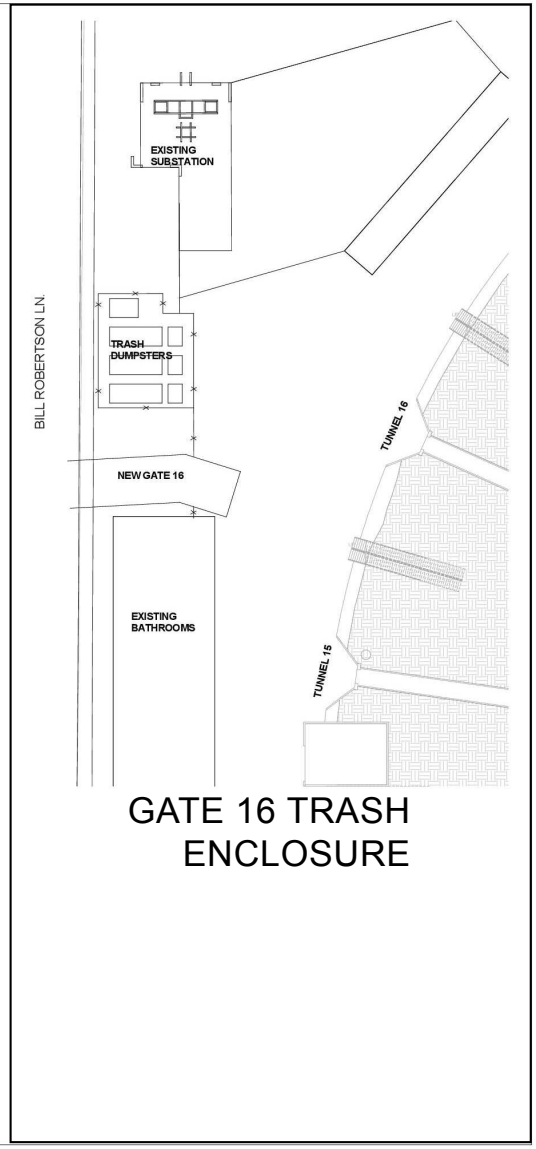


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Figure 6
Operations Building Plan and Trash Enclosure At Gate 15

Source: DLR Group, 2016.

to this space preserving the experience of entering the Coliseum through these unique portals. This level would also provide entry for the founders suites and elevators that would provide access to the upper levels.

- Founders Suite Levels—This level would consist of two levels with 24 suites (12 per level) provided for the founders level of donor. These suites would be supported by a lounge space that would include soft seat, tables, and chairs and food/beverage service areas. The suites would also have outdoor seating and would be the premiere seating option provided at the Coliseum.

- Club Level 4—Club seating would be provided at an outdoor seating tier with a capacity for 1,065 patrons. Patrons of the Club Level would have access to an indoor lounge space, which would include soft seat, tables, and chairs and food/beverage service areas. At the front of the club seating tier would be 24 outdoor loge boxes. These field view boxes would provide seating for four at a table with rolling chairs.

- Suites Level—This level would consist of 18 indoor suites and would include two outdoor/patio suites. These suites would include outdoor seating with an indoor lounge space, toilet facilities, and a pantry for food and beverage service.

- Press Level—The Press Level would be dedicated to spaces required for the operation of the event. This is a working level that would include all broadcast booths, scoreboard/PA/video board operations, game filming booth, coach's booths, security operations space, and other facilities for writers, photographers and print media. This area would only be accessible to credentialed press, facility operations staff and USC athletics staff. The level would include toilet facilities, a catering pantry, and a dining area for the working press.

- Roof Deck Level—A roof deck would be used as an outdoor entertainment area. The Roof Deck Level would include a roof canopy for shade and weather protection and concessions and toilet facilities for fans. The space would be provided for entertainment but would also be used as an overflow press/media level for special events that draw a large number of media.

The Modified Project would also renovate the existing seating to remain, which would include the installation of new chairs for all seats, increasing the tread depth of the seating area, and adding additional exit aisles. Specifically, new seats on the sidelines would be increased from 19 inches to 20 inches in width. The knee room for the side line seats would be increased by 3 inches, tread depth would be increased from 30 inches to 33 inches, and new aisles would be provided to aid in access to the seating sections. Handrails would also be added in the seating bowl aisles to meet code and increase safety. In addition, the Modified Project would include upgrades to existing toilet buildings and concession stands. A new trash collection compound would also be provided near Gate 16.

As with the Approved Project, the interior of the Coliseum under the Modified Project design would continue to feature the Peristyle as the dominant element of the bowl and would remain intact. The Peristyle would be restored and repaired along with the adjacent Coliseum Commission offices. Similar to the Approved Project, the Modified Project also proposes the removal of the existing scoreboards, advertising panels, and video boards that are mounted on the Peristyle.

Also similar to the Approved Project, the exterior wall of the Coliseum would remain intact under the Modified Project. In addition, all of the existing tunnels into the seating bowl, which were proposed to be closed under the Approved Project, would be retained with two tunnels being enlarged to provide egress and service access to the new addition. The existing elevator towers and escalators would also remain and would be modernized under the Modified Project. As previously discussed, the existing press box would be removed along with a portion of the seating bowl within the footprint of the new addition. A portion of the north and south stadium sideline seating bowl would also be removed and replaced with a new cast-in-place concrete seating bowl that would provide a wider seating tread and additional aisles. The new bowl would be designed to match the profile of the existing seating bowl to retain the slope and appearance of the existing seating bowl. Furthermore, the Modified Project would stabilize and preserve the Coliseum by repairing deteriorating structural members, weathered concrete, and corroding reinforcing steel. The Modified Project would also replace systems that are not functioning properly or have reached the end of their life cycle such as mechanical and electrical systems, food service equipment, seating, waterproofing, roofing and interior finishes. Restoration of the Coliseum would also include cleaning the existing board formed cast-in-place concrete on the exterior of the building, and replacing the upper south side rim of the Coliseum that was removed when the existing press box was added.

Like the Approved Project, the Modified Project would include the removal, replacement, or reconfiguration of some or all of the existing out-buildings surrounding the Coliseum structure. However, the Modified Project would not include the construction of two approximately 20,000-square-foot structures and 4,000 square feet of concession buildings to support ancillary retail or office uses. The Modified Project instead proposes the construction of a two-story 18,000-square-foot stadium operations building outside of the stadium walls. As with the Approved Project, this proposed structure would be designed to be architecturally compatible with existing structures.

(2) Access, Circulation, and Parking

Under the Modified Project, pedestrian access to the Project Site would also continue to remain substantially the same from outlying parking areas off-site. Pedestrian access to the subsurface locker rooms and operations area would be by way of the existing

service driveway/tunnel. Direct access to the field from the locker rooms and service building would also be by way of the existing service driveway/tunnel. Service access to all levels would be provided through freight elevators that would be located on the west side of the new addition and would be accessed by a new enlarged Tunnel 8. ADA-compliant access and circulation would be facilitated by new elevators that would provide access to all levels of the new addition. The perimeter fencing bordering the Peristyle area would remain as it is today and no improvements to this area are anticipated.

Vehicular access to the field from the exterior of the stadium would continue to be provided via the existing service drive and tunnel from Bill Robertson Lane (formerly Menlo Avenue). A new television truck parking area would be located on Leighton Avenue, just west of Robertson Lane.

The Modified Project would involve restriping of the existing parking lot south of Gate 7, which would reduce the number of parking spaces within this lot by 63 spaces. However, all other parking areas that serve the Coliseum would be unchanged and would continue to provide sufficient parking for the Coliseum.

(3) Lighting and Signage

The existing field lighting located on poles outside the Coliseum walls would be removed and replaced. New LED lighting would be provided by freestanding light poles on the north side of the Coliseum and a combination of free standing poles and roof mounted lighting on the south side of the Coliseum. Further, the Modified Project design would reduce the number of lighting fixtures and all new lighting would be more energy efficient as it would comply with Title 24 of the California Code of Regulations. The existing sound system would also be replaced with a combination system that would include a new point source audio system that would be integrated into the existing west scoreboard supplemented by distributed loudspeakers to provide full coverage to all seats in the seating bowl and premium seating areas.

Signage under the Modified Project would continue to be regulated under the Coliseum District Specific Plan or under the new Supplemental Use Sign District (SUD) currently proposed by the Los Angeles Football Club Project, if approved.[1] The Specific Plan establishes a conceptual sign program to permit and regulate the size, placement, and general characteristics of on-and off-site signage within the Coliseum District Specific Plan area. The Modified Project would be consistent with the signage requirements of the

[1] *Under the SUD currently proposed by the Los Angeles Football Club Project, the existing signage rights currently allowed under the Specific Plan for the Coliseum would not change.*

Coliseum District Specific Plan and would not construct more than 44,000 square feet of signage from the Coliseum and related uses. Specifically, the Modified Project would include two new video boards that would be placed in the seating bowl flanking the Peristyle. These video boards would be positioned to have minimal visual impact from the exterior of the Coliseum. The scoreboards located on the west end of the stadium would remain in place and would not be modified.

(4) Modified Project Construction and Operations

Construction of the Modified Project is expected to occur over an approximate 20-month period of continuous construction activities, beginning in January 2018 with an anticipated completion date of August 2019. It is estimated that the Modified Project would require approximately 37,000 cubic yards of earth to be excavated and removed from the site. Proposed renovation activities would be scheduled so that home games for USC's football team may continue to be played at the Coliseum.

Similar to the Approved Project, the Modified Project would not result in an increase in the number of events and with completion of the Modified Project, the existing event schedule would continue. In addition, with the improvements proposed under the Modified Project, the Coliseum would continue to be able to provide adequate facilities to host the 2024 Olympics.

(5) Discretionary Actions

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

- Coliseum Commission Approval of the Renovation Plan;
- Amendment to the Coliseum District Specific Plan pursuant to LAMC Section 11.5 7G; and
- Approval by the Director of Planning of Project Permit Compliance Review, pursuant to Section 8.A of the Coliseum District Specific Plan and LAMC Section 11.5.7 C.

IV. Comparative Analysis of Modified Project Impacts

The analyses provided below address each of the environmental issues analyzed in the Certified EIR and First Addendum and focus on the potential changes in environmental impacts due to the Modified Project. Specifically, potential impacts attributable to the Modified Project are compared with the analysis and findings within the Certified EIR and

First Addendum to determine if such impacts are within the envelope of impacts documented in the Certified EIR, including whether new significant impacts would result from the Modified Project or whether previously identified significant impacts would be substantially more severe. As set forth by the analyses below, the Modified Project would not result in any new environmental impacts or a substantial increase in a significant impact already identified in the Certified EIR and First Addendum. All mitigation measures set forth in the Certified EIR and as modified during approval of the Approved Project would continue to be implemented under the Modified Project.[2] In addition, any revisions to mitigation measures as a result of the Modified Project are shown in ~~strikethrough~~ for deletions and <u>underline</u> for additions.

A. Aesthetics/Visual Resources

(1) Visual Character and Views

As discussed in the Certified EIR and First Addendum, the Approved Project would renovate the Coliseum interior and would maintain its same interior shape. In addition, the historically significant exterior fabric of the Coliseum would remain intact. Furthermore, the primary visual alteration to the site visible from the surrounding areas would be the removal of the concession stands, restrooms and other facilities currently randomly lining the yard level of the site. As a result, improved lines of site to the historic Coliseum would be available. Overall, aesthetic and view impacts would be less than significant.

Similar to the Approved Project, the Modified Project would renovate portions of the Coliseum interior and would retain its existing interior shape. Like the Approved Project design, the Modified Project would be designed to include separate seating levels and amenities for the various ticket holders. These various seating levels and amenities would be provided within an approximately 25,000-square-foot concourse/addition within the interior of the Coliseum, which would be reduced in size and height when compared with the Approved Project. Specifically, under the Modified Project, the concourse/addition would be similar in height to the existing press box, while under the Approved Project the upper seating areas and shade canopies would rise to over twice the height of the existing rim wall of the Coliseum. Furthermore, when compared with the Approved Project, the number of luxury suites would be reduced from 200 suites to 44 suites, the press box would be reduced from approximately 25,000 square feet to 17,400 square feet, the concession-related facilities would be reduced from approximately 35,000 square feet to 24,500 square feet, and the ancillary structures would be reduced from 44,000 square feet

[2] *The mitigation measures provided herein coincide with the mitigation measures included in the City Planning Commission Determination, dated March 20, 2006 and included as part of Appendix A of the Coliseum District Specific Plan.*

(comprising two 20,000-square-foot structures and 4,000 square feet of ancillary structure) to 18,000 square feet.

As with the Approved Project, the proposed improvements would be designed to be architecturally compatible with existing structures. To provide for the new concourse/ addition, two concession stands, one electrical equipment building, and the existing press box within the Coliseum would be removed. As with the Approved Project, the Modified Project would also renovate the existing seating to remain, which would include the installing new chairs for all seats, increasing the tread depth of the seating area, and adding additional exit aisles. Also similar to the Approved Project, the exterior wall of the Coliseum would remain intact under the Modified Project. In addition, as part of the Modified Project, the existing restrooms and concession stands outside of the coliseum would be upgraded and a new enclosed centralized trash collection area would be constructed near Gate 16. Furthermore, the Modified Project would stabilize and preserve the Coliseum by repairing deteriorating structural members, weathered concrete, and corroding reinforcing steel. Restoration of the Coliseum would also include cleaning the existing board formed cast-in-place concrete on the exterior of the building and replacing the upper south side rim of the Coliseum that was removed when the existing press box was added.

Like the Approved Project, the Modified Project would include the removal, replacement, or reconfiguration of some or all of the existing out-buildings surrounding the Coliseum structure. However, the Modified Project would not include the construction of two approximately 20,000-square-foot structures and 4,000 square feet of concession buildings to support ancillary retail or office uses. The Modified Project instead proposes the construction of a two-story 18,000-square-foot stadium operations building outside of the stadium walls.

Like the Approved Project, the interior of the Coliseum under the Modified Project design would continue to feature the Peristyle as the dominant element of the bowl and would remain intact. The Peristyle would be restored and repaired along with the adjacent Coliseum Commission offices. Similar to the Approved Project, the Modified Project also proposes the removal of the existing scoreboards, advertising panels, and video boards that are mounted on the Peristyle. Thus, views of the historic Peristyle would be improved and more visible throughout the stadium. In addition, as discussed below in Section C, Cultural Resources, the historically significant fabric of the Coliseum would remain intact. Overall, the Modified Project would not result in a substantial adverse change in the visual character of the Project Site or a substantial adverse change to views of scenic resources. In addition, due to the reduction in square footage and overall massing, the Modified Project would result in reduced aesthetic impacts when compared with the Approved

Project. Thus, such impacts would be within the envelope of impacts set forth in the Certified EIR, and no new significant impacts would occur.

(2) Light and Glare

With regard to light and glare, no changes were proposed under the Approved Project that would introduce substantial lighting within the area. In addition, all illuminated signs under the Approved Project would have internal or focused lighting and would be designed or located in order to address direct light on adjacent uses. Thus, potential light and glare impacts under the Approved Project were concluded to be less than significant.

As part of the Modified Project, the existing field lighting located on posts outside the Coliseum walls would be removed and replaced. All new lighting installed would be more energy efficient as it would comply with Title 24 of the California Code of Regulations. In addition, a reduction in light spill would occur due to the more advanced lighting systems that are able to better focus on the area to be lit. Furthermore, all new signage would comply with existing signage requirements, and no more than 44,000 square feet of net new signage would be constructed. As part of the new signage, the Modified Project would place two new video boards in the seating bowl flanking the Peristyle. These interior video boards would be positioned to have minimal visual impact from the exterior of the Coliseum. In addition, the scoreboards located on the west end of the stadium would remain in place and would not be modified. Overall, light and glare impacts under the Modified Project would be less than significant and within the envelope of impacts set forth in Certified EIR.

B. Air Quality and Greenhouse Gas Emissions

(1) Air Quality

(a) Construction

As discussed in the Certified EIR and First Addendum, construction-related air emissions would be generated through activities including demolition, grading, construction worker travel, delivery and hauling of materials, fuel combustion from on-site vehicles, and the application of architectural coating. Construction emissions were conducted assuming an approximately 30- to 36-month construction schedule. Approximately 600,000 cubic yards of earth and approximately 40,000 to 50,000 cubic yards of building material/debris were estimated to be excavated and removed from the site during construction. These construction activities under the Approved Project would exceed the SCAQMD's significance threshold criteria for NO_X, CO, and $PM_{10,}$ while significance thresholds for ROG and SO_X pollutants would not be exceeded. With the implementation of mitigation measures identified in the Certified EIR and First Addendum, construction-related

emissions would remain significant and unavoidable for NO_X and CO emissions, and PM_{10} emissions would be reduced to less than significant levels. ROG and SO_2 emissions would remain less than significant.

As with the Approved Project, construction of the Modified Project would generate construction-related air emissions through activities such as demolition, grading, construction worker travel, delivery and hauling of materials, fuel combustion from on-site vehicles, and the application of architectural coating. Under the Modified Project, construction is expected to occur over 20-month duration. In addition, approximately 37,000 cubic yards of earth would be excavated and removed from the site, a substantial reduction compared to the Approved Project. As a result, the equipment mix for the excavation portion of the Modified would similarly be substantially reduced. Furthermore, the total new square footage to be constructed would be reduced when compared with the Approved Project. Thus, construction activities and associated regional and localized construction emissions would be reduced under the Modified Project. As shown in Appendix A, the Modified Project would still exceed the SCAQMD significance threshold for regional NO_X, but for all other pollutants construction air quality impacts would be reduced below regional SCAQMD significance thresholds (i.e., VOC, CO, PM_{10}, and $PM_{2.5}$) and localized SCAQMD significance thresholds (i.e., NO_X, CO, PM_{10}, and $PM_{2.5}$). The Modified Project would reduce the significant and unavoidable regional CO and PM_{10} impact under the Approved Project to a less than significant level. Like the Approved Project, the construction-related air quality mitigation measures set forth in the Certified EIR and First Addendum would continue to be implemented with the Modified Project. After implementation of these same mitigation measures, NO_X emissions would remain significant and unavoidable. Similar to the Approved Project, construction-related impacts regarding toxic emissions and objectionable odors would be less than significant. Overall, construction impacts under the Modified Project would be less than under the Approved Project. However, like the Approved Project, air quality impacts under the Modified Project would remain significant and unavoidable. Such impacts would be within the envelope of impact set forth in Certified EIR and First Addendum.

(b) Operation

The severity of potential air quality impacts under the Approved Project were directly proportional to the level of attendance and resulting numbers of vehicles attracted to the Coliseum vicinity. Under the Approved Project, the maximum seating capacity of 92,500 seats was reduced to approximately 78,000 seats. However, the number of events within the Coliseum would increase. As discussed in the Certified EIR and First Addendum, when compared with a non-event day, regional air pollutant emissions during an event day with maximum seating capacity would exceed SCAQMD thresholds for ROG, NO_X, CO, and PM_{10} emissions while the threshold for SO_X emissions would not be exceeded. The Approved Project would also result in less than significant localized CO impacts at

potentially impacted intersections. With implementation of mitigation measures, the Approved Project would still result in significant and unavoidable operational air quality impacts related to ROG, NO_X, CO, and PM_{10} emissions. Operational air quality impacts related to SO_X emissions would be less than significant.

The Modified Project would not increase number of events at the Coliseum, and would not change the seating capacity or anticipated attendance levels from the Approved Project. Therefore, this qualitative analysis focuses on how the change in square footage of land uses, proximity to current transit services, and implementation of current State mandates would change pollutant emissions on an event day. Operational air quality impacts under the Modified Project would be reduced compared to the Approved Project as the Modified Project would take advantage of current transit services now available at the Project Site (i.e., the Exposition Line Light Rail transit line was planned but not yet operational at the time the Certified EIR was prepared). In addition, the total square footage of proposed improvements would decrease under the Modified Project (e.g., Ancillary uses would decrease from 44,000 square feet to 18,000 square feet). Proposed improvements under the Modified Project would also be constructed to comply with 2013 CalGreen.[3] Thus, maximum daily pollutant emissions on an event day would be reduced compared to the Approved Project. However, when compared with a non-event day, as with the Approved Project, on an event day the Modified Project would exceed the SCAQMD's significance criteria for ROG, NO_X, CO, and PM_{10} emissions, and such impacts would remain significant and unavoidable even with implementation of mitigation measures. As with the Approved Project, the Modified Project would also result in less than significant localized CO impacts at potentially impacted intersections due in part to the reduction in traffic due to the reduction in seating capacity. Overall, operational impacts would be within the envelope of impact set forth in Certified EIR and First Addendum.

(c) Mitigation Measures

The following mitigation measures were included in the Certified EIR and First Addendum to reduce the Approved Project's impacts related to air quality. These mitigation measures would continue to be implemented as part of the Modified Project.

[3] *The 2013 CALGreen Code is anticipated to be over 50 percent more efficient than the 2005 Title 24 (applicable to the Approved Project) for nonresidential construction. California Energy Commission, Energy Commission Approves More Efficient Buildings for California's Future, May 31, 2012, www.energy.ca.gov/releases/2012_releases/2012-05-31_energy_commission_approves_more_efficient_buildings_nr.html, accessed September 10, 2015.*

Construction Phase

1. Haul trucks shall be staged on-site in the vacant parking areas within Exposition Park. Haul truck staging plan shall be subject to review by the City of Los Angeles Department of Building and Safety and the Department of Transportation. Trucks shall be called to the site by radio dispatch.

2. Diesel-powered equipment shall be located as far away as possible from sensitive land uses and areas. Specifically, diesel compressors, pumps and other stationary machinery shall be located to the extent feasible on the south side of the Coliseum or within the interior of the Coliseum to avoid air pollution impacts on passive recreational spaces in Exposition Park (such as the area north of the Coliseum and south of the museum complex).

3. Grading activities shall be restricted on exceedingly windy days (winds in excess of 25 mph) when fugitive dust emissions are likely to be carried off-site. All truck loads of export debris shall be covered or shall provide at least 2 feet of freeboard.

4. Ground wetting shall be required in accordance with SCAQMD Rule 403 for dust control during grading and construction.

5. Contractors shall cover any stockpiles of soil, sand and similar materials.

6. Equipment engines shall be maintained in proper tune.

7. Construction equipment shall be shut off to reduce idling when not in direct use for extended periods of time.

8. Contractors shall discontinue construction activities during second-stage smog alerts.

Operational Phase Mitigation

1. To reduce the traffic-related air quality impact on the affected intersections, the Proposed Project shall implement the required traffic management measures described in Section IV.C.6 of the EIR (Traffic, Parking, and Access).

2. The Proposed Project applicant shall comply with all requirements of the South Coast Air Quality Management District's Regulation 15, which attempts to reduce employee vehicle trips through the implementation of various transportation management strategies.

(2) Greenhouse Gas Emissions

Since the certification of the Certified EIR, numerous regulatory changes have occurred that are pertinent to the study of greenhouse gas (GHG) impacts under CEQA. To inform the analysis of the Modified Project's potential GHG impacts, a summary of the current regulatory framework surrounding GHG emissions is included in Appendix A of this Addendum.

(a) Significance Thresholds for the Modified Project

Subsequent to certification of the Certified EIR, the CEQA Guidelines were subsequently amended to add Section 15064.4, which is intended to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with developing practice, this section urges lead agencies to quantify GHG emissions of projects where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. In addition to quantification, this section recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments do not establish a threshold of significance. Lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis.[4] (see CEQA Guidelines Section 15130(f)).

Although GHG emissions can be quantified, CARB, SCAQMD and the City of Los Angeles, have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.[5]

The CEQA Guidelines were also amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact less than significant. Per CEQA

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[4] *See generally Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources (April 13, 2009).*

[5] *The South Coast Air Quality Management District has formed a GHG Significance Threshold Working Group. More information on this Working Group is available at www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2, accessed March 18, 2016.*

Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[6] To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[7] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."[8] Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significance for GHG emissions if a project complies with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.[9]

In the absence of any adopted, quantitative threshold, the Modified Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions including the Assembly Bill (AB) 32 Climate Change Scoping Plan, Southern California Associations of

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[6] *14 CCR § 15064(h)(3).*

[7] *Id.*

[8] *Id. (emphasis added).*

[9] *See, for example, San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, the South Coast Air Quality Management District (SCAQMD) has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO2e/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See: SCAQMD, Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2); SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (April 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2).*

Governments' (SCAG) 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), and the City of Los Angeles Green Building Ordinance.

(b) Modified Project Impacts

(i) NAT Comparison Analysis

As noted above, the AB 32 Climate Change Scoping Plan, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance are all applicable to the Project. These plans and policies are intended to reduce GHG emissions in order to meet the targets of AB 32. In order to demonstrate the efficacy of these measures required under these applicable GHG reduction plans and policies, and thereby demonstrating consistency with AB 32, this analysis compares the Modified Project's GHG emissions to the emissions that would be generated by the Modified Project in the absence of any GHG emission reduction measures (referred to hereafter as the no action taken or "NAT" scenario). This approach mirrors the concepts used in the CARB's *Climate Change Scoping Plan* for the implementation of AB 32. This methodology is used to analyze consistency with the applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

Evaluating the reduction in GHG emissions from the NAT scenario requires providing a quantitative estimate of GHG emissions based on the specific circumstances of the project in the context of relevant State activities and mandates. This requires the following three GHG emissions inventories:

- Approved Project—This scenario consists of the Approved Project's land uses and program assuming compliance with State mandates that were implemented at the time of the Certified EIR and trip generation rates provided in the Certified EIR (e.g. minimal trip reduction credit taken for transit accessibility).

- NAT—This scenario consists of the Modified Project's land uses and program assuming compliance with State mandates that were accounted for in the *Supplemental FED to the Climate Change Scoping Plan* (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard), and with a minimal trip reduction credit taken for transit accessibility.

- Modified Project As Proposed—This scenario consists of the Modified Project assuming compliance with current State mandates and with a trip-reduction credit taken based on the current transit services available at the Project Site (i.e., includes the Exposition Line Light Rail transit line, which was planned but not yet operational at the time the Certified EIR was prepared).

The Modified Project would not increase the number of events at the Coliseum, and would not change the seating capacity or anticipated attendance levels from the Approved Project. Therefore, this analysis focuses on how the change in square footage of land uses, proximity to current transit services, and implementation of current State mandates would change GHG emissions on an event day. GHG emissions associated with the three scenarios described above (i.e., Approved Project, NAT, and Modified Project as proposed) were calculated using CalEEMod, the model recommended by the SCAQMD for calculating emissions from land use projects. Model results are provided in Appendix A of this Addendum.

As summarized and shown in Table 1 on page 30, the Modified Project would result in a decrease in GHG emissions on an event day in comparison to operation of an event day under the Approved Project due to the increase in use of transit services available at the Project Site (e.g., Exposition Line Light Rail transit line), as well as compliance with CalGreen 2013. The Modified Project would result in a total of approximately 490 metric tons of carbon dioxide equivalent (CO_2e) on an event day, representing an approximate 22-percent reduction from the NAT scenario. This demonstrates the efficacy of the GHG reduction programs and measures applicable to the Modified Project.

(ii) Consistency with Plans, Programs, and Regulations for Reducing GHG Emissions

The following discussion describes the extent the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions including the AB 32 Climate Change Scoping Plan, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance.

AB 32 Climate Change Scoping Plan

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the Legislature as the 2006 Global Warming Solutions Act (Assembly Bill 32). In 2008, CARB approved a *Climate Change Scoping Plan* as required by AB 32.[10] The *Climate Change Scoping Plan* proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[11] The *Climate Change Scoping Plan* has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms,

[10] *Climate Change Proposed Scoping Plan was approved by CARB on December 11, 2008.*

[11] *Climate Change Scoping Plan, CARB, December 2008, www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm, accessed March 7, 2016.*

Table 1
Event Day GHG Emissions Summary
(metric tons of carbon dioxide equivalent)

Scope	Approved Project	" No Action Taken" Project	Modified Project as Proposed[a]	Modified Project's Break from "No Action Taken"
Area	<1	<1	<1	0%
Energy	26.6	24.9	20.6	-17%
Mobile	582.5	582.5	449.4	-23%
Waste	17.8	17.8	17.8	-0%
Water	2.8	2.4	1.9	-20%
Total	**629.8**	**627.6**	**489.7**	**-22%**

Source: Eyestone Environmental, 2015. Calculation worksheets are included in Appendix A of this Addendum.

monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The following discussion focuses on pertinent reduction actions that have the greatest potential to reduce Project-related GHG emissions.

As shown in Table 1, Modified Project operation would result in 490 $MTCO_2e$ on an event day. The breakdown of emissions by source category show approximately four percent from energy consumption, 92 percent from mobile sources, four percent from solid waste generation, and less than one percent from water supply, treatment and distribution. Provided below is an evaluation of applicable reduction actions/strategies by emissions source category to determine the extent the Project's design features comply with or exceed the reduction actions/strategies outlined in the AB 32 Climate Change Scoping Plan.

Applicable GHG reduction actions and strategies from the AB 32 Climate Change Scoping Plan that would serve to reduce GHG emissions from the Project are included in the following tables by source type: Table 2, Energy, on page 31; Table 3, Mobile, on page 34; Table 4, Solid Waste Diversion, on page 36; and Table 5, Water. on page 37. These GHG reduction actions and strategies would primarily be implemented at the state and federal level, but would also serve to reduce GHG emissions from the Modified Project. As shown in the tables, the Modified Project would be consistent with these reduction actions and strategies.

Table 2
AB 32 Scoping Plan Reduction Measures—Energy

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
California Renewables Portfolio Standard (RPS) program: Senate Bill 2X modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016.	Los Angeles Department of Water and Power (LADWP)	**Consistent.** These levels of reduction are consistent with LADWP's commitment to achieve 35 percent renewables by 2020. In 2011, LADWP indicated that 20 percent of its electricity came from renewable resources in Year 2010.[a] As LADWP would provide electricity service to the Project Site, the Modified Project would use electricity consistent with this performance based standard. Electricity GHG emissions provided in Table 1 on page 30 reflect consistency with this regulation.
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030 and also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[b]	State Energy Resources Conservation and Development Commission and LADWP	**Consistent.** LADWP would be required to meet this performance based standard. As LADWP would provide electricity service to the Project Site, the Project would use electricity consistent with this performance based standard. Table 1 presents projected GHG emissions for 2019 and does not include the additional reductions in GHG emissions from implementation of this regulation. Electricity GHG emissions presented in Table 1 would be further reduced by 17 percent. Doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under the California Code of Regulations Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, heating ventilation and air-conditioning (HVAC) systems and insulation. While not necessarily applicable to the Modified Project, the Modified Project would support this action/strategy via compliance with specific requirements of the Los Angeles Green Code (consistency with this regulation is discussed below).
Senate Bill 1368 (SB 1368): GHG Emissions Standard for Baseload Generation prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant.	State and LADWP	**Not Applicable.** This performance standard applies to electricity generated both within and outside of California, and to publicly owned as well as investor-owned electric utilities. The Modified Project would not impede the responsible parties for implementation of this action/strategy.

Table 2 (Continued)
AB 32 Scoping Plan Reduction Measures—Energy

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
California Code of Regulations (CCR), Title 20: The 2012 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.	State, California Energy Commission	**Consistent.** This performance standard applies to new appliances and lighting that are sold or offered for sale in California. As such, appliances and lighting used by the Project would comply with this performance based standard.
CCR, Title 24, Building Standards Code: The 2013 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.	State, California Energy Commission	**Consistent.** The Modified Project shall comply with applicable provisions of the 2013 Los Angeles Green Code, which in turn requires compliance with mandatory requirements included in the California Green Building Standards. The 2013 Building Energy Efficiency Standards are 25 percent more efficient energy consumption reflected in the 2008 standards for residential construction and 30 percent better for nonresidential construction.[c] The 2013 Standards are approximately 40 to 45 percent more efficient than the 2020 Projected Emissions under Business-as-Usual in the Climate Action Scoping Plan. The standards offer builders better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses.
Energy Independence and Security Act of 2007 (EISA): EISA requires manufacturing for sale within the Untitled States to phase out incandescent light bulbs between 2012 and 2014 resulting in approximately 25 percent greater efficiency for light bulbs and requires approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.	Federal/ Manufacturers	**Consistent.** This performance based standard would serve to reduce the use of incandescent light bulbs within the United States. While this specific GHG reduction action measure was not included within the Climate Change Scoping Plan, implementation of the measure at the federal level would reduce overall lighting-related GHG emissions within the United States and for the Modified Project. Electricity GHG emissions provided in Table 1 on page 30 conservatively do not account for the reduction in lighting electricity consumption with implementation of this regulation.
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act prohibits a person from manufacturing for sale in the state requires the establishment of minimum energy efficiency standards for all general purpose	State/ Manufacturers	**Consistent.** As with EISA discussed above, the Modified Project would meet this performance based standard.

Table 2 (Continued)
AB 32 Scoping Plan Reduction Measures—Energy

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.[d]		
The Cap-and-Trade Program: This program is designed to reduce GHG emissions from major sources, such as refineries and power plants, (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020.		**Consistent.** The Cap-and-Trade Program provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The analysis of GHG emissions provided above in Table 1 conservatively did not account for reductions in electricity usage covered by the Cap-and-Trade Program.

[a] *Website www.ladwpnews.com/go/doc/1475/987799/, accessed March 7, 2016.*

[b] *Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, Ch. 547.*

[c] *California Building Standards Commission, Energy Commission Approves More Efficient Buildings for California's Future, News Release, May 31, 2012, www.energy.ca.gov/releases/2012_releases/2012-05-31_energy_commission_approves_more_efficient_buildings_nr.html, accessed March 7, 2016.*

[d] *2007b. Assembly Bill 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534.*

Source: Eyestone Environmental, 2016.

SCAG's Sustainable Communities Strategy

As described in Table 3 on page 34, SB 375 requires the Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. SCAG's SCS is included in the SCAG 2012–2035 Regional Transportation Plan Sustainable Communities Strategy (RTP/SCS) (SCAG 2012). The document was adopted by SCAG in April 2012. The goals and policies of the RTP/SCS that reduce VMT focus on transportation and land use planning that include building infill projects, locating residents closer to where they work and play and designing communities

Table 3
AB 32 Scoping Plan Reduction Measures—Mobile

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Federal Corporate Average Fuel Economy Standards (CAFE): In 2010, CAFE standards were set for model years 2011–2016. The final rule regulating fuel efficiency and GHG pollution from motor vehicles for cars and light-duty trucks for model years 2017–2025 projects to achieve 163 grams/mile of CO_2 in model year 2025, on an average industry fleet wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency.[a] The adopted federal standards for medium- and heavy-duty trucks, which apply to vehicles from model year 2014–2018 would reduce GHG emissions and fuel consumption for affected vehicles by 9 percent to 23 percent.	Federal	**Not Applicable.** While these performance based standards would serve to reduce mobile source GHG emissions on a national basis, the United States Environmental Protection Agency (USEPA) granted the California Air Resources Board (CARB) to set more stringent state-specific regulations that reduce GHG emissions in new passenger vehicles. A comparison between AB 1493 (discussed below) and the CAFE standards was completed by CARB.[b] The analysis concludes that implementation of the Pavley standards by all 50 states would reduce greenhouse gas emissions by 462 $MTCO_2e$ between 2009 and 2016, almost double the reductions estimated from the adopted CAFE standards alone.
Assembly Bill 1493 (AB 1493) "Pavely Standards": AB 1493 requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. In compliance with AB 1493, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles and light duty trucks of model year 2009 through 2016. Model years 2017 through 2025 are addressed by California's Advanced Clean Cars program (discussed below).	State, CARB	**Consistent.** It is expected that the Pavley regulations will reduce GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency. This regulation will be implemented at the state level and would not have a project-level implementation requirement. Nonetheless, GHG emissions related to vehicular travel by the Modified Project would benefit from this regulation and mobile source emissions generated by the Modified Project would indirectly be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in Table 1 on page 30 reflect consistency with this regulation.
Executive Order S-01-07: The Low Carbon Fuel Standard (LCFS) requires a 10-percent or greater reduction by 2020 in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009 (CARB 2009).[c,d]	State, CARB	**Consistent.** This regulation will be implemented at the state level and would not have a project-level implementation requirement. Nonetheless, GHG emissions related to vehicular travel by the Modified Project would benefit from this regulation and mobile source emissions generated by the Modified Project would indirectly be reduced with implementation of the LCFS consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in Table 1 reflect consistency with this regulation.

Table 3 (Continued)
AB 32 Scoping Plan Reduction Measures—Mobile

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Advanced Clean Cars Program: In 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.	State, CARB	**Consistent.** These standards will apply to all passenger and light duty trucks used by customers, employees, and deliveries to the proposed Project. Similar to AB 1493, this regulation will be implemented at the state level and would not have a project-level implementation requirement. Nonetheless, GHG emissions related to vehicular travel by the Project would benefit from this regulation and mobile source emissions generated by the Project would indirectly be reduced with implementation of this performance based standard consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in Table 1 on page 30 conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation.
Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.	State, CARB Regional, SCAG	**Consistent.** SB 375 requires the Southern California Association of Governments (SCAG) to direct the development of the SCS for the region, which is discussed further below. As shown below, the Modified Project would be consistent with SCAG's Regional Transportation Plan Sustainable Communities Strategy (RTP/SCS) and thus consistent with SB 375.

[a] *United States Environmental Protection Agency, Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule, May 7, 2010, www.federalregister.gov/articles/2010/05/07/2010-8159/light-duty-vehicle-greenhouse-gas-emission-standards-and-corporate-average-fuel-economy-standards, accessed March 7, 2016.*

[b] *California Air Resources Board, Addendum to Comparison of GHG Reductions for all Fifty United States Under CAFÉ standards and ARB Regulations Adopted Pursuant to AB 1493 (www.arb.ca.gov/cc/ccms/pavley-addendum.pdf).*

[c] *California Air Resources Board, Initial Statement of Reason for Proposed Regulation for The Management of High Global Warming Potential Refrigerant for Stationary Sources, October 23, 2009, www.arb.ca.gov/regact/2009/gwprmp09/isorref.pdf, accessed March 7, 2016.*

[d] *Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the "lifecycle" of a transportation fuel.*

Source: Eyestone Environmental, 2016.

Table 4
AB 32 Scoping Plan Reduction Measures—Solid Waste Diversion

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
California Integrated Waste Management Act of 1989 and Assembly Bill 341: The California Integrated Waste Management Act of 1989 requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.[a] ***AB 341 (2011)*** amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.[b]	State	**Consistent.** These standards will be implemented at the state level and would not have a project-level performance based standard implementation requirement. Nonetheless, GHG emissions related to solid waste generation from the Modified Project would benefit from this regulation and solid waste disposal emissions generated by the Modified Project would indirectly be reduced with implementation of this performance based standard consistent with reduction of GHG emissions under AB 32. Modified Project-related GHG emissions from solid waste generation provided in Table 1 on page 30 conservatively do not include this 50- to 75-percent reduction in solid waste generation source emissions.

[a] *Cal. Pub. Res. Code § 41780(a).*
[b] *Cal. Pub. Res. Code § 41780.01(a).*
Source: Eyestone Environmental, 2016.

so there is access to high quality transit service. The 2012–2035 RTP/SCS is expected to reduce per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035. This level of reduction would exceed the region's GHG targets set by CARB of 8 percent per capita by 2020 and 13 percent per capita by 2035.[12] In June of 2012, CARB accepted SCAG's determination that the Final RTP/SCS would meet the region's GHG reduction target.

The 2012–2035 RTP/SCS establishes High-Quality Transit Areas, which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency

[12] *Southern California Association of Governments. Adopted April 2012. 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy: Executive Summary, http://rtpscs.scag.ca.gov/Documents/2012/final/2012fRTP_ExecSummary.pdf, accessed March 18, 2016.*

Table 5
AB 32 Scoping Plan Reduction Measures—Water

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.	State	**Consistent.** The Modified Project shall comply with applicable provisions of the 2013 Los Angeles Green Code which in turn requires compliance with mandatory standards included in the California Green Building Standards (20 percent overall water use reduction).
Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This in an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.	State	**Consistent.** As discussed above under Title 24, the Modified Project would meet this performance based standard.

Source: Eyestone Environmental, 2016.

during peak commute hours.[13] Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas.[14] Specifically, the Project Site is located within a High-Quality Transit Area as designated by the 2012–2035 RTP/SCS.[15] The Project Site location provides convenient pedestrian access to several stops on the Exposition Line Light Rail Line, including the Expo Park/USC Station (0.2 mile from the Project Site) and the Expo/Vermont Station (0.2 mile from the Project Site), as well as the 37th Street/USC Silver Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.4 mile from the Project Site). The Project Site is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Project Site. By focusing new development within a

13 *Ibid, pp. 114.*

14 *In accordance with SB 743, the City of Los Angeles promotes housing and employment growth through Zoning Initiative 2542, which defines Transit Priority Areas and provides that aesthetic and parking impacts for certain project types on infill sites in such Transit Priority Areas will not be determined to be significant.*

15 *Ibid, Exhibit 4.9: High-Quality Transit Areas (HQTA) SCAG Region, pp. 136.*

designated High-Quality Transit Area, the Modified Project would be consistent with regional growth strategies promoted in the 2012–2035 RTP/SCS, which represent widely recognized "smart growth" planning strategies that promote higher density, infill development with access to public transit in an effort to reduce urban sprawl and its associated environmental effects. Furthermore, as shown in Table 1 on page 30, the Modified Project would reduce the number of vehicular trips and related VMT by approximately 23 percent, which would support the 2012-2035 RTP/SCS target of 9 percent per capita reduction in transportation GHG emissions by 2020 and a 16 percent per capita reduction by 2035 compared to the 2005 level on a per capita basis. Overall, the Modified Project would be consistent with the 2012–2035 RTP/SCS, which is a relevant regional plan adopted for the purpose of reducing GHG emissions.

Building off of the considerable progress made under SCAG's 2012–2035 RTP/SCS, SCAG recently released the Draft 2016–2040 Regional Transportation Plan/ Sustainable Communities Strategy (Draft Plan).[16] The Draft Plan reaffirms the land use policies that were incorporated into the 2012–2035 RTP/SCS. The Draft Plan recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility and accessibility for people across the region. In particular, the Draft Plan draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The Draft Plan also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

The Draft Plan states that the SCAG region is home to about 18.3 million people in 2012 and currently includes approximately 5.9 million homes and 7.4 million jobs. By 2040, the integrated growth forecast projects that these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. High-Quality Transit Areas will account for 3 percent of regional total land, but are projected to accommodate 46 percent and 50 percent of future household and employment growth respectively between 2012 and 2040. The Draft Plan's overall land use pattern reinforces the trend of focusing new housing and employment in the region's High-Quality Transit Areas. Consistent with the 2012–2035 RTP/SCS, the Draft Plan sets a target of 9 percent per capita reduction in

[16] *SCAG, Draft 2016 RTP/SCS, dated December 2015, http://scagrtpscs.net/Pages/DRAFT2016RTPSCS.aspx, accessed February 2, 2016.*

transportation GHG emissions by 2020 and a 16 percent per capita reduction by 2035 compared to the 2005 level on a per capita basis.[17] As discussed above, the Modified Project would reduce the number of vehicular trips and related VMT by approximately 23 percent, which supports the Draft Plan targets for VMT reduction.

Los Angeles Green Building Ordinance

With regard to the Los Angeles Green Building Code, all Projects filed on or after January 1, 2014, must comply with the provisions of the Los Angeles Green Building Code, which incorporates various provisions of the 2013 CALGreen Code. The Modified Project would include provisions of the 2013 CALGreen Code, which is anticipated to be 30 percent more efficient for nonresidential construction compared to the 2008 CALGreen Code. Therefore, the Modified Project is consistent with the Los Angeles Green Building Code.

(iii) Conclusion

Given the Modified Project's consistency with State, regional, and local GHG emission reduction goals and objectives, the Modified Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, as was the case with the Original Stadium Project. Furthermore, the Modified Project would comply with plans, programs, and regulations that reduce GHG emissions. Therefore, impacts with respect to GHG emissions under the Modified Project would be less than significant and not cumulatively considerable. No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to GHG emissions, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

C. Cultural Resources

As set forth in the Certified EIR and Second Addendum, the Coliseum is a designated National Historic Landmark, a State Historical Landmark, and is listed on the National Register of Historic Places (National Register). Based on the Certified EIR, most of the alterations of the Coliseum under the Approved Project would preserve and enhance the historic character-defining features of the Coliseum. However, a few elements would

[17] *Southern California Association of Governments. Adopted April 2012. 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy: Executive Summary, http://rtpscs.scag.ca.gov/Documents/2012/final/2012fRTP_ExecSummary.pdf*

be covered over by new construction, and even a smaller number of features would be removed. As part of the Approved Project, removal of some of the existing seating, which was considered to be part of the historic fabric of the Coliseum in the Certified EIR, would be replaced with new stadium chairs. The removal of the existing seating was determined to be a significant impact that could not feasibly be mitigated with the proposed mitigation measures. Thus, historical impacts to the Coliseum under the Approved Project were determined to be significant and unavoidable even with the implementation of the mitigation measures provided further below.

A detailed analysis of the Modified Project's potential impacts associated with historic resources was completed as part of the *Los Angeles Memorial Coliseum Historic Resources Technical Report* (Historic Report), prepared by Historic Resources Group (January 2016) and included as Appendix B of this document. A summary of the findings of the Historic Report is provided below.

(1) Background and Existing Conditions

As discussed in detail in the Historic Report, the Coliseum was designated as a National Historic Landmark (NHL), as State Historical Landmark #960, and was listed in the National Register of Historic Place in 1984. The period of significance for the Coliseum is 1932-1984. The Coliseum is significant for its association with architects John Parkinson and Donald B. Parkinson, and as the site of two Olympic Games (1932 and 1984) and numerous other important sporting and civic events.

Construction of the Coliseum was completed in 1923. The Coliseum originally seated 75,000 people and was enlarged to 100,000 seats when Los Angeles was awarded the 1932 Olympic Games. As described in detail in the Historic Report, the stadium has undergone numerous additional changes over the years to accommodate updated uses and seismic strengthening. However, the basic design configuration, including its "elliptical" shape and dramatic curved peristyle, and structure have remained the same since 1932.

As described in detail in the Historic Report, numerous character-defining features convey the historic significance of the Coliseum. Significant features and spaces of the Coliseum include, but are not limited to:

- Open "elliptical" bowl configuration with seating and playing field;
- Earthen berm under concrete superstructure and visible from exterior of bowl;
- Lower concourse; open circulation space at perimeter of berm;

- Tunnels from lower concourse into stadium with retaining headwalls;
- Board-formed concrete super structure and seating tray;
- Upper concourse with vomitoria; and
- Peristyle; board-formed concrete curved open arcade with large central arch at eastern end of stadium, concrete "torch" with bronze bowl added for 1932 Olympic Games.

In addition, as discussed in detail in the Historic Report, North and South Coliseum Drives and Christmas Tree lane to the east of the Coliseum are also character-defining features of the Coliseum.

In addition to the Coliseum and its character-defining features, the Historic Report also reviewed historic resources in the Project vicinity. As described in Table 6 on page 42, other historic resources in the Project Vicinity include the Exposition Park Historic District and individual structures and areas within Exposition Park.

(2) Modified Project Impacts

As discussed in detail in the Historic Report, the Coliseum can be broken down into three primary components that define its historic character and convey its historic significance. These are: (1) the peristyle; (2) the seating bowl; and (3) the concrete superstructure. As discussed in the Project Description above, the Modified Project proposes to add a new seating and amenities tower to the south side of the Coliseum, and to alter the seating bowl on the north and south sidelines. Minor alterations to the areas immediately outside the Coliseum superstructure walls are also contemplated under the Modified Project. Potential impacts to the Coliseum under the Modified Project are summarized in the discussion below.

(a) Potential Impacts to the Peristyle

The Modified Project would not result in significant impacts to the peristyle. Under the Modified Project, the peristyle would be retained and repaired. The Modified Project would remove the large video and score boards currently attached to the roof of the peristyle, substantially restoring the peristyle and east elevation of the Coliseum to their original appearance. Two new video boards would be installed at the bench-seating areas above and to the north and south of the peristyle, facing west. This would require a small number of benches to be removed for new structural supports. Absent the benches, the seating area structure would remain intact under the Modified Project. Whereas the Approved Project would obscure the pylons flanking the peristyle when viewed from inside the Coliseum, the peristyle pylons would be fully visible under the current Modified Project.

Table 6
Historic Resources Table

Resource	Date Built	Status/Notes
Los Angeles Memorial Coliseum	1921; 1932	National Historic Landmark, State Historic Landmark #960, listed in the National Register of Historic Places, listed in the California Register of Historical Resources. North and South Coliseum Drives and the Christmas Tree Lane median were specifically called out as character-defining features of the Coliseum setting.
Exposition Park Historic District	1910–1932	Identified as eligible for the National Register by the Office of Historic Preservation on June 15, 1993. The Historic District as described included seven contributing resources: the 1910–1917 Beaux Arts civic group at the north end of the park (Natural History Museum, Exposition Building, State Armory, Rose Garden) and the 1921–1932 recreation group to the south of the civic group (Coliseum, Swimming Stadium, Exposition Clubhouse). 2001 Historic Property Survey Report (HPSR) prepared for a Section 106 review identified significant alteration and reduced integrity of the Historic District since 1993.
Natural History Museum (Los Angeles County Museum of History, Science and Art)	1913	Listed in the National Register of Historic Places in 1975.
Wallis Annenberg Building (State Armory)	1914	Listed in the California State Historic Resources Inventory (HRI) with a status code of 7N. Needs to be reevaluated.
Exposition Park Rose Garden	1913–1932	Listed in the National Register of Historic Resources in 1991.
Exposition Club House	1922–1926	Found eligible for the National Register in 1994 through Section 106 review. Designated Los Angeles Historic-Cultural Monument #127 in 1974.
Los Angeles Swimming Stadium	1931	Listed in the California State Historic Resources Inventory (HRI) with a status code of 2S2, or "Individual property determined eligible for the National Register by a consensus through Section 106 process. Listed in the California Register."
Los Angeles Memorial Sports Arena	1959	Evaluated as eligible for the California Register in the 2010 *Los Angeles Memorial Sports Arena Redevelopment Project Draft Environment Impact Report*.

Source: Historic Resources Group, 2016

(b) Potential Impacts to the Seating Bowl

The Modified Project would not result in significant impacts to the seating bowl. The Modified Project would construct a new tower structure for seating, concessions, offices and toilets at the south sideline, rising from the cross aisle. The footprint of the tower would follow the existing curve of the bowl. Installation of the new tower structure would require approximately 6.6 percent of the existing seating bowl to be removed in order to cut in the new seating tower. Another 5.8 percent of the existing seating bowl would remain but be visually obscured by the new seating tower. Therefore, a total of 12.4 percent of the existing bowl surface would be impacted, physically or visually, by the addition under the Modified Project. Five lower and five upper vomitoria would be removed, consisting of 17 percent of the total number of 58 historic vomitoria.

The Modified Project would replace the existing (non-original) stadium seats and increase the tread depth of a portion of the seating bowl. Twenty-five percent of the existing bowl surface would be replaced and altered, divided between the north and south sidelines. The replacement work would cut out the existing risers and aisle steps and replace them with all new material. Double aisles would be installed at transition points between the original and altered sections. The profile of the bowl would be altered over 25 percent of its surface in total, with 75 percent of the existing bowl profile remaining. The historic bowl shape from field wall to rim would remain intact except for the south sideline seating sections where the addition of the new seating tower would alter the seating bowl shape. Overall, under the Modified Project, the bowl shape would be substantially retained and the original shape would still be discernible when viewed straight on to the west from the peristyle.

Potential impacts to the seating bowl would be substantially greater under the Approved Project when compared with the Modified Project. The Approved Project would add two seating structures to the north and south sidelines, in contrast to the single south sideline structure of the Modified Project. The Approved Project also included upper seating trays and shade canopies that would rise to over twice the height of the existing rim wall of the Coliseum. The Approved Project would remove more than 69 percent of the original seating bowl and cover over 8 percent, leaving only 22 percent of original seating bowl intact. The entire cross-aisle would be removed, and the elliptical seating configuration altered.

(c) Potential Impacts to the Concrete Superstructure

The Modified Project would not result in significant impacts to the concrete superstructure. The Club/Loge level of the proposed seating tower would cover a small section of the upper concourse located between the seating bowl and the concrete superstructure. This would include installing windows within five bays of the existing

openings on the south side of the superstructure wall. Installation of the windows would result in a slight alteration to the profile of the superstructure when looking to the south façade from outside the Coliseum. The original openings, however, would remain intact and discernible. In addition, potential future removal of the added windows would not result in additional impacts to the superstructure.

The Modified Project also contemplates the removal of select original board-formed concrete toilet partitions and windows at the exterior wall at the outer side of the upper concourse. Portions of these partitions were reconstructed following the 1994 Northridge Earthquake to accommodate new concrete moment frames installed for seismic strengthening. If implemented, the select removal of partitions and exterior windows would not significantly impact the concrete superstructure.

Impacts to the concrete superstructure would be greater under the Approved Project than the Modified Project. The Approved Project would create new openings at the ground level on the north and south sides that would require the removal of existing berm. The Approved Project would also add four freestanding stairs on the exterior of the superstructure rising from grade to the bowl rim and enlarge two tunnels at the west end. In addition, the Approved Project would remove the entire exterior upper concourse located between the seating bowl and the concrete super structure to accommodate the new seating configuration within the seating bowl. All superstructure openings would be glazed to create a climate controlled environment for the new seating configuration.

(d) Potential Impacts to the Outer Concourse Area

The Modified Project would not result in significant impacts to the outer concourse area. The Modified Project contemplates removing some of the support facility buildings at the outer concourse fence line if some of those functions (e.g., toilets, food service) can be accommodated within the new south sideline tower structure. The existing fences and majority of the service buildings at the outer concourse are not original and are not considered character-defining features of the Coliseum. If implemented, the removal of these buildings and structures would improve views to and from Coliseum and return the condition of the immediately surrounding area closer to its historic appearance. No changes are proposed to the original concrete and wood-framed concession buildings that were previously relocated to the southwest area of the concourse. These buildings would remain intact and in their current locations. Any re-paving of the outer concourse would be simple in pattern and compatible in color with the historic palette of the building and concourse in order to assure that the new materials are visually subordinated to the Coliseum and its setting.

(e) Potential Impacts to Historic Resources in the Vicinity of the Coliseum

The majority of new construction, alteration and rehabilitation proposed by the Modified Project would be contained within the rim wall of the Coliseum and its outer concourse area. In addition, the ancillary structures that may be developed just outside the Coliseum would be low-rise, less than 18,000 square-feet, and would not be located in close proximity to any historic resources outside the Coliseum. The Modified Project would not demolish, alter, convert, or relocate any historic buildings, structures, objects or landscape areas located in the immediate vicinity of the Coliseum. Therefore, historically significant buildings, objects and sites located within Exposition Park would not be affected by the Modified Project and the Modified Project would not result in significant impacts to any historic resource located in the vicinity of the Coliseum.

(f) Modified Project Impact Summary

Impacts to the Coliseum would be substantially less under the Modified Project in comparison to the Approved Project. Specifically, as indicted above, the First Addendum concluded that the Approved Project would result in a significant historic resources impact. The Modified Project would construct a single new seating tower substantially smaller than the two towers proposed in the Approved Project; retain the existing shape of the playing field that would have been altered under the Approved Project; retain the two existing tunnels and stairs that would have been closed off under the Approved Project thereby retaining all existing tunnels and stairs; and would alter or remove substantially less historic fabric than the Approved Project.

As discussed above, the Modified Project would not result in significant impacts to the Coliseum or any historic resources located within its vicinity. The Modified Project would preserve the Coliseum peristyle and the Coliseum's concrete superstructure. The Coliseum seating bowl would be altered by the construction of a new seating tower addition and changes to portions of the existing seating risers. The proposed seating tower and alteration to the existing seating risers, however, would remove a relatively small percentage of historic fabric, leaving the majority of the original material and visual character of the Coliseum intact. Therefore, under the Modified Project, the Los Angeles Memorial Coliseum would retain sufficient physical integrity to convey its historic significance and retain its eligibility for listing as a National Historic Landmark. Thus, potential impacts to historic resources would be less than significant under the Modified Project and reduced when compared with the Approved Project.

(3) Archeological and Paleontological Resources

Potential impacts to archaeological and paleontological resources were not assessed in detail in the Certified EIR. Significant impacts to archaeological resources

could occur if a project were to cause a substantial adverse change in the significance of an archaeological resource. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. Significant impacts to paleontological resources could occur if a project were to directly or indirectly destroy a unique paleontological resource. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of prehistoric species are extinct.

The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to disturbance and excavation in the past, including through the development of the Coliseum and subsequent site improvements. Any archaeological and/or paleontological resources that may have existed near the surface of the Project Site are likely to have been disturbed and/or previously removed. However, some excavation activities would be necessary under the Modified Project. As such, while unlikely, the potential exists for previously undiscovered archeological and/or paleontological resources to be encountered during construction of the Modified Project.

As would have been the case with construction of Approved Project analyzed in the Certified EIR, if an archaeological resource is discovered during Modified Project construction activities, work in the area would cease and deposits would be treated in accordance with applicable federal, State, and local guidelines, including those set forth in California Public Resources Code (PRC) Section 21083.2. Any discovery of human remains would be treated in accordance with Section 5097.98 of the PRC and Section 7050.5 of the Health and Safety Code. Therefore, through compliance with existing regulations, impacts with respect to archaeological resources would be less than significant under the Modified Project.

If a paleontological resource is discovered during construction of the Modified Project, Mitigation Measure 3, below, would be implemented to reflect best management practices to ensure that potential impacts would be less than significant.

Based on the above, the Modified Project would not result in any significant impacts with respect to archaeological and paleontological resources.

(4) Mitigation Measures

Mitigation Measures 1 through 3 below were included in the Certified EIR and First Addendum to reduce the Approved Project's impacts related to historic resources. In addition, Mitigation Measure 4, below, is recommended as an additional mitigation measure to ensure that any impacts to paleontological resources under the Modified Project would be less than significant.

1. Recordation. Demolition of any historic fabric shall be documented in a report consistent with Historic American Buildings Survey (HABS) standards. The report shall document the significance and physical condition of the historic resources proposed for demolition, both historic and current, photographs, written data, and text. The documentation shall include:

    a. A brief written historic and descriptive report shall be completed in narrative format, including an architectural data form.

    b. A site plan on 8" x 11" paper showing the location of the buildings should be included. This site plan shall include a photo-key.

    c. A sketch floor plan on 8" x 11" paper shall accompany each architectural data form.

    d. Large format (4" x 5" or larger negative size) photographs in accordance with HABS guidelines. Views shall include several contextual views, all exterior elevations, detailed views of significant exterior architectural features, and interior views of significant historical architectural features or spaces.

    e. Field photographs (35 mm) based on HABS guidelines. Views as detailed in large format photographs.

    f. The report shall include copies or prints of any available original plans and historic photographs.

    g. Archivally stable reproductions of any available significant historic construction drawings and photographs.

    h. Archival copies of the documentation shall be submitted to the Los Angeles Memorial Coliseum Commission.

2. In accordance with Standard 7 of the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*, the surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning materials that will damage the historic building materials shall not be undertaken.

3. The Project shall be constructed in substantial conformance with the Conceptual Historic Fabric Retention Plan provided in Appendix C of the Second Addendum.

4. A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site where excavations into any older Quaternary Alluvium may occur. The services of a qualified paleontologist shall be secured by contacting the Natural History Museum of Los Angeles County. The frequency of inspections shall be based on consultation with the consulting paleontologist and will depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains.

   If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Any fossils collected should be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository. If fossils are found, following the completion of the above tasks, the paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

D. Geology/Seismic Hazards

The Certified EIR and First Addendum provided an analysis of impacts related to geology and seismic hazards such as fault rupture, ground shaking, landsliding, and liquefaction based on various geotechnical investigations. The analyses determined that the surface soils within the foundation area of the Approved Project were not expansive, collapsible, or compressible. Thus impacts associated with geology and soil stability were determined to be less than significant. Due to the depth of the groundwater and relatively high density of the soils underlying the site, the potential for liquefaction was considered remote. In addition, the Project Site is not located near any known mapped active, potentially active or inactive faults and potential impacts from groundshaking would we addressed through

compliance with regulatory requirements including the UBC. Overall, the analysis concluded that with compliance with regulatory requirements and proposed mitigation measures impacts associated with geology and seismic hazards would be less than significant.

The Modified Project would result in development within the same general footprint as that of the Approved Project and would not alter the Project Site's underlying soils or geologic formations. In addition, the Modified Project would result in approximately 37,000 cubic yard of excavation and export, a substantial reduction when compared with the Approved Project. The amount of overall development under the Modified Project would also be reduced when compared with the Approved Project. Furthermore, like the Approved Project, the Modified Project improvements would be subject to regulatory requirements regarding geology and seismic safety. In addition, the proposed mitigation measures included in the Certified EIR would continue to be implemented under the Modified Project. Thus, potential impacts related to geology and seismic safety would continue to be less than significant and such impacts would be within the envelope of impacts set forth in the Certified EIR and First Addendum.

(a) Mitigation Measures

The following mitigation measures set forth in the Certified EIR and First Addendum would continue to be implemented under the Modified Project to ensure that potential impacts to geology seismic safety would be less than significant.

1. All structures to be constructed or renovated as part of the Proposed Project shall be designed as required by either the Uniform Building Code for structures within Seismic Zone 4, or other pertinent State and/or City building codes (such as Division 23, Section 91.2305 of the City of Los Angeles Building Code), to withstand the expected ground motions.

2. A comprehensive geotechnical investigation shall be prepared to the satisfaction of the responsible State and/or City reviewing agencies. The investigation shall verify the soil conditions under the proposed structures and derive the pile capacities.

3. All grading activities shall be in compliance with specific recommendations and requirements provided in the geotechnical report prepared for the Proposed Project, subject to review and approval by the appropriate State and/or City responsible agencies.

4. A copy of the foundation report and/or supplements and approval letter shall be attached to the State and/or City office and field sets of plans, with one copy of the foundation report and/or supplements submitted to the State and/or City plan checker prior to the issuance of the permit.

5. During construction, all grading shall be carefully observed, mapped, and tested by the project engineer. All grading shall be performed under the supervision of a certified engineering geologist and/or soils engineer in accordance with the applicable provisions of the State and/or City Building Codes to the satisfaction of the State and/or City building and safety authorities. The responsible engineer shall review and approve the foundation plan and/or the excavation/shoring plan prior to the issuance of any permits.

6. Artificial fills in the existing 35-foot earth berm shall not be considered suitable for the support of foundations unless excavated, recompacted, and tested to be in compliance with the applicable State and/or City Grading Codes.

7. The geologist or the soils engineer shall inspect and approve all fill and subdrain placement areas prior to placing fill.

8. Haul route approval for the transport of graded and excavated earth materials and removed building materials to receptor sites and/or local landfills shall be obtained from the City of Los Angeles Department of Building and Safety and/or other responsible City agencies. Haul routes for the transport of such materials shall be established, where possible, through nonresidential areas so as to minimize the effects of noise, and shall maximize, where possible, the distance traveled on major arterials.

9. Discarded building and/or earth materials containing any hazardous materials, primarily asbestos, shall be disposed of in accordance with all applicable local, state, and federal regulations.

10. To the maximum extent feasible, uncontaminated graded materials shall be transported off-site to a receptor site needing imported fill material. Landfills shall only be considered as a last resort disposal option for materials from the site.

11. Prior to the issuance of building permits, if the soils and/or perched groundwater beneath the site are found to be contaminated, the City of Los Angeles Fire Department shall be notified and provided with a summary of all local, state, county, and federally required remediation activities and submit evidence of compliance.

12. Where encountered on the site, perched groundwater or saturated soils should be removed to the extent feasible or necessary.

13. During the construction plan and haul route approval process, the project contractor shall consult with the LAUSD Transportation Branch to address potential impacts upon existing pedestrian and school bus routes. Contractors must guarantee that safe and convenient pedestrian routes to school are maintained. The project contractor shall install appropriate traffic controls (signs and signals) as needed to ensure pedestrian and vehicular safety. The project

contractor shall fund crossing guards for safety of students, as needed, during construction activities at impacted crossings.

E. Land Use

(1) Land Use Compatibility

As set forth in the Certified EIR and First Addendum, the Approved Project would modify various aspects of the Coliseum, but would maintain the site's existing character and use as an outdoor sports and multi-purpose stadium. Thus, the use of the Coliseum under the Approved Project would be compatible with the surrounding environment, including the uses within Exposition Park and impacts associated with land use compatibility would be less than significant.

Under the Modified Project, the Coliseum would continue to be used as an outdoor sports and multi-purpose stadium, consistent with the Approved Project. In addition, the amount of overall new square footage developed under the Modified Project would be reduced when compared with the Approved Project. Proposed heights and massing of the new improvements would also be within the envelope set forth for the Approved Project. Thus, as with the Approved Project, the Modified Project would be compatible with surrounding uses, including uses within Exposition Park and potential impacts would be less than significant.

(2) Consistency with Land Use Plans and Zoning

As discussed in the Certified EIR, the continued use of the Coliseum as an outdoor sport and multi-purpose stadium would be consistent with the Open Space land use designation of the Project Site set forth by the City of Los Angeles General Plan. In addition, as set forth in the Certified EIR, with the secured long-term use of the Coliseum provided for by the Approved Project, the Approved Project would support the land use objectives of the California Museum of Science and Industry Exposition Park Master Plan (Exposition Park Master Plan), the South Los Angeles Community Plan, and the Hoover Redevelopment Plan. In particular, the Approved Project would support policies supporting revitalization of Exposition Park and preserving cultural monuments. Therefore, as discussed in the Certified EIR and First Addendum, impacts associated with consistency with relevant land use plans would be less than significant.

The Project Site is currently subject to the following land use plans and zoning requirements: the California Museum of Science and Industry Exposition Park Master Plan (Exposition Park Master Plan); the City of Los Angeles General Plan Framework Element; the South Los Angeles Community Plan; the City's Planning and Zoning Code; the City of Los Angeles' Coliseum District Specific Plan (Specific Plan), which was adopted

subsequent to preparation of the Certified EIR; SCAG's recently adopted 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS); SCAG's Compass Growth Vision, adopted in 2004; and SCAG's 2008 Regional Comprehensive Plan (RCP), which replaced SCAG's 1996 Regional Comprehensive Plan and Guide.[18] The Modified Project's consistency with these plans and regulations is addressed below.

The Exposition Park Master Plan was prepared in 1992 to guide land use planning for State-owned property and uses within Exposition Park. The Exposition Park Master Plan includes goals and objectives oriented around developing, preserving, and restoring the following areas within Exposition Park: (1) the California Museum of Science and Industry; (2) the Science Museum School; (3) the Science Educational Resource Center; (4) the California African-American Museum; (5) park landscaping and open space areas; (6) parking and circulation facilities; and (7) ancillary infrastructure improvement areas. The Master Plan does not include any goals or objectives related to specific alterations or the long-term use of the Coliseum. However, like the Approved Project, the Modified Project would support the relevant objectives of the Master Plan regarding reinforcing the dual role of Exposition Park as a regional and community resource; preserving the history of Exposition Park; and providing new development that is compatible in design with Exposition Park.

The Land Use Chapter of the General Plan Framework provides primary objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth in appropriate locations. The Land Use Chapter establishes land use categories which are broadly described by ranges of intensity/density, heights, and lists of typical uses. These land use categories do not connote land use entitlements or affect existing zoning for properties in the City and are intended to serve as a guideline for the Community Plans. The Land Use Chapter indicates portions of Martin Luther King, Jr. Boulevard and Vermont Avenue near the Project Site are designated as a Mixed Use Boulevard. Mixed Use Boulevards are described as connections between the City's neighborhood districts and community, regional, and Downtown centers. Mixed-use development is encouraged along these boulevards, with the scale, density and height of development compatible with the surrounding areas. The Modified Project would implement the intent of the General Plan Framework Land Use Element by maintaining and enhancing pedestrian connections, reinvigorating the

[18] *The Modified Project is located on the Project Site owned by the Sixth District Agricultural Association (State of California) and controlled by the Coliseum Commission, and accordingly the Modified Project is not subject to the requirements of the Exposition/University Park Redevelopment Plan (formerly Hoover Redevelopment Plan).*

community experience at the Coliseum, and the provision of ancillary uses that would be compatible in scale with the Coliseum and other nearby uses.

The South Los Angeles Community Plan (Community Plan) functions as the Land Use Element of the City's General Plan that is applicable to the Project Site. The Community Plan designates the Project Site and all of Exposition Park as Open Space (OS), and also identifies Exposition Park as a "major opportunity site." The OS designation permits parks, community centers and public serving facilities under the ownership or operation of a public agency. The continued use of the Coliseum as an outdoor sports and multi-purpose stadium for Los Angeles would be consistent with the land use designation of the Project Site. In addition, the Modified Project would support the relevant land use policies of the Community Plan. Specifically, as discussed below in Section C, Cultural Resources, with the Modified Project, the historic character of the Coliseum would be preserved, and new construction would be complimentary to the Coliseum consistent with Community Plan Policies 1-4.1, and 19-2.1. The continued use of the Coliseum as an outdoor sports and multi-purpose stadium would also be consistent with Policy 20-1.1 regarding support for the places and features within the Community that are cultural resources. In addition, with implementation of the Modified Project, existing recreational facilities and park space within Exposition Park would be preserved, consistent with Policy 4-1.1.

As stated in the Certified EIR, the Project Site is zoned OS-1XL (Open Space, Extra Limited Height District 1) under the City's Planning and Zoning Code, as is the majority of Exposition Park. In addition to the Project Site's zoning designation of OS-1XL, the Project Site is also located within the boundaries of the Coliseum District Specific Plan (Specific Plan). The Specific Plan provides additional land use regulations applicable to the Coliseum, the Sports Arena, and immediately surrounding ancillary areas. As explained in Section 3.B of the Specific Plan, "[w]henever this Specific Plan contains provisions that establish regulations... which are different from, more restrictive or more permissive than what would be allowed pursuant to the provisions contained in the LAMC [Los Angeles Municipal Code], this Specific Plan shall prevail and supersede the applicable provisions of the LAMC and those relevant ordinances." Therefore, the land use regulations of the Specific Plan supersede those of the LAMC, including those of the OS-1XL zone.

The Specific Plan currently permits a variety of uses in the Specific Plan area, including the operation of sports, entertainment and public gathering facilities; the sale of concessions and alcoholic beverages for consumption on-site; the sale of merchandise and other retail uses; offices; restaurants; bars; cafes; outdoor eating areas; museums; special events; telecommunication facilities; facilities for motion picture and television broadcasting; and parking facilities. In accordance with existing Specific Plan requirements, front, side, or rear yards or building setbacks are not be required. In addition, the Specific

Plan requires specified mitigation measures and project conditions contained in Appendices A and B, respectively, to the Specific Plan to be implemented. The Specific Plan also includes design regulations for the Coliseum that: (1) address substantial conformity with Map 2 of the Specific Plan; (2) provide for a maximum stadium capacity of 93,607 seats, including up to 200 luxury suites and club levels containing no more than 20,000 seats; and (3) address retaining the historic fabric of the Coliseum. The Specific Plan also requires that 850 parking spaces be retained within the Specific Plan area and sets forth detailed regulations regarding proposed signage.

The continued use of the Coliseum as an outdoor sports and multi-purpose stadium under the Modified Project would be consistent with the uses contemplated under the Specific Plan. In addition, the design of the Modified Project would be in substantial conformance with that shown in Map 2 of the Specific Plan and would specifically retain the shape of the Coliseum's bowl and continue to feature the Peristyle as a prominent feature. The Modified Project would also incorporate the mitigation measures and conditions set forth in the Specific Plan (all of the mitigation measures have been included as part of this Second Addendum). In addition, the 78,000 seats, including 1,065 outdoor club seats, and 44 suites, proposed by the Modified Project would be well below the maximums permitted by the Specific Plan. Under the Modified Project, at least 850 parking spaces would continue to be provided within the Specific Plan Area. With regard to signage, all signage would comply with the specific regulations within the Specific Plan or within the new Supplemental Use Sign District (SUD) currently proposed by the Los Angeles Football Club Project, if approved.[19] As part of the Modified Project, much of the historic fabric of the Coliseum would be retained, consistent with the intent of the Specific Plan, and the Modified Project would not reduce the integrity or significance of the Los Angeles Memorial Coliseum (refer to Section C. Cultural Resources, above). However, to provide more flexibility with regard to the improvements to the Coliseum that may be implemented, an amendment is proposed to the Specific Plan that would remove the requirement regarding compliance with the Secretary of Interior's Standards for Rehabilitation, but would include the requirement that the historic fabric of the Coliseum be retained such that the Coliseum continues to retain sufficient integrity to convey its historic significance and retain its designation as a National Historic Landmark.

The proposed revision to the Specific Plan would not result in a significant adverse effect. Under CEQA, the key issue is how a proposed development may impact the potential eligibility of a structure or a site for designation as an historic resource. The Secretary of Interior's Standards for Rehabilitation Standards were developed by the U.S.

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[19] *Under the SUD currently proposed by the Los Angeles Football Club Project, the existing signage rights currently allowed under the Specific Plan for the Coliseum would not change.*

Department of the Interior as a means to evaluate and approve work for federal grants for historic buildings and then for the federal rehabilitation tax credit. See 36 Code of Federal Regulations Section 67.7. Similarly, the City's Cultural Heritage Ordinance provides that compliance with the Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to Historic-Cultural Monuments. See Los Angeles Administrative Code Section 22.171.14.a.1. Therefore, the Standards are used for regulatory approvals for designated resources but not for resource evaluations. Similarly, CEQA recognizes the value of the Standards by using them to demonstrate that a project may be approved without an EIR. In effect, CEQA has a "safe harbor" by providing either a categorical exemption or a negative declaration for a project which meets the Standards. See State CEQA Guidelines Section 15331 and 15064.5(b)(3).

According to Appendix G of the State CEQA Guidelines, the appropriate threshold of significance is whether a project causes a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5. That Section provides a detailed definition of "substantial adverse change." In summary, the definition of substantial adverse change and, hence, the threshold of significance is whether a project demolishes or materially alters in an adverse manner the physical characteristics that convey historical significance of the resource or that justify its eligibility as a National Landmark, the California Register of Historical Resources or a local register such as the list of Historic-Cultural Monuments. In other words, if a project would render an eligible historic resource ineligible, then there would be a significant adverse effect under CEQA.

The proposed revised Specific Plan would include the requirement that the historic fabric of the Coliseum be retained such that the Coliseum continues to retain sufficient integrity to convey its architectural and historic significance and retain its designation as a National Historic Landmark. Therefore, the proposed revision to the Specific Plan would not result in a significant adverse effect under CEQA.

In accordance with City requirements, compliance with the remaining provisions of the Specific Plan would be assured through the approval of Project Permit Compliance review pursuant to the Specific Plan and LAMC Section 11.5.7 C. In addition, the Coliseum Commission would be required to approve the renovation plan for the Coliseum.

As discussed above, SCAG's 2012–2035 RTP/SCS, adopted in April 2012, presents a long-term transportation vision through the year 2035 for its six county region. The 2012–2035 RTP/SCS emphasizes sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of this approach, the 2012–2035 RTP/SCS establishes High-Quality Transit Areas, which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service

frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas. The Project Site is located within a High-Quality Transit Area as designated by the 2012–2035 RTP/SCS. Like the Approved Project, the Modified Project is located in proximity to public transit opportunities (e.g., Expo Light Rail, Harbor Transitway BRT station), thereby minimizing vehicle trips, vehicle miles traveled (VMT), and resulting air pollution. By focusing new improvements within a designated High-Quality Transit Area, the Modified Project would be consistent with regional growth strategies promoted in the 2012–2035 RTP/SCS, which represent widely recognized "smart growth" planning strategies. In addition, the proposed improvements under the Modified Project would include energy conservation, water conservation, and waste reduction features that would exceed the requirements and commitments applicable to the Approved Project. Therefore, the Modified Project would be consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS.

As discussed in the Certified EIR, SCAG's Compass Growth Vision, adopted in 2004, encourages better relationships between housing, transportation, and employment. The Compass Growth Vision is driven by four key principles: (1) Mobility—Getting where we want to go; (2) Livability—Creating positive communities; (3) Prosperity—Long-term health for the region; and (4) Sustainability—Preserving natural surroundings. SCAG's 2004 Growth Vision Report identified 2% Strategy Opportunity Areas, which represented areas of the region that were targeted for growth, where projects, plans, and policies consistent with the key principles would best serve the goals of the Compass Growth Vision to improve mobility for all residents, foster livability in all communities, enable prosperity for all people, and promote sustainability for future generations. Since certification of the Certified EIR, the 2% Strategy Opportunity Areas have been effectively replaced with the High-Quality Transit Areas established in the 2012–2035 RTP/SCS, as discussed above. The Modified Project is located in an area with an abundance of transit opportunities. In addition, the Modified Project would promote the long-term use of the Coliseum for Los Angeles, thereby also promoting a livable and prosperous community. In addition, the Modified Project would implement new improvements to the Coliseum that would include water and energy conservation features and would also preserve and enhance the surrounding area within Exposition Park. Thus, the Modified Project would also be consistent with the principles set forth in the Compass Growth Vision.

SCAG's Regional Comprehensive Plan (RCP) was adopted by SCAG in October of 2008 and serves as an advisory document for (voluntary) use by local governments in the SCAG region as an informational resource, and as a reference document for their use in developing plans and addressing local issues of regional significance. The 2008 RCP replaced SCAG's 1996 Regional Comprehensive Plan and Guide (RCPG). Because of its advisory nature, the RCP is not used in SCAG's Intergovernmental Review process for regionally significant projects. Rather, SCAG reviews new major regional projects based on consistency with the 2012–2035 RTP/SCS and Compass Growth Vision, described above.

Nonetheless, it is noted that the Modified Project would be substantially consistent with the applicable goals and policies set forth in the RCP for the reasons discussed above in relation to consistency with the 2012–2035 RTP/SCS.

Based on the above, the Modified Project would comply with applicable land use requirements and plans. In addition, with approval of the Specific Plan Amendment, the Modified Project would comply with existing zoning regulations. Thus, land use impacts under the Modified Project would continue to be less than significant and would be within the envelope of impact set forth for the Approved Project in the Certified EIR and First Addendum.

F. Noise

(1) Construction-Related Noise

According to the Certified EIR and First Addendum, construction of the Approved Project would result in a relatively short-term and temporary noise impact for nearby sensitive receptors. Sensitive receptors are located within Exposition Park and within 100 feet of the proposed active construction areas. Under the Approved Project, without mitigation, sensitive receptors would experience significant noise levels above 75 dBA that would occur during improvements outside of the Coliseum and during renovations of the stadium. In addition, off-site construction noise would likely result from the ingress and egress of haul trucks used to transport excavated materials. However, with implementation of mitigation measures provided below and compliance with the City of Los Angeles Noise Ordinance, construction-related noise impacts under the Approved Project would be reduced to less than significant levels.

Similar to the Approved Project, the Modified Project would create temporary construction-related noise due construction of the interior stadium improvements and demolition and construction of buildings and other improvements outside of the stadium. However, the overall amount of equipment used on site would likely be reduced due to the reduction in square footage proposed under the Modified Project. Like the Approved Project, the Modified Project would generate off-site construction noise through the ingress and egress of haul trucks. However, a substantial reduction in haul truck activity would occur under the Modified Project due to the reduced export under the Modified Project (i.e., a reduction of export from 600,000 cubic yards under the Approved Project to 37,000 cubic yards of export under the Modified Project). Thus, overall construction noise impacts under the Modified Project would be reduced when compared with the Approved Project. Like the Approved Project, with implementation of mitigation measures provided below and compliance with the City of Los Angeles Noise Ordinance, construction-related noise impacts under the Approved Project would be reduced to less than significant levels.

(2) Coliseum Event Noise

As discussed in the Certified EIR and First Addendum, the Approved Project would replace a one or two "sound cluster" system with a distributed sound system designed to provide intelligible and clear sound coverage throughout the stadium and to minimize sound reflection. Since individual speakers would be placed closer to the patrons, the sound level of the system would be reduced. In addition, the Approved Project would involve the renovation of an existing recreational facility that already creates significant noise impacts, and would not increase the intensity of crowds. Thus, event-related noise impacts associated with the Approved Project would be less than significant.

Under the Modified Project, the existing sound system would be replaced with a combination system that would include a new point source audio system that would be integrated into the existing west scoreboard supplemented by distributed loudspeakers to provide full coverage to all seats in the seating bowl and premium seating areas. As with the Approved Project, the new distributed sound system would result in overall reduced noise levels when compared with the existing cluster system. Furthermore, like the Approved Project, the Modified Project would result in a decrease in the number of seats within the stadium and an associated decrease in noise levels. Therefore, as with the Approved Project, noise impacts associated with coliseum events under the Modified Project would continue to be less than significant and would be within the envelope of impacts set forth in the Certified EIR and First Addendum.

(3) Noise from Event Traffic

As set forth in the Certified EIR and First Addendum, the Approved Project would involve the renovation of an existing recreational facility that already generates noise. Thus, the Approved Project, which includes a reduction in attendees on an event day, would not result in new significant traffic event noise impacts. As the Modified Project would also reduce the number of attendees on an event day, traffic noise impacts would also be less than significant and would be within the envelope of noise impacts set forth in the Certified EIR.

(a) Mitigation Measures

The following mitigation measures were included in the Certified EIR and Second Addendum to ensure that Approved Project impacts related to noise would be reduced to a less than significant level. These mitigation measures would continue to be implemented as part of the Modified Project.

1. The Applicant shall comply with the construction hours as specified by the City LAMC Noise Ordinance, Chapter IV, Section 41.40., which prohibits construction

before 7:00 A.M. or after 6:00 P.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday or any national holiday, and at anytime on Sunday.

2. The Applicant shall prepare a construction-related traffic plan detailing proposed haul routes and staging areas for the transportation of materials and equipment, with consideration for sensitive uses in the neighborhood. A traffic and parking plan for the construction phase will be submitted for approval by LADOT and the Department of Building and Safety prior to the issuance of any permits.

3. Adjacent museums and residents shall be given regular notification of major construction activities and their durations. A visible and readable sign (at a distance of 50 feet) shall be posted on the construction site identifying a telephone number where residents can inquire about the construction process and register complaints.

4. During construction, the Project contractors shall muffle and shield intakes and exhaust, shroud and shield impact tools, and use electric-powered rather than diesel-powered construction equipment, as feasible.

5. The perimeter of the Project Site (including the ancillary outbuildings proposed to be demolished) shall be enclosed with a temporary barrier wall for security and noise protection purposes. This barrier wall shall consist of a solid, heavy vinyl material or 0.75-inch plywood positioned to block direct line of sight from the active construction.

G. Public Services

(1) Fire Protection

As evaluated in the Certified EIR and First Addendum, the Approved Project would not alter the existing administrative fire protection procedures in place at the Coliseum and in the immediate surrounding area. In addition, the Approved Project would not require changes to the existing fire flow conditions as the Coliseum is an existing use and fire flow is maintained at an acceptable level. Furthermore, development of the Approved Project would not exacerbate existing adverse conditions with respect to traffic congestion during Coliseum events. Thus, Approved Project impacts associated with fire protection services would be less than significant and no mitigation measures were required.

The Modified Project would comply with applicable City building codes and requisite site inspections to address potential fire hazards during construction. With regard to fire flow requirements, the Modified Project would not result in an increase in seating capacity or square footage when compared with the Approved Project. Accordingly, the Modified Project would not increase fire flow requirements. In addition, the Modified Project would incorporate a fire sprinkler system, which would reduce hydrant demand. Thus,

as presented in the SAR prepared for the Modified Project on October 19, 2015 (see Appendix D of this Addendum), LADWP has indicated that adequate fire flows would be provided to accommodate the improvements under the Modified Project.

As with the Approved Project, the Modified Project would not alter the existing administrative fire protection procedures in place at the Coliseum. In addition, with the reduction in seats and square footage, similar to the Approved Project, the Modified Project would not be anticipated to impact existing fire services and facilities necessitating the addition of a new fire station or an increase in equipment or personnel. Furthermore, as with the Approved Project, the Modified Project would not exacerbate existing adverse conditions with respect to traffic congestion during Coliseum events. Thus, the Modified Project would not create any new fire impacts and impacts would continue to be less than significant. Impacts would therefore be within the envelope of impact set forth in Certified EIR.

(2) Police Protection

As evaluated in the Certified EIR and First Addendum, the Los Angeles Police Department (LAPD) would continue to serve the Project Site. The Certified EIR determined that the Approved Project would not place an increased burden on police services in the Southwest Area and would not have any adverse impact on the ability of officers to respond to calls at the Coliseum. In addition, the Approved Project would not change the existing police protection personnel arrangement in place at the Coliseum, and off-duty police officers and private civilian security personnel would continue to be used during events. Furthermore, under the Certified EIR and First Addendum, mitigation was included that required a Security Plan and other security measures to be developed and implemented by the Applicant to minimize the potential for on-site crime and the need for LAPD services. Thus, with the implementation of the mitigation measures, the Approved Project was determined to result in a less-than-significant impact on police protection services.

As with the Approved Project, under the Modified Project, the LAPD would continue to serve the Project Site. As the overall square footage and number of seats under the Modified Project would be within the envelope of the Approved Project, the Modified Project would not result in increased impacts associated with police protection services. In addition, the Modified Project would not change the existing police protection personnel arrangement in place at the Coliseum and the use of off-duty police officers and private civilian security personnel during events would continue. Furthermore, the Modified Project would implement the same mitigation measures provided in the Certified EIR that include consultation with LAPD and implementation of a Security Plan. Thus, under the Modified Project, impacts related to police protection services would continue to be less than

significant with incorporation of mitigation measures and such impacts would be within the envelope of impacts set forth in the Certified EIR.

(a) Mitigation Measures

The following mitigation measures were included in the Certified EIR and First Addendum to ensure that impacts related to fire safety and police protection would be less than significant. These mitigation measures would continue to be implemented as part of the Modified Project.

1. Plot plans for the proposed renovation shall be submitted to the Los Angeles Police Department's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented to the extent feasible.

2. Building plans shall be filed with the LAPD Southwest Area Commanding Officer. Plans shall include access routes, floor plans, evacuation routes, and any additional information that might facilitate prompt and efficient police response.

3. Security features shall be provided on the construction site(s), such as guards, fencing, and locked entrances.

4. Landscaping shall not be planted in a way that could provide cover for persons tampering with doors or windows of commercial facilities, or for persons lying in wait for pedestrians or parking lot users.

5. Additional lighting shall be installed where appropriate as determined in consultation with the LAPD.

6. Safety features shall be incorporated into Proposed Project to assure pedestrian safety, assist in controlling pedestrian traffic flows, and avoid pedestrian/ vehicular conflicts on-site. Safety measures may include provision of security and traffic control personnel; clearly designated, well-lighted pedestrian walkways on-site; special street and pedestrian-level lighting; physical barriers (e.g., low walls, landscaping), particularly around the perimeter of the Coliseum, to direct pedestrians to specific exit locations that correspond to designated crosswalk locations on adjacent streets.

7. A Security Plan shall be developed and implemented by the Applicant, in consultation with the LAPD, outlining the security services and features to be provided in conjunction with the Proposed Project. Security features may include but are not limited to the provision of a private on-site security force, implementation of a surveillance system, installation of locks and alarms on entryways where appropriate, security and parking lot lighting, "spotters" to survey parking lots, and maximum accessibility for emergency service personnel. The plan shall be reviewed by the LAPD, and any provisions pertaining to access

shall be subject to review by the LADOT. A copy of the Plan shall be provided to the LAPD Southwest Area Commanding Officer.

8. An Emergency Procedures Plan shall be established and implemented by the Applicant outlining guidelines and procedures in the event of civil disturbance, evacuation, and other types of emergencies. The plan shall be subject to review by the LAPD, and any provisions pertaining to access shall be subject to review by the LADOT. A copy of the Plan shall be provided to the LAPD Southwest Area Commanding Officer.

9. Traffic control personnel may be provided on adjacent roadways and in parking areas during Coliseum events and immediately preceding and following events to help prevent vehicles and pedestrians from obstructing emergency access.

H. Public Utilities

The following analysis is based, in part, on *Los Angeles Memorial Coliseum Project Utility Technical Report: Water, Wastewater, and Energy* (Utility Technical Report) prepared for the Project by KPFF Consulting Engineers, on December 4, 2015. This report is included as Appendix D of this Addendum.

(1) Energy

As set forth in the Certified EIR and First Addendum, the electricity consumed by the Approved Project would be approximately 63,323 kilowatt hours (kWh) per event, and 1,317 kWh per day on nonevent days. On event and non-event days proposed ancillary uses would be expected to consume approximately 1,419 kWh per day. Annually, the Approved Project would consume approximately 3.4 million kWh (based on 46 events per year and ancillary use daily throughout the year), which would represent an increase of 1.2 million kWh per year over existing 2003 conditions. The Certified EIR stated that the Los Angeles Department of Water and Power's (LADWP) regional infrastructure would deliver the peak electrical requirement to the site would not be expected to be severely affected by implementation of the Approved Project. However, additional power facilities would possibly be required in order to serve the load growth associated with the Approved Project. The Certified EIR and First Addendum also stated that such improvements could be made with minimal impact upon the surrounding land uses. In addition, a mitigation measure was included in the Certified EIR that required consultation with LADWP with regard to energy efficiency measures to be implemented. Thus, impacts to electricity infrastructure and supply were determined to be less than significant

The Approved Project would consume approximately 33,835 cubic feet of natural gas per event. The proposed ancillary uses would consume approximately 2,630 cubic feet of natural gas per day. Annually, the Approved Project would be anticipated to consume

approximately 2.3 million cubic feet (based on stadium consumption during 46 events per year and ancillary use daily throughout the year). This represents an increase of approximately 1.3 million cubic feet of natural gas per year over existing (2003) conditions. Natural gas demand would be met by the Southern California Gas Company (SoCal Gas) and the regional infrastructure would not be expected to be severely affected. Thus, impacts to natural gas services were determined to be less than significant.

The Modified Project would not result in an increase in the number of seats during an event or the number of events when compared with the Approved Project. In addition, the Modified Project would result in a reduction in new square footage, including a reduction in ancillary uses. As with the Approved Project, energy and natural gas demand associated with the Modified Project would be met by the LADWP and SoCal Gas.[20,21] Furthermore, the Modified Project would be required to comply with the 2013 Building Energy Standards, which took effect July 1, 2014. These new regulations would result in additional energy savings when compared with the regulations that were in place when the Approved Project was proposed. The Modified Project would also implement the same mitigation measure recommended by the LADWP for the Approved Project to further reduce impacts. Thus, the overall demand for energy under the Modified Project would be reduced when compared with the Approved Project and impacts to energy supply would continue to be less than significant. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

(a) Mitigation Measure

The City of Los Angeles Department of Water and Power recommends the following measure be incorporated into the final design as feasible, to reduce the Project's demands for energy resources:

1. During the design process, the Applicant should consult with the Los Angeles Department of Water and Power, Efficiency Solutions Business Group, regarding possible energy efficiency measures. The Applicant shall incorporate measures to meet or, if possible, exceed minimum efficiency standards for Title XXIV of the California Code of Regulations.

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[20] *Letter from Los Angeles Department of Water and Power (DWP), dated May 30, 2014.*

[21] *Letter from Southern California Gas Company (SoCal Gas), dated June 3, 2014. See Appendix C of this Addendum.*

(2) Water

As evaluated in the Certified EIR, the Approved Project would require approximately 468,000 gallons per event with the development of the Approved Project, assuming maximum levels of attendance at all events, and 7,200 gallons of water per day on non-event days. This would result in a total of approximately 24 million gallons of water consumed by the Approved Project per year, based on 46 events per year and daily use of the ancillary structures. Water service for the Coliseum would continue to be provided by LADWP from the existing infrastructure. In addition, several mitigation measures were included in the Certified EIR that require consultation with LAFD and LADWP as well as incorporation of numerous water conservation features. Consequently, impacts to water service were considered to be less than significant.

The Modified Project would not increase the number of events or maximum attendance when compared with the Approved Project. In addition, the Modified Project would result in a reduction in new square footage, including a reduction in ancillary uses. Thus, the water demand under the Modified Project would be reduced when compared with the Approved Project. In addition, the Modified Project would incorporate a new sprinkler system, which would reduce the demand for fire flows, as well as a new 8-inch lateral connection to an existing main in South Hoover Street.

LADWP has concluded that the Modified Project Site can be supplied with water from the Municipal System.[22] In addition, a Service Advisory Request (SAR) Report was completed for the Modified Project and is included in Appendix D. As shown therein, LADWP has determined that a flow of up to 2,500 gallons per minute can be delivered to the Project Site with a residual pressure of 49 psi, which exceeds the 20 psi requirement for the surrounding public hydrants. Therefore, the SAR confirms that sufficient fire water capacity is available for the Modified Project. Furthermore, as the Project will incorporate a fire sprinkler system, the hydrant requirement of 5,500 gallons per minute (gpm) with a residual 20 psi for the Modified Project the required hydrant demand would be halved (i.e. a fire flow of 2,750 gpm). In addition, the SAR also determined that the domestic water flows would be met. Furthermore, when compared with the Approved Project, the Modified Project would implement even more stringent water conservation measures set forth by recent regulations to reduce water consumption during event and non-event days. The Modified Project would also implement the same mitigation measures as the Approved Project that address water conservation. Overall, the Modified Project would result in reduced demand for domestic water and impacts associated with water infrastructure

[22] *Los Angeles Department of Water and Power, Water Availability Report, May 30, 2014. See Appendix C of this Addendum.*

capacity and demand would continue to be less than significant. Such impacts would be within the envelope of impact set forth in Certified EIR.

(a) Mitigation Measures

The following mitigation measures were included in the Certified EIR and First Addendum to ensure impacts related to water supply and demand would be reduced to a less than significant level. These mitigation measures would continue to be implemented as part of the Modified Project.

1. The Project Applicant shall be required to comply with any improvements necessary to meet Los Angeles Fire Department fire-flow requirements for the Proposed Project.

2. The Proposed Project shall incorporate water saving techniques as required by the City of Los Angeles' mandatory water conservation program (Ordinance Nos. 166,080 and 163,532). Water conservation measures described in the ordinance include, but are not limited to, the following:

    a. As necessary, the Project Site shall be landscaped with drought-tolerant/ indigenous species (xeriscape).

    b. Low flow flush valves and shower head water-conservation devices shall be installed in all restroom and/or locker room facilities.

In addition, the City of Los Angeles Department of Water and Power recommends the following water conservation measures:

3. Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

4. Reclaimed water should be investigated as a source to irrigate large landscaped areas, including the grass playing field.

5. On-site recycling of drainage from water used for playing field irrigation should be investigated.

6. Recirculating hot water systems which can reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet should be investigated.

7. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.

(3) Sanitary Sewers

As set forth in the Certified EIR and First Addendum, the Approved Project would generate approximately 390,000 gallons of sewage per event. Ancillary uses would generate approximately 6,000 gallons of wastewater per day. As described in the Certified EIR and First Addendum, existing infrastructure, including the Hyperion Treatment Plant, would have adequate capacity to accommodate the waste water flows. Thus, Approved Project impacts regarding sanitary sewers would be less than significant, and no mitigation measures were required.

The Modified Project would not include an increase in the number of seats or the number of events when compared with the Approved Project. In addition, the overall square footage, including the square footage associated with ancillary uses, would be reduced when compared with the Approved Project. Thus, an increase in the amount of wastewater generated by the Project Site beyond what was set forth in the Certified EIR would not occur under the Modified Project. As provided in the Utility Technical Report, a Sewer Capacity Availability Report (SCAR) was prepared for the Modified Project by the Bureau of Sanitation. The SCAR analyzed the Modified Project demand for wastewater infrastructure in conjunction with the existing conditions and forecasted growth and determined that adequate capacity is available to accommodate the Modified Project. Thus, potential impacts associated with wastewater would continue to be less than significant and such impacts would be within the envelope of impact set forth in the Certified EIR.

(4) Solid Waste and Disposal

As set forth in the Certified EIR and First Addendum, the Approved Project would generate a net increase of approximately 1,023,600 pounds (or approximately 512 tons) of solid waste per event. As the Approved Project would represent a relatively low increase in annual solid waste generation at the Project Site compared to existing conditions, the regional landfill capacity was determined to have adequate capacity for solid waste generated by the Approved Project. Impacts would be less than significant and no mitigation measures were required.

The Modified Project would comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. As the Modified Project would not result in an increase in events, maximum seating or ancillary uses, the Modified Project would not result in an increase in solid waste generation beyond that set forth in the Certified EIR . Furthermore, per the latest County of Los Angeles Countywide Integrated

Waste Management Plan Annual Report, sufficient landfill capacity is expected to be available to meet the County's solid waste disposal needs through 2028.[23] Thus, potential impacts associated with solid waste would continue to be less than significant and such impacts would be within the envelope of impact set forth in the Certified EIR.

I. Traffic and Circulation

The analysis of the Modified Project's potential impacts associated with transportation and circulation is based on *Traffic Study for the Los Angeles Memorial Coliseum Renovation Addendum, Los Angeles, California* (Traffic Study), prepared by Gibson Transportation (November 2015) and included as Appendix E of this document.

(1) Traffic

(a) Construction Traffic

The Certified EIR did not include a construction traffic impact analysis. The following provides a summary of the construction traffic impacts for the Modified Project that is provided in the Traffic Study.

The Modified Project is anticipated to be constructed over a period of approximately 20 months. During this period, the Coliseum would continue to host USC football games during the 2018 football season. However, construction activities would not occur on game days and thus, would not substantially affect gameday traffic operations. There is anticipated to be a brief overlap between the beginning of Modified Project construction and the Los Angeles Football Club (LAFC) construction for approximately three months in the first quarter of 2018. However, the peak construction periods of each project are outside of this timeframe. Furthermore, even during its peak activity, the LAFC would not result in significant construction impacts, and as described below, neither would the Modified Project. Further, both the LAFC and the Modified Project would implement Construction Management Plans that would work together to further reduce the impact of construction traffic. Therefore, no significant cumulative construction impact would occur.

Under the Modified Project, peak haul truck activity would occur during the excavation phase and peak worker activity would occur during the building construction phase. Thus, both these phases were evaluated.

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[23] *County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2013 Annual Report, May 2015.*

(i) Excavation and Grading Phase

The peak period of truck activity during construction would occur during excavation and grading of the Project Site. Based on projections compiled for the Project, approximately 460 loads of demolished materials and 37,000 CY of excavated dirt would be removed from the Project Site over a three-month period, requiring up to 76 haul trucks per day. Thus, up to 152 daily truck trips (76 inbound, 76 outbound) are forecast to occur during the excavation and grading period, with up to 14 trips per hour (seven inbound, seven outbound) uniformly over a typical 12-hour workday.

Transportation Research Circular No. 212 defines passenger car equivalency (PCE) for a vehicle as the number of through moving passenger cars to which it is equivalent based on the vehicle's headway and delay-creating effects. Table 8 of Transportation Research Circular No. 212 and Exhibit 16.7 of 2010 Highway Capacity Manual (Transportation Research Board, 2010) suggest a PCE of 2.0 for trucks. Assuming a PCE factor of 2.0, the 152 truck trips would be equivalent to 304 daily PCE trips. The 14 hourly truck trips would be equivalent to 28 PCE trips (14 inbound, 14 outbound) per hour.

The number of construction workers required during this period is small compared to the building and finishing stages of construction, with 20 workers on a typical day and a peak of approximately 30 workers. In addition, most of these workers would arrive and depart outside of the commuter peak periods as discussed in more detail in the Traffic Study. With the implementation of the Construction Management Plan, which is described in more detail in the Traffic Study, it is anticipated that almost all haul truck activity to and from the Project Site would also occur outside of the peak hours. However, haul truck activity was assumed to occur during the morning and afternoon peak periods for the purposes of providing a conservative analysis of potential temporary traffic impacts.

The excavated materials are expected to be transported away from the Project Site to the east via I-10, accessed via I-110. Haul trucks would enter and exit the Project Site via Bill Robertson Lane to Exposition Boulevard to I-110. Therefore, they would travel on public streets for approximately one mile between the freeway ramps and the Project Site. This route has been used previously during construction activities for the California Science Center without incident or complaint.

The anticipated haul truck trips, conservatively assumed to travel during the morning and afternoon commuter peak hours, were assigned to the street system along the designated haul route identified above. The routes would pass through three signalized study intersections, including Intersection No. 3 (Flower Street & Exposition Boulevard), No. 4 (Figueroa Street & Exposition Boulevard & 37th Street) and No. 5 (Flower Street & 37th Street). These three intersections currently operate at LOS A, B, or C during both the

morning and afternoon peak hours based on the traffic counts collected in year 2015. Further, 14 PCE trips in each direction is too small to result in a temporary traffic impact at any of these intersections based on LADOT traffic impact criteria. Therefore, no temporary traffic impact would occur. However, to minimize the effect of haul traffic, the Construction Traffic Management Plan includes a measure to schedule haul truck activity outside of the peak hours to the extent feasible.

(ii) Building Construction Phase

The traffic impacts associated with construction workers depend on the number of construction workers employed during various phases of construction, as well as the travel mode and travel time of the workers. The hours of construction on weekdays would be from 6:00 A.M. to 6:00 P.M. and, therefore, most workers would be on-site before the weekday morning commuter peak period and would leave before or after the afternoon commuter peak period (i.e., arrive at the site prior to 7:00 A.M. and depart before 4:00 P.M. or after 6:00 P.M.). Therefore, most, if not all, construction worker trips would occur outside of the typical weekday commuter peak periods.

According to construction projections prepared for the Project, a maximum of 200 workers would be on the construction site on the peak day of building construction. This maximum level of worker activity would only occur for a short duration. On most of the workdays during the 20-month construction period, there would be far fewer workers than on the peak day.

Assuming minimal carpooling amongst those workers, an average vehicle occupancy of 1.135 persons per vehicle was applied, as provided in CEQA Air Quality Handbook (South Coast Air Quality Management District, 1993). Therefore, 200 workers would result in a total of 176 vehicles that would arrive and depart from the Project Site each day, distributed in various directions according to where each worker lives. The estimated number of daily trips associated with the construction workers is approximately 352 (176 inbound and 176 outbound trips), but nearly all of those trips would occur outside of the peak hours, as described above. For these reasons, the building phase of Project construction is not expected to cause a significant traffic impact at any of the study intersections.

(iii) Potential Construction-Related Impacts Associated with Access, Transit and Parking

Construction activities are expected to be fully contained within the Project Site boundaries. Project construction will not encroach on the public right-of-way in any way other than by adding traffic to public roadways as described above. Therefore, the Project will not have any impact on access, transit, or parking.

(b) Operation

(i) Intersections

The Certified EIR and First Addendum evaluated a total of 26 intersections under weekend pre-event conditions, weekend post-event conditions, and week-day pre-event conditions. Impacts were identified using LADOT's significant impact criteria based on the difference between non-event conditions and event conditions, as if Coliseum events were new to the area. This resulted in a very conservative analysis, since Coliseum events were already occurring and, with the Approved Project, the maximum capacity of those events would be reduced due to the seating reduction. The weekend analysis was based entirely on traffic counts conducted on Saturday, November 30, 2002 during a USC football game with 87,944 fans in attendance. The "without Project" condition was identified based on the lowest hourly total volume between 2:00 P.M. and 5:00 P.M. at each intersection. The "pre-event peak hour" was identified based on the highest hourly total volume between 2:00 P.M. and 5:00 P.M. and the "post-event" peak hour was the hour between 8:30 P.M. and 9:30 P.M. Impacts were identified based on the difference between the "without Project" condition and the pre-event and post-event peak hour conditions.

The weekday analysis was conducted based on projected traffic volumes for the pre-event peak hour assuming a 78,000-person stadium event. These event traffic projections were added to weekday traffic counts conducted in April 2003. The 2003 EIR identified the following significant intersection impacts for the three event conditions:

- 8 intersection impacts during the weekend pre-event peak hour
- 6 intersection impacts during the weekend post-event peak hour
- 23 intersection impacts during the weekday pre-event peak hour

The Certified EIR included seven mitigation measures to address traffic impacts, which are listed further below. As these measures were already in place, the Certified EIR concluded that traffic impacts would be significant and unavoidable.

As discussed in detail in the Traffic Study, the study area has experienced several changes, including the construction and operation of a new Metro Expo Line on Exposition Boulevard. In addition, new Projects in the Project vicinity include the MyFigueora Streetscape Project, the USC Development Plan, and the LAFC stadium project. As such, new weekday peak period traffic counts were collected at 15 of the 26 intersections included in the Certified EIR. The intersections chosen for study were generally those closest to the Project Site, which are most affected by Project traffic. They were chosen as a representative sample of the present-day traffic conditions to compare to the projected

future conditions in the Certified EIR. LADOT reviewed and approved the intersection selection and agreed that the conclusions reached based on the analysis of those locations (i.e., that present-day conditions were similar to or better than projected future conditions in the Certified EIR, as discussed in detail below) extended to the other intersections not included in the selection.

Of the 15 locations, 13 were found to be significantly impacted in at least one analyzed scenario in the 2003 EIR. The 15 locations were analyzed for level of service (LOS) using the Critical Movement Analysis—Planning methodology from Transportation Research Circular No. 212 (Transportation Research Board, 1980) as required by LADOT and as used in the Certified EIR.

With regard to weekday pre-event peak hour conditions, as shown in Table 2 of the Traffic Study, at each of the 15 locations, the year 2015 LOS result is equal to if not better than the 2006 cumulative base projections in the Certified EIR. At five of the locations, the year 2015 LOS is better than what was projected in the Certified EIR. Because the year 2015 conditions are as good as or better than the Weekday Pre-Event Peak Hour Cumulative Base conditions identified in the Certified EIR, it follows that the analysis of weekday pre-event peak hour traffic impacts in the Certified EIR remains applicable to present-day conditions as the Modified Project would generate fewer game day trips than the Approved Project.

With regard to weekend traffic conditions, the weekend intersection analysis in the Certified EIR was conducted using traffic counts collected during a USC football game that began at 5:00 P.M. on November 30, 2002. In order to compare those traffic counts to current conditions, street segment traffic count data was collected at six locations in the vicinity of Exposition Park on September 12, 2015, on which there was also a USC football game beginning at 5:00 P.M. The six locations were:

1. Figueroa Street north of Jefferson Boulevard
2. Jefferson Boulevard west of Figueroa Street
3. Exposition Boulevard west of Figueroa Street
4. Figueroa Street north of Martin Luther King Jr. Boulevard
5. Martin Luther King Jr. Boulevard west of Figueroa Street
6. Vermont Avenue north of Exposition Boulevard

At these locations, the total volumes from 2:00 P.M. to 5:00 P.M. (prior to the game, the “Afternoon Period”) and from 6:30 P.M. to 9:30 P.M. (during and following the game, the

"Evening Period") from September 2015 were compared with the same volumes (interpolated from the intersection traffic counts) from November 2002. The results varied, with some of the six locations reflecting higher traffic levels in 2015 and some reflecting lower traffic levels. It was clear from both sets of traffic data that some street segments were closed for parts or all of the Afternoon Period and Evening Period due to gameday traffic controls, making direct comparison impossible.

Averaging all six locations, the Evening Period exhibited almost identical levels of traffic between 2015 and 2002, while the Afternoon Period exhibited slightly higher traffic volumes in 2015 than in 2002. One factor that could explain higher pre-game traffic levels is that there are three new parking structures that did not exist in 2002 which would bring more traffic closer to the stadium (2,160 spaces within Exposition Park and 2,332 spaces between Parking Structures 1 and 2 along Figueroa Street and Flower Street just north of the Coliseum). The addition of these three structures increases the amount of gameday traffic that circulates around the east side of Exposition Park, rather than driving further away (and potentially avoiding the streets around Exposition Park altogether) to find parking in 2002.

Overall, the results of the weekend traffic data comparison suggests that gameday traffic conditions are generally comparable today to what was analyzed in the 2003 EIR. Therefore, the results of the weekend intersection analysis presented in the 2003 EIR also remain applicable to present-day conditions.

The Certified EIR presents a conservative analysis of potential Project traffic impacts as Coliseum events were already occurring and, with the Approved Project, the maximum capacity of those events would be reduced due to the seating reduction. Like the Approved Project, the Modified Project reduces the maximum size of any single event (by reducing seating capacity). In addition, the Modified Project allows fewer major events per year than what would have been allowed with the Approved Project. Thus, given the fact that today's roadway conditions are better or generally comparable to the conditions projected in the Certified EIR, the Modified Project would not result in any significant impacts beyond those projected in the Certified EIR. Impacts would continue to be significant and unavoidable using the conservative methodology used in the Certified EIR, and impacts would be consistent with the traffic impacts previously disclosed in the Certified EIR.

(ii) Congestion Management Program

According to the Certified EIR, the Approved Project would significantly impact two regional Congestion Management Plan (CMP) freeways near the Project Site: the I-10 freeway at Budlong Avenue; and the I-110 freeway at Slauson Avenue. Updated Caltrans freeway segment volumes were collected based on year 2014 published count data (the

most recent available). By applying the directional and peak hour factors provided by Caltrans to the Annual Average Daily Traffic (AADT) volumes at each of the two segments, the peak hour volume was determined. On the I-10 freeway at Budlong Avenue, current peak hour traffic volumes are lower than those reported in the Certified EIR. On the I-110 at Slauson Avenue, the southbound peak hour traffic volume is lower than that reported in the Certified EIR while the northbound peak hour traffic volume is approximately 5 percent higher than that reported in the Certified EIR. This minor variation is within statistically acceptable norms, and the count data for this segment are considered comparable to those in the Certified EIR.

During Coliseum events, traffic strategies and mitigation measures were already implemented. Thus, even with the implementation of proposed mitigation measures, impacts at these freeway locations were determined to be significant and unavoidable. The Modified Project would not increase number of events at the Coliseum, and would not change the seating capacity when compared with the Approved Project. Thus, impacts would remain significant and unavoidable and such impacts would be consistent with the anticipated level of CMP-related impacts that were disclosed in the Certified EIR and First Addendum.

(iii) Site Access

Site access was not analyzed in the Certified EIR. Vehicular access to Exposition Park is currently provided at five major driveways and various smaller driveways. Major driveways are located at:

- Figueroa & 39th Street/Exposition Park Drive
- Hoover Street & Martin Luther King Jr. Boulevard
- Bill Robertson Lane & Martin Luther King Jr. Boulevard
- Vermont Avenue & Exposition Park Drive/39th Street
- Bill Robertson Lane & Exposition Boulevard

The above major driveways provide the access in the parking lots and structures at Exposition Park that serve the Coliseum during major events. The configuration and operation of these driveways would not change as a result of the Modified Project, nor would the parking supplies accessed by these driveways. Therefore, as the Modified Project would not change any of the existing access points or make substantial changes to internal circulation, no access impacts would occur as a result of the Modified Project and impacts would be less than significant.

(iv) Parking and Public Transit

As set forth in the Certified EIR, the Approved Project would not include major changes to the existing parking facilities at the Coliseum, Exposition Park, or the USC Campus. A total of 27 parking lots in the vicinity of the Project Site that were in regular use for Coliseum events at that time were identified. These included 10 parking lots within Exposition Park, a lot operated by the County of Los Angeles, a number of private parking lots, the Department of Motor Vehicles lot on the east side of the I-110 Freeway, and 8 lots and structures north of Exposition Park, including on USC's campus. Together, these lots provided a total of 19,820 parking spaces. Further, the Certified EIR anticipated the imminent construction of the structure immediately east of the Coliseum, which provides 2,210 parking spaces (of which 2,160 are available for Coliseum use). Thus, with the increase in parking and the reduction in stadium seating, parking impacts under the Approved Project would be less than significant.

Under the Modified Project, the parking lot just south of the Coliseum would be restriped and would lose approximately 63 parking spaces, which is the only direct change in parking supply as a result of the Modified Project. The parking structure east of the Coliseum with 2,160 parking spaces available for Coliseum use would not be changed. In addition, since the publication of the Certified EIR, additional parking supply has been built within the Project vicinity. USC has constructed Parking Structures 1 and 2 on the west side of Flower Street, providing a total of 2,332 new spaces, and in September 2015 began construction of the Shrine Parking Structure, which will provide 1,300 spaces adjacent to the Shrine Auditorium on Jefferson Boulevard (980 net after accounting for the loss of a 320-space surface lot). The Shrine Parking Structure is anticipated to open in November 2016. As shown in Table 7 on page 75, there are currently approximately 20,857 parking spaces available for Coliseum use, an increase of 1,037 spaces over the 19,820 spaces described in the Certified EIR. Furthermore, the use of public transit for stadium events has increased substantially due to the opening of the Metro Expo Line light rail, which was anticipated but not accounted for in the Certified EIR. In addition, Phase 2 of the Expo Line, which would extend the line to Santa Monica, is also expected to begin service in early 2016. Therefore, the percentage of event attendees driving to the Study Area is lower than it was in the Certified EIR, and parking demand has been reduced accordingly. Therefore, the Modified Project would not result in additional parking impact and impacts would continue to be less than significant. Impacts would therefore be within the envelope of impacts previously disclosed in Certified EIR and First Addendum. As noted previously, because more of the Coliseum parking supply is located closer to the stadium than it was in 2002, Project traffic tends to be more concentrated closer to the stadium and less concentrated further from it as compared to the findings in the Certified EIR. Therefore, while overall traffic has decreased from the levels set forth in the Certified EIR, there may be incrementally more localized traffic near the new parking.

Table 7
Overview of Prior and Present Coliseum Parking

Lot No.	Lot Name	EIR Spaces	Today	Notes
1	North Coliseum Drive	250	250	
2	South Coliseum Drive	210	147	Loss of 63 spaces as a result of the Project.
3	Coliseum Service Lot	60	60	
4	California Science Center Garage	2,160	2,160	
5	Lot 1, 1A, 1B	930	930	
6	Lot 2	880	880	
7	Lot 3	950	950	
8	Lot 4	450	450	
9	Lot 5—Surface	350	350	
10	Lot 6—Surface	1,100	1,100	
11	County	180	180	
12	Private	120	120	
13	Private	110	110	
14	Private	300	300	
15	Private	200	200	
16	Private	150	94	USC Credit Union was built at this location.
17	DMV	250	250	
18	USC—A	1,700	1,700	
19	USC—B	1,150	960	Based on 2015 USC Parking Monitoring Report.
20	USC—Surface	2,000	675	Based on 2015 USC Parking Monitoring Report.
21	USC—D	1,350	1,350	
22	USC—X	1,050	950	Based on 2015 USC Parking Monitoring Report.
23	USC—T	600	0	USC Galen Center was built at this location.
24	USC Parking Center	1,800	2,050	Based on 2015 USC Parking Monitoring Report.
25	Shrine Auditorium	1,000	1,000	
26	USC—C	200	0	Parking Structure 1 was built at this location.
27	Private	320	0	Shrine Structure was built at this location.
A	Parking Structure 1		1,150	Completed in 2004.
B	Parking Structure 2		1,191	Completed in 2006.
C	Shrine Structure		1,300	Expected to be completed in November 2016.
Total Spaces		**19,820**	**20,857**	

Source: Gibson Transportation, 2016.

(c) Mitigation Measures

The following mitigation measures were included in the Certified EIR and First Addendum to reduce Approved Project impacts related to traffic. These mitigation measures would continue to be implemented as part of the Modified Project.

1. To facilitate movement of vehicles, the LAPD and LADOT staff shall have the authority to implement turn restrictions, parking prohibitions, lane closures, barriers/cones, and flexible signage. There shall be a temporary command post available on the site to control and monitor traffic conditions. The area shall be split up into zones, with an engineer assigned to each zone. These engineers would have the authority to react to situations and change restrictions if necessary.

2. Electronic ticketing shall replace parking guards at problem area lots and traffic signs on adjacent Coliseum streets to minimize parking lot back-up. In addition, season and regular ticket holders could be issued speed passes and assigned parking at specific lots.

3. Real time radio alerts and broadcasts via Highway Advisory Radio (HAR) shall be located where LADOT deems appropriate.

4. In conjunction with the aforementioned measures, Changeable Message Signs (CMS) shall be used to direct vehicles from the freeways and surface streets to the Coliseum/USC parking lots. At least eight or more signs would be needed for results to be noticeable and coordinated.

5. Project implementation shall include the development of a carpool incentive system to reduce the number of overall vehicle trips.

6. Alternate parking sites located away from the Coliseum shall be made available, as well as transportation to and from these parking areas and the Coliseum.

7. Turn prohibitions shall remain in place on game days. Such prohibitions are changed both within and between game days based on the most current traffic conditions and to reflect current best practices based on the City's extensive experience implementing traffic control for Coliseum events.

The following Mitigation Measure has been added as part of the Modified Project to ensure construction-related traffic impacts are reduced to a less than significant level.

8. <u>Prior to the start of construction, a Construction Management Plan shall be prepared and submitted to the City for review and approval. The Construction Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on</u>

the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Provision of on-site parking for all construction workers.
- Staging of all construction vehicles, equipment, and materials on the Project Site.
- Scheduling of construction activities (worker schedules, haul truck traffic, and deliveries) to reduce the effect on traffic flow on surrounding arterial streets.
- Scheduling of construction-related deliveries, haul trips, etc. so as to occur outside the commuter peak hours to the extent feasible.
- Coordinate construction activities with LAFC construction to minimize traffic and other cumulative impacts.

V. Effects Not Found to Be Significant

The Certified EIR included a discussion of environmental topics that were not found to be significant and thus, were not discussed in detail in the Certified EIR. As set forth below, the Modified Project would also not result in significant impacts for these same topic areas. In addition, although not included in the Certified EIR, an analysis of potential impacts associated with hydrology and water quality is provided below, which demonstrates that potential hydrology and water quality impacts of the Modified Project would be less than significant.

A. Agricultural Resources

According to the Certified EIR and First Addendum, there have been no agricultural uses on the Project Site since before 1921, which construction of the Coliseum began. Similar to the Approved Project, the Modified Project would not involve any changes to the use of the Project Site and the Coliseum would continue hosting the same type of events as it currently does. Thus, the Modified Project would not convert an agricultural use to a non-agricultural use, and would not impact potential future agricultural uses on the site. Therefore, similar to the Approved Project, the Modified Project would not impact agricultural resources.

B. Biological Resources

The Project Site is a developed parcel located within a highly urbanized area. Thus, under the Certified EIR, impacts to biological resources were concluded to be less than significant. The Project Site continues to be a developed site and does not contain any species identified as a candidate, sensitive, or special status species in local or regional

plans, policies or regulations, or by the California Department of Fish and Wildlife. In addition the Modified Project would not result in the filling of a federally protected wetland and would not affect a wildlife corridor or native nursery site. Therefore, similar to the Approved Project, the Modified Project would have no impact to biological resources.

C. Hazard and Hazardous Materials

The Certified EIR concluded that the Approved Project would not result in impacts associated with hazards. The types of construction activities under the Modified Project would be similar to those under the Approved Project. In addition, the overall amount of construction activity would be reduced under the Modified Project. In addition, the types of operational land uses proposed under the Modified Project would be the same as those evaluated under the Approved Project. Thus, the types of potential hazards associated with construction and operation of the Modified Project would be the same as those evaluated for the Certified EIR. Therefore, similar to the Approved Project, the Modified Project would have no impact to hazards and hazardous materials.

D. Hydrology and Water Quality

The following analysis is based, in part, on *Los Angeles Memorial Coliseum—Modified Project South Tower Addition Water Resources Technical Report* (Water Resources Technical Report) prepared for the Project by KPFF Consulting Engineers, on December 4, 2015. This report is included as Appendix F of this Addendum.

The types of construction activities under the Modified Project would be similar to those under the Approved Project. However, the Modified Project would have a depth of excavation of 18 feet compared to the Approved Project's depth of excavation of 40 feet. As the Project would be greater than one acre, the Project would be required to obtain coverage under the NPDES General Construction stormwater permit. Compliance with this permit would require the Project to implement a stormwater pollution prevention plan (SWPPP) that specifies BMPs and erosion control measures to be used during construction to manage runoff flow and prevent pollution. Furthermore, the Project would be required to comply with all applicable City grading and permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion and would not result in discharge that would cause pollution that would alter the quality of the water of the State; contamination of the quality of the water of the State by waste; or cause a nuisance that would be injurious to health. Therefore, construction-related impacts to surface water hydrology and surface water quality would be less than significant.

With regard to ground water, previous boring explorations at the Project Site did not encounter groundwater up to 40 feet below grade. As noted above, the Modified Project

would have a depth of excavation of 18 feet below ground surface. Therefore, construction activities are unlikely to encounter groundwater due to the limited depth of excavation associated with the Project. If ground water is encountered during construction, however, the appropriate compliance and containment measures would be implemented to avoid impacts associated with potential groundwater discharges. Modified Project impacts to groundwater during construction would be less than significant.

The Project Site is currently nearly 100 percent impervious and would remain the same after implementation of the Modified Project. Thus, the Modified Project would not substantially increase runoff flow and volumes into the existing storm drain system. The Modified Project would be required to capture and infiltrate a portion of the storm water volume into the underlying soils for Low Impact Development (LID) compliance. The Modified Project would implement BMPs to mitigate stormwater runoff from building roof drains and site hardscape areas. Thus, the Modified Project would improve stormwater management during operation. Furthermore, with regard to groundwater recharge, as the Project would maintain 100 percent impervious surface coverage and would implement BMPs as required by LID, the Modified Project's potential impact on groundwater water recharge would not result in a net deficit of aquifer volume or lower the groundwater table. Therefore, potential impacts to the site hydrology and surface water quality during operation would be less than significant.

The Project Site is not located within a 100-year flood plain or within an area that could be impacted by a seiche, tsunami, or mudflow. Therefore impacts related to those potential issues would be less than significant.

E. Mineral Resources

According to the Certified EIR and First Addendum, the Project Site is not located on land containing significant mineral deposits. Additionally, the Project Site is not in an area of potential petroleum resources. The Modified Project would not change the location of the Project Site analyzed under the Approved Project. Thus, similar to the Approved Project, the Modified Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site. Therefore, similar to the Approved Project, the Modified Project would have no impact on mineral resources.

F. Population and Housing

No residential properties are located on Project Site and none were planned as part of the Approved Project. These conditions would not change under the Modified Project. Thus, the Modified Project would not result in a permanent population increase nor would it

displace any existing housing in the area. Therefore, similar to the Approved Project, the Modified Project would have no impact on population and housing.

IV. Conclusion

As demonstrated by the analysis above, impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR and First Addendum. Thus, a new or greater significant impact would not result from the Modified Project. In addition, all of the mitigation measures included as part of the Certified EIR and First Addendum would continue to be implemented under the Modified Project. As all of the impacts would be within the envelope of impacts analyzed in the Certified EIR and First Addendum, no additional environmental analysis of the Modified Project is necessary.