FOURTH ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT

FOR THE LOS ANGELES MEMORIAL COLISEUM RENOVATION PROJECT

State Clearinghouse No. 1990011065

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FOURTH ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT LOS ANGELES MEMORIAL COLISEUM RENOVATION PROJECT

I. Introduction/Background

This document is the Fourth 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. This addendum specifically addresses modification to the area to the west of the Los Angeles Memorial Coliseum (Coliseum) and the Coliseum District Specific Plan to accommodate the Lucas Museum of Narrative Art proposed by the University of Southern California (USC) on behalf of The Lucas Museum Foundation.

The Draft EIR for the Los Angeles Memorial Coliseum Renovation Project evaluated 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 19,000-square-foot press box, and approximately 35,000 square feet of new concession-related facilities. Following certification of the EIR, several modifications were proposed for the Los Angeles Memorial Coliseum Renovation Project. These modifications were addressed in three addenda to the Certified EIR that were approved by the LAMCC and relied upon by the City of Los Angeles (City). These addenda demonstrated that the modifications to the Project would not result in any new significant impacts compared to those evaluated and disclosed in the Certified EIR, or substantially increase the severity of previously identified significant impacts.

The First Addendum was approved by the LAMCC on May 2, 2006, and subsequently considered and approved by the City Planning Commission 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. The First Addendum evaluated 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 First 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 First 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, including a modification to signage regulations, and a reduction in the CDSP boundaries.

USC signed a long-term lease with the Los Angeles Memorial Coliseum Commission for use of the Coliseum in 2008 that was amended in 2013. The lease agreement, provides for renovations to the Coliseum and management of the Coliseum by USC. USC proposed the renovation of the Coliseum as previously contemplated in the Certified EIR with some modifications. Such modifications primarily included reducing the number of luxury suites, and reducing the size of the press box, concession-related facilities, and ancillary structures. The proposed modifications also included the addition of 24 outdoor loge boxes and 1,065 outdoor club seats. These modifications were addressed in a Second Addendum that was approved by the LAMCC on July 28, 2016.

In addition, a Third Addendum was prepared and approved by the LAMCC in December, 2016. The Third Addendum addressed the replacement of two video boards with two new video boards that would be better integrated into the seating bowl of the Coliseum as well as the replacement of the center Peristyle game clock with a modern smaller integrated game clock.

The Certified EIR, as referred to herein, comprises the Draft EIR, Final EIR, and the First, Second, and Third Addenda to the EIR. In addition, all references hereafter to the "Approved Project" reflect the Los Angeles Memorial Coliseum Renovation Project as evaluated in the EIR and as modified by the three addenda and other approvals.

In accordance with the California Environmental Quality Act (CEQA), this Fourth 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.

Provided below are an overview of the CEQA regulations regarding the preparation of an addendum, a description of the modifications to the Los Angeles Memorial Coliseum Renovation Project to accommodate the Lucas Museum of Narrative Art (LMNA) and

associated improvements (Modified Project), and a comparative analysis of the impacts of the Modified Project with those set forth in the Certified EIR.

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 and 15163 of the CEQA Guidelines requires the preparation of a Subsequent or Supplemental 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), while the Modified Project would introduce a new museum use to Exposition Park that would attract additional annual visitors, the Modified Project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Furthermore, no substantial changes have occurred with respect to the circumstances under which the project is undertaken, nor is there new information of substantial importance, that would result in a new or more severe significant impact. Therefore the modifications resulting from the Modified Project do not meet the standards for a Subsequent or Supplemental EIR pursuant to PRC Section 21166 and CEQA Guidelines Section 15162 and 15163.

III. Project Description

A. Project Location and Existing Conditions

As shown in the aerial photograph provided in Figure 1 on page 5, the LMNA and associated improvements would be located within the western portion of Exposition Park. Exposition Park is comprised of approximately 160 acres of land and 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. Exposition Park houses the

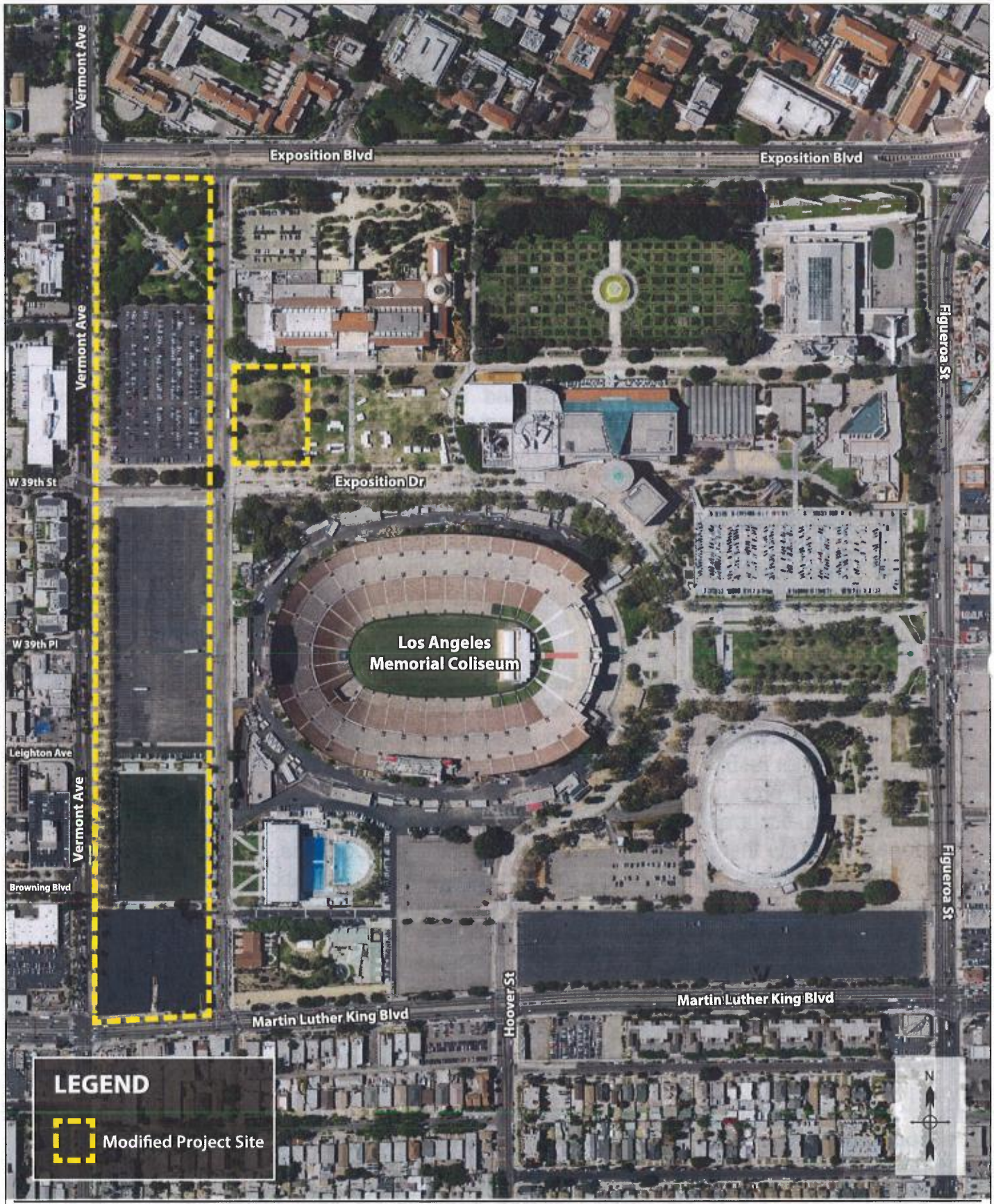

Figure 1
Aerial Photograph of Modified Project Site

Source: Apple Maps, 2017.

Los Angeles Memorial Coliseum, 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, the Expo Center, which includes a swim stadium, recreation center, senior citizen center, amphitheater, and pre-school, and the future Banc of California stadium. In addition, there are approximately 6,180 parking spaces within Exposition Park, of which approximately 4,060 spaces are provided within surface lots and 2,160 spaces are provided in the parking structure located west of Figueroa Street. USC's University Park Campus lies adjacent to the north of Exposition Park.

The Modified Project improvements are proposed to be located west of the Coliseum, within a site that is generally bounded by Exposition Boulevard to the north, Bill Robertson Lane to the east, Vermont Avenue to the west, and Martin Luther King Jr. Boulevard to the south.

As shown in the aerial photograph provided in Figure 1 on page 5, the Modified Project Site is developed with surface parking lots that include approximately 1,691 parking spaces, a City operated soccer field to the south, and Jesse Brewer Jr. Park to the north. Landscaping within the site is limited to the landscape improvements in Jesse Brewer Jr. Park and street trees along portions of the periphery of the surface parking areas and soccer field.

Regional access to the Modified Project Site is provided by the Harbor Freeway (Interstate 110), located approximately 0.5 mile to the east. Major arterials in the vicinity 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. In addition, the Metro Expo Line is located just north of the site. The Metro Expo Line runs between downtown Santa Monica and downtown Los Angeles, connecting with the Metro Blue Line, Metro Purple Line and Metro Red Line in downtown Los Angeles. In addition, the site is well-served by 13 bus lines operated by Metro and the LADOT Downtown Area Shuttle.

B. Approved Project

The Approved Project provided for the renovation of the Coliseum and several outbuildings. Modifications included reducing the maximum seating capacity from 92,500 seats to 78,000 seats; the addition of luxury suites, outdoor loge boxes and outdoor club seats; the construction of ancillary structures outside of the Coliseum; a new press box; and new concession-related facilities. In addition, the Approved Project provided for new field amenities and offices, new elevators, improved seating, and improved ADA and service access.

Under the Approved Project, the interior of the Coliseum design would continue to feature the Peristyle as the dominant element the bowl. The Peristyle would be restored and repaired along with the adjacent Coliseum Commission offices. In addition, under the Approved Project, the existing scoreboards, advertising panels, and video boards that are mounted on the Peristyle would be removed. The Approved Project would also construct a single new seating tower that would be below the height of the existing press box. However, the existing shape of the playing field would be retained. In addition, the location of the existing stairs and tunnels would be retained. Thus, the historically significant fabric of the Coliseum would remain intact.

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. 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 and an ancillary support building. 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.

With completion of the Approved Project, the existing event schedule at the Coliseum would continue.

C. Modified Project

As summarized above, USC, on behalf of The Lucas Museum Foundation, proposes modifications to the Los Angeles Memorial Coliseum Renovation Project to accommodate the Lucas Museum of Narrative Art (LMNA) and associated improvements (the Modified Project) within the western portion of Exposition Park, west of the Coliseum. LMNA, a non-profit museum led by filmmaker George Lucas, would be a one-of-a-kind gathering place to experience art collections, films and exhibitions dedicated to visual storytelling and the evolution of art and moving images in a setting focused on narrative painting, illustration, photography, film, animation and digital art. LMNA would present original work by world renowned and emerging artists, cutting-edge digital technologies, and daily film screenings in state-of-the-art theaters, as well as educational opportunities for students of all ages. The collections would include original, artist-made creations, from sketches to storyboards to sets and costumes from movies. LMNA would also feature public lectures and classes for all ages, hands-on workshops, after-school programs and camps, and a wide variety of additional educational opportunities.

Special tours, talks, workshops and screenings would be tailored to serve the curriculum of students from grammar school to college age. Collection and education programming would include collection presentations, temporary exhibitions, daily film

screenings, film premieres, public lectures, hands-on workshops, school tours and programs, classes for all ages, and campus-wide festivals. LMNA would also include numerous amenities such as a sit-down restaurant, state-of-the-art cinematic theaters, museum store, casual café, lecture halls of various sizes, digital classrooms, video conferencing for guest lectures and workshops, a drop-in library, several spaces available for event rental, and production quality editing classrooms

A Conceptual Site Plan for the Modified Project is provided in Figure 2 on page 9. The LMNA building would comprise approximately 299,717 square feet of floor area. The new building would include five-levels above grade rising to a maximum height of 115 feet. A two-level parking structure, referred to as the Museum Parking Garage, would be located beneath the LMNA. A separate three-level subterranean parking structure, referred to as the Replacement Parking Garage, would be located the south of the LMNA. In total, approximately 2,425 parking spaces would be provided to serve the LMNA and replace the existing surface parking.

In addition, the Modified Project would provide improvements to Jesse Brewer Jr. Park to the north and a portion of Exposition Park to the east. Improvements to Jesse Brewer Jr. Park include an updated play area, improved, water efficient plantings and paving, as well as better integration and circulation between LMNA and the park. Improvements to Exposition Park to the east include improved pedestrian circulation between Exposition Park, the Natural History Museum, the Coliseum and LMNA, as well as incorporation of water- conserving plantings, gathering spaces and improved pedestrian pathways. In addition, to provide for the Modified Project, the existing soccer field would be relocated to the south at the corner of Vermont and Martin Luther King Jr. Boulevard.

As shown in the Conceptual Renderings provided in Figure 3 and Figure 4 on pages 10 and 11, the LMNA building would be elevated at the fourth and fifth levels and would arch over 39th Street with the intent of creating a floating canopy with public park space below. The Project proposes to vacate 39th Street but would continue to use the roadway to function as a limited vehicular throughway that would also provide museum drop zones, museum entrance plazas, and would permit periodic special events in the vacated area that require closure of the throughway. At the ground level, the museum building is split into two wings with two theatres and an entrance lobby located to the north of vacated 39th Street along with a café and museum shop. The ground floor of the south wing would include archive space, and offices with educational space and classrooms located on the second floor. The third level would include a library. The two wings connect at the fourth level that would contain the LMNA's main exhibition spaces. The fifth level would feature additional exhibition space and a sit-down restaurant surrounded by a continuous public roof garden along the museum's perimeter with trees, seating areas, and

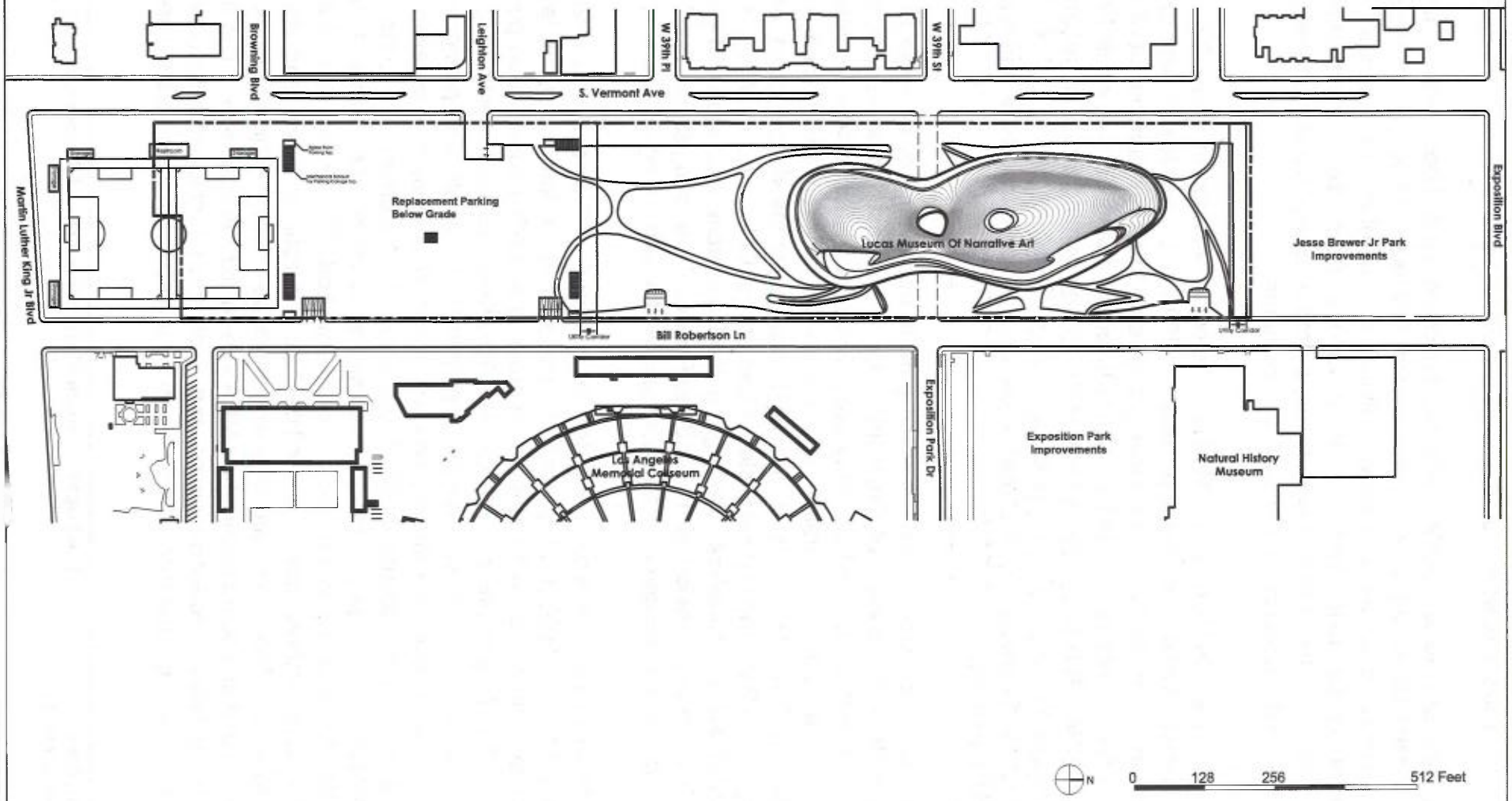

Figure 2
Conceptual Site Plan

Source: Stantec, 2017.

Figure 3
Conceptual Rendering
Bird's Eye View

Source: mad architects, 2017.

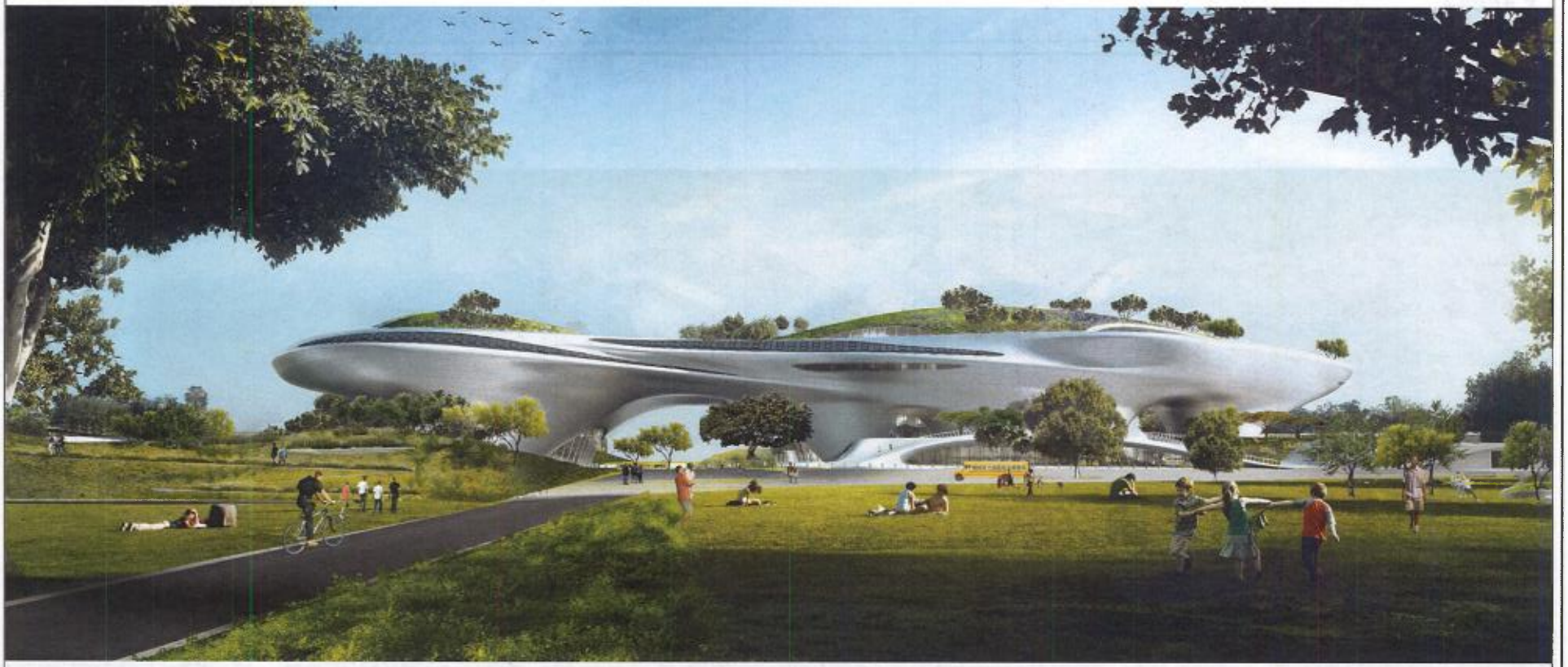

Figure 4
Conceptual Rendering View
From Exposition Park

Source: mad architects, 2017.

terraces. From the proposed public roof garden, visitors would experience panoramic views of the surrounding Exposition Park and USC campus, Downtown Los Angeles, and surrounding mountains.

The LMNA would be a focal point and civic gathering space for Exposition Park, providing public programs for the community and interactive landscape elements. The design proposes a network of proximal open spaces with public open space at the ground level comprised of contoured landscaped areas connected by a series of meandering pedestrian walkways that would share visual and functional connections with the Natural History Museum to the northeast, Exposition Park to the east, the Los Angeles Memorial Coliseum to the east, and Jesse Brewer Jr. park to the north.

It is anticipated that the LMNA will attract approximately 1.2 million annual visitors. In addition, the typical daily hours of operation of LMNA would be from 10 A.M. to 7 P.M. with additional special events in the evening from time to time. Special events would be conducted in accordance with a lease with the State of California that would include a requirement for limiting and scheduling LMNA special events to avoid conflicts with other uses in Exposition Park.

(1) LMNA Design Concept and Landscaping

As shown in the Conceptual Renderings provided in Figure 3 and Figure 4 on pages 10 and 11, the LMNA is proposed to undulate like a cloud; the design of the museum building is intended to float over a park landscape with a variety of public spaces facilitating natural social interaction, recreation, and public events. The exterior building surface would be smooth and organic, and intended to complement the surrounding neighborhoods and landscape.

Movement through the galleries is intended to be directed by a path that loops around the "floating cloud," continuing through a variety of exhibition spaces. Within the gallery cloud, selected views to the surrounding park landscapes would become highlights. The roof landscape is designed as a topographical floating park, with paths and terraces meandering through the greenery and shading trees. The floating landscape blends into the urban scenery of Los Angeles and the views reach from the Hollywood Hills to the skyline of downtown.

As shown in the Conceptual Landscape Plan provided in Figure 5 on page 13, landscaping surrounding the LMNA is intended to provide a park setting that would be integrated with Jesse Brewer Jr. Park to the north and Exposition Park to the east.

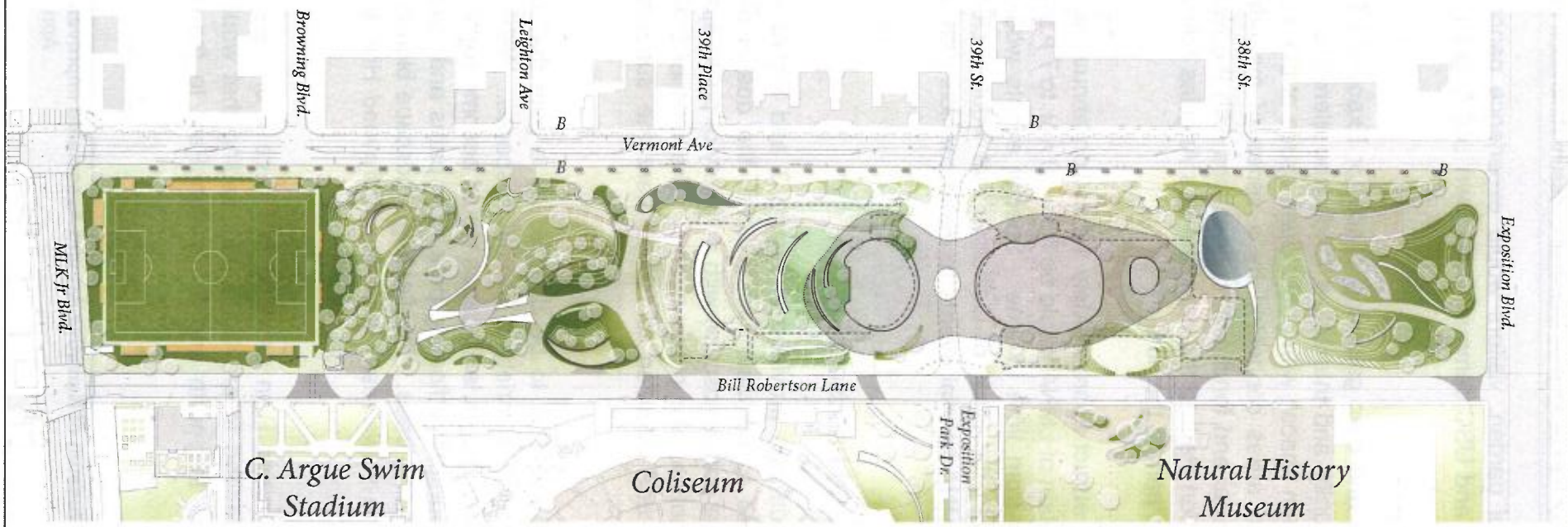

Figure 5
Conceptual Landscape Plan

Source: mad architects, 2017.

Landscaping would include undulating planted slopes that meld with the building and create a varied topography. Pathways and gathering spaces would be integrated into the landscape. Native and drought-tolerant landscaping and unique spaces would be integrated throughout.

(2) Parking and Access

The two-level Museum Parking Garage located beneath the LMNA would provide a total of up to approximately 1,025 parking spaces, including 600 spaces to satisfy LMNA's parking needs and the remainder for the use of the Natural History Museum located on the east side of Bill Robertson Lane. Two full-access driveways would be provided to Bill Robertson Lane—one north and one south of 39th Street. Service access would also be from Bill Robertson Lane. The three-level Replacement Parking Garage located to the south of the LMNA would provide a total of up to approximately 1,400 spaces. It also would provide two full-access driveways to Bill Robertson lane along with a full-access driveway to Vermont Avenue at Leighton Avenue. A new traffic signal would be installed at Leighton Avenue as part of the Modified Project. In total, the Modified Project would provide up to approximately 2,425 parking spaces, for a net increase of up to approximately 734 parking spaces when compared with the existing 1,691 spaces that are located within the Modified Project Site. The approximately up to 2,425 parking spaces would replace the existing parking spaces that would be displaced and would also provide parking for LMNA. In addition, while the net increase of 734 parking spaces would exceed the 599 code-required spaces for the LMNA by 135 spaces, the existing parking count of 1,691 does not account for the existing intermittent use of the soccer field for temporary parking that would be eliminated by the Modified Project. Under the Modified Project there would be no parking on the relocated soccer field as this would adversely impact its upgraded surface. Thus, the additional 135 permanent parking spaces would also serve to offset the loss of temporary parking spaces that would no longer be available within the soccer field.

As mentioned above, the Modified Project also includes the vacation and closure of 39th Street between Vermont Avenue and Bill Robertson Lane. Following vacation, 39th Street would continue to provide public access between Vermont Avenue and Bill Robertson Lane during major events at Exposition Park, but would generally be closed to public traffic.

(3) Lighting and Signage

Modified Project lighting would include architectural lighting for the LMNA building, and exterior lights adjacent to the building and along pathways for aesthetic, security and wayfinding purposes. Further, all exterior and interior lighting would meet high energy-

efficiency requirements utilizing light-emitting diode (LED) or efficient lighting technology. All light sources would be shielded and/or directed toward areas to be illuminated thereby minimizing spill-over onto nearby sensitive areas. In addition, new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and thus would maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would be consistent with the signage requirements of the Coliseum and Soccer Stadium Sign District, Ordinance No. 184290 (the Sign District). Proposed signage would be designed to be unobtrusive so as not to detract from the character of the new building. Proposed signage would include identification signage and pedestrian and vehicular way-finding and informational signage. Such signage would include lighted pole-mounted, building-mounted, and freestanding signs, as well as lighted kiosks with maps.

(4) Sustainability Features

The Modified Project will be designed and constructed to incorporate environmentally sustainable design features as required by California Green Building Code (CALGreen) and the Los Angeles Green Building Code (LAGBC). In addition, the Modified Project has been designed to implement features that are equivalent to the Leadership in Energy Efficiency and Design (LEED) Gold standards set forth by the U.S. Green Building Council (USGBC). Design features that are anticipated to be implemented by the Modified Project include:

Location and Transportation

- Close proximity to an abundance of public transit options; in particular, the Project would provide a direct and convenient pedestrian pathway within Jesse Brewer Jr. Park that would connect the Metro Station on Exposition Boulevard to the LMNA;
- Bicycle parking; and
- Electric vehicle charging station infrastructure provided in the parking garage in accordance with LAMC requirements.

Sustainable Sites

- Construction activity pollution prevention;
- Stormwater pollution prevention;

- Light pollution reduction in outdoor lighting; and
- New parkland replaces existing asphalt parking lots, reducing the heat island effect.

Water Efficiency

- Water-efficient landscaping for reduction in outdoor water usage;
- Weather or soil moisture-based automatic irrigation system controllers for landscaping;
- Water conserving plumbing fixtures and fittings that reduce indoor water use by at least 20 percent;
- Gray/Rainwater/Condensate recycled water that would be treated and harnessed; and
- Permanent water metering.

Building Design

- Minimum of 15 percent of roof area to have photovoltaic panels installed;
- Implementation of a landscape water feature to provide passive cooling; and
- Incorporation of a high-performance façade that will minimize heat gain/loss.

(5) Modified Project Construction

Construction of the LMNA is expected to occur over an approximate 42-month period of continuous construction activities, beginning in January 2018 with an anticipated completion date in 2021. It is estimated that the proposed improvements would require approximately 101,210 cubic yards of import and approximately 605,747 cubic yards of export. While a portion of this export would likely be utilized as fill material at other construction sites that are more proximate to the Modified Project Site, this Fourth Addendum conservatively assumes that all export would be transported to a more distant landfill. Proposed construction activities would occur in accordance with a Construction Management Plan. Construction on the replacement soccer field would start before construction of the Replacement Parking Garage, although there may be some overlap of construction.

(6) Discretionary Actions

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

- A General Plan amendment to Mobility Plan 2035, an element of the General Plan, to change the street designation of the portion of 39th Street located between Vermont Avenue and Bill Robertson Lane within the Coliseum District Specific Plan as shown on the Citywide General Plan Circulation System Maps and the South Los Angeles Community Plan Circulation Map from a Collector Street to a Local Street;
- Specific Plan Amendment to the Coliseum District Specific Plan that would contain regulations for the development and operation of LMNA that include permitted uses, height, floor area, required parking, open space, and the sale and consumption of alcohol within the museum's restaurant and special event spaces;
- Possible Development Agreement;
- Project Permit Compliance Review for Project compliance with the Specific Plan; and
- Vesting Tentative Tract Map for the merger and resubdivision of the site to create two ground lots and for commercial condominium purposes and to vacate 39th Street between Vermont Avenue and Bill Robertson Lane and a 20-foot-wide public right-of-way, and Haul Route approval.

IV. Comparative Analysis of Modified Project Impacts

A. Aesthetics/Visual Resources

(1) Visual Character and Views

As discussed in the Certified EIR and addenda, the Approved Project would renovate the Coliseum interior and would maintain its same interior shape. In addition, the historically significant 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.

(a) Construction

Similar to the Approved Project, during construction activities for the Modified Project, the visual appearance of portions of the Modified Project Site would be altered due to the removal of surface parking areas, relocation of the soccer field, and development of the LMNA building. Related construction activities including site preparation and grading and the staging of construction equipment and materials would also alter the visual character of the site. However, the perimeter of the Modified Project Site would be screened, which would limit views of construction activities from off-site areas. Given the temporary nature of construction activities and the use of screening to limit views of construction activities, short-term construction activities would not substantially and adversely alter or degrade the existing visual character of the Project Site. Therefore, as with the Approved Project, construction of the Modified Project would not result in any significant impacts with respect to construction-related visual character and view impacts.

(b) Operation

As described above in Section III, Project Description, the Modified Project Site is developed with surface parking lots that include approximately 1,691 parking spaces, a City-operated soccer field to the south, and Jesse Brewer Jr. Park to the north. Aesthetic resources within the Modified Project Site are limited to Jesse Brewer Jr. Park and trees located within the site and along the adjacent streets. Aesthetic resources in the vicinity include the open space areas in Exposition Park and historic features and buildings including the Coliseum, the Natural History Museum, the Los Angeles Swimming Stadium and Exposition Clubhouse, the Exposition Park Rose Garden, North and South Coliseum Drives/Christmas lane and the California Aerospace Museum.

The Modified Project includes a new museum building, subterranean parking, a relocated soccer field, and improvements to Jesse Brewer Jr. Park and the open space area within Exposition Park located to the east of Bill Robertson Lane and south of the Natural History Museum. The LMNA building would comprise approximately 299,717 square feet of floor area and would include five-levels above grade rising to a maximum height of 115 feet. A two-level parking structure would be located beneath the LMNA and a separate three-level subterranean parking structure would be located to the south of the LMNA.

As shown in the Conceptual Renderings provided in Figure 3 and Figure 4 on pages 10 and 11, the LMNA building would be elevated at the fourth and fifth levels and would arch over 39th Street with the intent of creating a floating canopy with public park space below. At the ground level, the museum building would be split into two wings. The fifth level would feature a continuous public roof garden along the museum's perimeter with trees, seating areas, and terraces.

Proposed to undulate like a cloud, the design of the museum building is intended to float over a park landscape with a variety of public spaces facilitating natural social interaction, recreation, and public events. The exterior building surface would be smooth and organic, and intended to complement the surrounding neighborhoods and landscape. A proposed four-story escalator would ascend from the transparent glass museum lobby located on the ground floor beginning a path through the museum's sculptural space.

As shown in the Conceptual Renderings, while several existing trees would be removed to provide for the proposed improvements, the large surface parking areas would be replaced with an expansive park setting that would surround the LMNA and would be integrated with Jesse Brewer Jr. Park to the north and Exposition Park to the east. Landscaping would include undulating planted slopes that meld with the new building and create a varied topography. Pathways and gathering spaces would be integrated into the landscape. Native and drought-tolerant landscaping and unique spaces would be integrated throughout with extensive landscaped setbacks along all sides of the museum building. Thus, implementation of the proposed improvements would not result in significant impacts associated with removal of on-site aesthetic resources. Rather, the new building and extensive landscape improvements would result in an improvement of the aesthetic character of the site when compared with the existing setting that is dominated by surface parking.

The new museum building would be taller than the two to four-story structures located to the west of Vermont Avenue, north of Exposition Boulevard, and south of Martin Luther King Jr. Boulevard in the immediate vicinity. The LMNA building would also be taller than the existing structures to the east across Bill Robertson Lane, the closest of which are the two-story Natural History Museum and the Coliseum, which has an exterior wall that measures approximately 75 feet height (from ground level) and a press box that measures approximately 101 feet in height. However, as discussed above, the LMNA building would be setback from adjacent streets and integrated with a new topographically diverse and unique landscape setting. In addition, Jesse Brewer Jr. Park, the relocated soccer field, and the existing landscaped buffer along Vermont Avenue would separate and visually buffer the new building from other existing buildings along Exposition Boulevard, Martin Luther King Jr. Boulevard and Vermont Avenue. Furthermore, the landscape setting would connect with the Jesse Brewer Jr. Park to the north and Exposition Park to the west, thereby expanding the park setting within the vicinity. In addition, while the contemporary architecture of the LMNA building would vary from several other nearby buildings in the vicinity, the buildings in the vicinity already exhibit a wide range of architectural styles. Overall, the new building and landscape setting would be compatible with surrounding development. Thus, as with the Approved Project, the Modified Project would not result in significant impacts associated with aesthetic compatibility. Refer to Subsection IV.C,

Cultural Resources, below regarding the Modified Project's less than significant impacts associated with compatibility with historic resources.

Given the developed nature of the Project vicinity and the relatively flat topography, view resources are generally limited to elements in the vicinity and include landscaping and historic resources. As discussed above, the Modified Project would expand the park setting of Exposition Park and would also include improvements to Jesse Brewer Jr. Park and the open space area within Exposition Park to the west. Thus, while certain trees would be removed, views of landscape elements would be improved when compared with existing conditions. With regard to views of historic resources, views of the historical resources within Exposition Park are visible from Martin Luther King Boulevard, and Exposition Boulevard. Given the location and orientation of the LMNA building (see Figure 1 on page 5), views of the nearby historic buildings (e.g., the Coliseum, Swimming Stadium and Natural History Museum) would continue to be visible from Martin Luther King Jr. Boulevard and Exposition Boulevard. In addition, while the new LMNA building would be located between Vermont Boulevard and the Coliseum and Natural History Museum, views of these historic structures from Vermont Avenue are already partially blocked by the existing rows of trees that line Vermont Avenue. Furthermore, as discussed in detail in IV.C, Cultural Resources, below, the main entrance to the Coliseum faces Figueroa Street, and the approach to the building from the east is its primary view. In addition, the portion of the Natural History Museum that faces west, toward the LMNA, is utilitarian in function and contains no fenestration or architectural features. Finally, the LMNA building is far enough from the Los Angeles Swimming Stadium and Exposition Clubhouse buildings such that it would not obstruct their view from any angle. Thus, as with the Approved Project, the Modified Project would not result in significant impacts associated with views.

Overall, aesthetics and views impacts under the Modified Project would be less than significant and within the envelope of impacts set forth in Certified EIR.

(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.

(a) Construction

Construction lighting would be limited to short durations during the winter season and would be temporary. Further, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, the perimeter of the Project Site would be screened and would limit views of construction activities. Therefore, uses which are not adjacent to the Project Site would not be anticipated to be substantially affected by construction light or daytime glare. As such, like the Approved Project, construction of the Modified Project would not result in any new significant impacts with respect to construction-related lighting.

(b) Operation

Modified Project lighting would include architectural lighting for the LMNA building, and exterior lights adjacent to the building and along pathways for aesthetic, security and wayfinding purposes. All exterior and interior lighting would meet high energy-efficiency requirements utilizing light-emitting diode (LED) or efficient lighting technology. In addition, all light sources would be shielded and/or directed toward areas to be illuminated, thereby minimizing spill-over onto nearby sensitive areas. Furthermore, In accordance with Chapter 9, Article 3, Div. 1, Sec. 93.0117(b) of the LAMC, no exterior light would cause more than 2 foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units. In addition, new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and thus would maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties. With regard to the relocated soccer field, the new lighting would be directed towards the field and would comply with more recent energy efficiency requirements set forth by Title 24 of the California Code of Regulations as well as the LAMC requirement described above that limits light levels and glare to no more than 2 foot-candles at sensitive residential uses.

Proposed signage would include identification signage and pedestrian and vehicular way-finding and informational signage. Such signage would include lighted pole-mounted, building-mounted, and freestanding signs, as well as lighted kiosks with maps. In accordance with Chapter 1, Article 4.4, Sec. 14.4.4 E of the LAMC, no sign would be arranged and illuminated in such a manner as to produce a light intensity greater than 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially-zoned property.

With regard to glare, glare is typically caused by direct light sources or direct reflections of light sources. Direct reflection is typically off of highly polished surfaces such as glass, mirror, bright silver paint and even water surfaces. The skin material of the LMNA building would be comprised of a honed or matte finish. Thus, even though the color proposed would be off white, the surface texture would produce a diffuse reflection. As such, the façade would not result in significant glare impacts.

Based on the above, light and glare impacts under the Modified Project would be less than significant and within the envelope of impacts set forth in Certified EIR.

(3) Shading

As discussed above, the LMNA building would extend to up to 115 feet in height. The closest off-site shadow-sensitive use to the Modified Project Site is the open space area within Exposition Park to the east. The maximum shadows that would be generated by the LMNA building would occur during the winter and would be oriented to the north. As shown in the shadow diagrams included in Appendix A, given the location of the shadow-sensitive uses to the east of the site, the Modified Project would not shade the Exposition Park open space area for more than three hours during the winter or four hours during any of the remaining seasons. As such, as with the Approved Project, the Modified Project's potential shading impacts would be less than significant.

B. Air Quality and Greenhouse Gas Emissions

(1) Air Quality

(a) Construction

As discussed in the Certified EIR and addenda, construction-related air emissions under the Approved Project 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 (equivalent to VOC) and SO_X pollutants would not be exceeded. With the implementation of mitigation measures identified in the Certified EIR and addenda, 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 42-month duration. In addition, it is estimated that the proposed improvements would require approximately 101,210 cubic yards of import and approximately 605,747 cubic yards of export. As shown in Table 1 on page 24, the Modified Project would not exceed any of the current SCAQMD regional and localized construction significance thresholds with incorporation of the Mitigation Measure 9, which requires that off-road diesel-powered equipment used on-site for an aggregate of 40 or more hours during any portion of the construction activities shall meet Tier 4 standards.

This analysis conservatively assumed a round trip import/export haul distance of 38 miles to Puente Hills Landfill, located at 2800 Workman Mill Road, in Whittier, CA. This is equivalent to a total daily import/export haul vehicle miles travelled (VMT) of 9,120 miles. Closer locations may be determined feasible (e.g., other projects requiring fill material) as construction begins, which could reduce overall VMT and impacts, but were not relied upon for purposes of this analysis. As pollutant emissions from haul trucks are directly proportional to VMT, the Modified Project may be able to increase the daily number of truck trips if a closer location is determined feasible, thereby limiting the daily VMT to less than 9,120 miles.

In the event that construction activities associated with the Modified Project would overlap with construction activities analyzed in the Second Addendum, the combined emissions would exceed the SCAQMD regional NO_X significance threshold, as disclosed in the Certified EIR and Second Addendum. For all other pollutants combined construction air quality impacts would remain 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 $PM_{2.5}$). Furthermore, the combined impacts of the Modified Project and the Coliseum improvements would be substantially less than the impacts disclosed in the Certified EIR. As shown in Table 1, regional NO_X emissions under the Modified Project and Coliseum improvements represent approximately a 66 percent reduction in emissions in comparison to emissions set forth in the Certified EIR. This reduction is primarily a function of cleaner equipment being introduced into the off-road equipment fleet mix that were not contemplated under the Certified EIR. In addition, the Modified Project would comply with Mitigation Measure 9, which requires that off-road diesel-powered equipment used on-site for an aggregate of 40 or more hours during any portion of the construction activities shall meet Tier 4 standards. Tier 4 standards result in an approximate 80 percent reduction in NO_X emissions in comparison to the CalEEMod default off-road equipment mix.

Table 1
Unmitigated Estimate of Regional Modified Project Construction Emissions[a]

Construction Year	Pollutant Emissions (pounds per day)					
	VOC[b]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Emissions						
2018	10	99	158	<1	15	4
2019	5	39	84	<1	8	2
2020	18	37	80	<1	8	2
2021	7	62	78	<1	8	2
Maximum Construction Emissions	18	99	158	1	15	4
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(57)	(1)	(392)	(150)	(135)	(51)
Exceed Threshold?	No	No	No	No	No	No
Comparison of Combined Modified Project and Coliseum Improvements to the Approved Project in the Certified EIR						
Combined Emissions	29	207	228	<1	12	7
Approved Project Emissions	57	638	349	6	214	214
Percent Decrease	(66%)	(68%)	(35%)	(94%)	(88%)	(95%)
Localized Emissions						
2018	----	10	62	----	7	1
2019	----	13	3	----	<1	<1
2020	----	13	3	----	<1	<1
2021	----	13	2	----	<1	<1
Maximum Daily Localized Emissions	----	13	62	----	7	1
SCAQMD LST[c]	----	95	1,861	----	16	8
Over/(Under)	----	(82)	(1799)	----	(9)	(7)
Exceed Threshold?	----	No	No	----	No	No

[a] *The CalEEMod model printout sheets and/or calculation worksheets are presented in Attachment A (CalEEMod Output) of this document.*

[b] *Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic compounds (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.*

[c] *Maximum active construction activities would conservatively occur on approximately 5 acres at a distance of approximately 25 meters from sensitive land uses (the shortest distance available for LSTs). Potential localized construction impacts were evaluated using SCAQMD's LSTs for SRA 1.*

Source: Eyestone Environmental, 2017.

Overall, under the Modified Project the significant and unavoidable regional NO_X, CO and PM_{10} impact disclosed in the Certified EIR would be less than significant. In addition, the construction-related air quality mitigation measures set forth in the Certified EIR and addenda would continue to be implemented with the Modified Project. 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 those set forth in the Certified EIR and addenda.

(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. Thus, significant regional air quality impacts would occur. The Approved Project would result in less than significant localized CO impacts at potentially impacted intersections.

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. However, the LMNA would generate additional trips within the vicinity.

Operational emissions were calculated for the Modified Project and are included in Table 2 on page 26. As shown therein, the Modified Project would result in regional operational emissions that are below SCAQMD regional operational daily significance thresholds.

As with the Approved Project, the Modified Project would also result in less than significant localized CO impacts at potentially impacted intersections. None of the intersections analyzed in the Traffic Study for the Modified Project meet the SCAQMD criteria for requiring a local CO hotspot analysis.[1] Overall, operational impacts would be within the envelope of impact set forth in Certified EIR and addenda.

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[1] *The SCAQMD recommends an evaluation of potential localized CO impacts when a project causes the level of service (LOS) at a study intersection to worsen from C to D, or if the project increases the volume-to-capacity (V/C) ratio at any intersection rated D or worse by 2 percent or more.*

Table 2
Project Regional Operational Emissions—Buildout (2021)[a]

Emission Source	Pollutant Emissions (pounds per day)					
	VOC[b]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Emissions						
Area	7	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	1	1	<1	<1	<1
Mobile	3	13	32	<1	9	2
Total Proposed Uses Emissions	10	14	33	<1	9	2
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(45)	(41)	(327)	(149)	(141)	(53)
Exceed Threshold?	No	No	No	No	No	No
Localized Emissions						
Area	----	<1	<1	----	<1	<1
Energy (Natural Gas)	----	1	1	----	<1	<1
Maximum Daily Localized Emissions	----	1	1	----	<1	<1
SCAQMD LST[c]	----	95	1,861	----	16	8
Over/(Under)	----	(94)	(1,860)	----	(16)	(8)
Exceed Threshold?	----	No	No	----	No	No

[a] *The CalEEMod model printout sheets and/or calculation worksheets are presented in Attachment A (CalEEMod Output) of this document.*

[b] *Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic compounds (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.*

[c] *Maximum active operational activities would conservatively occur on approximately 5 acres at a distance of approximately 25 meters from sensitive land uses (the shortest distance available for LSTs). Potential localized operational impacts were evaluated using SCAQMD's LSTs for SRA 1.*

Source: Eyestone Environmental, 2017.

(c) Mitigation Measures

The mitigation measures that were included in the Certified EIR and addenda would continue to be implemented as part of the Modified Project. In addition, as shown in underline below, Mitigation Measure 9 has been added to the construction mitigation measures as shown in underline below.[2]

[2] *CEQA Guidelines Section 15164 allows for some necessary changes and/or additions to the Certified EIR as long as the conditions that require the preparation of a Subsequent EIR described in Section*

(Footnote continued on next page)

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). **[Note that the second sentence of this Mitigation Measure is not applicable to the Modified Project]**

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.

9. Off-road diesel-powered equipment used on-site for an aggregate of 40 or more hours during any portion of the construction activities shall meet Tier 4 standards.

15162 and 15163 have not occurred. Changes to the mitigation measures included in the Certified EIR and addenda are permitted.

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)~~ the Traffic Study.

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. In the context of these changes, the following analysis is provided.

(a) Significance Thresholds for the Modified Project

Subsequent to certification of the Certified EIR, the CEQA Guidelines were amended to add Section 15064.4, which is intended to assist lead agencies in determining the significance of the impacts of GHGs. This section recommends that lead agencies quantify GHG emissions of projects. In addition to quantification, this section recommends consideration of several other 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 have the discretion to establish significance thresholds for their respective jurisdictions. 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 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.[3] (see CEQA Guidelines Section 15130(f)).

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

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 Modified Project.[4]

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 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.[5] 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.[6] 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."[7] 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 adopted programs and/or other regulatory schemes to reduce GHG emissions.[8]

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[4] *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 December 20, 2016. While the Working Group proposed a draft GHG threshold, the SCAQMD never adopted it.*

[5] *14 CCR § 15064(h)(3).*

[6] *14 CCR § 15064(h)(3).*

[7] *14 CCR § 15064(h)(3).*

[8] *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/*

(Footnote continued on next page)

In the absence of any adopted numeric threshold, the significance of the Modified Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Modified Project complies with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as a land use development project, the most directly applicable adopted plan to reduce GHG emissions is the Southern California Associations of Governments' (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. The 2016–2040 RTP/SCS is considered a "vision" plan, and even though it is not mandatory, by meeting or exceeding its standards, the Modified Project would not result in a significant environmental impact. This analysis also considers consistency with regulations or requirements adopted by the Assembly Bill (AB) 32 Climate Change Scoping Plan, and the City of Los Angeles Green Building Ordinance.

(b) Modified Project Impacts

(i) Project Emissions

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 Modified 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. 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.

Similar to the Second Addendum, 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. While the LMNA would generate an increase in trips, the Modified Project would take advantage of current transit services now available

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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).

at the Site (i.e., the Exposition Line Light Rail transit line was planned, but not yet operational, at the time the Certified EIR was prepared).

GHG emissions associated with the Modified Project were calculated using CalEEMod, the model recommended by the SCAQMD for calculating emissions from land use projects. Model results are provided in Appendix B of this Addendum.

As summarized and shown in Table 3 on page 32, the Modified Project would result in a total of approximately 4,406 metric tons of carbon dioxide equivalent ($MTCO_2e$), representing an approximate 54-percent reduction associated with implementation of Project Features. This demonstrates the efficacy of the GHG reduction programs and measures applicable to the Modified Project. This decrease is due to the increase in use of transit services available at the Site (e.g., Exposition Line Light Rail transit line), as well as compliance with CalGreen 2016, and LEED Gold equivalency.

(ii) Consistency with Applicable Plans and Policies for Reducing GHG Emissions

As described above, compliance with a GHG emissions reduction plan renders a less-than-significant impact. The following section describes the extent the Modified Project complies with or exceeds the performance-based standards included in the regulations outlined in the *Climate Change Scoping Plan*, the Regional Transportation Plan/Sustainable Communities Strategy, and the Los Angeles Green Building Ordinance. As shown herein, the Modified Project would be consistent with the applicable GHG reduction plans and policies.

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.[9] 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."[10] The Climate Change Scoping Plan h[as a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such

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

[10] *Climate Change Scoping Plan, CARB, December 2008.*

Table 3
Event Day GHG Emissions Summary
(metric tons of carbon dioxide equivalent)

Scope	Modified Project Prior to Implementation of Project Features	Modified Project with Implementation of Project Features[a]	Modified Project's Percent Reduction with Implementation of Project Features
Area	<1	<1	0%
Energy	2,886	2,296	-20%
Mobile	6,437	1,619	-75%
Waste	69	69	-0%
Water	122	97	-20%
Construction	324	324	0%
Total	**9,514**	**4,406**	**-54%**

Source: Eyestone Environmental, 2017. Calculation worksheets are included in Appendix B of this Addendum.

as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce project-related GHG emissions.

As shown in Table 3, the Modified Project would result in 4,406 $MTCO_2e$ annually. The breakdown of emissions by source category shows approximately less than 1 percent from area sources; 52 percent from energy consumption; 37 percent from mobile sources; 2 percent from solid waste generation; 2 percent from water supply, treatment, and distribution; and 7 percent from construction activities. Provided in Table 4 on page 33 is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the Modified Project's design features comply with or exceed the reduction actions/strategies outlined in the *Climate Change Scoping Plan*.

SCAG's Sustainable Communities Strategy

As described in Table 4, SB 375 requires the Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. The 2016–2040 RTP/SCS is the region's transportation and sustainability investment strategy for protecting and enhancing the region's quality of life and economic prosperity through this period. The 2016–2040 RTP/SCS implementation is expected to result in regional benefits to mobility, economy, health and sustainability. The 2016–2040 RTP/SCS is also expected to help California reach its GHG reduction goals, with reductions in per

Table 4
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Modified Project Consistency Analysis
Area (Less than 1 percent of Modified Project inventory)		
SCAQMD Rule 445 (Wood Burning Devices): Requires use of natural gas to power all cooking stoves and fireplaces.	SCAQMD	**Consistent.** The Modified Project would not include wood burning devices.
Energy (52 percent of Modified Project inventory)		
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.** LADWP's commitment to achieve 35 percent renewables by 2020 would exceed the requirement under the RPS program of 33 percent renewables by 2020. In 2016, LADWP indicated that 21 percent of its electricity came from renewable resources in Year 2015.[a] As LADWP would provide electricity service to the site, the Modified Project would use electricity that is produced consistent with this performance based standard. Electricity GHG emissions provided in Table 3 on page 32 assume that LADWP will receive at least 33 percent of their electricity from renewable sources by the year 2020. In addition, the Modified Project would include a minimum of 15 percent of roof area to have photovoltaic panels installed.
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 generate electricity that would increase renewable energy resources to 50 percent by 2030. As LADWP would provide electricity service to the site, the Modified Project by 2030 would use electricity consistent with the requirements of SB 350. Project buildout would occur in Year 2021 and, therefore, the estimated GHG emissions from electricity usage provided above conservatively do not include implementation of SB 350 with a compliance date of 2030. Electricity GHG emissions presented in Table 3 on page 32 would be further reduced by 17 percent by Year 2030 as the electricity provided to the site would meet the requirements under SB 350. As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under the

Table 4 (Continued)
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Modified Project Consistency Analysis
		CCR, 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. The Modified Project would support this action/strategy because it includes compliance with specific requirements of the Los Angeles Green Code (consistency with this regulation is discussed below). In addition, the Modified Project would include a minimum of 15 percent of roof area to have photovoltaic panels installed.
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, CEC, and LADWP	**Not Applicable.** LADWP would meet the requirements of SB 1368. As LADWP would provide electricity service to the site, the Modified Project would use electricity that meets the requirements under SB 1368.
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 and CEC	**Consistent.** The Appliance Efficiency Regulations apply to new appliances and lighting that are sold or offered for sale in California. The Modified Project would include new appliances and lighting that comply with this energy efficiency 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,	State and CEC	**Consistent.** Consistent with regulatory requirements, the Modified Project shall comply with applicable provisions of the 2016 Los Angeles Green Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2016 Title 24 standards are 5 percent better for nonresidential construction in comparison to the 2013 standards.[c] The 2016 Title 24 standards are more efficient than the 2020 Projected Emissions under Business-as-Usual in the *Climate Action Scoping Plan*. The standards required builders better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the Modified Project

Table 4 (Continued)
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Modified Project Consistency Analysis
energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.		has incorporated energy efficiency standards that are more effective than the measures identified in the *Climate Action Scoping Plan* to reduce GHG emissions.
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.** EISA would serve to reduce the use of incandescent light bulbs for the Modified Project and, thus, reduce energy usage associated with lighting. Electricity GHG emissions provided in Table 3 on page 32 conservatively account for a 25-percent 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 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]	State/ Manufacturers	**Consistent.** As with the EISA, discussed above, the Modified Project would meet the requirements under AB 1109 because it incorporates energy efficient lighting and electricity consumption that complies with local and state green building programs.
Cap-and-Trade Program: The program establishes an overall limit on GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, and cement production). Facilities subject to the cap are able to trade permits to emit GHGs within the overall limit.		**Consistent.** As required by AB 32 and the Climate Change Scoping Plan, 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. Therefore, GHG emissions associated with the Modified Project's electricity usage per year presented in Table 3 on page 32 would be covered by the Cap-and-Trade Program and would be consistent with AB and the Climate Change Scoping Plan.

Table 4 (Continued)
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Modified Project Consistency Analysis
Mobile (37 percent of Modified Project inventory)		
Assembly Bill 1493 (AB 1493) "Pavley 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.** The Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and are expected to reduce GHG emissions by about 30 percent in 2016, all while improving fuel efficiency. GHG emissions related to vehicular travel by the Modified Project would benefit from this regulation because vehicle trips associated with the Modified Project would be affected by AB 1493. Mobile source emissions generated by the Modified Project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in Table 3 on page 32 were calculated using CalEEMod which includes implementation of AB 1493 into mobile source emission factors.
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).[e,f]	State, CARB	**Consistent.** GHG emissions related to vehicular travel by the Modified Project would benefit from this regulation because fuel used by Modified Project-related vehicles would be compliant with LCFS. Mobile source GHG emissions provided in Table 3 on page 32 were calculated using CalEEMod, which includes implementation of the LCFS into mobile source emission factors.
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	**Not applicable.** Although this is not applicable to the Modified Project since it is a statewide program, standards under the Advanced Clean Cars Program will apply to all passenger and light duty trucks used by visitors, employees, and deliveries to the Modified Project. 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 be reduced with implementation of standards under the Advanced Clean Cars Program consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in Table 3 on page 32, conservatively do not include this additional 34-percent reduction in

Table 4 (Continued)
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Modified Project Consistency Analysis
		mobile source emissions as the CalEEMod model does not yet account for this regulation. The Modified Project would further support this regulation since the project applicant will provide at least 20 percent of the total code-required parking spaces for the LMNA to be capable of supporting future electric vehicle supply equipment (EVSE) and will provide at least 5 percent of the total code-required parking spaces with EV charging stations.
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 SCAG to direct the development of the SCS for the region, which is discussed further below. The Modified Project represents an infill development within an existing urbanized area that would concentrate new institutional uses within a HQTA. Therefore, the Modified Project would be consistent with SCAG's 2016–2040 RTP/SCS as it is located within a HQTA. Furthermore, the 2016–2040 RTP/SCS would result in an estimated 18-percent decrease in per capita GHG emissions by 2035 and 21-percent decrease in per capita GHG emissions by 2040. As project-related transportation emissions are reduced by approximately 75 percent (see Table 3 on page 32), therefore the Modified Project would be consistent with SB 375 and the 2016–2040 RTP/SCS.
Solid Waste (Two percent of Modified Project inventory)		
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.[g]	State	**Consistent.** GHG emissions related to solid waste generation from the Modified Project would benefit from this regulation as it would decrease the overall amount of solid waste disposed of at landfills. The decrease in solid waste would then in return decrease the amount of methane released from the decomposing solid waste. Modified Project-related GHG emissions from solid waste generation provided in Table 3 on page 32 includes a 50-percent reduction in solid waste generation source emissions per goals of the City of Los Angeles. The project applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. In addition, the Modified Project would provide recycling

Table 4 (Continued)
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Modified Project Consistency Analysis
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.[h]		bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material.
Water (Two percent of Modified Project inventory)		
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 2016 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.
Construction (Seven percent of Modified Project inventory)		
CARB In-Use Off-Road Regulation: CARB's in-use off-road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.	CARB	**Consistent.** The project applicant would use construction contractors that would comply with this regulation, and all off-road diesel-powered equipment used on-site for an aggregate of 40 or more hours during any portion of the construction activities will meet Tier 4 standards
CARB In-Use On-Road Regulation: CARB's in-use on-road heavy-duty vehicle regulation ("Truck and Bus	CARB	**Consistent.** The project applicant would use construction contractors that would comply with this regulation.

Table 4 (Continued)
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Modified Project Consistency Analysis
Regulation") applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.		

[a] *California Energy Commission, Utility Annual Power Content Labels for 2015, www.energy.ca.gov/pcl/labels/.*
[b] *Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, Ch. 547.*
[c] *CEC, Adoption Hearing, 2016 Building Energy Efficiency Standards.*
[d] *2007b. Assembly Bill 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534.*
[e] *CARB, Initial Statement of Reason for Proposed Regulation for The Management of High Global Warming Potential Refrigerant for Stationary Sources, October 23, 2009.*
[f] *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.*
[g] *Cal. Pub. Res. Code § 41780(a).*
[h] *Cal. Pub. Res. Code § 41780.01(a).*
Source: Eyestone Environmental, 2017.

capita transportation emissions of 9 percent by 2020 and 16 percent by 2035.[11] Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.[12] The 2016–2040 RTP/SCS would result in an estimated 8-percent decrease in per capita GHG emissions by 2020, 18-percent decrease in per capita GHG emissions by 2035, and 21-percent decrease in per capita GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals.

The 2016–2040 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.[13] Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas.[14] Specifically, the Site is located within a High-Quality Transit Area as designated by the 2016–2040 RTP/SCS.[15] The 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 Site) and the Expo/Vermont Station (0.09 mile from the Site), as well as the 37th Street/USC Silver Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.5 mile from the Site). The 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 Site. By focusing new development within a designated High-Quality Transit Area, the Modified Project would be consistent with regional growth strategies promoted in the 2016–2040 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. As shown in Table 3 on page 32, the Modified

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[11] *CARB, Regional Greenhouse Gas Emission Reduction Targets Pursuant to SB 375, Resolution 10-31.*

[12] *SCAG, Final 2016–2040, RTP/SCS, April 2016, p. 153.*

[13] *SCAG, Final 2016–2040, RTP/SCS, April 2016, p. 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] *SCAG, Final 2016–2040, RTP/SCS, April 2016, Exhibit 4.9: High-Quality Transit Areas (HQTA) SCAG Region, p. 136.*

Project results in a VMT and GHG reduction from mobile sources of approximately 75 percent in comparison to a standard project as estimated by CalEEMod, and would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS. This reduction is attributable to the Modified Project characteristics as being an infill project near transit that supports multi-modal transportation options. Overall, the Modified Project would be consistent with the 2016–2040 RTP/SCS, which is a relevant regional plan adopted for the purpose of reducing GHG emissions.

Los Angeles Green Building Ordinance

Consistent with regulatory requirements, the Modified Project shall comply with applicable provisions of the 2016 Los Angeles Green Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2016 Title 24 standards are 5 percent better for nonresidential construction in comparison to the 2013 standards.[16] The 2016 Title 24 standards are more efficient than the 2020 Projected Emissions under Business-as-Usual in the *Climate Action Scoping Plan*. The standards require builders better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the Modified Project has incorporated energy efficiency standards that comply with the Los Angeles Green Building Ordinance.

(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 Approved 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 and addenda.

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[16] *CEC, Adoption Hearing, 2016 Building Energy Efficiency Standards.*

C. Cultural Resources

(1) Historical Resources

As discussed in the Certified EIR and addenda, there are numerous historical resources within the vicinity, including the Los Angeles Memorial Coliseum, the Natural History Museum, and the Exposition Park Historic District. The Project as initially proposed in the Certified EIR included the removal of some of the existing Coliseum seating. Removal of the seating was determined to be a significant impact. However, as discussed in detail in the Second and Third Addenda, the design of the Project was subsequently modified to include a single new seating tower substantially smaller than the two towers originally proposed. In addition, the design was modified to retain the existing shape of the playing field and retain the two existing tunnels and stairs that were previously proposed to be closed off. Overall, most of the alterations of the Coliseum under the Approved Project would preserve and enhance the historic character-defining features of the Coliseum. Therefore, as set forth in the Second and Third Addenda, under the Approved 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. In addition, no other historic resources in the vicinity would be impacted directly or indirectly. Thus, potential impacts to historic resources would be less than significant under the Approved Project.

A detailed analysis of the Modified Project's potential impacts associated with historic resources was completed as part of the *Lucas Museum of Narrative Art Historical Resources Technical Report* (Historic Report), prepared by Architectural Resources Group (March 2017) and included as Appendix C of this document. A summary of the findings of the Historic Report is provided below.

(a) Background and Existing Conditions

The Modified Project site was historically developed with single-family dwellings, horse barns, multi-family residences, and commercial/industrial buildings. However, all of the buildings and structures once present at this location have been removed, and the site has served as surface parking for Exposition Park since the early 1950s. The most recent modifications within the site include the introduction of Jesse Brewer Jr. Park in 1998 and the introduction of a soccer field (Soboroff Field) in 2009. The Modified Project Site also includes numerous trees. However, none of the trees are historic or part of a historic district.

The Modified Project Site has never been formally part of Exposition Park, which historically had a western boundary of Menlo Avenue, today known as Bill Robertson Lane. Given the absence of historic buildings and structures and the lack of historical association

with Exposition Park, the Modified Project Site is not eligible for listing in the National Register, the California Register, or as a Los Angeles Historic-Cultural Monument.

Historic resources adjacent to the proposed LMNA include the Coliseum to the east across Bill Robertson Lane, and the Natural History Museum to the northeast, also across Bill Robertson Lane. The Coliseum is designated as a National Historic Landmark, as State Historical Landmark #960, and was listed in the National Register of Historic Places in 1984. In addition, the Natural History Museum is listed in the National Register. The LMNA is also adjacent to the Exposition Park Historic District, which is roughly bounded by Exposition Boulevard, Figueroa Street, Bill Robertson Lane, and Martin Luther King Jr. Boulevard. Other nearby historical resources in the Project vicinity include: North and South Coliseum Drives with Christmas Tree Lane (determined eligible for the National Register); the Exposition Park Rose Garden (listed in the National Register); the Exposition Clubhouse (determined eligible for the National Register and designated City of Los Angeles Historic-Cultural Monument No. 127); the Los Angeles Swimming Stadium (now the LA84 Foundation/John C. Argue Swim Stadium; determined eligible for the National Register and listed in the California Register); and the California Aerospace Museum (now the Air and Space Gallery; listed in the California Register).

(b) Modified Project Impacts

As discussed above, there are no historical resources within the area proposed for development of the LMNA and associated improvements. As such, the Historic Report concluded that the Modified Project would not directly impact any historical resources.

The Historic Report also provides a detailed analysis of the potential for the Modified Project to result in construction that reduces the integrity or significance of the important resources in the vicinity. A summary of the analysis is provided below:

- Los Angeles Memorial Coliseum—The southernmost portion of the LMNA building, which would be approximately 115 feet tall at its highest point, would be approximately 250 feet from the northwest corner of the Coliseum. The main entrance to the Coliseum faces Figueroa Street, and the approach to the building from the east is its primary view. The Coliseum's elaborate peristyle entrance continues to be its iconic public façade, and the allée formed by the trees along North and South Coliseum Drives (now Exposition Park Lane) and Christmas Tree Lane accentuate this view from the east. The Coliseum is also visible from Martin Luther King Jr. Blvd., to the south, and from Bill Robertson Lane, to the west, although these views are secondary to the view from Figueroa Street. The Coliseum is approximately 500 feet from Vermont Avenue at its closest point, and although it is intermittently visible from Vermont Avenue, the view is largely obscured by vegetation and fencing from most angles.

As the Modified Project Site originally contained single- and multi-family residential buildings (most of which were razed in the early 1950s to make way for surface parking), the Coliseum would not have been visible from Vermont Avenue during its historical period. Therefore, the view from the west was never a significant view of the Coliseum. Furthermore, the Coliseum has never had any significant association with the proposed site of the LMNA. Historically, the Coliseum was situated at the far western edge of Exposition Park, which culminated at Menlo Avenue (now Bill Robertson Lane), and the LMNA site remained residential in character until the 1950s. Thus, the land to the west of the Coliseum, including the site of the proposed LMNA, has never had any association with the Coliseum aside from providing surface parking for visitors in the present day. In addition, construction of the LMNA and associated improvements would not change the setting of the Coliseum in such a way that its overall integrity will be diminished. Although the Modified Project would introduce a large new building to the west of the Coliseum, the site elements with which the Coliseum has direct, historical association are to the east of the building, and these would remain unchanged. Therefore, the Modified Project would not have the potential to reduce the integrity or significance of the Coliseum.

- Natural History Museum—The Natural History Museum is located to the east of the proposed LMNA, across Bill Robertson Lane. The northern portion of the LMNA building, which would be approximately 115 feet tall at its highest point, would be approximately 250 feet from the southwest corner of the Natural History Museum. The National Register designation for the Natural History Museum focuses on the 1913 portion of the building, which has been expanded significantly with additions constructed in 1925, 1930, 1960, and 1974. The building has not been reevaluated for individual eligibility against local, state, or national criteria since the time of its designation. The portion of the building nearest to the proposed LMNA was constructed in 1960 and altered in 1974. The 1913 building is separated from the LMNA by these substantial additions. Even if the building as a whole were significant, including all of its additions dating to the 1970s, its significance and integrity would still not be reduced by the proposed LMNA. The Natural History Museum building has a long, axial footprint running east-west. The primary entrance is currently located on the south side of the building, facing an expansive lawn. Significant views of the building include the view north toward the main entrance from the south lawn, the view west toward the 1913 rotunda building from the Rose Garden, and the view south of the building from Exposition Boulevard. The portion of the building that faces west, toward the LMNA, is utilitarian in function and contains no fenestration or architectural features. There is no significant view of the Natural History Museum that would be blocked by the proposed LMNA; currently, the building is barely visible from Vermont Avenue.

  Furthermore, the Natural History Museum has never had any significant association with LMNA. Historically, the Natural History Museum was situated at

the far western edge of Exposition Park, which culminated at Menlo Avenue (today's Bill Robertson Lane), and the LMNA site remained residential in character until the 1950s. Any notable landscape features to the west of the 1913 Natural History Museum were removed with the construction of its additions in the 1920s, '30s, '60s and '70s. Construction of the LMNA would not change the setting of the Natural History Museum in such a way that its overall integrity is diminished; its integrity of setting has already been compromised. Therefore, the proposed LMNA does not have the potential to reduce the integrity or significance of the Natural History Museum.

- Exposition Park Historic District—The LMNA site has no historical association with the Exposition Park Historic District. The proposed LMNA would not reduce the integrity of any of the historic district's component parts, nor would it change any of the spatial relationships between them. The LMNA building would be located directly west of the historic district. At its highest point, the new building would be approximately 115 feet tall. The district's contributing buildings do not represent a single unified architectural style; rather, they exhibit a wide range of styles including Beaux Arts, Moderne, and Spanish Colonial Revival. There are several non-contributing buildings within the historic district boundary that are contemporary in style, including Frank Gehry's California Aerospace Museum (1982-1984). Therefore, Exposition Park is already a campus of both historic and contemporary institutional architecture without a common visual theme. The addition of a contemporary building outside of the district would not have an impact on the district in terms of the compatibility of and relationships between its component parts.

  With the exception of the Coliseum, which includes an exterior wall that measures approximately 75 feet height (from ground level) and a press box that measures approximately 101 feet in height, most of the contributing buildings in the historic district are two stories tall. The new LMNA building would exceed all of these buildings in height. However, as stated above, significant views of the historic district or its contributors would not be blocked by the LMNA building. Furthermore, the visual character of the proposed LMNA site has changed significantly since the period of significance of the adjacent historic district (identified as 1910-1932). Although the Modified Project introduce a new building adjacent to the Exposition Park Historic District, because the setting at this location has already changed and because there is no significant impact on the contributors to the historic district, there would be no further reduction in integrity or significance of the historic district.

- Los Angeles Swimming Stadium and Exposition Clubhouse—The northwestern edge of the Swimming Stadium would be approximately 900 feet from the southernmost edge of the LMNA. A new subterranean parking structure would be constructed directly to the west of the Swimming Stadium and northwest of the Clubhouse, across Bill Robertson Lane. The Los Angeles Swimming Stadium and Exposition Clubhouse are visible from Bill Robertson Lane and

Martin Luther King Jr. Blvd. The LMNA building is far enough from these two buildings such that it would not obstruct their view from any angle. Therefore, the proposed LMNA building does not have the potential to reduce the integrity or significance of the Los Angeles Swimming Stadium or Exposition Clubhouse.

- Exposition Park Rose Garden, North and South Coliseum Drives with Christmas Tree Lane, and California Aerospace Museum—The Exposition Park Rose Garden, North and South Coliseum Drives with Christmas Tree Lane, and California Aerospace Museum are all located in the eastern portion of Exposition Park. The closest of these to the LMNA improvements is the Rose Garden, which is approximately 930 feet from the northeastern-most edge of the LMNA. In all cases, there are large buildings and structures between these important resources and the LMNA improvements. Furthermore, there is no historical association between any of these buildings and the Modified Project site. Therefore, the Modified Project does not have the potential to reduce the integrity or significance of the Exposition Park Rose Garden, North and South Coliseum Drives with Christmas Tree Lane, or California Aerospace Museum.

Based on the above, the Modified Project would not result in significant impacts to the Coliseum or any other historic resources located within the vicinity. Thus, potential impacts to historic resources would be less than significant under the Modified Project and within the envelope of impacts set forth in the Certified EIR and addenda.

(2) Archaeological and Paleontological Resources

Potential impacts to archaeological and paleontological resources were not assessed in detail in the Certified EIR. However, as set forth in the Addenda, potential impacts associated with paleontological resources would be less than significant with implementation of mitigation measures, and potential impacts associated with archaeological resources would be less than significant.

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. 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, 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 is the case with the Approved Project, 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 4, 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.

(3) Mitigation Measures

Mitigation Measures 1 through 4 below were included in the Certified EIR and addenda to reduce the Approved Project's impacts related to historic and paleontological resources. Mitigation Measures 1 through 3 will be implemented as part of the improvements to the Coliseum and are not applicable to the Modified Project. Mitigation Measure 4 would continue to be implemented during construction of the Modified Project.

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. **[Mitigation Measure not applicable to the Modified Project.]**

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. **[Mitigation Measure not applicable to the Modified Project.]**

3. The Project shall be constructed in substantial conformance with the Conceptual Historic Fabric Retention Plan provided in Appendix C of the Second Addendum. **[Mitigation Measure not applicable to the Modified Project.]**

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 addenda 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 be addressed through compliance with regulatory requirements including Los Angeles Building Code. 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 following summary of potential impacts under the Modified Project is based, in part, on the *Preliminary Geotechnical Assessment, Proposed Lucas Museum of Narrative Art*, dated October 27, 2016, the *Supplemental Liquefaction Hazard Information,* dated October 31, 2017, and the *Update of Preliminary Geotechnical Assessment, Proposed Lucas Museum of Narrative Art*, dated February 10, 2017. These reports, which

collectively are referred to hereafter as the Geotechnical Reports, have all been prepared by Geotechnologies, Inc. and are included in Appendix D of this Addendum.

The Modified Project would result in development within the same general vicinity as that of the Approved Project. Thus, due to the relatively flat nature of the site, no unique geologic formations would be modified and landsliding associated with significant slopes would not occur. The soils underlying the site generally consist of alluvial soils. Alluvial soils are typically medium dense to very dense, or stiff, and well consolidated, with expansion characteristics that range from very low to moderate. It is anticipated that some amount of existing fill materials overlies the native alluvium, and such fill materials are expected to be completely removed during excavation, exposing dense alluvial soils at the subgrade.

As was the case with the Approved Project, while there are known active or potentially active faults that underlie the site, the site is not located within an Alquist-Priolo Fault Zone. Thus, the potential for surface ground rupture is considered low. Groundwater was not encountered during exploration conducted to a maximum depth of 70 feet below ground surface. In addition, according to the Geotechnical Reports, the historic-high groundwater level for the site was 40 feet below ground surface. Therefore, as with the Approved Project, the liquefaction analysis for the Modified Project determined that the potential for liquefaction at the site is considered low. Similarly, the potential for subsidence on the site would continue to be low due to the depth of the groundwater table and since there are no withdrawals of oil resources or groundwater occurring on or in the vicinity of the site, as noted in the Certified EIR. Based on the Geotechnical Reports, it is anticipated that the soils underlying the site consist of alluvial soils that are comprised of a mixture of sands and silty sands with varying amounts of gravel and cobbles that are typically medium dense to very dense, or stiff. These soils have very low to moderate expansion characteristics. The existing fill materials would be removed to construct the subterranean parking structures, which would expose dense native alluvial soils. Thus, impacts resulting from soil stability and soil expansion would be less than significant. The Geotechnical Reports also concluded that the potential for dynamic settlement at the site continues to be negligible. With regard to seismic hazards, overall, the Geotechnical Reports concluded that compliance with current regulatory requirements would reduce potential impacts associated with ground shaking and associated seismic hazards to less than significant levels. The Modified Project would also continue to implement the mitigation measures regarding geology and seismic hazards that are set forth in the Certified EIR and included below. Thus, as with the Approved Project, with implementation of regulatory requirements and mitigation measures, impacts associated with geology and seismic hazards would be less than significant under the Modified Project.

(1) Mitigation Measures

Mitigation Measures 1 through 13, below, were included in the Certified EIR and addenda to reduce Approved Project impacts related to geology and seismic hazards. With the exception of Mitigation Measure 6, which is not applicable to the Modified Project, these mitigation measures would continue to be implemented under the Modified Project to ensure that potential impacts to geology and seismic hazards 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. **[Mitigation Measure is not applicable to Modified Project.]**[17]

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.

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[17] *The earth berm is not located on the Modified Project Site. As such, this mitigation measure is not applicable.*

E. Land Use

(1) Land Use Compatibility

As set forth in the Certified EIR and addenda, 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.

The Modified Project would not alter the Coliseum's existing use as an outdoor sports and multi-purpose stadium. Rather, the Modified Project would develop a new building with approximately 299,717 square feet of new floor area for museum and ancillary uses, including restaurant, theater, retail, classroom, and event spaces. The types of land uses proposed are consistent and compatible with the Approved Project and with other land uses within and around Exposition Park. Specifically, land uses within Exposition Park include museums, event centers, educational facilities and associated office/administration, conference, and concession spaces. The Modified Project Site has been used for a variety of uses, the most recent of which includes surface parking for uses within Exposition Park, a soccer field, and a community park. As discussed above, the soccer field would be relocated within the site and the park would be improved. In addition, new parking would be provided to serve the LMNA and replacement parking spaces would be provided to serve existing uses. In particular, when accounting for the code parking required for the LMNA and the replacement parking, a net increase of up to 135 permanent parking spaces would be available. 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 and addenda, 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 site set forth by the City of Los Angeles General Plan. In addition, as set forth in the Certified EIR and addenda, 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 (Community Plan), the City of Los Angeles General Plan Framework (Framework Element), and the Hoover Redevelopment Plan. In particular, the Approved Project would support policies supporting revitalization of Exposition Park and preserving cultural monuments. In addition, the Approved Project would be consistent with the Coliseum District Specific Plan (Specific Plan) and LAMC. 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 Modified Project is also subject to the Exposition Park Master Plan, the Framework Element, the Community Plan, the LAMC, the Specific Plan, as well as the Southern California Association of Governments' (SCAG) recently adopted 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS); SCAG's Compass Growth Vision, adopted in 2004, and SCAG's 2008 Regional Comprehensive Plan (RCP) and Specific Plan.[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 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. As detailed in the Section III, Project Description, the Modified Project would develop a new museum building within Exposition Park. Similar to the Approved Project, the Modified Project would support Objective 1 of the Master Plan to reinforce the dual role of Exposition Park as a regional and community resource by developing a one-of-a-kind gathering place to experience art collections, films, and exhibitions. In addition, the Modified Project would include more enhanced landscape and pedestrian improvements as compared to the Approved Project by creating a park landscape around the new building, developing a variety of public spaces, and installing improvements to the Jesse Brewer Jr. Park and Exposition Park, which would support Objective 2 of the Master Plan to enhance the character and landscape features in Exposition Park by increasing the area available for passive and active recreational uses and Objective 3 to provide pedestrian transit linkages. Development of the new LMNA building would also support Objective 3 of the Master Plan to create new employment, recreational, educational, and cultural opportunities. In addition, the Modified Project would not diminish the historical legacy of Exposition Park.

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[18] *Most of the Modified Project is located on a site owned by the Sixth District Agricultural Association (State of California) orl the Coliseum Commission. Accordingly, most of the Modified Project, including the museum and its associated parking, is not subject to the requirements of the Exposition/University Park Redevelopment Plan (formerly Hoover Redevelopment Plan).. However, the City owns the now vacated portion of Leighton Drive running through the Modified Project Site. This portion will be developed with a portion of the Replacement Parking Structure, which will be consistent with the Redevelopment Plan's Public Use designation for this City-owned property. Moreover, that portion of the Modified Project will obtain any necessary approvals or clearances from the CRA successor agency prior to building permit issuance.*

Rather, the addition of the new museum would attract more visitors to the area to appreciate the significance of Exposition Park; thereby supporting Objective 4. Finally, the Modified Project would support Objective 5, to establish consistent and compatible design standards for Exposition Park by relocating the parking spaces removed by the Modified Project within two subterranean parking structures and creating additional landscaping and open spaces on-site. Therefore, consistent with the conclusions in the Certified EIR for the Approved Project, the Modified Project would be consistent with the relevant objectives of the Master Plan.

The Land Use Chapter of the Framework Element 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 Modified 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 Framework Element by maintaining and enhancing pedestrian connections, reinvigorating the community experience within Exposition Park by providing a new cultural facility and improvements to Jesse Brewer Jr. Park, and providing uses that would be compatible in scale with the Coliseum and other nearby uses. In addition, as discussed in Section IV.A, Aesthetics, above, the scale, mass, and height of the proposed LMNA building would be compatible with surrounding uses within and adjacent to Exposition Park. Therefore, the Modified Project would be consistent with the intent of the Framework Element.

The South Los Angeles Community Plan functions as the Land Use Element of the City's General Plan that is applicable to the Modified Project Site. With the exception of the southernmost portion of the Modified Project Site that is designated for Community Commercial and High Medium Residential uses, the Community Plan designates the majority of Modified 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 portions of the Modified Project Site that are designated as Open Space are owned by the Sixth District Agricultural Association, a state agency (also referred to as Expo Park), or the City of Los Angeles. Moreover, the corresponding zones for Community Commercial and High Medium Residential allow the uses under the Modified Project

proposed in those land use designations. The proposed uses under the Modified Project would be consistent with the Open Space, Community Commercial, and High Medium Residential land use designations of the Project Site. The Modified Project would also support the relevant land use objectives and policies of the Community Plan. Specifically, the development of LMNA would provide new employment opportunities and strengthen the economic base of the area consistent with Objective 2-3. The proposed design of the Modified Project would improve the appearance of the Modified Project Site, provide additional landscaping, and preserve the character, scale, and architectural diversity of Exposition Park and the surrounding area consistent with Policies 2-5.1 and 2-5.2. Implementation of the Modified Project would also preserve and enhance existing recreational facilities, park space, and pedestrian connections within Exposition Park, consistent with Policies 4-1.1 and 4-1.2. In addition, the design of the new LMNA building would provide a variety of public spaces consistent with Policy 5-1.2. As with the Approved Project, the Modified Project would preserve the historic character of the Coliseum and the construction of the museum would be complimentary to the Coliseum consistent with Community Plan Objective 1-4 and Policies 1-4.1, and 19-2.1. The LMNA would be located just south of the Metro Expo Line Expo/Vermont Station and is served by numerous bus lines operated by Metro consistent with Policy 13-1.1. Furthermore, the Modified Project would provide a new amenity within Exposition Park consistent with Objective 20-1 and Policies 20-1.1 and 20-1.2.

The Modified Project Site is zoned OS-1XL (Open Space, Extra Limited Height District 1), RD1.5-1 (Restricted Density Multiple Dwelling Zone, and C2-1L (Commercial, Height District IL) under LAMC. In addition, the Modified Project is also located within the boundaries of the Coliseum District Specific Plan. The Specific Plan provides additional land use regulations applicable development of property within the Specific Plan area. 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.

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. The Specific Plan also requires that 850 parking spaces be retained within the Specific Plan

area. In addition, the Coliseum and Soccer Stadium Sign District (Sign District) has been established that regulates signage within the Specific Plan area. The Modified Project proposes an amendment to the Specific Plan to provide applicable development parameters for the Modified Project Site. Specifically, the Specific Plan Amendment would contain regulations for the development and operation of LMNA, including permitted uses, height, floor area, required parking, and the sale and consumption of alcohol within the museum's restaurant and special event spaces. Although the Modified Project is proposing a Specific Plan Amendment, the Modified Project is compatible with the Specific Plan's generally permitted uses. In addition, at least 850 parking spaces would continue to be provided within the Specific Plan Area. In addition, with regard to signage, the Modified Project is not seeking to amend the Sign District. Therefore, all signage would comply with the applicable LAMC requirements.

SCAG's 2016 RTP/SCS, adopted on April 7, 2016, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The mission of the 2016 RTP/SCS is to provide "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians." The 2016 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 2016 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 development within a designated High-Quality Transit Area, the Modified Project would be consistent with regional growth strategies promoted in the 2016 RTP/SCS. In addition, 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 2016 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 2016 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 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.

As discussed above, the Modified Project also includes the vacation and closure of 39th Street between Vermont Avenue and Bill Robertson Lane. Following vacation, 39th Street would continue to provide public access between Vermont Avenue and Bill Robertson Lane during major events at Exposition Park, but would generally be closed to public traffic. In order to vacate 39th Street, a general plan amendment to change the street designation of 39th Street between Vermont and Bill Robertson Lane from a Collector Street to a Local Street is required. Also required to implement the Modified Project are Project Permit Compliance Review for Project compliance with the Specific Plan as well as a Vesting Tentative Tract Map for the merger and resubdivision of the site.

Based on the above, the Project would comply with applicable land use plans. In addition, with approval of the Specific Plan Amendment, Project Permit Compliance Review, Vesting Tentative Tract Map, and General Plan Amendment for the vacation of 39th Street, the Modified Project would comply with relevant planning and 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 addenda.

F. Noise

(1) Noise and Vibration Background

The Modified Project Site is located in a highly urbanized environment. Primary noise sources in the vicinity include events at the Coliseum, traffic on the adjacent streets (i.e., Vermont Avenue, Exposition Boulevard, Martin Luther King Jr. Boulevard, and the Exposition Metro Light Rail (along Exposition Boulevard). The passive recreational open spaces and outdoor soccer field are also sources of noise.

Noise-sensitive receptors within the vicinity of the Modified Project Site include residential uses located west of Vermont Avenue and south of Martin Luther King Jr. Boulevard. Noise-sensitive uses within Exposition Park also include passive recreational areas, museums, and educational facilities. To establish baseline noise conditions within

the vicinity of the Modified Project Site, existing daytime and nighttime ambient noise levels were measured at seven locations as shown in Figure 6 on page 60. Table 5 on page 61 provides the measured ambient noise levels at the receptor locations. As indicated therein, the daytime ambient noise levels within the Project Site vicinity range from 53.7 dBA L_{eq} at the Theodore T. Alexander Jr. Science Center School (Receptor Location R4) to 75.0 dBA L_{eq} at the residential uses along Martin Luther King Jr. Boulevard (Receptor Location R7). In addition, the nighttime ambient noise levels range from 50.9 dBA L_{eq} at Receptor Location R4 to 74.1 dBA at Receptor Location R7.

With regard to existing groundborne vibration, the typical sources of groundborne vibration in the vicinity of the Project Site include roadway truck traffic and buses. These vehicles typically generate groundborne vibration velocity levels of approximately 63 vibration decibels (VdB), with levels reaching 72 VdB where the vehicles pass over bumps in the road. In addition, the Exposition Metro Light Rail also generates groundborne vibration of approximately 75 VdB at 48 feet from the track centerline.[19]

(2) Construction-Related Noise

As set forth in the Certified EIR and addenda, 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.

Under the Modified Project, construction activities would be associated with building the new parking structures, the LMNA building, relocation of the soccer field, and landscape and access improvements within Jesse Brewer Jr. Park to the north and the western portion of Exposition Park south of the Natural History Museum. Construction of the LMNA and associated improvements would include the following six phases: (1) demolition; (2) grading; (3) grading/foundation overlap; (4) foundation/building construction overlap; (5) building construction; and (6) site finishing (paving/landscaping). It is anticipated that the types of construction equipment that would be used for

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[19] *Los Angeles County Metro, Mid-City/Westside Transit Draft EIS/EIR, April 2001, Table 3.9-14.*

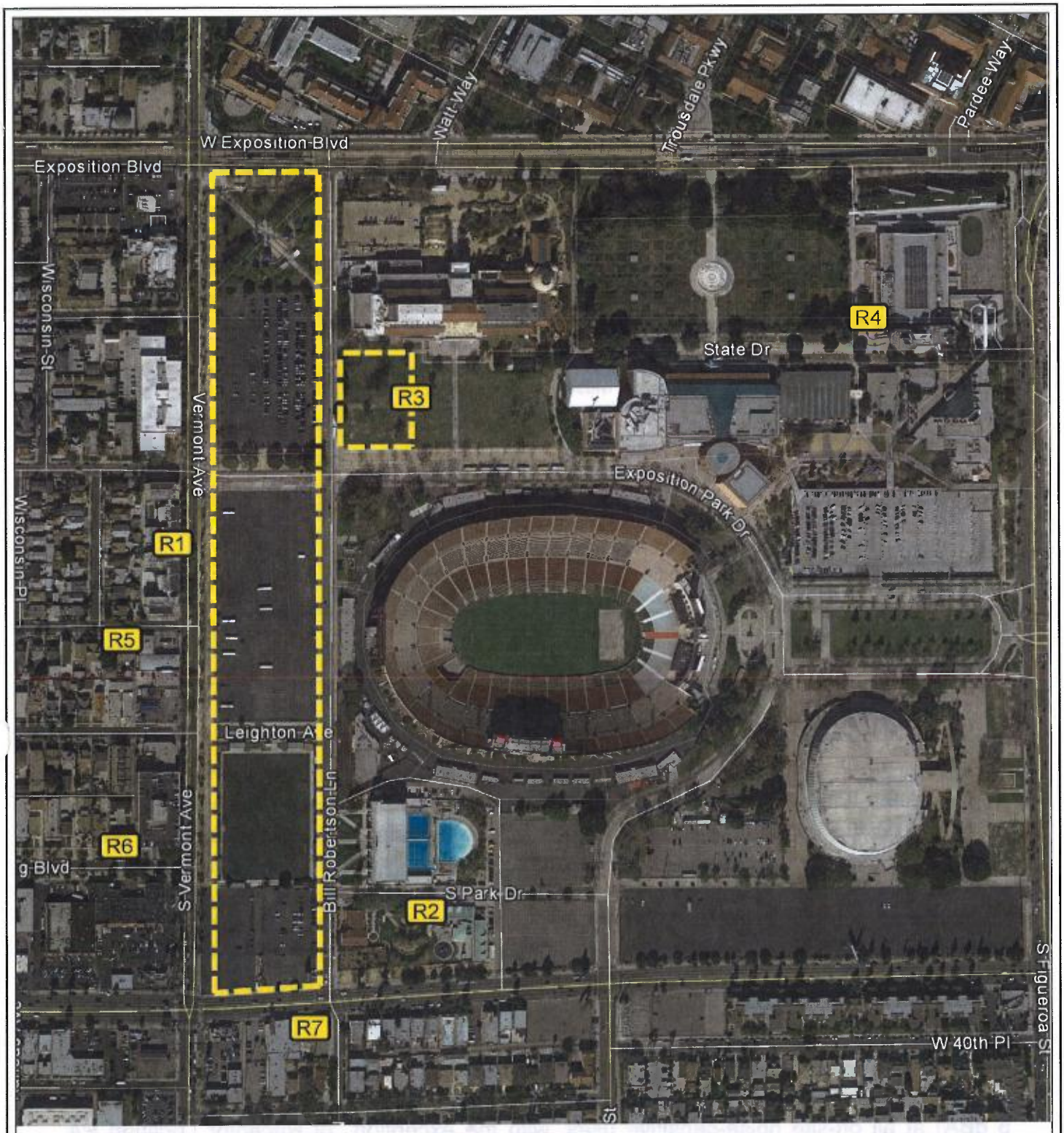

Figure 6
Noise Monitoring Locations

Source: Eyestone Environmental, 2017.

Table 5
Existing Ambient Noise Levels

Receptor Location	Description of Receptor	Measured Ambient Noise Levels, dBA L_{eq}	
		Daytime	Nighttime
R1	Vermont Senior Housing on the west side of Vermont Avenue, west of the Project Site	68.6	65.6
R2	Ralph M. Parsons Preschool located within the Expo Center, southeast of the Project Site	58.1	51.8
R3	Exposition Park Natural History Museum open space, east of the Project Site	56.0	55.2
R4	Theodore T. Alexander Jr. Science Center School	53.7	50.9
R5	Residential use on 39th Place west of Vermont Avenue, west of the Project Site	62.6	55.3
R6	Residential use on Browning Boulevard west of Vermont Avenue, west of the Project Site	58.3	57.4
R7	Residential use Martin Luther King Jr. Boulevard, south of the Project Site	75.0	74.1

Source: AES, 2017.

construction of the proposed improvements would be similar to those used for the Approved Project. A detailed construction noise model was created and included in Appendix E of this Addendum to calculate the construction-period noise levels at the off-site sensitive receptors, using the construction equipment reference noise levels provided by the Federal Highway Administration (FHWA).[20] The average (hourly L_{eq}) noise level associated with each construction phase is calculated based on the anticipated quantity and type of equipment that would be used during each construction phase. Table 6 on page 62 provides the estimated construction noise levels for various construction phases at the Project Site's off-site noise-sensitive receptors. To represent the maximum construction noise levels at the off-site sensitive receptors, all construction equipment was assumed to operate simultaneously and was assumed to be located at the construction area nearest to the affected receptors. As indicated in Table 6, the estimated construction-related noise would exceed the significance threshold (existing ambient plus 5 dBA) at all off-site noise-sensitive uses, with the exception of Receptor Location R4. However, with implementation of Mitigation Measures MM 1 through MM 5 below, such impacts would be reduced to less than significant levels.

[20] *FHWA Roadway Construction Noise Model User's Guide, 2006.*

Table 6
Estimated Construction Noise Levels

Receptor Location	Approximate Distance to Project Construction Area (feet)	Estimated Construction Noise Levels by Phases, dBA L_{eq}						Significance Threshold[a] dBA L_{eq}
		Demolition	Grading	Grading/ Foundation Overlap	Foundation/ Building Construction Overlap	Building Construction	Site Finishes	
R1	125	80.0	77.8	77.8	78.6	80.2	80.5	73.6
R2	375	73.3	60.3	60.3	60.0	53.0	73.9	63.1
R3	250	73.3	71.2	71.2	70.9	73.2	73.9	61.0
R4	1,785	51.9	49.8	49.8	49.5	51.9	52.5	58.7
R5	260	71.4	69.3	69.3	69.0	62.2	72.1	67.6
R6	260	71.4	64.3	64.3	64.0	54.9	72.1	63.3
R7	100	81.1	68.1	68.1	67.9	61.1	70.9	80.0

[a] *Significance threshold is equal to the measured ambient noise levels plus 5 dBA.*
Source: AES, 2017.

With regard to potential construction-related impacts associated with off-site traffic noise, based on the Project's Traffic Study, the maximum number of construction-related truck trips would occur during the grading phase, where there would be a maximum of 550 daily truck trips (275 incoming and 275 leaving).[21] Based on an 8-hour haul day and even distribution of haul trucks, there would be approximately 68 haul truck trips (34 incoming and 34 leaving) per hour. It is anticipated that the haul trucks would travel to and from I-110 via Bill Robertson Lane and Exposition Boulevard. There would also be approximately 40 workers onsite during the grading phase. However, the workers would typically arrive on-site prior to the start of the construction and leave following construction finished. The estimated noise level from construction-related trucks would be approximately 58.9 dBA L_{eq} at Receptor Location R3 facing Bill Robertson Lane, which would be 2.9 dBA above the existing ambient noise level of 56.0 dBA (measured Receptor Location 1). The construction-related truck noise generate noise level of approximately 64.7 dBA L_{eq} along Exposition Boulevard would be consistent with the existing ambient noise level of approximately 68.6 dBA L_{eq} (based on measured ambient noise level at Receptor Location R1).[22] Thus, the estimated noise levels from the construction-related traffic along the anticipated haul routes (Bill Robertson Land and Exposition Boulevard)

[21] *Gibson Transportation Consulting, Inc., "Traffic Impact Study for the Lucas Museum of Narrative Art," March 2017.*

[22] *Ambient noise level along Exposition Boulevard is estimated based on the measured ambient noise level along Vermont Avenue, which has similar traffic volume.*

would be below the significance threshold of 5 dBA L_{eq} above ambient.[23] Therefore, similar to the Approved Project, noise impacts associated with off-site construction under the Modified Project would be less than significant. No mitigation measures are required.

With regard to vibration during construction, under the Modified Project, the closest receptor to on-site construction activities would be Receptor Location R7 south of the Project Site. Based on an approximate distance of 100 feet, the construction-related vibration level at this location would be approximately 69 VdB. This vibration level is less than the FTA's vibration impact threshold of 72 VdB, applicable to residential uses.[24] In addition, the construction trucks would generate a vibration level of up to 70 VdB at the sensitive receptors along the haul route (i.e., the USC residence building on the north side of Exposition Boulevard and the residential building at the northeast corner of Figueroa Street and Exposition Boulevard). Therefore, ground-borne vibration impacts associated with construction would also be less than significant. No mitigation measures are required.

(3) Operational Noise

As discussed in the Certified EIR, 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. In addition, as set forth in the Certified EIR and addenda, the Approved Project, which includes a reduction in Coliseum attendees on an event day, would not result in new significant traffic event noise impacts.

Provided below is an analysis of potential impacts of the Modified Project associated with use of outdoor open spaces, special events, parking facilities, loading dock areas, mechanical equipment, and the relocated soccer field. As demonstrated by these analyses, like the Approved Project, impacts associated with operation of the Modified Project would be less than significant.

(a) Use of Outdoor Spaces

The Modified Project would include additional landscaped open space areas at the lower outdoor levels below the LMNA building as wells as an expansive roof garden within the upper level of the LMNA building. Noise sources associated with outdoor uses typically include noise from people gathering and conversing. For this analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used

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[23] *City of Los Angeles, "L.A. CEQA Thresholds Guide," 2006, Chapter I.1 Construction Noise.*

[24] *FTA, "Transit Noise and Vibration Impact Assessment," May 2006.*

to analyze potential noise impacts from people gathering at the outdoor spaces.[25] In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. For the noise analysis, it was assumed that up to approximately 6,320 people would gather at within the open space areas to the south of the LMNA building and up to approximately 1,270 people would gather within the upper rooftop level. Another potential noise source associated the upper rooftop level of the LMNA would be the use of an outdoor amplified sound system. It was assumed that the amplified program sound system would have a maximum noise level of 80 dBA L_{eq} at a distance of 25 feet from the speaker locations. Table 7 on page 65 presents the estimated noise levels from the Project outdoor spaces. As indicated in Table 7, the estimated noise levels at all off-site receptors would be below the significance threshold of 5 dBA L_{eq} above ambient noise levels. As such, noise impacts from use of the outdoor spaces would be less than significant. Mitigation Measure 6 has been included below to ensure that the noise levels at the speaker would not exceed 80 dBA L_{eq} at a distance of 25 feet from the speaker locations.

(b) Special Events

The Project proposes to vacate the portion of 39th Street between Vermont Avenue and Bill Robertson Lane, which would allow for periodic special events within the vacated area. For the noise analysis, it was assumed that up to approximately 2,000 people would gather within this area and that an amplified sound system may be used. It was assumed that the amplified program sound system would have a maximum noise level of 88 dBA L_{eq} at a distance of 25 feet from the speaker locations. As indicated in Table 8 on page 66, the estimated noise levels at all off-site receptors would be below the significance threshold of 5 dBA L_{eq} above ambient noise levels. As such, noise impacts associated with the special events at this location would be less than significant. Mitigation Measure 6 has been included below to ensure that the noise levels at the speaker would not exceed 88 dBA L_{eq} at a distance of 25 feet from the speaker locations.

(c) Parking Facility

The Modified Project would include a two-level parking structure, located beneath the LMNA building along with a separate three-level subterranean parking structure located to the south of the LMNA building. Since the parking structure would be fully enclosed, noise associated with the parking structure would be shielded from the off-site sensitive receptors. In addition, any mechanical equipment within the structure would be shielded and would comply with the noise limitation requirements set forth in Section 112.02 of the

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[25] *Harris, Cyril M., Handbook of Acoustical Measurements and Noise Control, Third Edition, 1991, Table 16.1.*

Table 7
Noise Levels from Use of Outdoor Spaces

Receptor Location	Existing Ambient Noise Levels, dBA L_{eq}	Estimated Noise Levels from the Outdoor Uses, dBA L_{eq}	Ambient Plus Outdoor Uses Noise Levels, dBA L_{eq}	Significance Threshold,[a] dBA L_{eq}
R1	68.6	53.0	68.7	73.6
R2	58.1	36.7	58.1	63.1
R3	56.0	53.3	57.9	61.0
R4	53.7	36.7	53.8	58.7
R5	62.6	48.7	62.8	67.6
R6	58.3	28.9	58.3	63.3
R7	75.0	42.6	75.0	80.0

[a] *Significance threshold is equal to the measured ambient noise levels plus 5 dBA.*
Source: AES, 2017.

LAMC. Thus, noise associated with the new parking structure would be less than the noise levels associated with the existing above grade surface parking lot. Therefore, noise impacts associated with the parking facility would be less than significant.

(d) Loading Dock Activities

The Modified Project would include two loading docks and two trash collections areas, located with the northeast and southeast corners of LMNA building. The two loading docks would be located within the ground level of the LMNA building and would be shielded from the off-site residential uses. Based on measured noise levels from typical loading dock facilities and trash compactors, delivery/trash collection trucks and trash compactors could generate noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq}, respectively, at a distance of 50 feet.[26] Table 9 on page 67 presents the estimated noise levels at the off-site receptor locations from operation of the loading dock and trash compactor. As indicated in Table 9, the estimated noise levels from the loading dock and trash compactor at all off-site receptor locations would be below the significance threshold of 5 dBA L_{eq}. Therefore, noise impacts associated with loading dock and trash compactor operations under the Modified Project would be less than significant and no mitigation measures would be required.

[26] *RK Engineering Group, Inc., Wal-Mart/Sam's Club Reference Noise Level Study, 2003.*

Table 8
Noise Levels from Special Events

Receptor Location	Existing Ambient Noise Levels, dBA L_{eq}	Estimated Noise Levels from the Outdoor Uses, dBA L_{eq}	Ambient Plus Outdoor Uses Noise Levels, dBA L_{eq}	Significance Threshold, [a] dBA L_{eq}
R1	68.6	63.3	69.7	73.6
R2	58.1	43.7	58.3	63.1
R3	56.0	58.6	60.5	61.0
R4	53.7	39.3	53.9	58.7
R5	62.6	40.7	62.6	67.6
R6	58.3	28.5	58.3	63.3
R7	75.0	44.0	75.0	80.0

[a] *Significance threshold is equal to the measured ambient noise levels plus 5 dBA.*
Source: AES, 2017.

(e) Mechanical Equipment

The operation of mechanical equipment such as air conditioners, fans, and related equipment may generate audible noise levels. However, all mechanical equipment would be designed with appropriate noise control devices, such as sound screen/parapet walls, to comply with the noise limitation requirements set forth in Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping and filtering equipment from exceeding the noise level on the premises of other occupied properties by more than 5 dBA. Therefore, operation of new mechanical equipment would not exceed the thresholds of significance identified above. Impacts would be less than significant, and no mitigation measures are required.

(f) Relocated Soccer Field

The proposed Project would relocate the existing soccer field to the southern portion of the site, at the corner of Vermont Avenue and Martin Luther King Jr. Boulevard. Noise levels from the existing soccer field was measured on January 17, 2017, and used to model the noise associated with the new location. Table 10 on page 68 presents the estimated noise levels from the soccer field with the field at the existing and at the future relocated locations. As indicated therein, the estimated noise levels from the soccer field at the future relocated location would be lower than existing noise levels at Receptor Locations R1, R3, R4 and R5. The estimated soccer field noise levels at Receptor Locations R2, R6 and R7 would be somewhat higher with the relocated soccer. However, the estimated noise levels at these receptor locations would be consistent with the existing

Table 9
Noise Levels from Loading Docks and Trash Compactors

Receptor Location	Existing Ambient Noise Levels, dBA L_{eq}	Estimated Noise Levels from the Loading Dock/Trash Compactor, dBA L_{eq}	Ambient Plus Loading Dock/Trash Compactor Noise Levels, dBA L_{eq}	Significance Threshold,[a] dBA L_{eq}
R1	68.6	30.1	68.6	73.6
R2	58.1	21.6	58.1	63.1
R3	56.0	52.7	57.7	61.0
R4	53.7	34.9	53.8	58.7
R5	62.6	26.3	62.6	67.6
R6	58.3	18.2	58.3	63.3
R7	75.0	13.3	75.0	80.0

[a] *Significance threshold is equal to the measured ambient noise levels plus 5 dBA.*
Source: AES, 2017.

ambient and well below the significance threshold of 5 dBA Leq above ambient noise levels. Therefore, noise associated with the relocation of the soccer field would be less than significant. No mitigation measures are required.

(g) Off-Site Traffic

Twenty one (21) roadway segments were selected to evaluate potential traffic noise impacts associated with the Modified Project. These segments were selected based on proximity to noise-sensitive uses along the roadway segments and potential increases in traffic volumes from the proposed Project. Traffic noise levels were calculated using the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) and traffic volume data from the Project's Transportation Report. The TNM traffic noise prediction model calculates the hourly L_{eq} noise levels based on specific information including the hourly traffic volume, vehicle type mix, vehicle speed, and lateral distance between the noise receptor and the roadway. To calculate the 24-hour CNEL levels, the hourly L_{eq} levels were calculated during daytime hours (7:00 A.M. to 7:00 P.M.), evening hours (7:00 P.M. to 10:00 P.M.), and nighttime hours (10:00 P.M. to 7:00 A.M.). The Modified Project is expected to be operational in 2021. Thus, to determine the Project-related noise impacts, the roadway noise levels under "Future (2021) Without Project" conditions were calculated and compared to noise levels that would occur with implementation of "Future (2021) Plus Project" conditions set forth in the Project's Transportation Report.

Table 10
Noise Levels from Soccer Field

Receptor Location	Existing Ambient Noise Levels, dBA L_{eq}	Estimated Noise Levels from the Soccer Field, dBA L_{eq}		Significance Threshold,[a] dBA L_{eq}
		With Field at Existing Location	With Field at Future Location	
R1	68.6	57.0	53.8	73.6
R2	58.1	54.6	62.3	63.1
R3	56.0	51.5	48.8	61.0
R4	53.7	37.5	34.5	58.7
R5	62.6	50.4	44.8	67.6
R6	58.3	55.3	61.3	63.3
R7	75.0	59.3	66.7	80.0

[a] *Significance threshold is equal to the measured ambient noise levels plus 5 dBA.*
Source: AES, 2017.

The calculated off-site roadway noise levels in the vicinity of the site for the Future (2021) Without Project and Future (2021) Plus Project conditions are provided in the noise calculation worksheets (see Appendix E of this Addendum). The calculated CNEL levels are applicable to receptors with a direct line-of-sight to the roadways and do not account for the presence of any physical sound barriers or intervening structures. Traffic volumes from the Modified Project would result in a maximum noise increase of up to 0.2 dBA (CNEL) for a typical weekday, and up to 0.5 dBA (CNEL) for a typical weekend, along Exposition Boulevard. The noise increase along other analyzed roadway segments would be lower. The increase in traffic noise levels is considered negligible and would be well below the 3-dBA significance threshold (applicable when noise level falls within the normally unacceptable category (70 CNEL or greater at noise-sensitive uses). Therefore, off-site traffic noise impacts associated with the proposed Project would be less than significant. Thus, similar to the Approved Project, noise impacts associated with off-site roadways under the proposed Project would be less than significant. No mitigation measures are required.

(4) Mitigation Measures

The Certified EIR included mitigation measures 1 through 5 below to ensure that potential construction-related impacts would be less than significant. The Modified Project would continue to implement these mitigation measures with changes shown as ~~strikethrough~~ or underline. In addition, Mitigation Measure 6 has been added to ensure

that potential impacts associated with future amplified sound systems would be less than significant.

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~~ 9:00 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. Haul trucks shall not be permitted to travel along local residential streets.

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. The noise barrier shall provide a minimum 5 dBA reduction at Receptor Locations R5 and R7, a minimum 8-dBA reduction at Receptor Location R1, a minimum 9-dBA reduction at Receptor Location R6, a minimum 11-dBA reduction at Receptor R2, and a minimum 13-dBA reduction at Receptor Location R3.[27]

6. The outdoor amplified sound systems shall be designed so as not to exceed a maximum noise level of 80 dBA $L_{eq\text{-}1hr}$ at a distance of 25 feet

[27] *Generally, an 8-foot-tall barrier would provide a noise reduction of approximately 5 dBA; a 10-foot-tall barrier would provide a noise reduction of approximately 8 to 9 dBA; a 12-foot-tall barrier would provide a noise reduction of approximately 11 dBA; and a 14-foot-tall barrier would provide a noise reduction of approximately 13 dBA.*

from the amplified sound systems within the fifth level outdoor space and 88 dBA L_{eq-1hr} at a distance of 25 feet for the amplified sound system associated with special events at the ground level.

As with the Approved Project, implementation of the mitigation measures would ensure that potential noise impacts under the Modified Project would be less than significant.

G. Public Services

(1) Fire Protection

As evaluated in the Certified EIR and Addenda, 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.

As stated in the Certified EIR, three fire stations provide initial response to the Project vicinity: Fire Station No. 15, Fire Station No. 46, and Fire Station No. 14. Fire Station No. 15, which was located at 915 W. Jefferson Boulevard at the time the Certified EIR was prepared, has been moved to 3000 Hoover Street, approximately 1 mile from the Modified Project. Fire Station No. 46, located at 4370 S. Hoover Street, is approximately 1.1 miles from the Modified Project, and Fire Station No. 14, located at 3401 S. Central Avenue, is approximately 2.3 miles from the Modified Project. These three stations would continue to serve the site. At the time the Certified EIR was prepared, Fire Station No. 15 had a staff of 14 and was a task force station with a truck and engine company, a paramedic ambulance, an EMT ambulance. Fire Station No. 46 had a staff of eight and was a single engine company with a paramedic ambulance. Fire Station No. 14 had a staff of 14 and was a task force station with a truck and engine company, a paramedic ambulance, and an EMT ambulance. Based on current data from the City of Los Angeles Fire Department (LAFD), Fire Station No. 15 is equipped with two engines, two ambulances, and a truck, and has a staff of 14; Fire Station No. 46 is equipped with one engine and three ambulances, and has a staff of 10; and Fire Station No. 14 is equipped with one engine, two ambulances, and has a staff of 24.[28] Therefore, current equipment

[28] *Based on telephone conversations with Captain Marshall Rodgers (Fire Station No. 46), Captain Nicholas Avila (Fire Station No. 15), and Captain Mario Trujillo (Fire Station No. 14) on September 23, 2016.*

and staffing levels at the fire stations serving the Modified Project Site are commensurate with the levels that were assessed in the Certified EIR.

Construction activities have the potential to result in accidental on-site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, Modified Project construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site during Modified Project construction. Furthermore, construction of the Modified Project would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with applicable regulatory requirements would effectively reduce the potential for construction activities under the Modified Project to expose people to the risk of fire or explosion related to hazardous materials. Therefore, as with the Approved Project, impacts related to fire protection services during construction would be less than significant under the Modified Project.

With regard to fire flow requirements, the Modified Project would fall within the Commercial category, which has a required fire flow of 6,000 gallons per minute (gpm) from hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi) as set forth in Section 57.507.3 of the LAMC. This demand translates to a required flow of 2,000 gpm each from three hydrants. An Information of Fire Flow Availability Request (IFFAR) was submitted to the City of Los Angeles Department of Water and Power (LADWP) regarding available fire hydrant flow to demonstrate compliance with the requirements of LAMC. As shown by the IFFAR, the three existing hydrants near the Modified Project flowing simultaneously can deliver combined flows of 6,000 gpm with a minimal residual pressure of 71 psi. In addition, the Modified Project would incorporate a fire sprinkler suppression system to reduce or eliminate public hydrant demands. Therefore, similar to the Approved Project, there is adequate fire flow available and the Modified Project would comply with the requirements of Section 57.507.3 of the LAMC. Furthermore, Section 57.507.3.3 of the LAMC provides that the maximum response distance from fire stations with an engine company is 1 mile and the maximum response distance from fire stations with a truck company is 1.5 miles for land uses in the Commercial category. Thus, as with the Approved Project, the Modified Project would fall within the maximum response distances from fire stations.

As with the Approved Project, the Modified Project would not alter the existing administrative fire protection procedures in place at the Coliseum. In addition, all

improvements would be constructed in compliance with the design and emergency access requirements set forth by the LAFD. In particular, as with other existing parking subterranean parking structures in the vicinity and throughout the City, the proposed subterranean parking structures would comply with LAFD's design and access requirements. Furthermore, an emergency response plan would be implemented as part of operation of the LMNA. Thus, based on the response distance standards set forth by the LAFD, and compliance with LAFD's requirements related to design, access, and fire flows, 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. 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 Addenda, the Los Angeles Police Department (LAPD) would provide police protection services for the Approved Project. 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 Project Applicant to minimize the potential for on-site crime and the need for LAPD services. Thus, with the implementation of the mitigation measures listed below, the Approved Project was determined to result in a less-than-significant impact on police protection services.

As discussed in the Certified EIR, the Project vicinity is served by the Southwest Community Police Station located at 1546 W. Martin Luther King Jr. Boulevard, approximately 1.2 miles west of the Project Site. At the time the Certified EIR was prepared, staff at the Southwest Area Police Station included 327 sworn officers and 26 civilian support staff. The staff at this police station currently consists of 352 sworn personnel and 32 civilian personnel serving a population of approximately 165,000 (or approximately 1 officer per 469 residents).[29] Thus, the staffing levels at the Southwest Community Police Station have increased since the preparation of the Certified EIR.

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[29] *Los Angeles Police Department, About Southwest, www.lapdonline.org/southwest_community_police_station/content_basic_view/1639, accessed March 17, 2017.*

Additionally, at the time the Certified EIR was prepared, the average response time for emergency calls in the Southwest Area was 11.1 minutes. Based on current data provided by LAPD, in 2015, the average response time for emergency calls in the Southwest Area was 4.0 minutes.[30] Thus, average response time for the Southwest Area have significantly decreased since the preparation of the Certified EIR.

On-site construction activities associated with the development of the Modified Project could result in an increased demand for police protection services due to the potential for theft and vandalism. The Certified EIR for the Approved Project included a mitigation measure which requires security features such as guards, fencing, and locked entrances on the construction site. The Modified Project would also continue to implement this mitigation measure to reduce the demand for police protection services during construction. Therefore, consistent with the conclusions in the Certified EIR for the Approved Project, impacts with respect to police protection services during construction would be less than significant under the Modified Project with implementation of the mitigation identified in the Certified EIR. No additional mitigation measures are required.

The Modified Project would develop approximately 299,717 square feet of museum floor area on the Modified Project Site, which could increase the demand for police protection services on-site. However, the Modified Project would implement the same mitigation measures provided in the Certified EIR that include consultation with LAPD and implementation a wide range of security measures through a comprehensive Security Plan. The museum would include specific security measures, such as the use of security personnel, implementation of a surveillance system, security and parking lot lighting and installation of locks and alarms. In addition, the mitigation measures also require the implementation of an Emergency Procedures Plan outlining guidelines and procedures in the event of civil disturbance, evacuation or other types of emergencies. Thus, the Modified Project would not result in significant impacts associated with police protection services. Overall, 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 addenda to ensure that impacts related to fire safety and police protection would be less than

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[30] *Written correspondence from Ruby Flores, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, October 28, 2016.*

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 the *Lucas Museum of Narrative Art Utility Infrastructure Technical Report: Water, Wastewater, and Energy* (Utility Technical Report) prepared for the Project by KPFF Consulting Engineers, on March 28, 2017. This report is included as Appendix F of this Addendum.

(1) Energy

The Certified EIR stated that the LADWP's regional infrastructure would deliver the peak electrical requirement to the site and 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 addenda 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

With regard to natural gas, the Certified EIR confirmed that the Southern California Gas Company (SoCal Gas) would have the capacity to meet the natural gas demand of the Approved Project 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.

Under the Modified Project, electricity would be consumed to construct the proposed building and facilities. Typical uses of electricity include temporary power for lighting, equipment, construction trailers, etc. The demand would be supplied from existing electrical services or a new temporary service and would not affect services to surrounding areas. Overall, demolition and construction activities would require minimal electricity consumption and would not be expected to have any adverse impact on available electricity supplies and infrastructure. No use of natural gas infrastructure is expected to occur during construction. Therefore, impacts on electricity and natural gas supply associated with short-term construction activities of the Modified Project would be less than significant.

The development of approximately 299,717 square feet of new floor area under the Modified Project would increase the demand for electricity and natural gas resources. As with the Approved Project, energy and natural gas demand associated with the Modified Project would be met by the LADWP and SoCal Gas.[31,32] The Modified Project's estimated net electrical consumption of 5.1 megawatts (MW) would account for approximately 0.09 percent of LADWP's available capacity for the buildout year. The Modified Project's estimated new daily natural gas consumption of 0.1 million cubic feet per day would account for approximately 0.002 percent of SoCal Gas's available capacity for the buildout year. In addition, the proposed LMNA building would be required to comply with the 2016 Building Energy Efficiency Standards, which took effect January 1, 2017. These new regulations would result in additional energy savings when compared to the regulations that were in place when the Approved Project was proposed. Furthermore, the Modified Project would include solar panels and has been designed to implement features that are equivalent to the Leadership in Energy Efficiency and Design (LEED) Gold standards set forth by the U.S. Green Building Council. The Modified Project would also implement the same mitigation measure recommended by the LADWP for the Approved Project to further reduce impacts. Overall, in accordance with Appendix F of the CEQA Guidelines, the Project would not result in inefficient, wasteful, or unnecessary consumption of energy. Thus, the impacts to energy supply would continue to be less than significant and such impacts would be within the envelope of impacts set forth in the Certified EIR.

(a) Mitigation Measure

The following mitigation measure was recommended by LADWP to be incorporated into the final design as feasible, to reduce the Project's demands for energy resources and was included in the Certified EIR and addenda. This mitigation measure would continue to be implemented as part of the Modified Project.

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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[31] *Will-Serve Letter from LADWP, dated October 26, 2016. See Exhibit 4 of the Utility Technical Report included as Appendix F to this Addendum.*

[32] *Will-Serve Letter from SoCal Gas, dated March 17, 2017. See Exhibit 5 of the Utility Technical Report included as Appendix F to 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.

Water would be used during the construction of the Modified Project for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gallons per day (gpd). As discussed below, the LADWP would have sufficient capacity to service the Modified Project during operation. Thus, it is reasonable to assume that the existing water infrastructure would be able to meet the more limited and temporary water demand associated with construction of the Modified Project. Construction of the Modified Project would include new on-site water distribution lines to serve the new building, as well as potential relocation of existing lines. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the lines below surface. Installation of new water infrastructure would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. No upgrades to public water mains are anticipated. Prior to ground disturbance, contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, Project impacts on water supply and infrastructure during construction would be less than significant.

The Modified Project would not increase the number of events or maximum attendance at the Coliseum when compared with the Approved Project. However, the Modified Project would result in the development of approximately 299,717 square feet of new floor area, which would increase the on-site domestic and fire flow water demand. The Modified Project improvements would connect to the existing 12-inch water main located in Vermont Avenue with a lateral that would be adequately sized to accommodate the expected water demand. As shown in Table 11 on page 78, the expected water demand for the Modified Project is approximately 21,255 gpd. In addition, as previously discussed, the Modified Project has a required fire flow of 6,000 gallons per minute from

Table 11
Proposed Water Demand

Use	Size/Unit	Generation Factor[a]	Average Daily Water Demand
Museum/Education/Operation/Public Spaces/Archive[b]	193,615 sf	36 gpd/1,000 sf	6,970 gpd
Shop[c]	2,973 sf	30 gpd/1,000 sf	89 gpd
Theater	600 seats	3.6 gpd/seat	2,160 gpd
Restaurant/Café	184 seats	36 gpd/seat	6,624 gpd
Event Space[d]	9,433 sf	420 gpd/1,000 sf	3,692 gpd
Office[e]	11,946 sf	144 gpd/1,000 sf	1,720 gpd
Total Proposed Water Demand			**21,255 gpd**

gpd = gallons per day
sf = square feet
[a] *Based on 120 percent of the sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (BOS, 2012).*
[b] *The standard BOS facility description of "Museum" was used to best represent the proposed Museum/Education/Operation/Public Spaces/Archive uses.*
[c] *The standard BOS facility description of "Retail" was used to best represent the proposed Shop use.*
[d] *The standard BOS facility description of "Banquet" was used to best represent the proposed Event Space use.*
[e] *The standard BOS facility description of "Museum: Office" was used to best represent the proposed Office use.*
Source: KPFF, Lucas Museum of Narrative Art, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, March 17, 2017.

hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch. LADWP has concluded that the municipal water system has sufficient capacity and infrastructure to service the Modified Project Site. A Service Advisory Request (SAR) Report was completed for the Modified Project, which demonstrated that a flow of up to 5,000 gallons per minute (gpm) can be delivered to the Project Site with a residual pressure of 59 psi to meet the Modified Project's domestic and fire flow water demand.[33] An Information of Fire Flow Availability Request (IFFAR) was also submitted to LADWP, which confirmed that the three existing public hydrants near the Modified Project flowing simultaneously can deliver combined flows of 6,000 gpm with a minimal residual pressure of 71 psi.[34] Furthermore, the Modified Project would incorporate a fire sprinkler

[33] *LADWP—Water System, SAR Number 56324, dated November 8, 2016. See Exhibit 2 of the Utility Technical Report included as Appendix F to this Addendum.*

[34] *LADWP—Water System, Information of Fire Flow Availability, revised December 21, 2016. See Exhibit 1 of the Utility Technical Report included as Appendix F to this Addendum.*

suppression system to reduce or eliminate public hydrant demands. Therefore, the SAR and the IFFAR confirm that LADWP has sufficient water infrastructure capacity to accommodate the Modified Project.

Compared to the Approved Project, the Modified Project would implement more stringent water conservation measures set forth by recent water regulations to reduce water consumption. Additionally, the Modified Project would implement the same mitigation measures as the Approved Project to address water conservation. As such, impacts to water supply and infrastructure capacity would continue to be less than significant under the Modified Project and 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 addenda 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 addenda, 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 addenda, existing infrastructure, including the Hyperion Treatment Plant, would have adequate capacity to accommodate the waste water flows. Thus, impacts related to sanitary sewers under the Approved Project would be less than significant, and no mitigation measures were required.

Construction activities for the Modified Project would result in a temporary increase in wastewater generation as a result of construction workers on-site. However, the wastewater generated during construction would be temporary and nominal when compared to the amount of wastewater generated during operation of the Modified Project. In addition, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. As discussed below, the existing public sewer system would have capacity to accommodate the estimated wastewater flows from the Modified Project during operation. Thus, it is reasonable to assume that the existing public sewer system would be able to meet the limited and temporary flows associated with construction of the Modified Project. Construction of the Modified Project would include new on-site infrastructure to serve the new building, relocation of existing infrastructure, and potential upgrade and relocation of existing infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Overall, construction impacts would be short-term and would cease to occur once the installation of the required infrastructure is complete. Therefore, as with the Approved Project, impacts to wastewater capacity and infrastructure during construction would be less than significant.

The Modified Project would not include an increase in the number of seats or the number of events at the Coliseum when compared with the Approved Project. However, the Modified Project would result in the development of approximately 299,717 square feet of new floor area of museum space, including galleries, restaurant, theater, educational, and office uses, which would increase the wastewater generation on-site. According to the Utility Technical Report, there is an existing eight-inch sewer line in Vermont Avenue and an 8-inch sewer line in Bill Robertson Lane, each with a capacity of approximately 0.709 cubic feet per second, or 458,149 gpd. As shown in Table 12 on page 82, the Modified Project would generate approximately 17,938 gpd of wastewater. A Sewer Capacity Availability Report (SCAR) was submitted and approved for the Modified Project, which confirmed that the existing public sewer system would have capacity to accommodate the estimated wastewater flows from the Modified Project.[35] The 17,938 gpd of wastewater flow from the Modified Project would represent less than five percent of the capacity of the existing sewer lines in Vermont Avenue and Bill Robertson Lane. Furthermore, the wastewater flow generated by the Modified Project represents less than one percent of the Hyperion Treatment Plant's capacity, which is approximately 550 million gallons per day. 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 addenda, 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.

Construction of the Modified Project would involve demolition and building construction activities. These activities would generate construction and demolition wastes (e.g., wood, concrete, asphalt, cardboard, brick, glass, plastic, and metal) that would be recycled or collected by private waste haulers contracted by the Applicant and taken to a City-certified waste processing facility for sorting and final distribution, including disposal at the County's unclassified landfill. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, the Project would not result in the

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[35] *Sewer Capacity Availability Request (SCAR) and approval letter, March 6, 2017. See Exhibit 3 of the Utility Technical Report included as Appendix F to this Addendum.*

Table 12
Proposed Wastewater Generation

Use	Size/Unit	Generation Factor[a]	Average Daily Water Demand
Museum/Education/Operation/Public Spaces/Archive[b]	193,615 sf	30 gpd/1,000 sf	5,808 gpd
Shop[c]	2,973 sf	25 gpd/1,000 sf	74 gpd
Theater	600 seats	3 gpd/seat	1,800 gpd
Restaurant/Café	184 seats	30 gpd/seat	5,520 gpd
Event Space[d]	9,433 sf	350 gpd/1,000 sf	3,302 gpd
Office[e]	11,946 sf	120 gpd/1,000 sf	1,434 gpd
Total Proposed Wastewater Generation			**17,938 gpd**

gpd = gallons per day
sf = square feet
[a] *Based on the sewage generation rates provided by BOS (2012).*
[b] *The standard BOS facility description of "Museum" was used to best represent the proposed Museum/Education/Operation/Public Spaces/Archive uses.*
[c] *The standard BOS facility description of "Retail" was used to best represent the proposed Shop use.*
[d] *The standard BOS facility description of "Banquet" was used to best represent the proposed Event Space use.*
[e] *The standard BOS facility description of "Museum: Office" was used to best represent the proposed Office use.*
Source: KPFF, Lucas Museum of Narrative Art, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, March 17, 2017.

need for an additional solid waste collection route. Pursuant to Sections 66.32–66.32.5 of the Los Angeles Municipal Code (Ordinance No. 181,519), the Modified Project's construction contractor would be required to deliver construction and demolition waste generated by the Project to a Certified Construction and Demolition Waste Processing Facility for processing and recycling. Thus, the amount of demolition and construction waste generated by the Modified Project that would be disposed at the Azusa Land Reclamation Landfill, the County's only permitted inert waste landfill, would be significantly reduced. The total amount of construction and demolition waste generated by the Modified Project is anticipated to be only a fraction of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 57.56 million tons.[36] Therefore, construction impacts to solid waste facilities would be less than significant.

[36] *County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2015 Annual Report, December 2016.*

The Modified Project would comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. The Modified Project would not result in an increase in events, maximum seating or ancillary uses at the Coliseum. However, the Modified Project would develop a new museum use with approximately 299,717 square feet of floor area, which would increase the amount of solid waste generated on-site. The *L.A. CEQA Thresholds Guide* provides a solid waste generation factor of 10.53 pounds per employee per day to evaluate solid waste impacts. The number of employees per 1,000 square feet of proposed use is calculated based on employment generation factors provided by the Los Angeles Unified School District in Table 12 of the *2012 Developer Fee Justification Study* (February 9, 2012). Since museum uses are not included as a category in the *2012 Developer Fee Justification Study*, this analysis conservatively assumes a generation factor of 4.79 employees per 1,000 square feet for "Standard Commercial Office." Based on this conservative factor, the proposed 299,717 square feet of museum uses would result in approximately 1,436 employees, which equates to approximately 15,121 pounds (or approximately 7.6 tons) of solid waste per day that would be potentially generated by the Modified Project. Solid waste generated by the Modified Project would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City, and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles.[37] According to the *Countywide Integrated Waste Management Plan 2015 Annual Report*, the estimated remaining capacity for the County's Class III landfills that are open to the Modified Project is approximately 101.53 million tons.[38] The approximately 7.6 tons of solid waste generated by the operation of LMNA would be a fraction of the remaining disposal capacity of these Class III landfills. 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 *Transportation Impact Study for the Lucas Museum of Narrative Art, Los Angeles, California* (Traffic Study), prepared by Gibson

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[37] *Private solid waste haulers hold individual contracts with landfill operators for the disposal of waste. Thus, it is unknown at this time which landfills would ultimately receive Project-generated waste. However, it is assumed that Project-generated waste would generally be disposed of at a Class III landfill open to the City of Los Angeles.*

[38] *Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Burbank, Pebbly Beach, and San Clemente). Total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site. See Appendix E-1 and Appendix E—2, Table 1 of the Countywide Integrated Waste Management Plan 2015 Annual Report.*

Transportation (March 2017) and included as Appendix G of this document. On March 30, 2017, the Department of Transportation issued a memorandum stating that the transportation study prepared by Gibson Transportation adequately evaluated the proposed project's traffic impacts on the surrounding community and that none of the study intersections would be significantly impacted by project-related traffic. The Traffic Study evaluates the potential for impacts caused by the Modified Project on the street system surrounding the Modified Project Site. Consistent with Transportation Impact Study Guidelines (LADOT, December 2016), the following traffic conditions were developed and analyzed within the Traffic Study:

- Existing Conditions (Year 2016)—The analysis of existing traffic conditions provides a basis for the assessment of future traffic conditions. The Existing Conditions (Year 2016) analysis includes a description of key area streets and highways, traffic volumes and current operating conditions, and transit service in the Study Area. Intersection turning movement counts were collected in January and September 2015, July 2016 (Saturday counts only), and September 2016 and represent existing conditions. Fieldwork (lane configurations and signal phasing) for the analyzed intersections was collected in September 2016.

- Existing With Project Conditions (Year 2016)—This analysis condition projects the potential intersection operating conditions that could be expected if the Modified Project were completed and operational under existing conditions. This analysis evaluates the potential Modified Project-related traffic impacts as compared to Existing Conditions (Year 2016).

- Future Without Project Conditions (Year 2021)—This analysis projects the future traffic growth and intersection operating conditions that could be expected as a result of regional growth and related project traffic in the Study Area by year 2021. The Future Without Project (Year 2021) traffic conditions are projected by adding ambient traffic growth and traffic from related projects to Existing Conditions (Year 2016). This analysis provides the conditions by which the Modified Project impacts are evaluated in the future at full buildout.

- Future with Project Conditions (Year 2021)—This analysis projects the potential intersection operating conditions that could be expected if the Modified Project were completed and operational in the projected buildout year. This analysis identifies the potential incremental impacts of the Modified Project at full buildout on projected future traffic operating conditions by adding the Modified Project-generated traffic to the Future Without Project (Year 2021) traffic forecasts.

(1) Traffic

(a) Construction

The Certified EIR did not include a construction traffic impact analysis. However, Second Addendum provided a construction traffic impact analysis for the Approved Project and determined that construction-related traffic impacts would be less than significant with implementation of a Construction Management Plan.

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 an approximately 42-month period between years 2017 and 2021. Typical construction activity would occur between 7:00 A.M. and 3:00 P.M. on weekdays and Saturdays. Under the Modified Project, peak haul truck activity would occur during excavation and peak worker activity would occur during building construction, though most days there would be far fewer workers than on the peak day. Thus, both these phases were evaluated.

(i) Excavation and Grading Phase

The peak period of truck activity during construction would occur during excavation of the Modified Project Site, which is anticipated to last approximately six months. Based on projections compiled for the Modified Project, a maximum of 275 haul truck trips would leave the site each day. Haul trucks would travel from to and from I-110 via Bill Robertson Lane and Exposition Boulevard, which is the most direct route to the freeway.

Haul activity would occur uniformly over an 8-hour haul day, resulting in approximately 34 hourly haul truck departures from the Modified Project Site. Similarly, there would be 34 hourly haul truck arrivals. Because construction trucks (such as earth-hauling trucks and cement trucks) are larger and slower than the passenger vehicles that make up the majority of the vehicles on the roads, they have an effect on traffic that is greater than a passenger vehicle's effect. The 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. Assuming a PCE factor of 2.0, there would be a total of approximately 68 hourly arriving and 68 hourly departing PCE trips attributable to haul trucks between the hours of 7:00 A.M. to 3:00 P.M. Monday through Saturday. Haul truck trips would not affect the evening commuter peak hour but would occur during the weekday morning commuter peak hour and the Saturday midday peak hour.

During the excavation and grading phase, up to 40 workers would be on-site. Using an average vehicle occupancy (AVO) of 1.135 persons per vehicle as provided in *CEQA*

Air Quality Handbook (South Coast Air Quality Management District, 1993), 40 workers would result in a total of 35 vehicles that would arrive and depart from the Modified Project Site each day. As the hours of construction are expected to be from 7:00 A.M. to 3:00 P.M., workers would typically arrive on-site prior to the weekday morning commuter peak period and leave prior to the evening commuter peak period. On Saturdays, the workers would leave following the Saturday midday peak period. Therefore, construction worker trips would not affect peak-hour traffic conditions.

In total, peak haul activity would result in 68 hourly arriving and departing PCE trips traveling along the haul route identified above and affecting only the streets along the haul route. The number of trips generated by the Modified Project's haul activity would be substantially lower than the 163 inbound and 245 outbound trips identified for the Saturday midday peak hour during operation. In addition, each of the study intersections along the haul route identified above currently operates at LOS A during the Saturday midday peak hour. Based on a review of other recent traffic studies and available traffic data, each of those intersections operates at LOS C or better during the morning peak hour, and the addition of the Modified Project's haul trips would not trigger any of the City's significance thresholds for intersections. Therefore, no temporary significant traffic impact would occur during the excavation and grading phase as a result of haul truck and worker trips.

(ii) Building Construction Phase

According to construction projections prepared for the Modified Project, a maximum of approximately 400 workers could be on the construction site at one time during building construction. On most days during the 32-month building construction phase, far fewer workers would be on-site. Daily construction schedule would be from 7:00 A.M. to 3:00 P.M. Thus, construction workers would typically arrive before the weekday morning peak period and depart before the weekday evening peak period, and would not affect traffic conditions during the weekday commuter peaks. Similarly, construction workers would not affect the Saturday midday peak hour, which ends prior to 3:00 P.M. Therefore, construction worker traffic would not result in significant traffic impacts.

During building construction, there would be a maximum of approximately 170 delivery trucks (including concrete trucks) to and from the Modified Project Site per day. These trucks would typically arrive regularly throughout the day, resulting in approximately 21 trips in and out during each hour of the 8-hour workday, which is equivalent to 42 PCE trips each direction based on a PCE of 2.0 for concrete or delivery trucks. This is fewer truck trips than estimated during the peak haul truck activity, which as determined above, would not to result in temporary significant impacts. Therefore, peak worker activity also would not result in temporary significant impacts.

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

Most construction activities would be primarily contained within the Modified Project Site boundaries. However, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Modified Project Site on Bill Robertson Lane in order to accommodate deliveries, haul trucks, concrete trucks, and other equipment.

Temporary traffic controls would be provided to direct traffic around any closures as required in the Construction Management Plan. Bill Robertson Lane does not allow on-street parking, and is wide enough to accommodate construction encroachment without restricting traffic in the travel lanes. Therefore, travel lanes would be maintained in each direction throughout the construction period, and emergency access would not be impeded. The use of the public right-of-way on Bill Robertson Lane would require temporary rerouting of pedestrian traffic to the east side of the street, as the sidewalks fronting the Modified Project Site would be closed. The Construction Management Plan would include measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). There is no public transit on Bill Robertson Lane and, therefore, transit operations would not be affected by construction activities.

During construction, Exposition Park would provide adequate parking to accommodate construction workers (likely in Lots 4 and/or 5, which are located directly south of the Coliseum) in addition to regular daily parking demand for museums, athletic facilities, etc. Parking structure construction would be scheduled so as to make the new parking available for major events as quickly as possible, prior to completion of building construction. In addition, the proposed parking structures could also accommodate construction workers once a Certificate of Occupancy has been issued. Nonetheless, to the extent that major events (e.g., football games at the Coliseum) occur prior to completion of replacement parking, the Parking Management Plan to be developed as a component of the Construction Management Plan would reduce the effects of the loss in parking.

Modified Project construction is not expected to create hazards for roadway travelers, bus riders, or parkers, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) would be incorporated into the Construction Management Plan. The construction-related impacts associated with access and transit are anticipated to be less than significant, and the implementation of the

Construction Management Plan set forth in Mitigation Measure 8, below, would further reduce those impacts.

(b) Operation

(i) Intersections

The Certified EIR and addenda 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 City of Los Angeles Department of Transportation's (LADOT) 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.

The LMNA (the only trip generating component of the Modified Project) would be ancillary to Coliseum facilities, and although it would host events from time to time, the patronage of these events would be a fraction the size of events hosted at the Coliseum. On a typical day without a major event in Exposition Park, the LMNA would generate traffic

commensurate with a typical museum, as documented in Chapter 6 of the Traffic Study. It is anticipated that the LMNA would experience a decrease in exclusive patronage (that is, visitors solely attending the LMNA) on days when major events occur in Exposition Park, since traffic congestion during those events can deter local visitors who have the option to come at any time.

The Traffic Study for the Modified Project is ancillary to the analysis conducted for the Approved Project, as the Modified Project does not substantively modify the major event conditions analyzed for the Approved Project. Thus, the Traffic Study includes a fully updated analysis of existing and future baseline traffic conditions for the Study Area developed for the Modified Project, which is defined in the Traffic Study as a geographic area approximately 1.0 mile (north-south) by approximately 1.2 miles (east-west) that is generally bounded by Jefferson Boulevard to the north, I-110 to the east, Martin Luther King Jr. Boulevard to the south, and Normandie Avenue to the west. The Study Area includes the 20 signalized intersections listed in Table 1 and shown in Figure 2 of the Traffic Study. The potential Modified Project-generated trips are added to the existing and future baseline traffic conditions to evaluate potential intersection impacts under existing conditions and projected future conditions in year 2021 (buildout year) as a result of the Modified Project. Potential intersection impacts were evaluated for typical weekday evening (3:00 P.M. to 6:00 P.M.) and Saturday midday (11:00 A.M. to 3:00 P.M.) peak periods. The typical weekday morning (7:00 A.M. to 10:00 A.M.) peak period was not evaluated since LMNA would not be open prior to 10:00 A.M.

Existing Conditions (Year 2016)

Intersection turning movement counts were conducted at the 20 study intersections during the weekday evening (3:00 P.M. to 6:00 P.M.) and Saturday midday (11:00 A.M. to 3:00 P.M.) peak periods. As shown in Table 5 of the Traffic Study, under Existing Conditions (Year 2016), all 20 study intersections operate at LOS D or better during both the weekday evening and Saturday midday peak hours.

Future Without Project Conditions (Year 2021)

As discussed in detail in the Traffic Study, the existing traffic volumes were factored by an annual ambient growth rate to approximate regional growth and development. In addition to the ambient growth, for purposes of providing a conservative analysis of potential cumulative traffic impacts, the traffic generated by proposed, approved, and under construction projects in and around the Study Area was also added to estimate the Future Without Project (Year 2021) traffic conditions. The future conditions analysis includes proposed modification of Figueroa Street within the Study Area identified in the MyFigueroa Streetscape Project, and the narrowing of Jefferson Boulevard proposed in the Jefferson Boulevard Streetscape Plan. Since the proposed infrastructure improvements contained in

Mobility Plan 2035 and the 2010 Bicycle Plan would not be implemented by year 2021, these improvements were not assumed in the future conditions analysis.

As summarized in Table 7 of the Traffic Study, 19 of the 20 study intersections are projected to operate at LOS D or better during both the weekday evening and Saturday midday peak hours under Future Without Project Conditions (Year 2021). Intersection No. 14, Figueroa Street & Martin Luther King Jr. Boulevard, is projected to operate at LOS F during the weekday evening peak hour.

Existing With Project Conditions (2016)

Trip generation estimates for the Modified Project are based on the expected attendance level during a Design Day, which represents a 90th percentile attendance day. According to the Traffic Study, it is estimated that LMNA will attract approximately 1.2 million visitors per year. The 90th percentile attendance day is estimated to be approximately 0.53 percent of the annual attendance. Thus, the Design Day attendance for LMNA is approximately 6,400 visitors, which is applicable to both weekdays and Saturdays. Based on an assumption of 6,400 daily visitors, as well as the travel mode splits and hourly arrival and departure pattern assumptions detailed in Chapter 6 of the Traffic Study, the Modified Project is expected to generate a net total of 245 new weekday evening peak-hour trips (82 inbound, 163 outbound) and 408 new Saturday midday peak-hour trips (163 inbound, 245 outbound). The 245 new weekday evening peak-hour trips and 408 new Saturday midday peak-hour trips generated by the Modified Project, as well as the redistributed trips from 39th Street, were added to the existing weekday evening and Saturday midday peak-hour traffic volumes to determine the potential intersection impacts as a result of the Modified Project. As shown in Table 11 of the Traffic Study, all study intersections would continue to operate at LOS D or better during the weekday evening and Saturday midday peak hours with the addition of traffic volumes generated by the Modified Project. In addition, none of the study intersections would be significantly impacted by the Modified Project under the Existing With Project Conditions (Year 2016), and therefore no mitigation measures are required.

Future With Project Conditions (Year 2021)

The weekday evening and Saturday midday peak-hour traffic volumes generated by the Modified Project were added to the Future Without Project (Year 2021) peak-hour traffic volumes. The 39th Street redistribution volumes, were also added in after increasing them by 5.10 percent to account for ambient traffic growth. The resulting volumes represent Future With Project Conditions (Year 2021) after development of the Modified Project. Table 12 of the Traffic Study summarizes the results of the Future with Project Conditions during the weekday evening and Saturday midday peak hours for the 20 study intersections. As shown, 19 of the 20 study intersections would continue to operate at LOS

D or better during the weekday evening and Saturday midday peak hours under Future With Project Conditions (Year 2021). The addition of traffic generated by the Modified Project to these intersections would not result in a change to the volume-to-capacity (V/C) ratio that would exceed the significance thresholds. Intersection No. 14, Figueroa Street & Martin Luther King Jr. Boulevard, is forecast to operate at LOS F during the weekday evening peak hour; however, as previously discussed, Intersection No. 14 is projected to operate at LOS F during the weekday evening peak hour under Future Without Project Conditions (Year 2021). The addition of traffic generated by the Modified Project to Intersection No. 14 under Future With Project Conditions (Year 2021) would not result in a change to the V/C ratio that would exceed the significance thresholds. Thus, none of the study intersections would be significantly impacted by Modified Project under the Future With Project Conditions and no mitigation measures are required.

(ii) Caltrans Facilities

An analysis of Caltrans facilities was included in the Traffic Study because the Modified Project met one or more of the screening thresholds identified in the *Agreement Between City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures* (Amended December 2015). Caltrans facilities, including three freeway mainline segments and the express lanes on I-110, six Caltrans intersections, five freeway off-ramps, and five freeway on-ramps were analyzed based on the methodology described in detail in Chapter 9 of the Traffic Study. The analysis considered the following three scenarios with and without the addition of the traffic generated by the Modified Project: Existing Conditions (Year 2016); Future Conditions (Year 2021); and Long Range Conditions (Year 2035).

As concluded in the Traffic Study, the Modified Project would not cause the LOS to worsen at any of the freeway mainline segments analyzed, and would have negligible effects on traffic density at each segment under all three scenarios. The Modified Project also would not cause the LOS to worsen at any intersection analyzed, and would have negligible effects on delay at each location under all three scenarios. The Modified Project's effect on queue lengths at off-ramps under all three scenarios would be negligible. Furthermore, the Modified Project would not substantially increase the on-ramp volumes at any location under any scenario analyzed. Therefore, the Modified Project would not result in a significant impact to Caltrans facilities and no mitigation measures are required.

(iii) Congestion Management Program

The Congestion Management Plan (CMP) does not identify any arterial monitoring intersections within the Study Area. The nearest arterial monitoring intersection is at Alameda Street and Washington Boulevard, nearly 3 miles east of the Modified Project. Thus traffic generated by the Modified Project would have a negligible effect on the

intersection. Therefore, because the Modified Project would not add 50 or more peak-hour trips to any arterial monitoring intersection, no further analysis was conducted in the Traffic Study.

According to the Certified EIR, the Approved Project would significantly impact two regional CMP freeways near the Project Site: the I-10 freeway at Budlong Avenue; and the I-110 freeway at Slauson Avenue. However, the Modified Project would add a maximum of 73 trips to I-110 in the northbound direction, including at the CMP freeway mainline monitoring location at Slauson Avenue, and would generate far fewer trips on the I-10 at Budlong Avenue freeway mainline monitoring location. Therefore, as the Modified Project would not add 150 trips to any segment in a single direction during a peak hour, no further analysis was conducted in the Traffic Study.

As discussed in Chapter 2 of the Traffic Study, the Study Area is served by numerous established transit routes. Based on Metro ridership data from March 2015 for the bus system and October 2016 for the rail system, there is capacity within the system to accommodate an additional 7,500 riders during the weekday evening peak hour and 3,363 riders during the Saturday midday peak hour. According to the Traffic Study, a total of 1,472 daily visitors to LMNA are expected to use public transit, which equates to approximately 221 transit riders during the weekday evening peak hour and approximately 368 transit riders during the Saturday midday peak hour. Even with potential growth in transit ridership by year 2021, the Modified Project's peak-hour transit ridership would be easily accommodated within the available capacity of the transit system. Therefore, the Modified Project is not anticipated to result in regional transit impacts.

(iv) Site Access

Vehicular access to LMNA would be provided via two full-access driveways on Bill Robertson Lane, one north and one south of 39th Street. Each of these driveways would lead to the Museum Parking Garage. The Replacement Parking Garage, which serves to replace the surface parking displaced by the Modified Project, would have three access points: two full-access driveways to Bill Robertson Lane and one driveway to Vermont Avenue at Leighton Avenue. The access point at Leighton Avenue would have a new traffic signal to safely permit left- and right-turns into and out of this driveway during events. Service access would also be provided on Bill Robertson Lane.

The Modified Project would include the vacation and regular closure of 39th Street between Vermont Avenue and Bill Robertson Lane, which is currently used for access to Exposition Park. With the closure, traffic would be redirected to Exposition Boulevard or Martin Luther King Jr. Boulevard to reach Bill Robertson Lane. However, 39th Street would be available for access to Exposition Park during major events at the Coliseum.

Pedestrian access to the Modified Project Site would be provided via existing sidewalks and proposed pedestrian plazas on the Modified Project Site. There is also a wide pedestrian parkway (approximately 60 feet in width) along the east edge of Vermont Avenue, between Vermont Avenue and the Modified Project. The open design on the ground level of LMNA would offer direct pedestrian access to and from this pedestrian parkway as well as to and from the rest of Exposition Park to the east.

Bicycle access to the Modified Project Site would be provided by a network of existing and proposed bicycle facilities on many of the streets within the Study Area, including those directly adjacent to the Modified Project. Bill Robertson Lane is designated for bicycle friendly street treatments, and bicycle lanes are proposed on Vermont Avenue, Exposition Boulevard, and Martin Luther King Jr. Boulevard.

Based on the *L.A. CEQA Thresholds Guide* procedures the analysis of impacts to access and circulation considers the operating conditions of the intersections nearest the primary access points. As previously discussed, 19 of the 20 study intersections are projected to operate at LOS D or better during both analyzed peak hours, under Future Without Project Conditions (Year 2021) and would continue to operate at LOS D or better during both analyzed peak hours under Future With Project Conditions (Year 2021). Intersection No. 14, Figueroa Street & Martin Luther King Jr. Boulevard, is forecast to operate at LOS F during the weekday evening peak hour without and with the addition of traffic generated by the Modified Project. However, this intersection is not adjacent to any of the access points identified above. In addition, all access points would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. Therefore, the Modified Project would not result in a significant access and circulation impact in the Study Area.

(v) Parking

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 three existing on-site surface parking lots, which provide a total of 1,691 spaces would be removed. The Modified Project would construct two subterranean parking structures with a total of up to 2,425 parking spaces, which equates to a net increase of 734 parking spaces within Exposition Park. Approximately 1,025 spaces would be provided in the two-level Museum Parking Garage beneath LMNA, which would serve the Modified Project and the adjacent Natural History Museum. The Replacement Parking Garage would provide up to 1,400 spaces in three subterranean levels. The Modified Project would also provide 30 short-term and 30 long-term bicycle parking spaces.

LAMC requires one space per 500 square feet of gross floor area for museum uses. As the Modified Project would include up to 299,717 square feet of floor area, a maximum of 599 parking spaces would be required. The LAMC also requires bicycle parking at a rate of one short-term and one long-term bicycle parking space for each 10,000 square feet of gross floor area. For the Modified Project, a total of up to 30 short-term and 30 long-term spaces would be required. Based on the number of vehicle parking spaces provided in the Museum Parking Garage and the Replacement Parking Garage, and the bicycle parking spaces provided on-site, the Modified Project would satisfy both the vehicular and bicycle parking requirements specified by LAMC. Therefore, the Modified Project would not result in significant impacts to parking.

(c) Mitigation Measures

Mitigation Measures 1 through 8, below, were included in the Certified EIR and addenda to reduce Approved Project impacts related to traffic. With the exception of Mitigation Measures 2, 4 and 6 that are not applicable to the Modified Project, 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. **[Mitigation Measure not applicable to the Modified Project.]**

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. **[Mitigation Measure not applicable to the Modified Project.]**

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. **[Mitigation Measure not applicable to the Modified Project.]**

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.

8. 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 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

A. Agricultural Resources

According to the Certified EIR and addenda, there have been no agricultural uses on the site since before 1921. Similar to the Approved Project, the Modified Project would not involve any changes to the use of the Coliseum, which would continue hosting the same type of events as it currently does. The Modified Project would construct a new building with approximately 299,717 square feet of museum and ancillary uses in an area that is currently used for vehicle parking. In addition, the Modified Project includes the relocation of a soccer field to an area currently used for surface parking. 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

Under the Certified EIR, impacts to biological resources were concluded to be less than significant. The Modified Project is located within a highly urbanized area. The project site is developed with paved surface parking lots and a soccer field 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, consistent with the conclusions in the Certified EIR for the Approved Project, no impacts to sensitive species, designated natural communities, wetlands, wildlife corridors or nursery sites, or habitat conservation plans would occur as a result of the Modified Project.

The City of Los Angeles Protected Tree Ordinance (Ordinance 177,404) regulates the relocation or removal of Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as "protected" by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree..." and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety. In addition, the Board of Public Works has a policy that requires replacement of street trees at a ratio of 4:1.

According to the *Exposition Park Tree Inventory & Evaluation* (Tree Report) prepared by Arborgate Consulting, Inc., included as Appendix H, there are no protected trees on the Modified Project site. The Tree Report inventoried 187 trees on-site and along 39th Street, Leighton Avenue, Bill Robertson Lane, Vermont Avenue, and Martin Luther King Jr. Boulevard. This inventory included the condition of each tree and recommendations for removal or retention. As part of the Modified Project, all trees on-site and along Leighton Avenue, 39th Street, Bill Robertson Lane, and Martin Luther King Jr. Boulevard noted in the inventory would be removed. The majority of the trees along Vermont Avenue are anticipated to remain. None of the trees designated for removal are of species that are protected under the City's Protected Tree Ordinance. However, the on-site trees would be replaced on a 1:1 basis. In addition, consistent with the Board of Public Works policy, the Modified Project would replace all street trees at a ratio of 4:1. The new street tree species would be drought-tolerant and/or of a climate-adapted nature and would primarily require moist to dry soil conditions. Thus, the planting of new street tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. Based on the above, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Although unlikely, trees on the Modified Project Site that are proposed for removal could potentially provide nesting sites for migratory birds. Construction activities under the Modified Project would be required to comply with the Migratory Bird Treaty Act and the California Department of Fish and Game Code. Specifically, in accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–August 15), to the extent feasible. If vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 200-foot buffer radius (500 feet for raptors) would be established until the fledglings have left the nest. Through compliance with this existing regulatory requirement, potential impacts to nesting raptors would be less than significant under the Modified Project.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to biological resources. Therefore, similar to the Approved Project, the Modified Project would not have a significant impact on biological resources.

C. Hazard and Hazardous Materials

The following analysis is based, in part, on the following reports prepared by Converse Consultants, which are included as Appendix I of this Addendum:

- Phase I Environmental Site Assessment Report, Parking Lots 1 and 1A, Northeast Corner of Martin Luther King Jr. Boulevard & Vermont Avenue, Los Angeles, California, February 6, 2017
- Phase II Environmental Site Assessment Report, Parking Lot 1 Northeast Corner of West Martin Luther King Jr. Boulevard & South Vermont Avenue, Los Angeles, California, March 22, 2017
- Phase I Environmental Site Assessment Report, Los Angeles Coliseum, Sports Arena, and Parking Lots 2, 3, 4, 5, and 6, Los Angeles, California, January 24, 2012
- Phase II Environmental Site Assessment Report, Parking Lot 2 and 3 Located North and South of 39th Street/Exposition Park Drive Between Vermont Avenue and Bill Robertson Lane, Los Angeles, California, December 8, 2016

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. During demolition and building construction, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be used, handled, and stored on-site. All potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and would not include materials beyond what is generally used in typical construction activities, thereby reducing the risk of hazardous materials use. In addition, the Modified Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Thus, there is limited potential for construction activities to expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard in excess of regulatory standards. Furthermore, based on the results of the Phase I and II Environmental Site Assessments (ESA) for the Modified Project site, there are no significant quantities of hazardous substances on-site or evidence of hazardous environmental conditions.

Operation of the Modified Project would involve the limited use of potentially hazardous materials typical of those used in museum, retail, and restaurant operations, including cleaning agents, paints, pesticides, and other materials used for landscaping. With implementation of appropriate hazardous materials management at on-site and continued compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, significant impacts associated with the use, storage, and management of hazardous materials during operation of the Project would not occur.

Based on the information contained in the Phase I ESAs, the Modified Project site is currently used as a soccer field (Lot 1A) and parking lots (Lots 1, 2, and 3). There are no recognized environmental conditions (REC) within the site. However, on-site and adjacent historical uses include auto-related businesses, a battery repair facility, dry cleansers, gas stations, manufacturing, and agricultural-related uses. These historical uses were considered potential environmental concerns; therefore, Phase II ESAs were conducted for the Modified Project to assess the extent to which the on-site soils may have been impacted by the historical uses and to determine the presence or absence of underground storage tanks (USTs). The Phase II ESAs concluded that no concentrations of volatile organic compounds (VOCs) were detected in any of the soil samples analyzed and that all reported levels of total petroleum hydrocarbons (TPH) were below the screening levels. With the exception of arsenic and lead, all of the reported metal concentrations were below their respective screening levels for residential land use. Of the soils samples that contained arsenic concentrations that exceeded the screening level for residential use, all but one are less than the level determined by the Department of Toxic Substances Control to be an average naturally occurring level for the region. The Phase II ESA for Lot 1 concluded that the source of arsenic may have been from a surficial application of a product for weed control. The soil samples that were reported to have lead concentrations that exceeded the screening levels for residential land use had concentrations that are less than the screening levels for commercial/industrial land use such as the Modified Project. In addition, according to the Phase II ESAs, all concentrations of VOCs detected in the soil vapor samples were below the calculated soil-vapor screening levels for future residential and commercial land uses. Furthermore the geophysical survey conducted did not reveal the presence of any suspected USTs. Based on these results, the Phase II ESAs concluded that the historical on-site and off-site uses have not significantly impacted the Modified Project site. Therefore, similar to the Approved Project, the Modified Project would not have a significant impact to hazards and hazardous materials.

D. Hydrology and Water Quality

The Certified EIR included a discussion of several environmental topics, including hydrology and water quality, that were not found to be significant and thus, were not discussed in detail in the Certified EIR. The Second Addendum to the Certified EIR did provide an analysis of potential impacts associated with hydrology and water quality. That analysis concluded that the Approved Project's impacts associated with hydrology, water quality, and groundwater would be less than significant

The following analysis for the Modified Project is based, in part, on the *Lucas Museum of Narrative Art Water Resources Technical Report* (Water Resources Technical Report) prepared for the Project by KPFF Consulting Engineers, dated March 10, 2017. This report is included as Appendix J 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 approximately 30 feet compared to the Approved Project's depth of excavation of 40 feet. As the Modified Project site would be greater than 1 acre in size, coverage under the NPDES General Construction stormwater permit would be required. Compliance with this permit would require the implementation of a stormwater pollution prevention plan (SWPPP) that specifies Best Management Practices (BMPs) and erosion control measures to be used during construction to manage runoff flow and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction by containing and treating stormwater or construction watering. Furthermore, the Modified 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. Therefore, the Modified Project would not substantially alter the drainage patterns in such a manner that would result in substantial erosion, siltation, or flooding. Furthermore, the Modified Project would not result in discharge that would violate any water quality or waste discharge standards, or otherwise substantially degrade water quality. As such, construction-related impacts to surface water hydrology and surface water quality would be less than significant.

As noted in the Water Resources Technical Report, previous boring explorations immediately west of the Modified Project Site did not encounter groundwater to a depth of 70 feet below grade. An additional investigation conducted 0.25 mile east of the Modified Project Site did not encounter groundwater to a depth of 130 feet below grade. As noted above, the Modified Project would have a depth of excavation of approximately 30 feet below ground surface. Therefore, construction activities are unlikely to encounter groundwater due to the limited depth of excavation associated with the Modified Project and dewater operations are not expected. However, construction activities could increase the opportunity for hazardous materials such as fuels, paints, solvents, and concrete additives to be released into the groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous wastes would reduce the potential for hazardous materials to contaminate groundwater during construction of the Modified Project. Therefore, construction related impacts to groundwater hydrology and water quality would be less than significant.

The area proposed for construction of the LMNA is currently nearly 100 percent impervious With the exception of Jesse Brewer Jr. Park, the open space area that would be improved within Exposition Park, and the southern portion of the relocated soccer field, the portions of the site that would contain landscaping and pervious groundcover would be located above a subterranean parking structure. Thus, new drainage systems would be implemented to collect stormwater runoff from the landscape areas. According to the Water Resources Technical Report, the existing peak flow rate for a 50-year storm event is

approximately 28.6 cubic feet per second (cfs). Post-development, the peak flow rate for a 50-year storm event would remain at 28.6 cfs, indicating that there would be no increase in stormwater runoff. Thus, the Modified Project would not increase the rate or volume of stormwater runoff into the existing storm drain system during operation. The Modified Project would be required to implement a Standard Urban Stormwater Mitigation Plan (SUSMP) and comply with the Low Impact Development (LID) ordinance, which requires BMPs to capture and treat a portion of the stormwater volume. The site currently does not have structural BMPs for the treatment of stormwater runoff from the existing impervious surfaces. Therefore, the implementation of BMPs proposed by the Modified Project would result in a substantial improvement in surface water quality runoff from the site during operation. As such, operational impacts to surface water hydrology and surface water quality would be less than significant.

The Modified Project would not result in the infiltration of stormwater that could impact groundwater levels or flows. In addition, the Modified Project would not include the installation or operation of water wells, which could result in a net deficit of aquifer volume or lower the groundwater table. Operational activities that could impact ground water quality include spills of hazardous materials and leaking underground storage tanks. The Modified Project would not include the installation of underground storage tanks, and there are no known underground storage tanks in the vicinity of the site. Furthermore, the Modified Project would comply with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous materials to reduce the potential for contamination. Therefore, operational impacts to groundwater hydrology and groundwater quality would be less than significant.

The Modified 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.

Based on the above, as with the Approved Project, potential impacts associated with hydrology, groundwater, and water quality would be less than significant under the Modified Project.

E. Mineral Resources

According to the Certified EIR and addenda, the site area does not include land containing significant mineral deposits. Additionally, the site area does not contain potential petroleum resources. 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, as with the Approved Project, the Modified Project would have no impact on mineral resources.

F. Population and Housing

No residential properties are located on the Modified Project site and none were planned as part of the Approved Project. The Modified Project would not include the construction of residential uses on-site. Thus, the Modified Project would not result in a permanent population increase nor would it displace any existing housing in the area. In addition, the Modified Project Site is adjacent the Metro Expo Line and the site is also well-served by 13 bus lines operated by Metro and the LADOT Downtown Area Shuttle. Given the proximity to an abundance of public transit options and the types of employment that would be created, it is anticipated that the majority of Modified Project employees would come from the existing labor pool and would not relocate as a result of working at the Project. Thus, any indirect increase in population resulting from employees that would relocate to the vicinity would be limited. Therefore, similar to the Approved Project, the Modified Project would have no impact on population and housing.

G. Schools

The Modified Project is located within the boundaries of the Los Angeles Unified School District (LAUSD). While the Modified Project would not generate residents, the additional employment generated by the Modified Project would have the potential to generate new students that may attend LAUSD schools. However, as discussed above, the Modified Project Site is adjacent the Metro Expo Line and the site is also well-served by 13 bus lines operated by Metro and the LADOT Downtown Area Shuttle. Given the proximity to an abundance of public transit options and the types of employment that would be created, it is anticipated that the majority of Modified Project employees would come from the existing labor pool and would not relocate as a result of working at the Project. Thus, the potential for actual student generation is anticipated to be limited. Moreover, any increase in LAUSD enrollment that may occur under the Modified Project would be dispersed across many LAUSD schools, as school attendance is primarily a function of an employee's location of residence rather than his or her place of work, and Modified Project employees are anticipated to live in many different areas within LAUSD's jurisdiction. Pursuant Senate Bill 50, the Applicant would be required to pay school fees prior to the issuance of building permits to offset costs associated with school facilities made necessary by new construction. Pursuant to Government Code Section 65995, the payment of these fees by the Applicant serves to fully mitigate all potential project impacts on school facilities from implementation of a project to a less-than-significant level. Through compliance with this regulatory requirement, the Modified Project's potential impacts with regard to school facilities would be less than significant and no mitigation

measures are required. Furthermore, during construction, the Modified Project would implement a Construction Management Plan, subject to LADOT approval, which would establish proposed haul routes and staging areas for the transportation of materials and equipment with consideration for sensitive uses in the neighborhood, including schools. Therefore, the Modified Project would not result in any significant impacts to schools.

H. Parks and Recreation

The Modified Project would not generate residents; however, the additional employment generated by the Modified Project would have the potential to increase the use of parks and recreational facilities by on-site workers and employees during the construction and operation of the Modified Project. During construction of the Modified Project, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is potential for construction workers to spend their lunch breaks at the parks and recreational facilities located in proximity to the site. However, any such use would be temporary and nominal and would not be anticipated to create an increased demand for parks and recreational facilities that could result in the need for new or physically altered facilities. The additional employment generated by the operation of the Modified Project would have the potential to generate an increased demand for parks and recreation facilities. However, this potential is anticipated to be limited because it is anticipated that the majority of Modified Project employees would come from the existing labor pool and would not relocate as a result of working at the site. In addition, the Modified Project includes expansive new open space areas for use by employees, visitors, and the community. Thus, the Modified Project would not create an increased demand for parks and recreational facilities that could result in the need for new or physically altered facilities. Therefore, operation of the Modified Project would not result in a substantial adverse impact to parks and recreational facilities, and impacts would be less than significant. No mitigation measures are required.

I. Libraries

Library services within the Project area are provided by the Los Angeles Public Library (LAPL). The closest library to the site is the Exposition Park–Dr. Mary McLeod Bethune Regional Library located at 3900 S. Western Avenue, approximately 1.2 miles west of the site. The residential population of a library's service area is the primary metric used by the LAPL for assessing the adequacy of library services and planning for future growth. Since the Modified Project would not develop residential uses, implementation of the Modified Project would not result in a direct increase in the number of residents within the service population of the Exposition Park–Dr. Mary McLeod Bethune Regional Library.

During construction of the Modified Project, it is unlikely that construction workers would utilize the libraries that serve the site on their way to/from work or during their lunch hours because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. While new employment at the LMNA would have the potential to generate an indirect demand for library services, this potential demand is anticipated to be limited because it is anticipated that the majority of Modified Project employees would come from the existing labor pool and would not relocate as a result of working at the LMNA. Although employees could spend their lunch breaks at nearby libraries or visit them after work, any such use would be for limited periods and would not be anticipated to create an increased demand for libraries that could result in the need for new or physically altered facilities. As such, the Modified Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered LAPL facilities, and impacts would be less than significant. No mitigation measures are required.