EXPOSITION PARK MASTER PLAN

Initial Study

Prepared for:

Office of Exposition Park Management
700 Exposition Park Drive
Los Angeles, CA 90037

Prepared by:

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430 North Halstead Street
Pasadena, California 91107

January 10, 2020

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SECTION 1.0
PROJECT DESCRIPTION

The State of California Office of Exposition Park Management (OEPM) proposes to adopt the Exposition Park Master Plan (proposed project) to provide a unified vision for the site and help guide the long-term development, growth, and financial and environmental sustainability of Exposition Park (Master Plan Area). The California Environmental Quality Act (CEQA), as established by statute (California Public Resources Code [PRC] §§ 21000 et seq.), requires that the environmental implications of an action requiring discretional approval by a local agency be estimated and evaluated before project approval. This Initial Study was prepared by OEPM pursuant to CEQA, as amended (Division 13, PRC) and the State CEQA Guidelines (Division 6, California Administrative Code). The proposed project would ultimately result in the construction of improvement projects on public lands, some of which may involve the expenditure of public funds, and thus constitutes a project pursuant to CEQA.

This Initial Study and supporting environmental analysis will support the decision-making process to be undertaken by OEPM, in their role as the Lead Agency pursuant to CEQA, in considering the proposed project for approval. Except for parcels owned by the City of Los Angeles, which include the Rose Garden and EXPO Center recreational center, the Master Plan Area, Exposition Park, is owned by the State of California, and OEPM is the Lead Agency pursuant to CEQA.

1.1 PROJECT TITLE

Exposition Park Master Plan

1.2 LEAD AGENCY NAME

State of California Office of Exposition Park Management

1.3 PRIMARY CONTACT PERSON

Office of Exposition Park Management
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1.4 PROJECT LOCATION

Exposition Park is located on a 152-acre site located approximately 2 miles southwest of the Los Angeles Civic Center at 700 Exposition Park Drive in the City of Los Angeles, Los Angeles County, California (Figure 1.4-1, *Regional Vicinity Map*). The Master Plan Area is bordered by the University of Southern California (USC) and Exposition Boulevard (Exposition Blvd.) to the north, Figueroa Street (Figueroa St.) and the Harbor Freeway (Interstate 110) to the east, Martin Luther King Jr. Boulevard (MLK Jr. Blvd.) to the south, and South Vermont Avenue (Vermont Ave.) to the west (Figure 1.4-2, *Local Vicinity Map*).

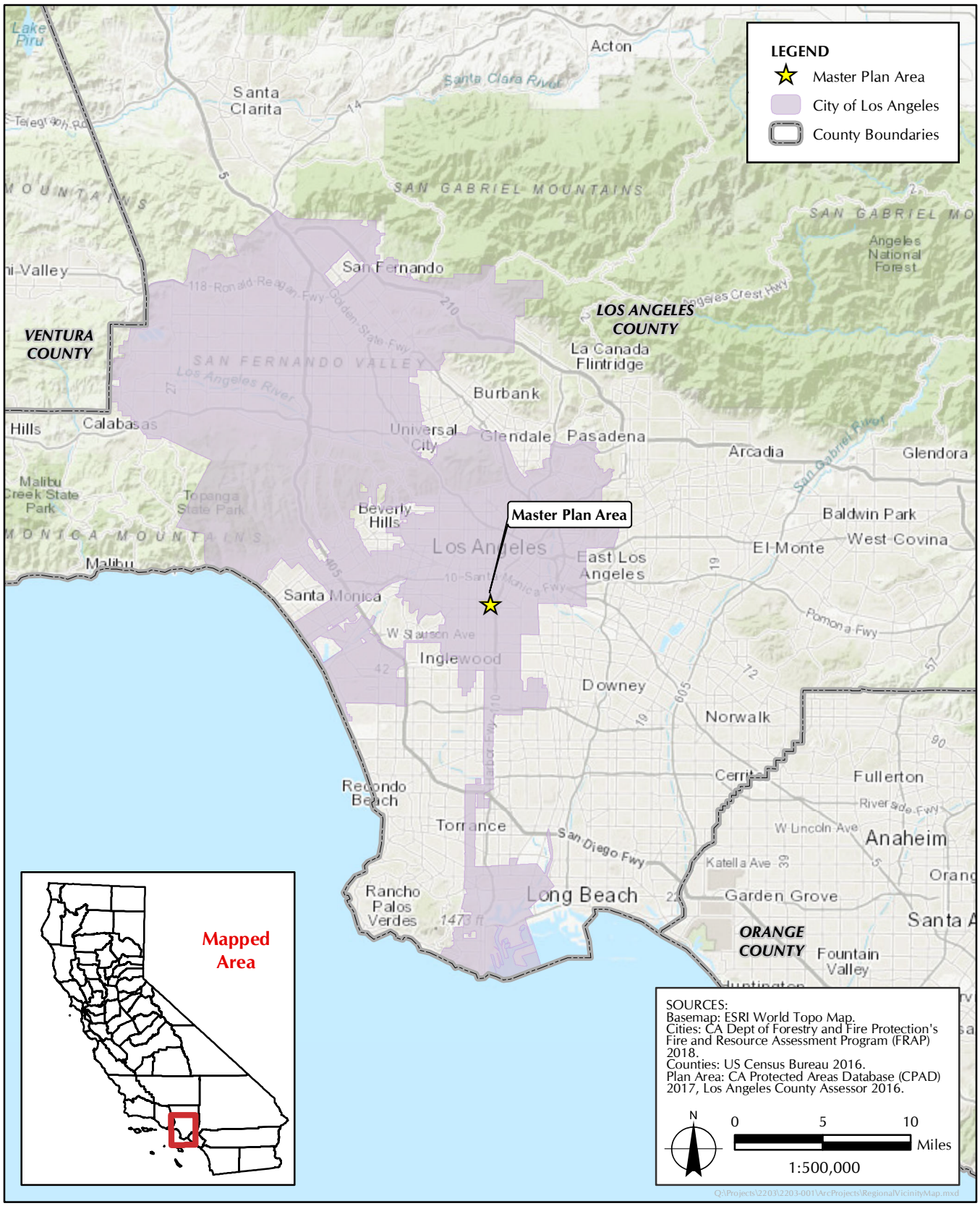


FIGURE 1.4-1

Regional Vicinity Map

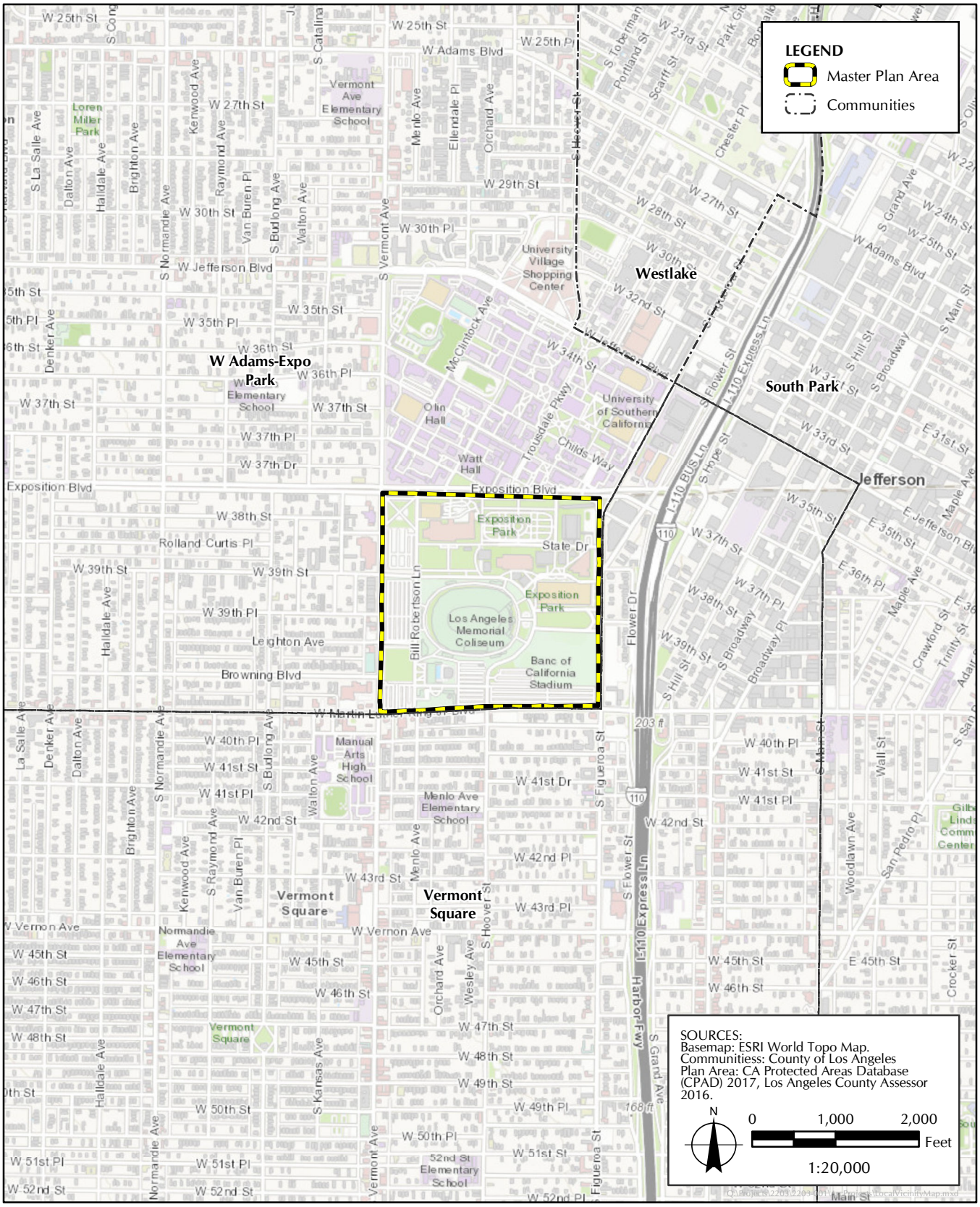


FIGURE 1.4-2

Local Vicinity Map

The Master Plan Area is in the U.S. Geological Survey (USGS) 7.5-minute Hollywood topographic quadrangle (Figure 1.4-3, *Topographic Map*). The elevation ranges from approximately 134 feet above mean sea level (MSL) within the middle of the Los Angeles Memorial Coliseum (Coliseum) to approximately 222 feet above MSL along the southeastern portion of the outer berm of the Coliseum.

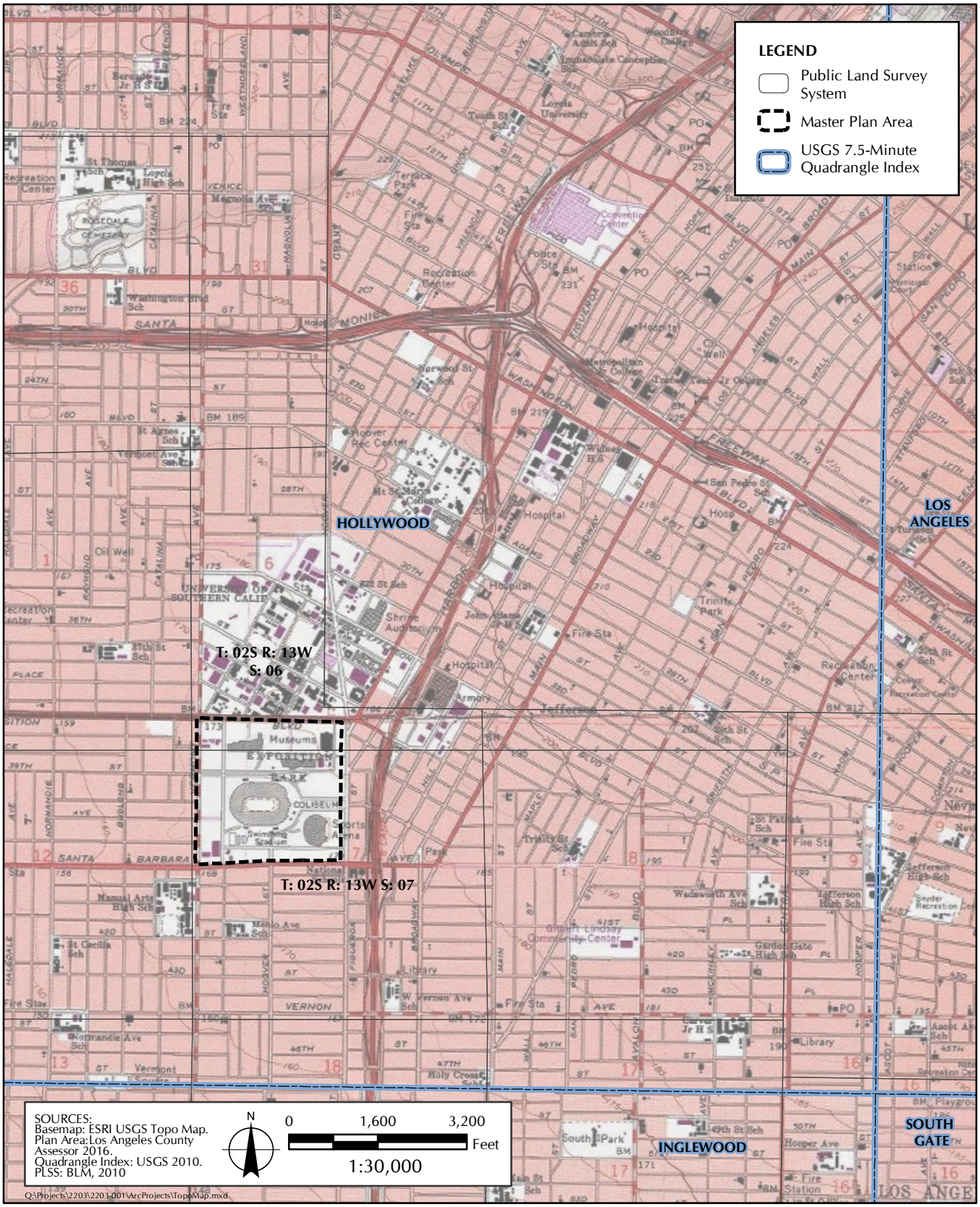
Regional access to Exposition Park is provided by Interstate 110, located approximately 0.1 mile east of the park. The proposed project is located within a High Quality Transit Area (HQTA) in an urbanized location and is in close proximity to high-density urban development.[1] The Metro Expo Line is located immediately north of the Master Plan Area, including the Expo Park/USC Station and Expo Park/Vermont Station (Figure 1.4-4, *Master Plan Area – Existing Conditions*). Exposition Park is also well served by 13 bus lines operated by the Los Angeles County Metropolitan Transportation Authority (LA Metro) and the Los Angeles Department of Transportation (LADOT) Downtown Area Shuttle. There are 95 bus stops and 3 LA Metro Expo Line light rail stops within a half-mile radius of the Master Plan Area. There are six existing public parking lots/structures at Exposition Park: the Natural History Museum of Los Angeles County (NHM) parking structure near the northwestern corner of the park; the Visitor Parking Structure on the eastern side of the park immediately south of the California African American Museum (CAAM); the Los Angeles Football Club (LAFC) Parking Lot south of the Coliseum; and surface parking Lots 4, 5, and 6 located south of the Coliseum and Banc of California Stadium. Additionally, the Lucas Museum of Narrative Art (LMNA) will include two underground parking structures (the southern one has been completed and the northern one is still under construction). The OEPM Public Safety Strategic Operating Procedures has emergency evacuation plans for individual parts of Exposition Park and overall strategic operating procedures (SOPs) that would be updated following completion of each Master Plan Element. Emergency responses and procedures have been outlined for various scenarios within the OEPM Public Safety SOPs including traffic violations, natural disturbances, public disturbances, and more. The OEPM SOPs include protocols for urgent/emergency notifications during park hours and special events, non-emergency notifications and park policies and enforcement. Key park and law enforcement contacts during emergencies are also listed under the SOPs.

The most recent available aerial imagery for the Master Plan Area, June 2018, shows the construction site for the LMNA, one of multiple projects already approved at Exposition Park (see Figure 1.4-5, *Approved Projects*).[2,3] There are six previously approved projects at Exposition Park that are outside the scope of the Master Plan (Table 1.4-1, *Previously Approved Projects*). Additionally, there are five projects under consideration by the City of Los Angeles that may be developed independently of the proposed project (Table 1.4-2, *Projects under Consideration*; Figure 1.4-6, *Projects under Consideration*).

[1] Southern California Association of Governments. Accessed December 3, 2019. High Quality Transit Areas (HQTA) 2045 – SCAG Region. http://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-118.328%2C34.008%2C-118.247%2C34.021

[2] Lucas Museum of Narrative Art. Accessed October 9, 2019. Lucas Museum of Narrative Art. https://lucasmuseum.org/

[3] California Science Center. Accessed October 9, 2019. Our Future. https://californiasciencecenter.org/about/our-future



T (Township): 02S, 02S
R (Range): 13W, 13W
S (Section): 07, 06

FIGURE 1.4-3
Topographic Map

SOURCES: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

Aerial Imagery, June 2018

FIGURE 1.4-4
Master Plan Area - Existing Conditions

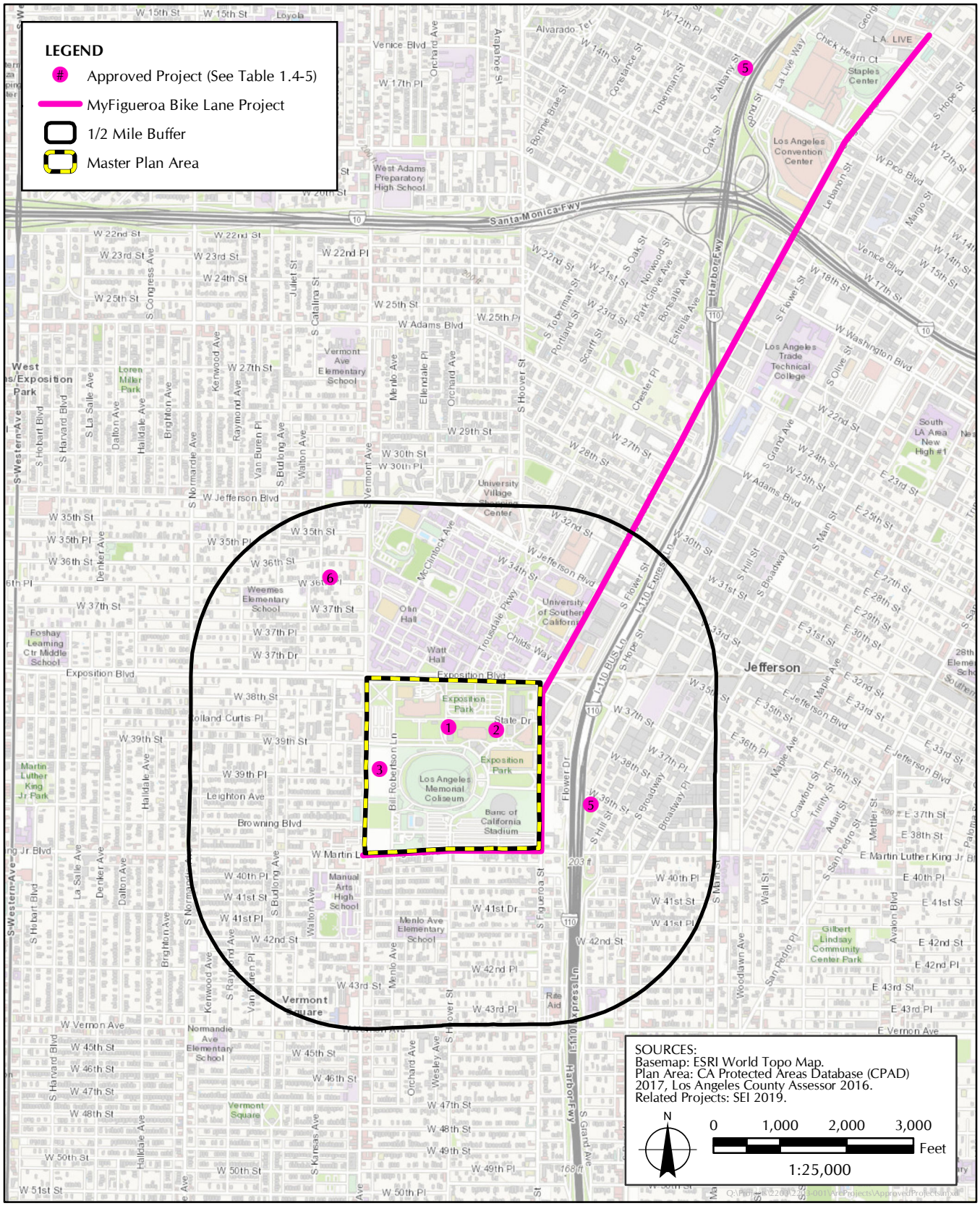


FIGURE 1.4-5

Approved Projects

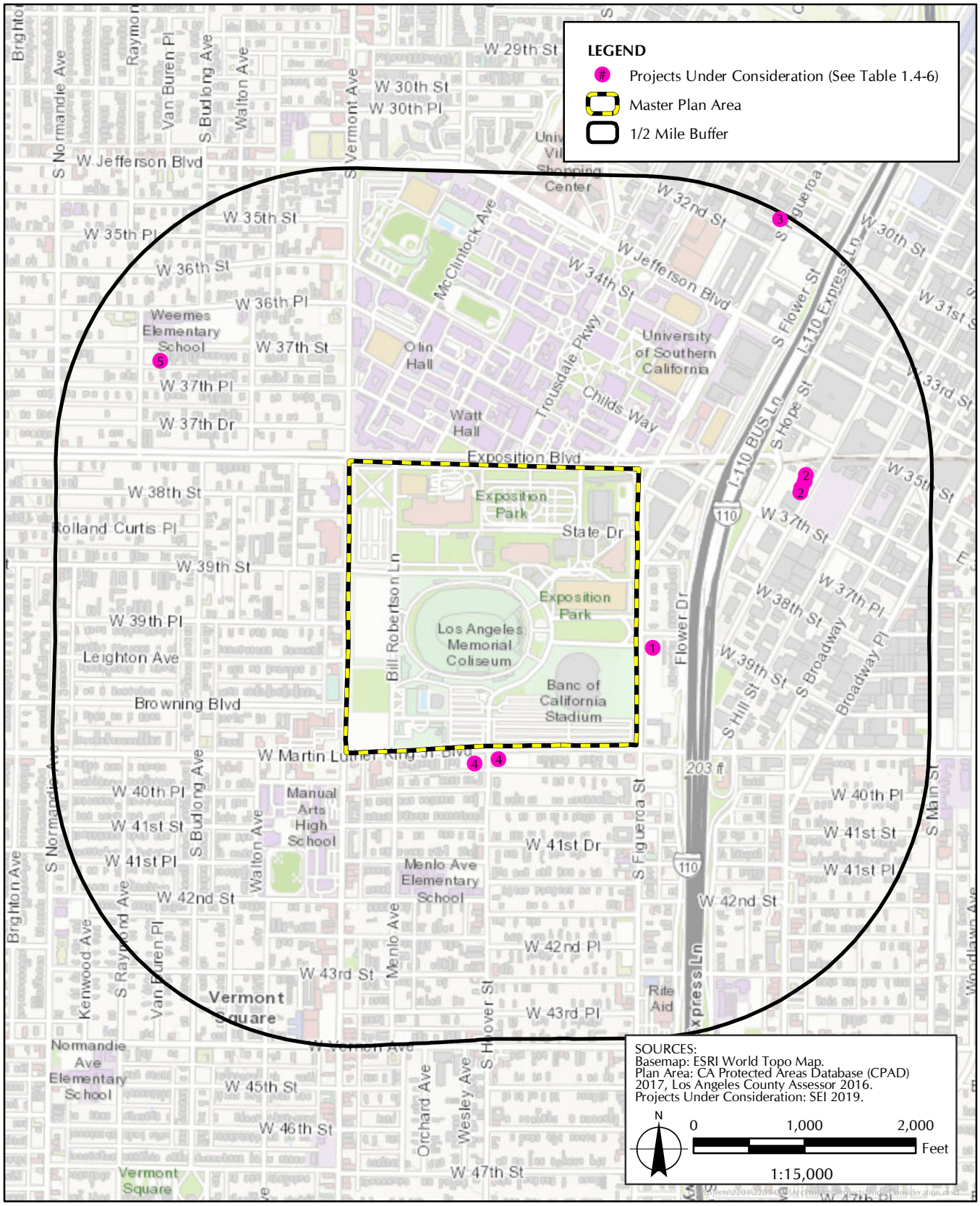


FIGURE 1.4-6

Projects Under Consideration

TABLE 1.4-1
PREVIOUSLY APPROVED PROJECTS

Number in Figure 1.4-5	Project Name	CEQA Lead Agency and Date Approved	Project Scope/Location	Project Status
1	Lucas Museum of Narrative Art[a]	City of Los Angeles (May 2017)[b]	Museum and 11 acres of green space over 2 underground parking lots between Vermont Avenue (proposed Element 1) and Bill Robertson Lane (proposed Element 5; see Section 1.8-2, below).	Under construction
2	Samuel Oschin Air and Space Center (SOASC)[c]	State of California (approved in as part of Phase III of three-phase 25-year California Science Center Master Plan, approved in 1990)[c,d]	Demolition of three existing buildings and construction of new 200,000-square-foot building to house the Space Shuttle Endeavour, along with 157 air and space related exhibits and artifacts; 3 levels, at approximately 4 stories tall. This building will replace the existing Administration West, Administration East, and Kinsey Auditorium between the California Science Center and the California African American Museum, south of State Drive (proposed Element 6) and adjacent to proposed Element 7 (see Section 1.8.2, below).[f]	Plan development
3	Rain Forest[g]	State of California (approved as part of Phase II of three-phase 25-year California Science Center Master Plan, approved in 1990)[c,d]	Replacement of existing approximately 17,500-square-foot temporary Samuel Oschin Pavilion currently housing the Space Shuttle Endeavor with a living Southeast Asian Rainforest and suspended walkways (25 feet above ground) within the tree canopy. This project would be located between the Howard F. Ahmanson Building of the California Science Center and the South Lawn (proposed Element 8), south of South Drive (proposed Element 6). It is the final element of the existing two-story approximately 45,000-square-foot Ecosystems exhibit, which opened in 2010.[g]	Acquiring fundraising
4	MyFigueroa Bike Lane Project	City of Los Angeles (approved 2013)[h]	4.5 miles of new bicycle facilities and streetscape improvements within the public right-of-way along Figueroa Street (from 7th Street to Martin Luther King Jr. Boulevard [proposed Element 1]); 11th Street (from Broadway to Figueroa Street); Martin Luther King Jr. Boulevard (from Figueroa Street to Bill Robertson Lane [proposed Element 1]); and Bill Robertson Lane (from Martin Luther King Jr. Boulevard to Exposition Boulevard [proposed Element 5]). The project includes new buffered bicycle lanes and cycle tracks along S. Figueroa Street (Element 1) and a new buffered bicycle lane along Bill Robertson Lane (Element 5).	Construction completed in August 2018[i]
5	Los Angeles Football Club (LAFC) Freeway Signage Project	Fourth addendum to the EIR for the Los Angeles Memorial Sports Arena Redevelopment Project approved July 10, 2019[j]	**Scope:** An amendment to the Coliseum District Specific Plan and the Coliseum and Soccer Stadium Sign District *(Sign District) to include noncontiguous parcels for the placement of digital signs visible from the I-110 (Harbor) Freeway and the inclusion of brightness limits and other regulations on signage within the Sign District; also the erection of two identical digital signs for the LAFC in these areas visible from the Harbor Freeway. **Location:** 3912 S. Grand Avenue, Los Angeles, CA 90037; 1320 W. 12th Place, Los Angeles, CA 90015; also the boundaries of the existing Coliseum District Specific Plan, plus the existing Major Site Sign located easterly of the 110 (Harbor) Freeway, and excluding the EXPO Center and those portions of Exposition Park north of the Coliseum and Christmas Tree Lane north of Exposition Park Drive.	Unknown
6	ENV-2014-3296-MND	City of Los Angeles	**Scope:** Demolition of two single-family dwelling units and a detached garage to construct 4 single-family dwelling-units with parking spaces. **Location:** 1157 W. 36th Place, Los Angeles, CA	Approved June 5, 2018; under construction as of May 2019

SOURCE:

[a] Lucas Museum of Narrative Art. Accessed October 25, 2019. *The Building*. https://lucasmuseum.org/building
[b] Board of Recreation and Park Commissioners of the City of Los Angeles.
[c] California Science Center. Accessed October 9, 2019. *Our Future*. https://californiasciencecenter.org/about/our-future
[d] California Science Center. Accessed December 4, 2019. *California Science Center Celebrates 20 Year Anniversary*. https://californiasciencecenter.org/about/press-room/press-releases/california-science-center-celebrates-20-year-anniversary
[e] California Science Center. Accessed December 4, 2019. *EndeavorLA Campaign*. https://californiasciencecenter.org/support/donate/endeavourla-campaign
[f] Exposition Park California. Accessed December 4, 2019. *Capital Projects*. http://expositionpark.ca.gov/public-notices/capital-projects/
[g] California Science Center. Accessed December 4, 2019. *Rain Forest: A Future Addition to Ecosystems*. https://californiasciencecenter.org/exhibits/ecosystems/forest-zone/rain-forest
[h] Los Angeles City Planning. Accessed December 4, 2019. The Figueroa Streetscape Project. https://planning.lacity.org/development-services/eir/figueroa-streetscape-project
[i] City of Los Angeles. Last updated October 5, 2018. *My Figueroa*. Blog available at: https://myfigueroa.com/blog
[j] Los Angeles City Planning. Accessed December 4, 2019. *LAFC Signage Project*. https://planning.lacity.org/development-services/eir/lafc-freeway-sinage-project

TABLE 1.4-2
PROJECTS UNDER CONSIDERATION

Number in Figure 1.4-6	Project Name	CEQA Lead Agency	Project Scope/Location	Project Status
1	The Fig Project	City of Los Angeles	**Scope**: demolish 8 existing multi-family residential buildings and surface parking areas in order to develop a mixed-used project located adjacent to Expo Park and near the USC University Park Campus--a Hotel Component, and Student Housing Component, and a Mixed-Income Housing Component. **Location:** 3900 S. Figueroa Street, across the street from Master Plan Area (near proposed Elements 1, 2, and 4)	NOP for EIR released July 18, 2016 (ENV-2016-1892-EIR).[a] A review of Google Earth aerial and street-view imagery from May 2019 shows that the 8 multi-family residential buildings and parking lots are still there, so the project construction has not begun, and would likely continue during the 25-year implementation period of the Master Plan, pending approval of the EIR.
2	Grand Avenue Public Storage Replacement Project	City of Los Angeles	**Scope:** demolish and reconstruct a Public storage building for household goods through a height and square footage increase. **Location:** 3601, 3621, 3623, 3625 S Grand Ave, on opposite side of I-110 from Master Plan Area	Proposed MND filed with County Clerk's office December 17, 2018[b]
3	7-Story Dual-Branded Hotel with 275 Guest Rooms	City of Los Angeles	**Scope:** Construct a new 7-story hotel building with a variety of amenities such as restaurants, pools, etc. **Location:** 3031 S Figueroa St, approximately 0.5-mile northeast of Master Plan Area	Proposed MND dated January 11, 2017[c]
4	Honda of Downtown Los Angeles Dealership Relocation	City of Los Angeles	Relocation of Honda of Downtown Los Angeles to 704-740 & 800-820 W Martin Luther King Jr. Blvd, and 703-705 W 40th Pl. from its current location at Figueroa St. & Venice Blvd. in downtown Los Angeles. The project would involve the demolition of the existing building, billboard sign structures, and parking lots, and the construction of 2 new structures. The structure at the southeast corner of the S Hoover St./W Martin Luther King Jr. Blvd. intersection would contain the primary dealership uses & vehicle service facilities. Additionally, a structure providing dealership uses & vehicle storage would be constructed at the southwest corner of the intersection. Both structures would reach 5 stories, 6 levels in height.	Proposed MND dated June 8, 2016[d]
5	ENV-2014-4939-MND	City of Los Angeles	**Scope:** Demolition of 2 single-family dwellings and a duplex, and construction of 10 small lot residential dwellings. **Location:** 1284-1288 W 37th St; South Los Angeles	Proposed MND dated April 27, 2016[e]

SOURCE:
[a] City of Los Angeles. July 18, 2016. Notice of Preparation of an Environmental Impact Report and Public Scoping Meeting. https://planning.lacity.org/eir/nops/theFig/nop.pdf
[b] City of Los Angeles. December 2018. Proposed Mitigated Negative Declaration: Grand Avenue Public Storage Replacement Project. https://planning.lacity.org/odocument/89d4b54d-655d-4954-95dc-a25a62171ac6/ENV-2018-870.pdf
[c] City of Los Angeles. January 11, 2017. Proposed Mitigated Negative Declaration: ENV-2016-2467-MND. https://planning.lacity.org/staffrpt/mnd/Pub_122216/ENV-2016-2467.pdf
[d] City of Los Angeles. June 8, 2016. Initial Study: Honda of Downtown Los Angeles Dealership Relocation. https://planning.lacity.org/staffrpt/mnd/Pub_051916/ENV-2016-1036.pdf
[e] City of Los Angeles. April 27, 2016. Proposed Mitigated Negative Declaration: ENV-2014-4939-MND. https://planning.lacity.org/staffrpt/mnd/Pub_040716/ENV-2014-4939.pdf

Exposition Park is located in South Los Angeles within a short light rail train and bus ride from Downtown Los Angeles, the Westside, South Bay, and the San Gabriel Valley (see Figure 1.4-7, *Public Transit in Project Vicinity*). There is an existing light rail transit network that provides significant transportation infrastructure to accommodate the Master Plan Area, including two Metro Expo Line light rail stations at the northern border of the Master Plan Area on Exposition Park Blvd.[4] There is also a station of the Silver Line (bus rapid transit [BRT] running in the high-occupancy vehicle [HOV] lanes of the I-110) within two blocks of the park and LA Metro is currently planning a new BRT line that will run along Vermont Avenue.

The approximately 152-acre park serves as an open campus providing cultural, recreational, and athletic activities to a half million members of the community who live within a 3-mile radius and millions of residents throughout the Los Angeles Basin and beyond. Exposition Park provides an iconic place to gather, gaze at the sky, rest in the gardens, exercise, and enjoy life. Home to celebrated museums, sporting venues, and recreational and educational facilitates, Exposition Park thrills, energizes, and sparks the imagination of approximately 4 million annual visitors from near and far.[5]

Except for parcels owned by the City of Los Angeles near the edges of the Master Plan Area,[6] all other areas in the park are owned by the State of California,[7] which enters into master leases to public and private agencies (Figure 1.4-8, *Property Owners and Operators*). There are multiple easements in the Master Plan Area with the City of Los Angeles,[8] the Los Angeles County Metropolitan Transportation Authority (LA Metro),[9] the University of Southern California (USC),[10] and the Los Angeles Football Club (LAFC)[11] that would require coordination with the OEPM prior to and during any improvements.[12] The OEPM is responsible for parking services, public safety, overall park beautification, park maintenance, lease management, lease negotiations, and asset management. The OEPM also administers supervision and coordination of all park-wide events, public safety, landscape maintenance for the common areas within Exposition Park, and provides parking services for State-owned parking areas.

The purpose of the proposed project is to provide a unified vision for the site and help guide the long-term development, growth, and financial and environmental sustainability of the park.

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[4] Los Angeles County Metropolitan Transportation Authority. August 24, 2019. Metro Expo Line Route Map. https://www.metro.net/riding/maps/

[5] Office of Exposition Park Management. Accessed November 20, 2019. Exposition Park, California: Park History. http://expositionpark.ca.gov/about-us/park-history/

[6] As of December 2019, the City of Los Angeles owns the Rose Garden, Expo Center, and a segment of Leighton Avenue.

[7] The Sixth District Agricultural Association, also known as the California Science Center, is a state agency that was created for the sole purpose of governing Exposition Park and its associated assets. The park's operations and assets are managed by the Office of Exposition Park Management.

[8] The City has an easement covering the western 10 feet of lots 109 and 119 for the purposes of widening Vermont Avenue to 80 feet, as well as easements for various roadways running through Exposition Park.

[9] LA Metro has easements for installing and operating transit ticketing kiosks within the park on lots 1, 2, 3, 5, 6, 10, 14, and 18.

[10] USC has an easement for an underground telecommunication system, including cables, wires, and conduits.

[11] LAFC has the right to install, maintain, and replace utility lines with respect to the Banc of California stadium property, the right to erect off-site signs in and around parking lot 6 in accordance with the Master Signage Plan, and an easement for use of 400 daily parking stalls in Lot 6.

[12] Office of Exposition Park Management. January 18, 2018. Subject: Exposition Park Master Plan documents review memo by BRV. Prepared by Biederman Redevelopment Ventures (BRV).

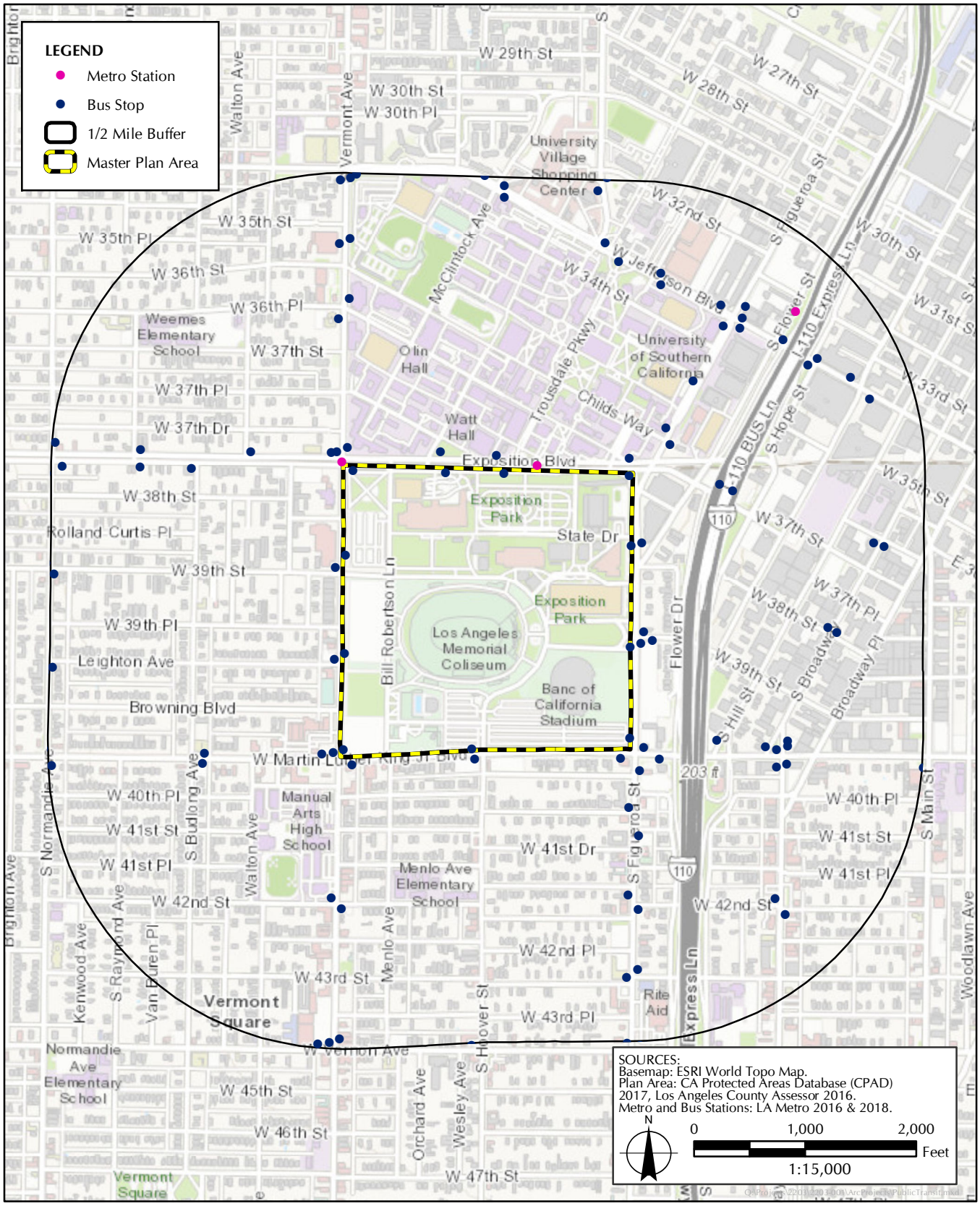


FIGURE 1.4-7

Public Transit in Project Vicinity

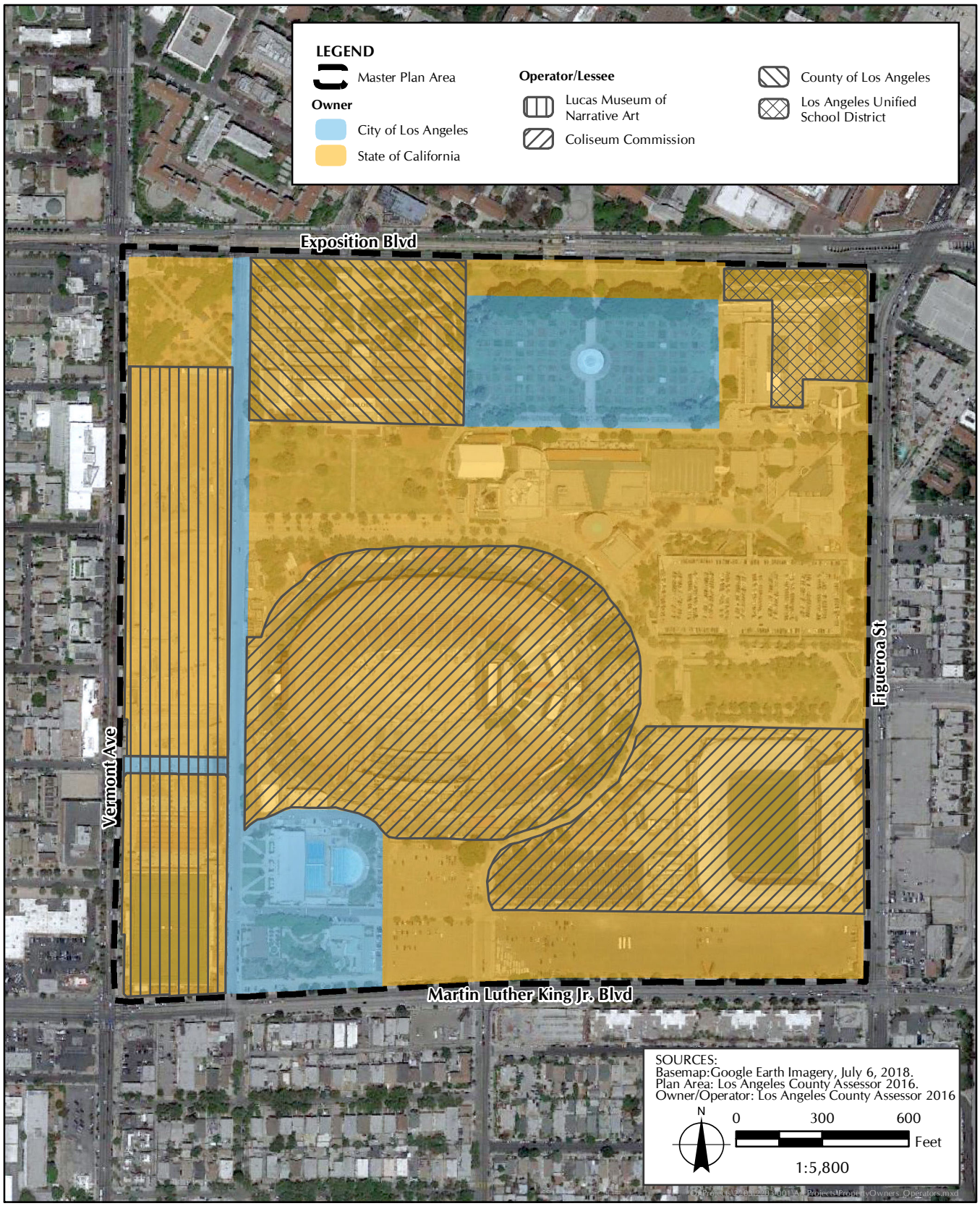


FIGURE 1.4-8

Property Owners and Operators at Exposition Park

Specifically, the study area for the proposed project includes the entire campus but not the interiors of any of the below-mentioned entities, which presently occupy the park:

- Banc of California Stadium (BoCS); (newly constructed, opened in April 2018), operated by the Los Angeles Football Club
- California African American Museum (CAAM), a state museum
- California Science Center (CSC; which includes the Alexander Science Center School and Amgen Center for Science Learning, IMAX Theater, Samuel Oschin Pavilion, and future Samuel Oschin Air and Space Center), a state museum
- EXPO Center, owned and operated by the City of Los Angeles' Recreation and Parks, including the following:
  - The Roy A. Anderson Recreation Center
  - The Ahmanson Senior Center
  - The LA84 Foundation/John C. Argue Swim Stadium
  - The Ralph M. Parsons Pre-School
  - EXPO/CSU Urban Mini Farm
  - The W.M. Keck Amphitheater
  - The Front Lawn; Private Boardwalk; and all other trees, lawns and flowers within the property line of the EXPO Center
- Soboroff Playfield, owned by the State, leased and operated by the City of Los Angeles (tenant)
- Exposition Park Rose Garden, owned and operated by the Los Angeles City Department of Recreation and Parks
- Los Angeles Memorial Coliseum, operated by USC (tenant)
- Lucas Museum of Narrative Art (LMNA; currently under construction)
- Natural History Museum (NHM), operated by County of Los Angeles

1.5 PROJECT SPONSOR

Office of Exposition Park Management
700 Exposition Park Drive
Los Angeles, CA 90037

1.6 GENERAL PLAN DESIGNATION

Although the State is not subject to city general plans, the City General Plan designations have been provided to inform OEPM's decision-making process and guide portions of the proposed project located in areas owned and/or operated by the City of Los Angeles. The Master Plan Area is located within the South Los Angeles Community Plan Area (CPA).[13] The City of Los Angeles' General Plan land use designations for Exposition Park are Public Facilities – PF and Open Space - OS.[14] The South Los Angeles CPA categorizes Exposition Park as a Regional Park and identifies two designated Cultural/Historical Sites in the Master Plan Area. The South Los Angeles CPA identifies nine National Register Historic Districts, including Exposition Park (Figure 1.6-1, *Eligible Historic Districts*).

[13] City of Los Angeles Department of City Planning. November 2017. South Los Angeles Community Plan. https://planning.lacity.org/complan/pdf/sclcptxt.pdf

[14] City of Los Angeles Department of City Planning. Adopted November 22, 2017. South Los Angeles Community Plan. General Plan Land Use Map. https://planning.lacity.org/complan/central/PDF/slaplanmap.pdf

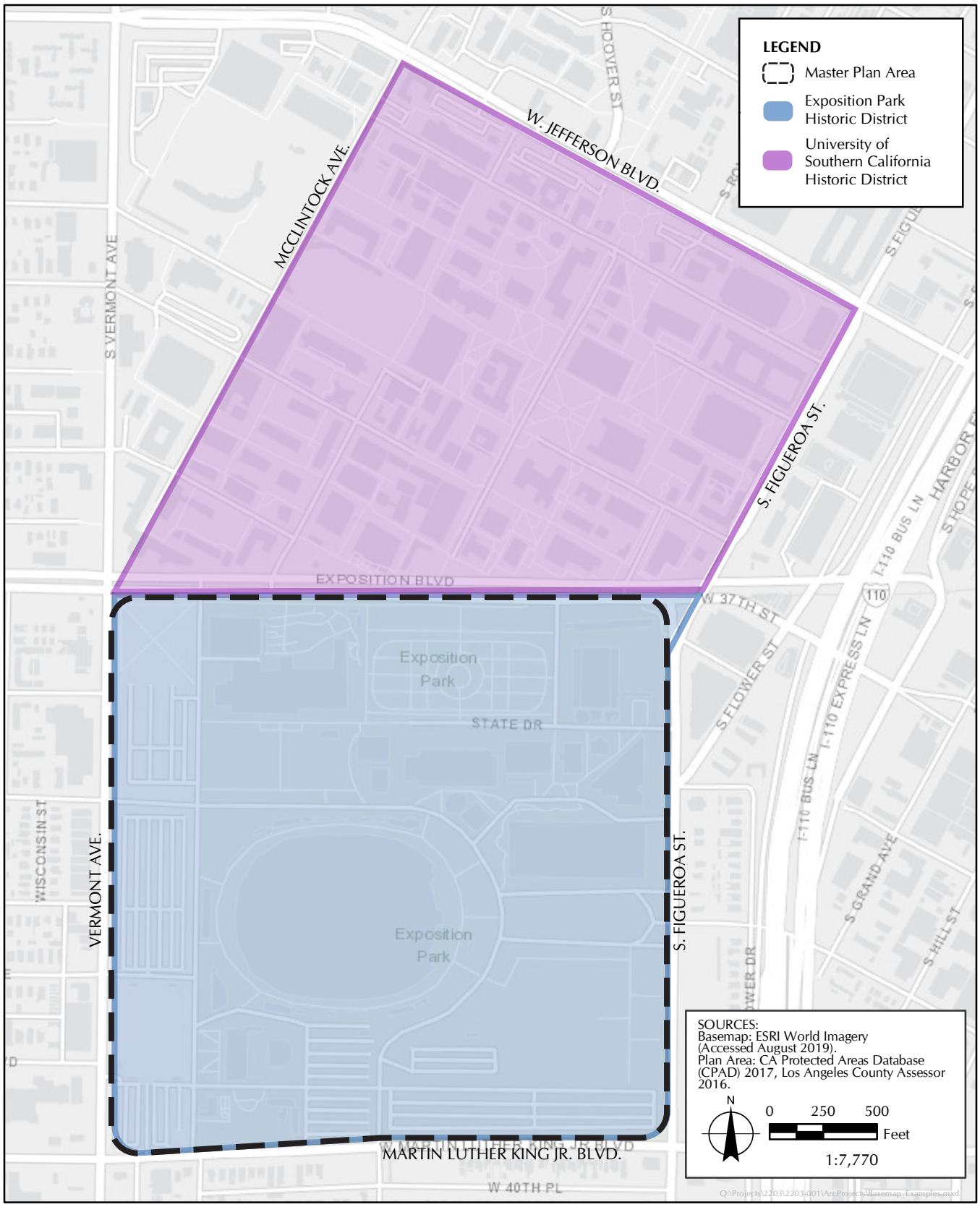


FIGURE 1.6-1

Eligible Historic Districts

The southwestern and southern portions of Exposition Park are located within the Coliseum District Specific Plan, including[15]

- Lucas Museum of Narrative Art (LMNA) Construction Site (including Bill Robertson Lane)
- Christmas Tree Lane (CTL)
- Los Angeles Memorial Coliseum (LAMC)
- Banc of California Stadium (BoCS)
- Parking Lots 4, 5, and 6 (including S. Hoover St.)
- VIP Parking

The Coliseum District Specific Plan area does not include the EXPO Center. The Coliseum District Specific Plan is intended to provide regulatory controls and incentives, ensure orderly development by establishing general procedures for development within the Specific Plan area, provide for the preservation and upgrade of the historic Los Angeles Memorial Coliseum stadium and associated development and enhancements to the site in conformance with the goals and objectives of local and regional plans and policies, and provide for the development of the approximately 15-acre Los Angeles Memorial Sports Arena site (Banc of California Stadium) with a state-of-the-art professional soccer stadium and ancillary uses.

1.7 ZONING

A State zoning designation has not been assigned to Exposition Park due to its location within an incorporated city. Although the State is not subject to city zoning, the City's zoning designations have been provided to inform OEPM's decision-making process and because portions of the Master Plan Area are owned or operated by the City of Los Angeles. There are three City zoning designations for the Master Plan Area: PF-1, PF-1-SN, and OS-1XL.[16] Allowable uses within the "PF" Public Facilities Zone include any joint public and private development uses permitted in the most restrictive adjoining zones if approved by the Director utilizing the procedures described in Section 16.05 to H of the City of Los Angeles Municipal Code.[17] Allowable uses within the "OS" Open Space Zone include parks and recreation facilities, including bicycle trails, equestrian trails, walking trails, nature trails, parkland/lawn areas, children's play areas, child care facilities, picnic facilities, and athletic fields (not to exceed 200 seats in park) used for park and recreation purposes.[18]

[15] City of Los Angeles Department of City Planning. Accessed October 15, 2019. Coliseum District Specific Plan. Ordinance No. 195042. https://planning.lacity.org/plans-policies/overlays/coliseum-district

[16] City of Los Angeles Department of City Planning. Accessed September 5, 2019. ZIMAS. http://zimas.lacity.org/

[17] City of Los Angeles. Accessed September 5, 2019. Official City of Los Angeles Municipal Code – Chapter I, Planning & Zoning. Section 12.04.09 "PF" Public Facilities Zone. http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpublicfacilitieszone?f=templates$fn=altmain-nf.htm$q=[field%20folio-destination-name:%2712.04.09.%27]$x=Advanced#JD_12.04.09.

[18] City of Los Angeles. Accessed September 5, 2019. Official City of Los Angeles Municipal Code – Chapter I, Planning & Zoning. Section 12.04.05 "OS" Open Space Zone. http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120405osopenspacezone?f=templates$fn=altmain-nf.htm$q=[field%20folio-destination-name:%2712.04.05.%27]$x=Advanced#JD_12.04.05.

1.8 DESCRIPTION OF PROJECT

The Exposition Park Master Plan would guide the development of Exposition Park during a 25-year period to link Exposition Park to the City of Los Angeles around it; connect the park's segments to one another; and encourage the community members and visitors to linger with the inclusion of more plentiful pathways, plantings, and visitor amenities. The proposed project would connect the park's segmentsby improving pedestrian and recreational use of the spaces between its buildings and moving surface parking spaces underground.

1.8.1 Background

The Master Plan Area was established in 1872 as a 160-acre agricultural fairground. The property was jointly purchased in 1889 (called Agricultural Park at the time) by the State of California and the County and City of Los Angeles for development of a cultural center, and the park was renamed Exposition Park in 1910 when the State of California agreed to build an exposition building and armory if the County of Los Angeles would construct a history and art museum with the City of Los Angeles maintaining the grounds (see Figure 1.4-8). The Los Angeles Memorial Coliseum (Coliseum) known as the "Greatest Stadium in the World," was erected in 1923 as a living memorial to all who served in the U.S. Armed Forces during World War I by the Community Development Association.[19,20,21] The Coliseum hosted the Olympic Games in 1932 and 1984 and will again in 2028. In 1955, a joint powers agreement (JPA) known as the Los Angeles Memorial Coliseum Commission Management Agreement was made between the City of Los Angeles, County of Los Angeles, and the Sixth District Agricultural Association (California Museum of Science and Industry) providing for the operation of the Los Angeles Memorial Coliseum and the Los Angeles Memorial Sports Arena by the Los Angeles Memorial Coliseum Commission.

In 1993, a Master Plan to improve and guide the development of Exposition Park over a 20-year period was prepared by the California Science Center in consultation with neighborhood leaders and the park entities. Many of the major projects proposed in that plan have been accomplished to the benefit of community and visitors from around the world. Over 25 years later, it is time to focus on the next 25 years, through the Master Plan process, to make further improvements that take into account the growth within the park as well as the 21st-century vitality of the greater stakeholder community. This land use vision takes into consideration the foundation set by the 1993 Master Plan from a fresh perspective that highlights the presence of a light rail transportation line (the Metro Exposition Line); the addition of new "key" park stakeholders; as well as the ongoing renewal, urbanization, and expansion of Downtown Los Angeles. The goal of this new Master Plan is to address the future vision and land use strategy for the park as it adjusts to its vibrant and continually changing environment.

Concurrent with the execution of the new Master Plan, Exposition Park would continue fundraising to address projects identified in the Master Plan. These may be operational, infrastructural, sustainability or include strategic marketing or branding projects.

[19] Los Angeles Conservancy. Accessed December 17, 2019. Los Angeles Coliseum: Overview. https://www.laconservancy.org/locations/los-angeles-memorial-coliseum

[20] Los Angeles Memorial Coliseum. Accessed December 17, 2019. Coliseum History. https://www.lacoliseum.com/coliseum-history/

[21] Los Angeles Memorial Coliseum Commission. Accessed December 17, 2019. The Los Angeles Coliseum History. http://lamcc.lacounty.gov/History

There are historical resources within and adjacent to the Master Plan Area that must be considered in the land development process. The Master Plan Area and immediate surrounding areas have several designated and eligible historical resources including the Los Angeles Memorial Coliseum; Los Angeles County Museum of History, Science, and Art (renamed the Los Angeles County Natural History Museum in 1965); Wallis Annenberg Building; Exposition Park Rose Garden; Exposition Clubhouse; Los Angeles Swimming Stadium; Christmas Tree Lane; the California Air and Space Museum (designed by Frank Gehry in 1984), and the California State Museum of Science and Industry (renamed the California Science Center in 1996) all located within the Exposition Park boundary (Section 3.5, *Cultural Resources*). The Exposition Park Historic District, with the boundaries of the district being the same as Exposition Park, was found eligible for the National Register of Historic Places by the Office of Historic Preservation on June 15, 1993, but was never designated, and includes the above eight resources (see Figure 1.6-1).[22] Several historic resources border the project area, including the University of Southern California Historic District to the north. Seeley Wintersmith Mudd Hall of Philosophy, an individually designated resource and a contributor to the University of Southern California Historic District, is located on the northern border of the Master Plan Area (Figure 1.8.1-1, *Designated Historical Resources*).

The University of Southern California Historic District, bounded by Exposition Blvd. to the south, S. Figueroa St. to the east, McClintock Avenue (McClintock Ave.) to the west, and Jefferson Boulevard (Jefferson Blvd.) to the north, boosts 49 contributing historical resources to its district, with 11 of those resources individually designated to the National Register of Historic Places or California Register of Historical Resources (see Figure 1.8.1-1). SurveyLA, the citywide historic survey completed in 2014, identified 36 eligible resources within a 0.3-mile radius of the project area, with 2 of those resources located on the project border (Figure 1.8.1-2, *Eligible Historical Resources*). A record search at the South Central Coastal Information Center (SCCIC) identified an additional 11 individual resources within a 0.3-mile radius of the proposed project and the Flower Drive Historic District to the east.

The Flower Drive Historic District borders the proposed project site on the eastern edge with its boundaries being W. 38th Street, Flower Drive, Martin Luther King Jr. Boulevard, and Figueroa Street. It includes 17 contributing multifamily buildings from the 1920s.

Overall, 122 identified historical resources, either designated, eligible for designation, or contributing to one of the three historic districts identified, are in the immediate vicinity of the Master Plan Area.

[22] Historic Resources Group. August 2015. Los Angeles Memorial Sports Arena Historic Resources Technical Report. http://lamcc.lacounty.gov/LinkClick.aspx?fileticket=9b1BlHypVeY%3D&portalid=17.

FIGURE 1.8.1-1

Designated Historical Resources

FIGURE 1.8.1-2

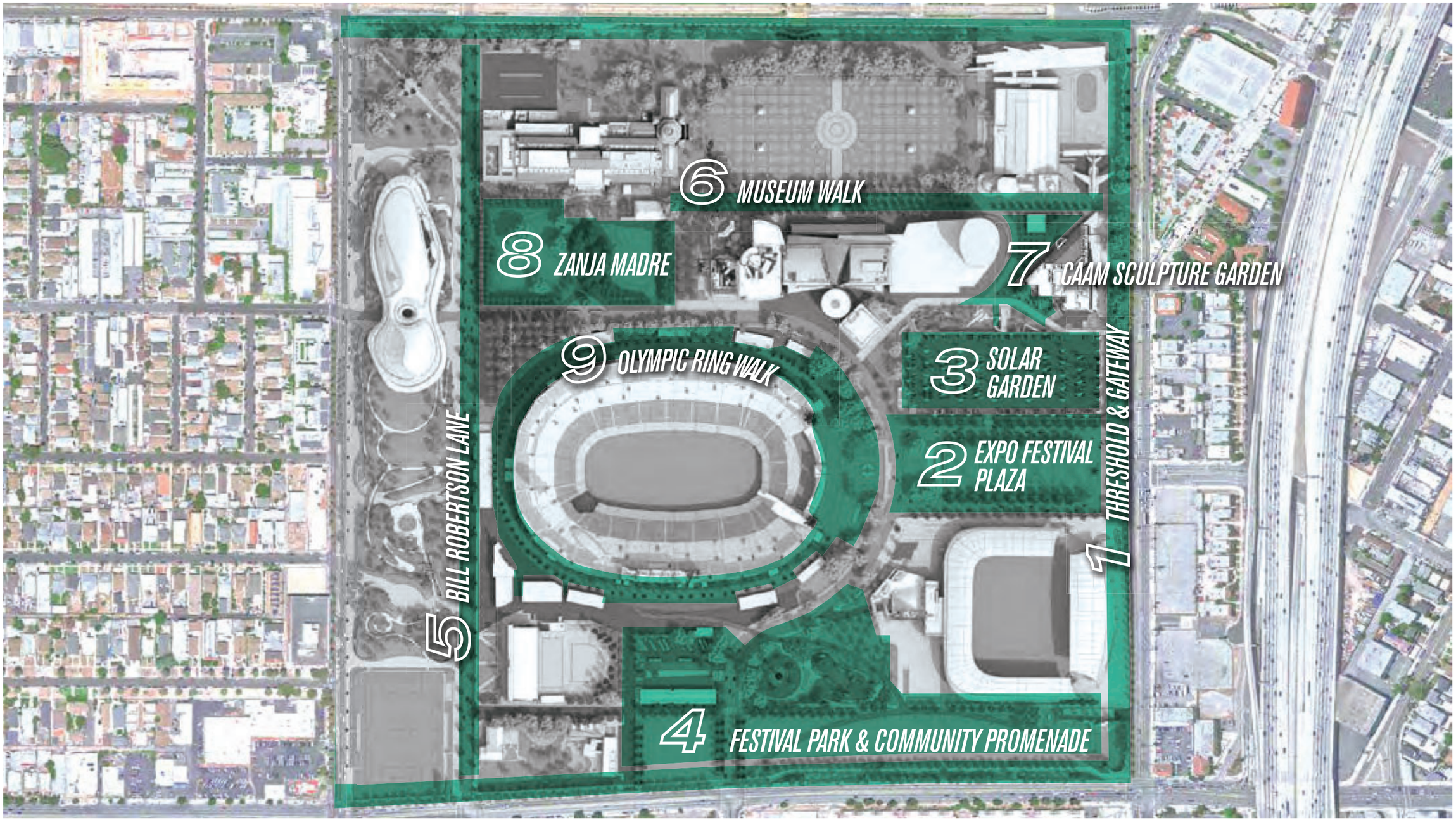
Eligible Historical Resources

As stated in Section 1.5, the proposed project would not involve modifications to the Exposition Park Rose Garden, Exposition Club House (now the Ahmanson Senior Center), the State Armory Building (now the Wallis Annenberg Building), Los Angeles Swimming Stadium, or the Los Angeles Memorial Coliseum interior and surrounding berm. The proposed project would not involve modifications to any structures across the street from Exposition Park. Alterations to character-defining features related to historical resources located in the Expo Festival Plaza and Museum Walk areas need to be evaluated and comply with the Secretary of the Interior Standards for Rehabilitation. More specifically, should any unanticipated alterations occur in the areas of Christmas Tree Lane or southern exterior character-defining features of the Exposition Park Rose Garden, construction activities would need to be monitored and evaluated for adverse effects to these historical resources.

1.8.2 Proposed Project

The proposed project is a 25-year master plan composed of nine elements (Figure 1.8.2-1, *Proposed Master Plan*):

1. Threshold and Gateway
2. Expo Festival Plaza
3. Solar Garden
4. Festival Park and Community Promenade
5. Bill Robertson Lane
6. Museum Walk
7. California African American Museum Sculpture Garden
8. Zanja Madre
9. Olympic Ring Walk



SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

Not To Scale

FIGURE 1.8.2-1
Proposed Master Plan

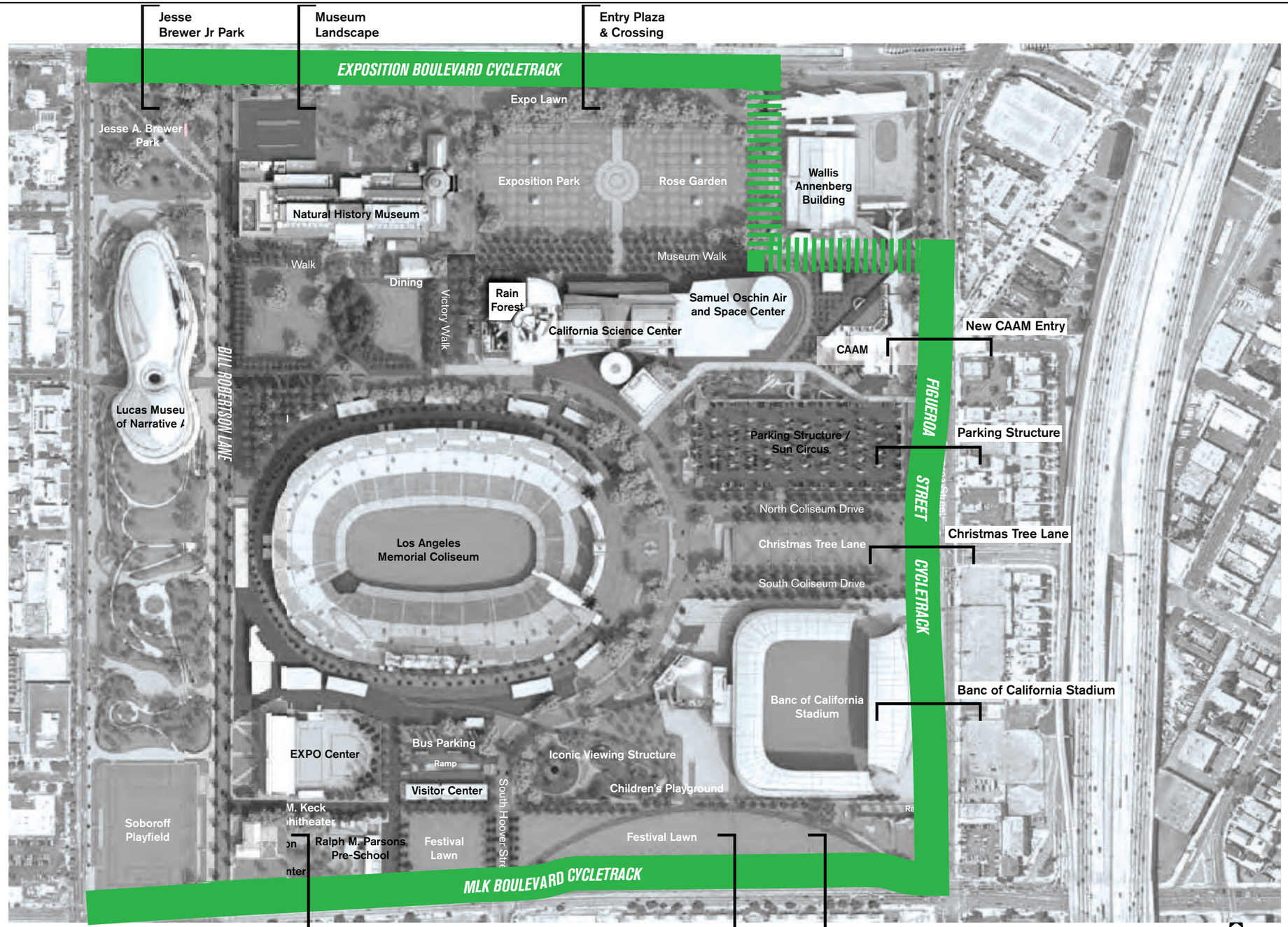
Element 1 – Threshold and Gateway

Element 1 would improve the pedestrian, vehicular, and cyclist entrance experience at Exposition Park with new wayfinding signage for welcoming visitors arriving via Metro light rail, bus, walking, bicycles, or vehicles from the north (Exposition Park Rose Garden); south (S. Hoover St. and Element 4 – Festival Park and Community Promenade); or east (Christmas Tree Lane and Element 2 – Expo Festival Plaza) (Figure 1.8.2-2, *Proposed Master Plan Element 1 – Threshold and Gateway*). The proposed Threshold and Gateway enhancements would be installed along the existing perimeter of the Master Plan Area, including cycle tracks, ride share (drop off/pick up) areas, wayfinding, and improvements to the existing bike lane along Figueroa St. Improvements would occur within state park property and would not encroach into the streets surrounding the Master Plan Area. Light rail stations and bus stop locations surrounding the Master Plan Area would remain.

Element 1 would include:

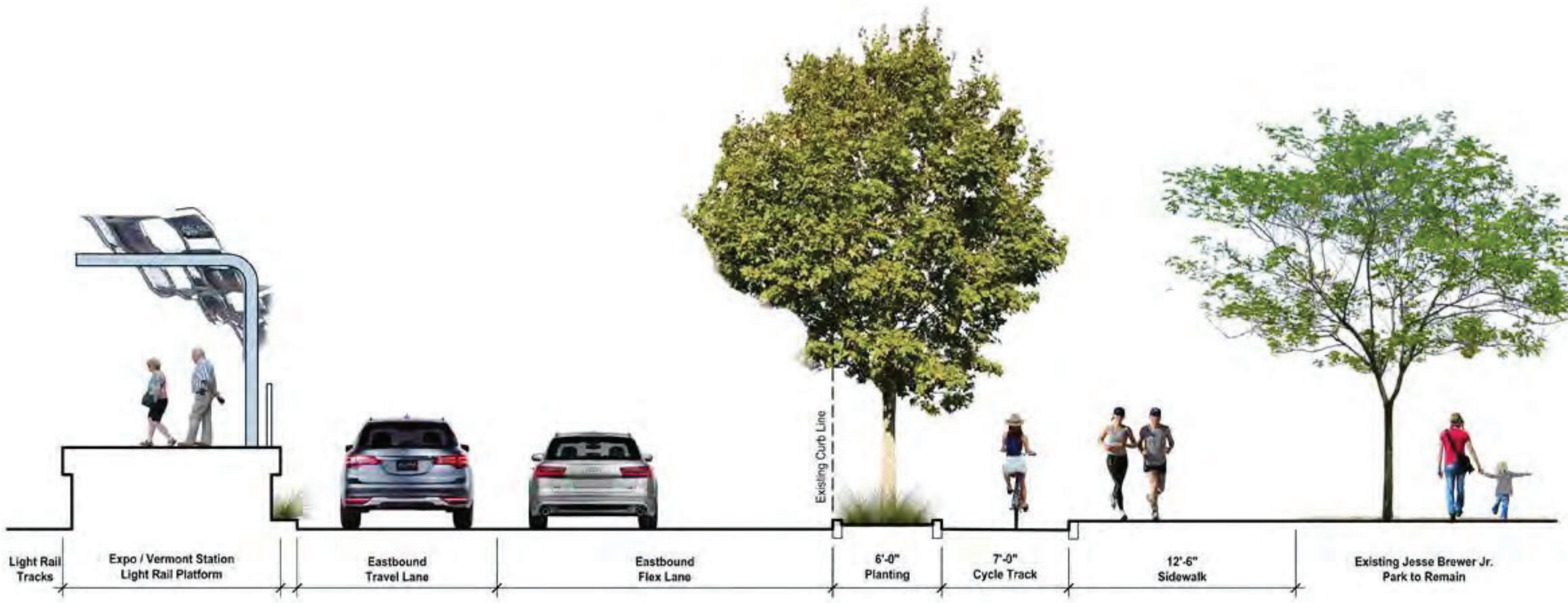
1. Installation of a new protected cycle track along Exposition Blvd. between Vermont Ave. and Figueroa St. and along MLK Jr. Blvd. between Figueroa St. and Vermont Ave.
2. Conversion of the existing bike lane to a protected cycle track along Figueroa St. between Exposition Blvd. and MLK Jr. Blvd.
3. Installation of a new bike lane along Kinsey Dr. from Exposition Blvd. to State Dr. (flanked by Exposition Park Rose Garden and Wallis Annenberg Building) and wrapping east on State Dr. towards Figueroa St.
4. Other improvements along the proposed cycle tracks and bike lanes including new canopy street trees, planting buffers (for protecting cyclists and for treating off-site stormwater), widening of sidewalks with enhanced paving, crosswalk markings, seating opportunities, wayfinding and gateway enhancements, and ride share (drop off/pick up) areas at various locations throughout the site.

The cycle track would be 7 feet wide along three perimeter sides of the Master Plan Area (Exposition Blvd., Figueroa St., and MLK Jr. Blvd.), except at Exposition Park Rose Garden Entry Plaza, where the cycle track would be a 16-foot-wide shared use path for bicycles and pedestrians. The planted buffers, for cyclist protection and stormwater treatment, would be approximately 6 feet wide, except at Christmas Tree Lane, where the planter between the through traffic and cycle track would be 12 feet wide and the planter buffer between the cycle track and the sidewalk would be 5 feet wide. These low impact development (LID) best management practices (BMPs) would be installed per the City's LID Ordinance.



SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

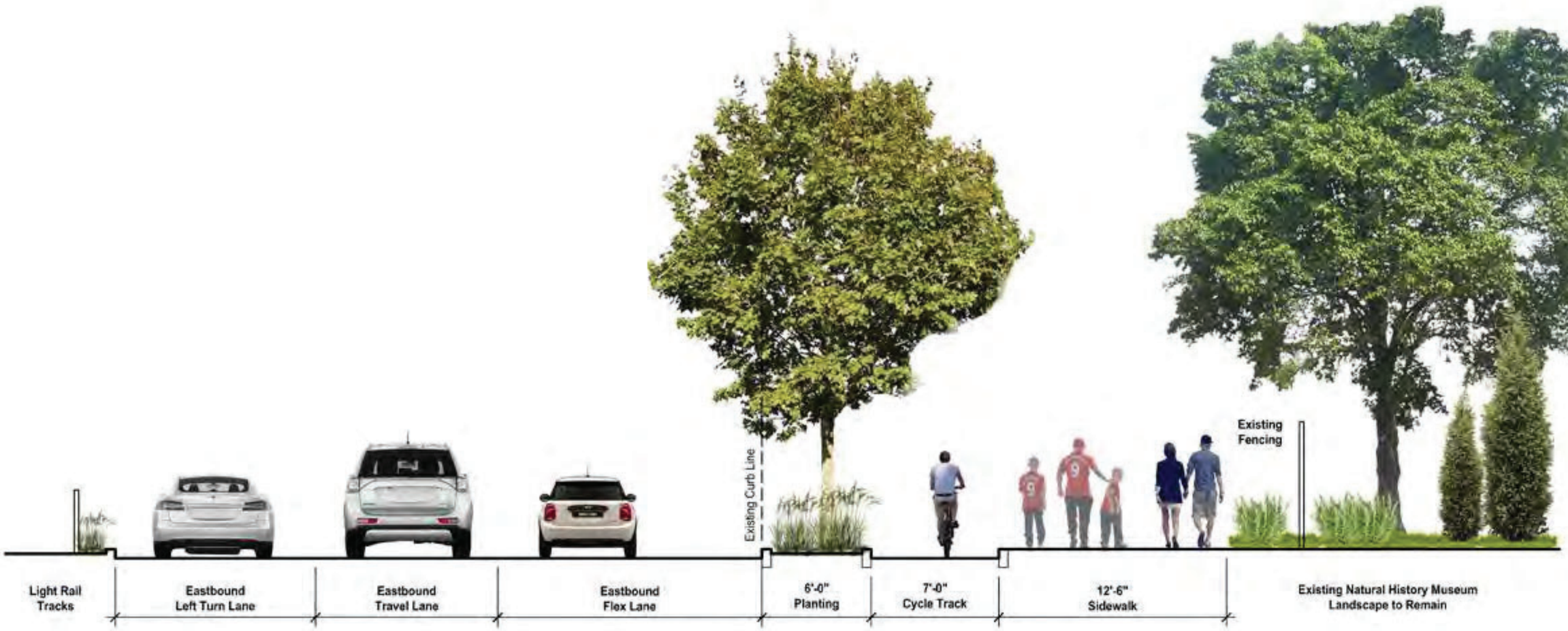
FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway



Exposition Boulevard at Jesse Brewer Jr. Park

SOURCE: Torti Gallas + Partners 2019

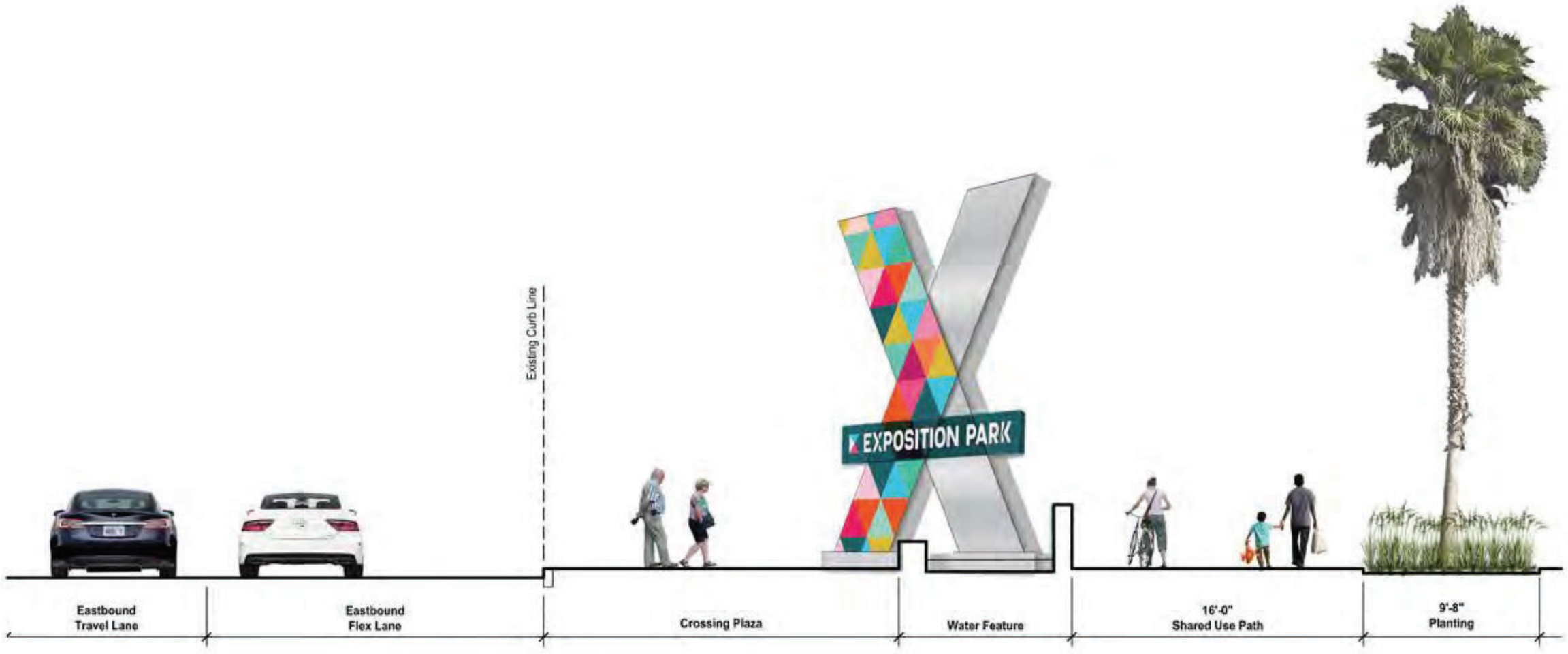
FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway



Exposition Boulevard at Natural History Museum Landscape

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway



Exposition Boulevard Near Rose Garden Entry Plaza & Crossing

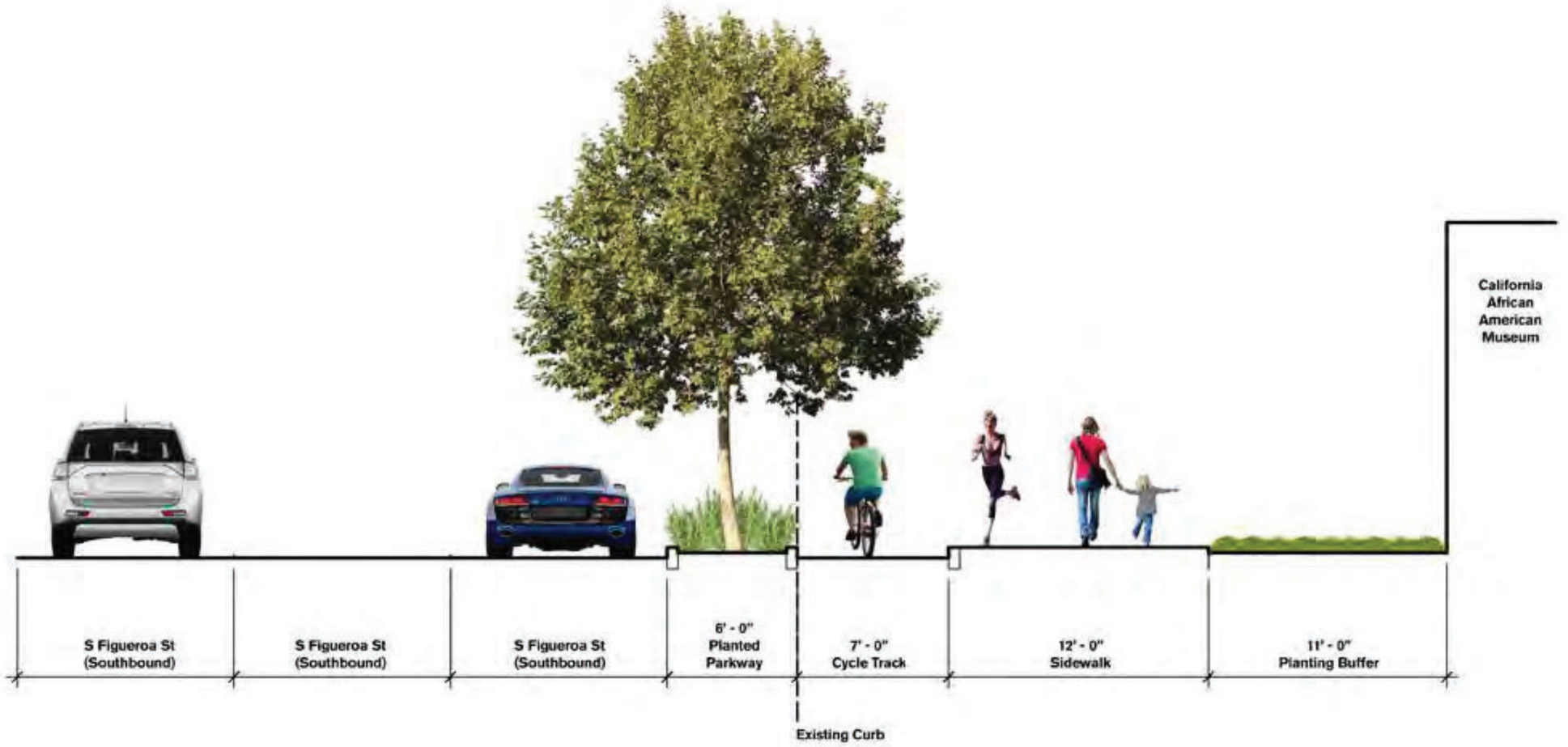
SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway

Exposition Boulevard at Historic Entry Area to Rose Garden

SOURCE: Torti Gallas + Partners 2019

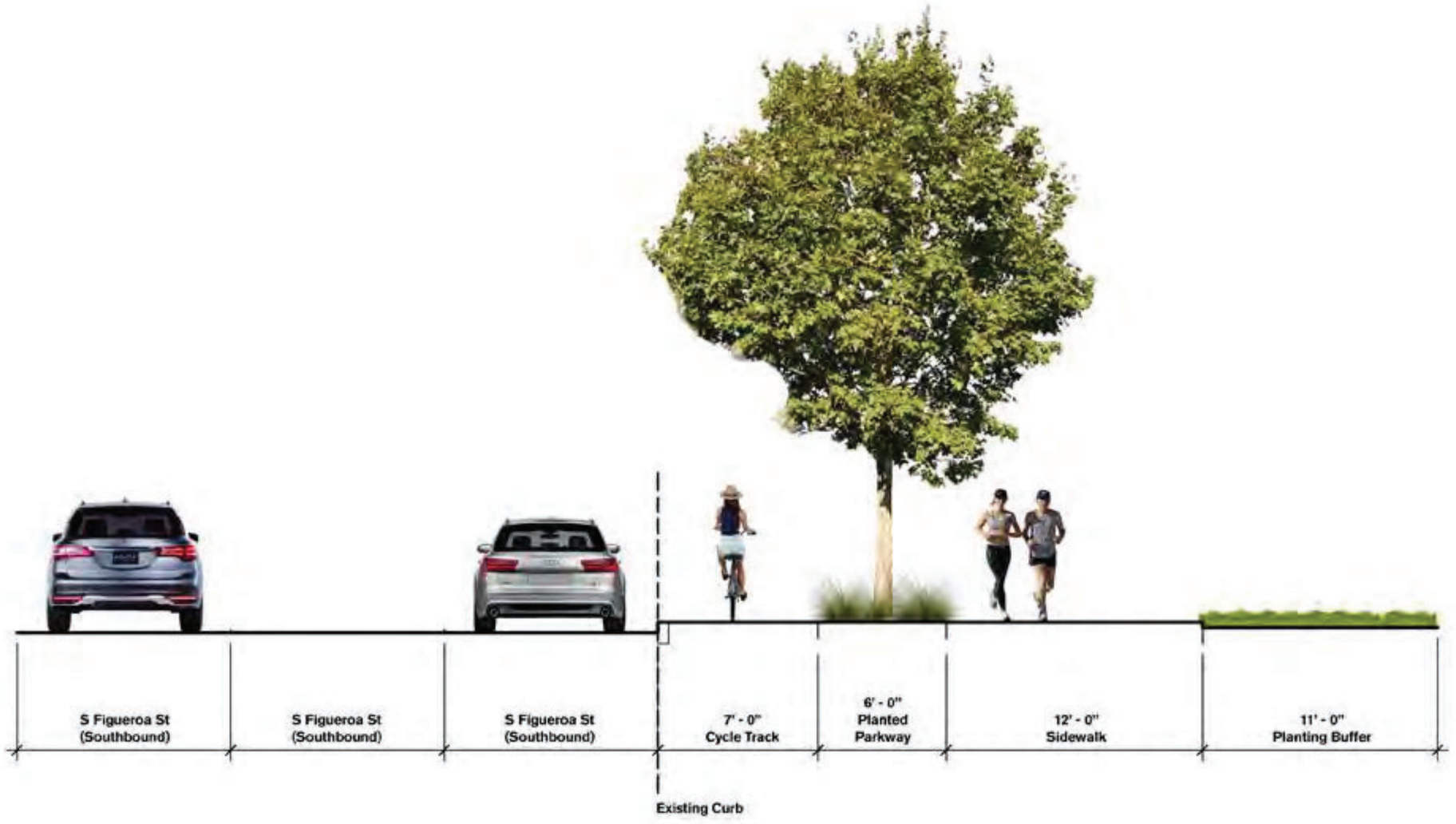
FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway



S. Figueroa Street at California African American Museum

SOURCE: Torti Gallas + Partners 2019

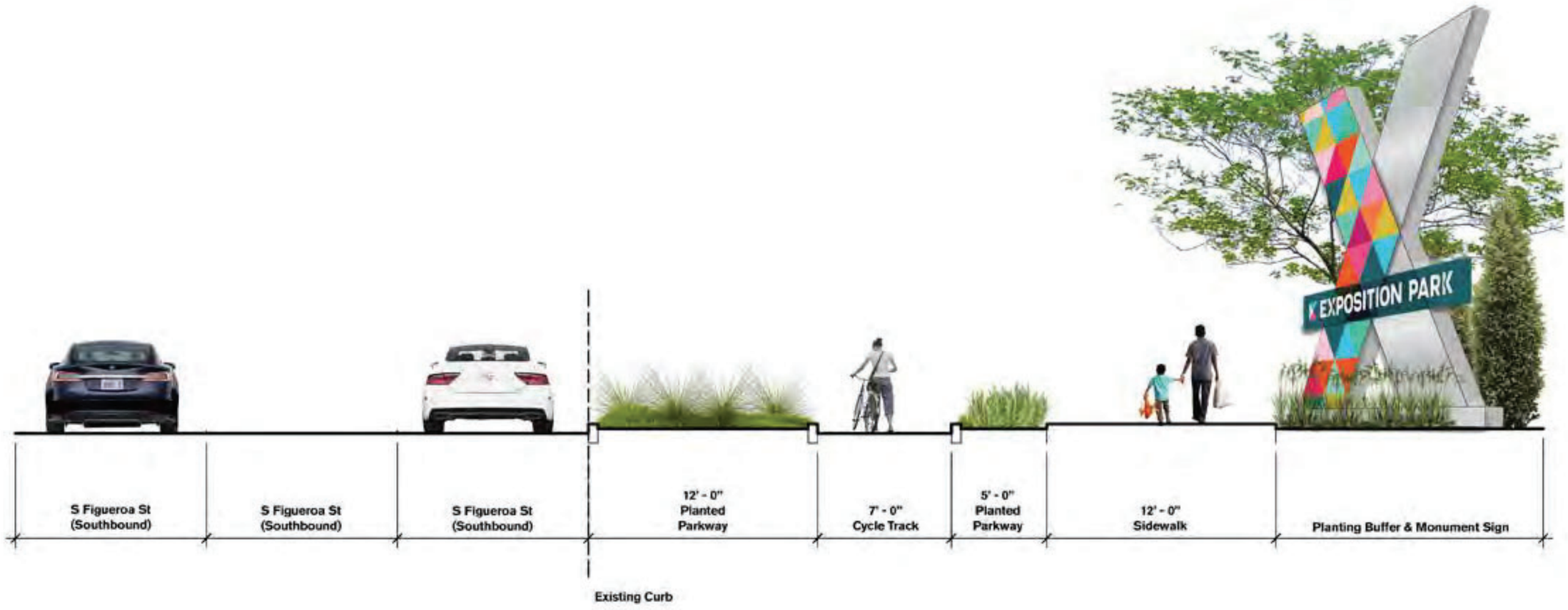
FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway



S. Figueroa Street at Visitor Parking Structure (Element 3 – Solar Garden)

SOURCE: Torti Gallas + Partners 2019

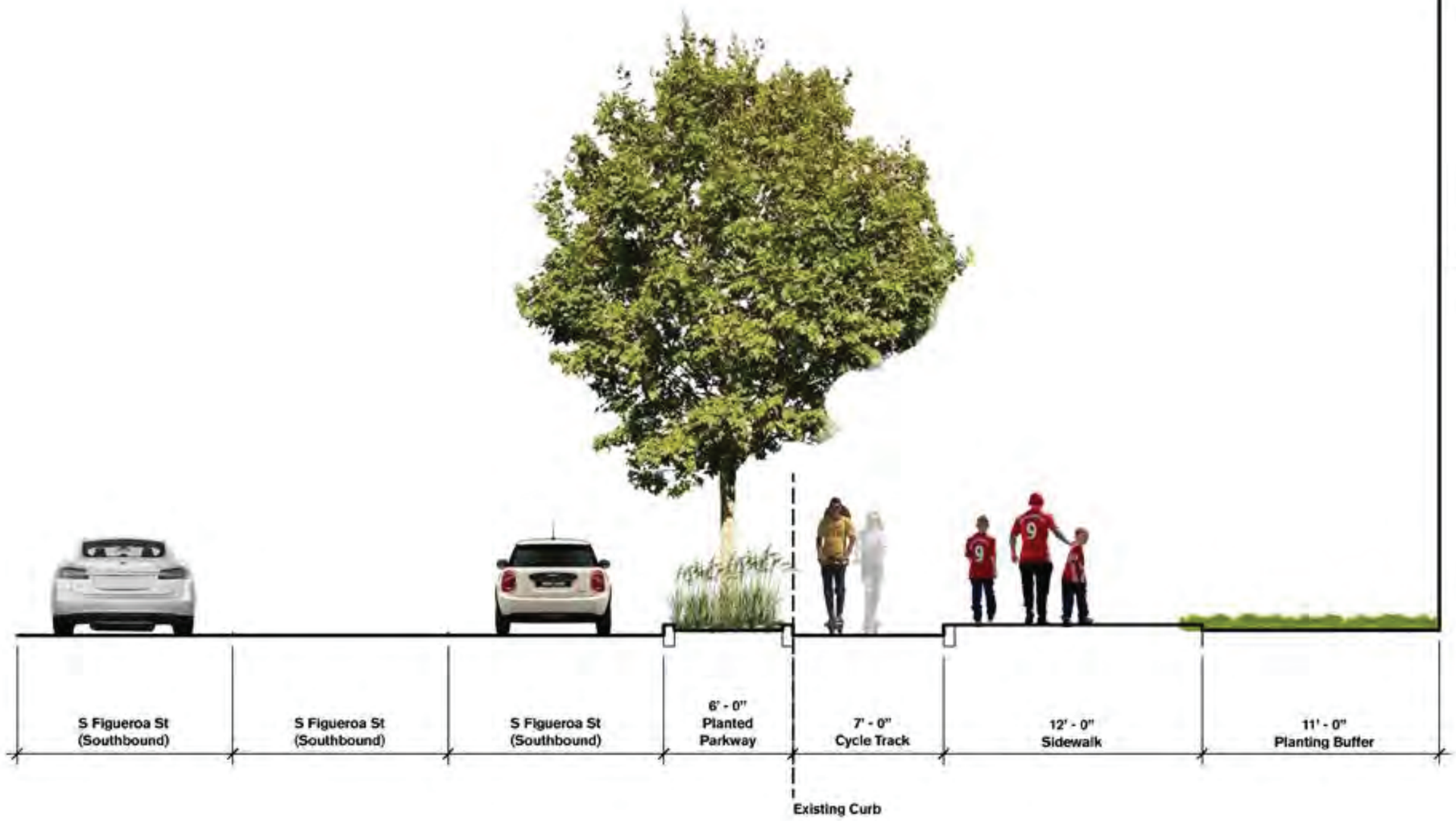
FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway



S. Figueroa Street at Christmas Tree Lane (Element 2 – Expo Festival Plaza)

SOURCE: Torti Gallas + Partners 2019

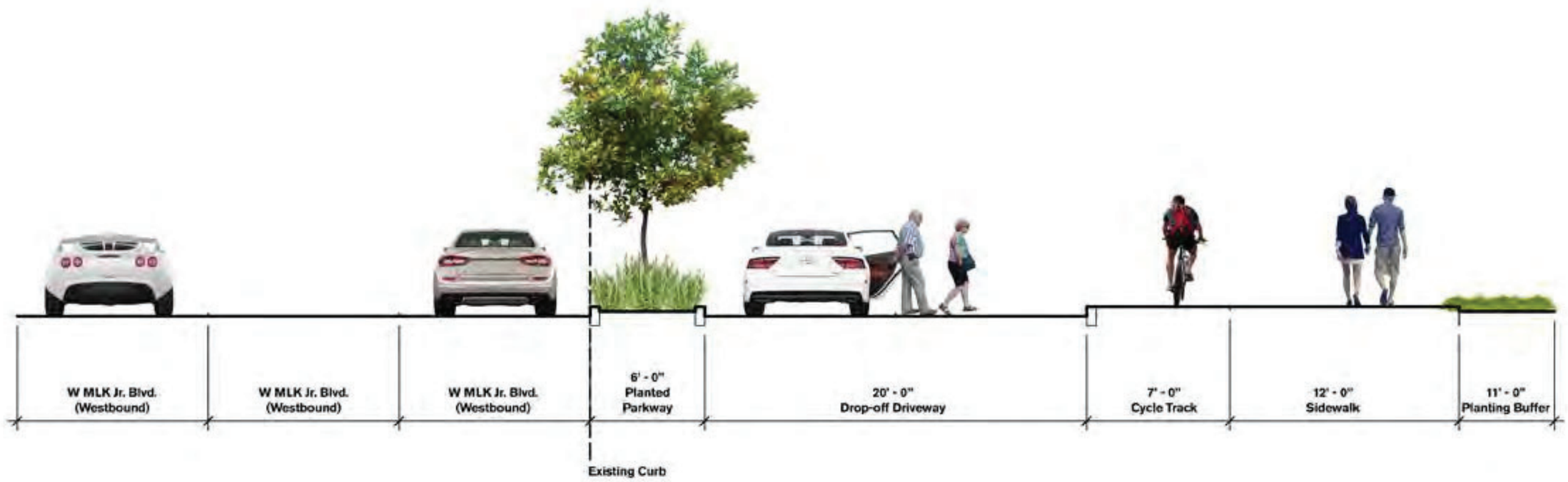
FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway



S. Figueroa Street at Banc of California Stadium

SOURCE: Torti Gallas + Partners 2019

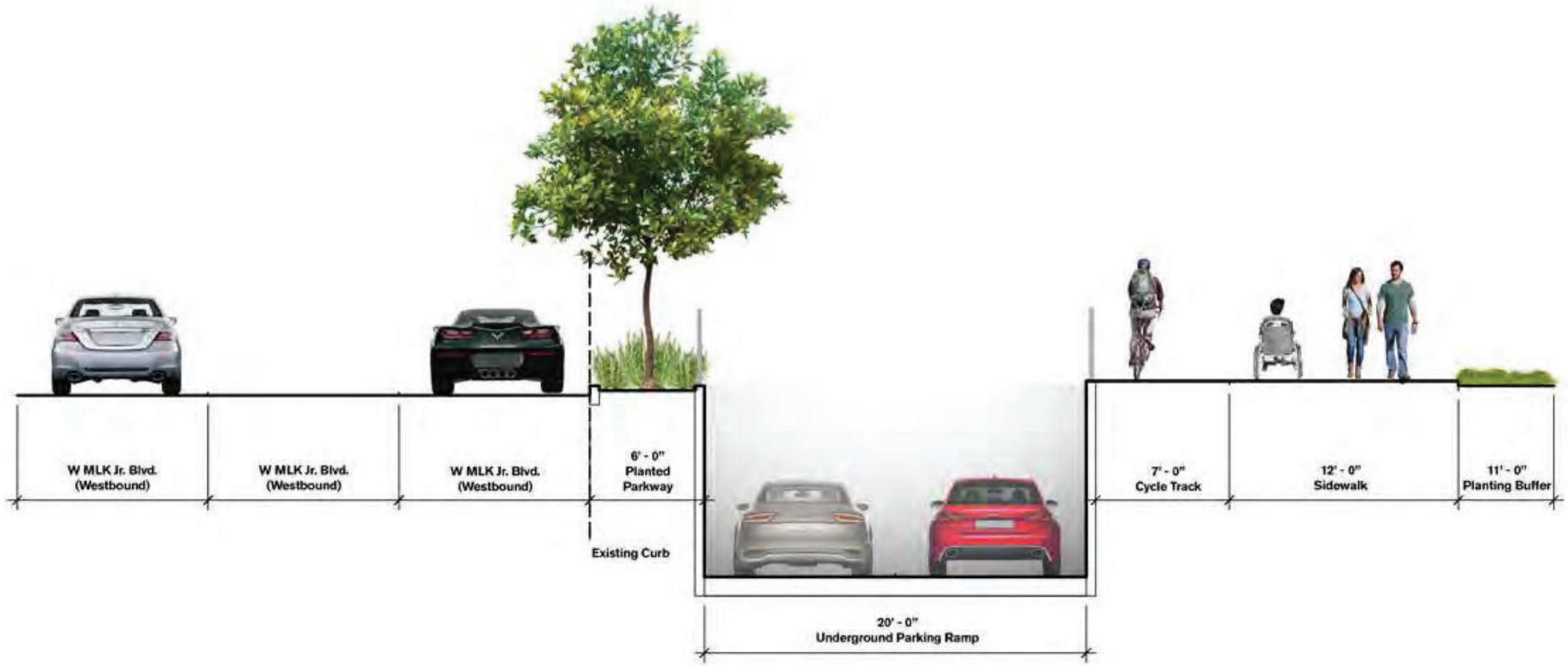
FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway



W. MLK Jr. Boulevard at Proposed Parking Structure Entry (Element 4 – Festival Park & Community Promenade)

SOURCE: Torti Gallas + Partners 2019

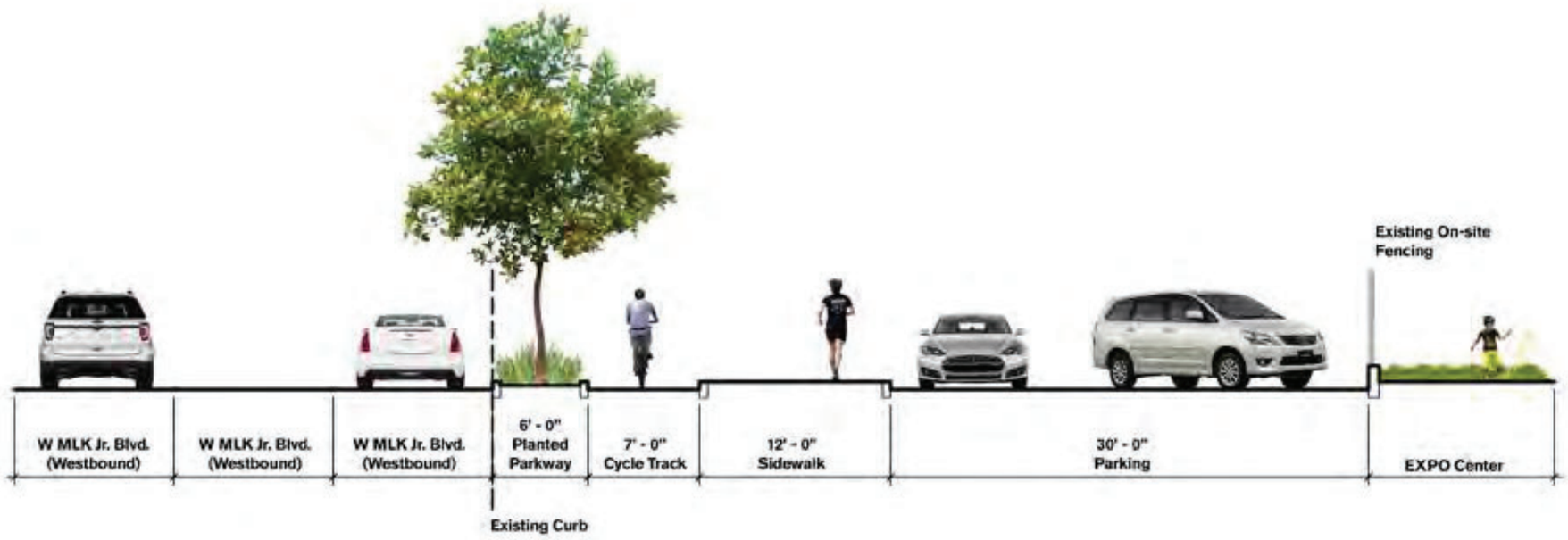
FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway



W. MLK Jr. Boulevard at Proposed Ride Share (Element 4 – Festival Park & Community Promenade)

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway



W. MLK Jr. Boulevard at Expo Center

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-2
Proposed Master Plan Element 1 - Threshold and Gateway

Element 2 – Expo Festival Plaza

Element 2 would enhance the gathering space and pedestrian experience between the Banc of California Stadium and the Visitor Parking Structure.

The proposed Expo Festival Plaza would be located at the existing Christmas Tree Lane and two underground parking garage ramps, between North Coliseum Drive (N. Coliseum Dr.), Figueroa St., South Coliseum Drive (S. Coliseum Dr.), and Exposition Park Drive (Exposition Park Dr.) and the newly renovated Coliseum (Figure 1.8.2-3, *Proposed Master Plan Element 2 – Expo Festival Plaza*). The Expo Festival Plaza, consisting of approximately 5.2 acres (227,826 square feet), would overlap with modification of the existing vehicular circulation islands, walking paths, and bike lane along Figueroa St. at N. and S. Coliseum Dr. that would be part of Element 1 – Threshold and Gateway. Existing vehicular ramps (for accessing the underground parking structure but also visible just north of N. Coliseum Dr.) are located at the west side of the Expo Festival Plaza and would remain. The existing Christmas Tree Lane open space would include proposed bisecting paths across the lawn area with proposed promenades along the north and south perimeter of the Christmas Tree Lane open space.

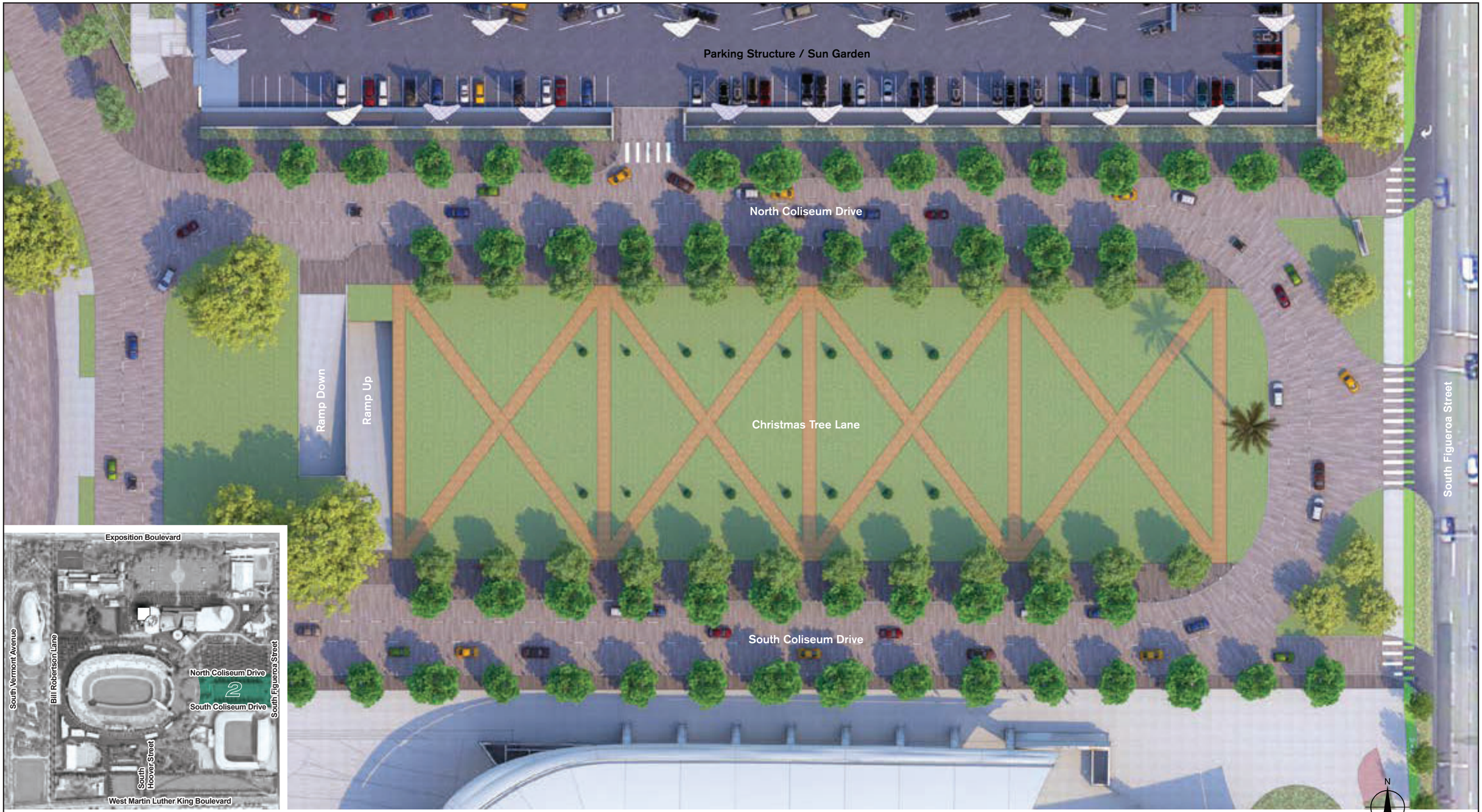
The proposed promenades would consist of zero curb street/sidewalks (with possible opportunities for stormwater capture and use system on-site) lined with bollards, truncated domes, wayfinding banners and shade trees (in security planters) along N. and S. Coliseum Dr. The proposed Expo Festival Plaza would include pervious and impervious materials within the project area. The existing Plaza at the Coliseum entrance, across the street to the west of Christmas Tree Lane open space, would remain.

Element 2 would be built in the existing location of Christmas Tree Lane, which is a character-defining feature to the National Register designation of the Coliseum. The view provided from Figueroa Street to the Coliseum Plaza by Christmas Tree Lane is a significant character-defining feature of the Coliseum, specifically the plaza.[23] Significant elements of Christmas Tree Lane include the roadways, sidewalks, and low walls dating to 1925; the greenway between N. and S. Coliseum Dr.; the two rows of mature Deodar Cedars; the London Plane Trees; the three Art Moderne streetlights; and the mature palm tree and its associated marker.[24,25] These features and their contribution to the setting of the Coliseum are significant to its National Register and National Historic Landmark designation. The additions of wayfinding banners and shade trees would alter the viewshed of Christmas Tree Lane from Figueroa Street to the Coliseum Plaza.

[23] Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure.

[24] Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure.

[25] Three Art Moderne Streetlights were documented in Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure. Streetlights not visible or locatable at indicated location on-site.



SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

Not To Scale

FIGURE 1.8.2-3
Proposed Master Plan Element 2 – Expo Festival Plaza

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-3
Proposed Master Plan Element 2 – Expo Festival Plaza

FIGURE 1.8.2-3
Proposed Master Plan Element 2 – Expo Festival Plaza

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-3
Proposed Master Plan Element 2 – Expo Festival Plaza

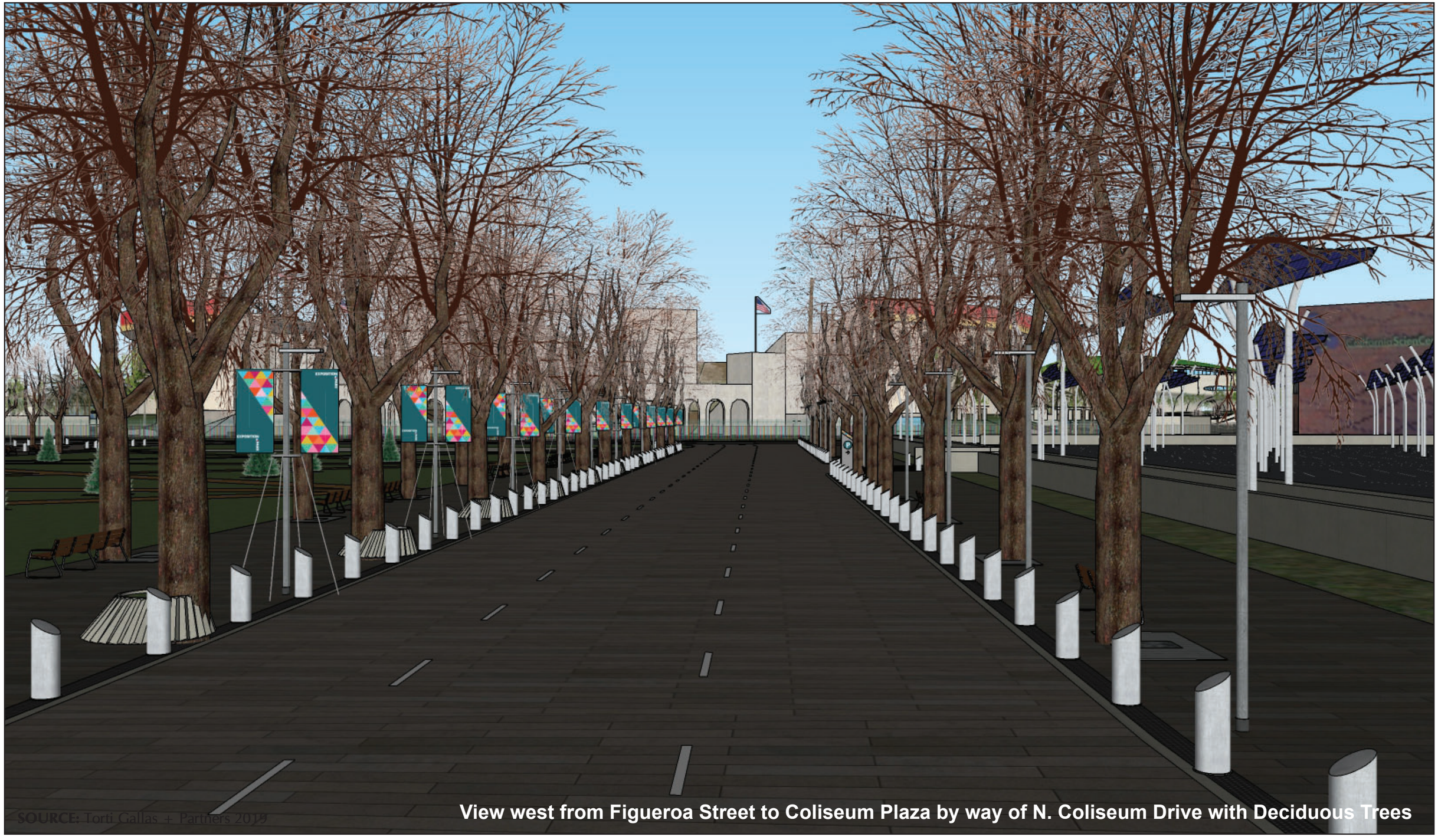
FIGURE 1.8.2-3
Proposed Master Plan Element 2 – Expo Festival Plaza

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-3
Proposed Master Plan Element 2 – Expo Festival Plaza

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-3
Proposed Master Plan Element 2 – Expo Festival Plaza



SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-3
Proposed Master Plan Element 2 – Expo Festival Plaza

Element 3 – Solar Garden

Element 3 would provide shade for visitors arriving at Exposition Park by vehicle, as well as energy production.

The top of the Visitor Parking Structure would be outfitted with a set of artistically designed solar panels on poles, to be analogous in their spacing to an orchard of trees. Element 3 would include a new photovoltaic shade array system with various shade features lining the top level of the existing parking structure (Figure 1.8.2-4, *Proposed Master Plan Element 3 – Solar Garden*). The new photovoltaic shade array system or Solar Garden would involve the installation of solar panel poles to the existing parking structure along with electrical connections. In addition, there would be some overlap with Element 2 – Expo Festival Plaza along the southern perimeter. It would not alter the number (2,131) of existing parking spaces in the existing approximately 4.0-acre (173,967 square feet) visitor parking structure.

SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

FIGURE 1.8.2-4
Proposed Master Plan Element 3 – Solar Garden

Element 4 – Festival Park and Community Promenade

Element 4 would increase the recreational facilities available, for the enjoyment of those living nearby and visitors located south of the Banc of California Stadium, by relocating surface parking underground and providing some open space and public spaces above ground.

The proposed Festival Park and Community Promenade, consisting of approximately 14.2 acres (619,819 square feet), would be located at the southeastern corner of the Master Plan Area along MLK Jr. Blvd. and extending just past S. Hoover St. (Figure 1.8.2-5, *Proposed Master Plan Element 4 – Festival Park and Community Promenade*). Element 4 would be bounded by the Banc of California Stadium and the Coliseum to the north, Figueroa St. to the east, MLK Jr. Blvd. to the south, and the Ralph M. Parsons Pre-School and Expo Center to the west. The existing Hoover St. entry road, intersecting MLK Jr. Blvd., would have proposed improvements that would be shared with Element 1 – Threshold and Gateway along MLK Jr. Blvd. such as a cycle track, a ride share/drop-off/pick-up area, landscaping, gateway improvements, wayfinding and crosswalk enhancements.

The proposed Festival Park and Community Promenade improvements would include landscaping along pedestrian circulation paths, recreational features, an expansive lawn area, and wayfinding elements such as gateway signage, pedestrian and vehicular directional signage, crosswalk paving, parking signage, and pedestrian orientation maps.

The existing surface parking lots along MLK Jr. Blvd. between Figueroa St. and Ralph M. Parsons Pre-School/Expo Center (parking lots 4, 5, 6 and VIP parking) that provide 1,600 vehicular parking spaces would be demolished and replaced with a 2,000-space underground garage accommodating the existing surface spaces plus 400 temporary or "tailgating" spaces that are currently provided on the South Lawn during Coliseum events. The proposed subterranean parking structure, which is two-levels for 85 percent of its footprint, and three-levels for the remaining 15 percent, would incorporate vehicular ramped ingress and egress access (ingress access from MLK Jr. Blvd., Figueroa St., and S. Hoover St.; egress access from Figueroa St., MLK Jr. Blvd. and northwest of the proposed Information/Operations Center/Restrooms). During School Week (when schools are visiting), the garage would accommodate 94 school buses and 1,440 cars.

The proposed Festival Park and Community Promenade area would be constructed at street surface level, over the proposed underground parking and would include five main spaces:

1. A Festival Lawn area of open space consisting mainly of turf, trees, paths and parking structure daylighting or skylight features (from Figueroa St traversing across S. Hoover St.)
2. Recreational Areas consisting of a children's playground (Playground), a plaza with a planned iconic viewing structure (Plaza), and a skateboard park (Skate Park)
3. A Community Promenade (Promenade) as the main thoroughfare connecting pedestrians to the various areas within the Element
4. An Information/Operations Center/Restrooms (IOCR)
5. A Bus Parking lot at street surface level just north of the Information/Operations Center/Restrooms (IOCR)

SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

Not To Scale

FIGURE 1.8.2-5
Proposed Master Plan Element 4 – Festival Park & Community Promenade

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-5
Proposed Master Plan Element 4 – Festival Park & Community Promenade

The proposed IOCR and additional Bus Parking would be located at level grade in the current location of parking lot 4 and above the proposed subterranean parking structure, north of MLK Jr. Blvd and west of Hoover St. The proposed Bus Parking would be just north of the proposed IOCR (Figure 1.8.2-6, *Proposed Master Plan Element 4 – Subterranean Garage*). The proposed Bus Parking area would also accommodate electric vehicles with EV Charging stations.

The Lawn area would be constructed over the current location of parking lots 5 and 6 and over the proposed subterranean parking structure, adjacent to MLK Jr. Blvd., from Figueroa St. to just west of Hoover St.

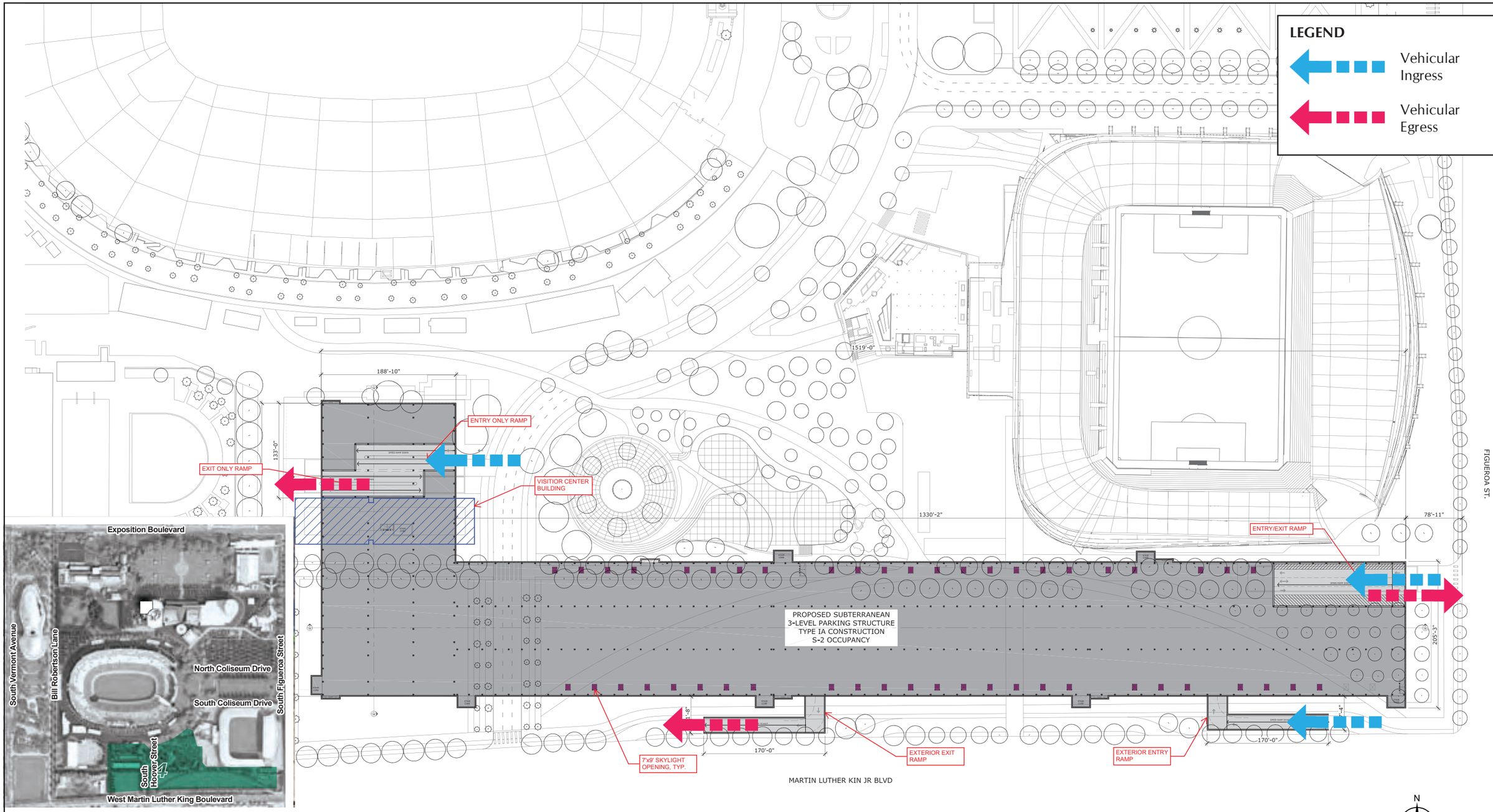
The proposed Festival Park and Community Promenade area would include overall improvements such as landscaping/planting (trees, palms, understory planting and turf), pervious and impervious surfacing, wayfinding elements (vehicular and pedestrian), seating areas located in and around the Recreational Areas and Promenade, stormwater treatment (a drywell over the Recreational Areas and a capture and use system over the new parking structure) plus skylights or daylighting features[26] for the proposed subterranean parking structure, arrayed in two rows on the Festival Lawn along MLK Jr. Blvd.

The proposed Promenade would run parallel with MLK Jr. Blvd. and would bisect the proposed Festival Lawn and the proposed Recreational Area (Playground and Plaza), making the Recreational Area the northern space and the Festival Lawn the southern space. The Promenade would connect from the Skate Park at the east end to the southern side of the IOCR at the west end while traversing Hoover St. The IOCR would include a second Promenade on the northern side as well.

The proposed Festival Park and Community Promenade area east of Hoover St. would also be bisected by two secondary pedestrian paths. One proposed path would bring visitors into the site starting at the existing sidewalk corners of MLK Jr. Blvd./Hoover St. and MLK Jr. Blvd./Figueroa St. adjacent to one of the Recreational Areas (Skate Park). The second proposed path would bring visitors into the site from the existing sidewalk along MLK Jr. Blvd. and across the proposed Festival Lawn, in a northerly direction, towards the newly constructed Banc of California Stadium and the proposed Recreational Area (Playground and Plaza). A third proposed path would intersect the proposed Promenade east of the proposed Playground and traverse just north of the proposed Recreational Area (Playground and Plaza), connecting visitors from the proposed Festival Park and Community Promenade to the existing Coliseum. Proposed streetscape beautification (landscaping), crosswalk, cycle track and wayfinding improvement efforts along MLK Jr. Blvd. and Figueroa St. would overlap with Element 1 – Threshold and Gateway, as mentioned earlier as part of this Element.

The proposed Festival Lawn and planned Iconic Viewing Structure (Plaza) would be located in the southern portion of Exposition Park, north of MLK Jr. Blvd, and would not impede directly on any known historic resources. No Los Angeles Historic Preservation Overlay Zones border the Element 4 area, and thus no height limitations for the viewing structure need to be met to protect historic viewsheds.

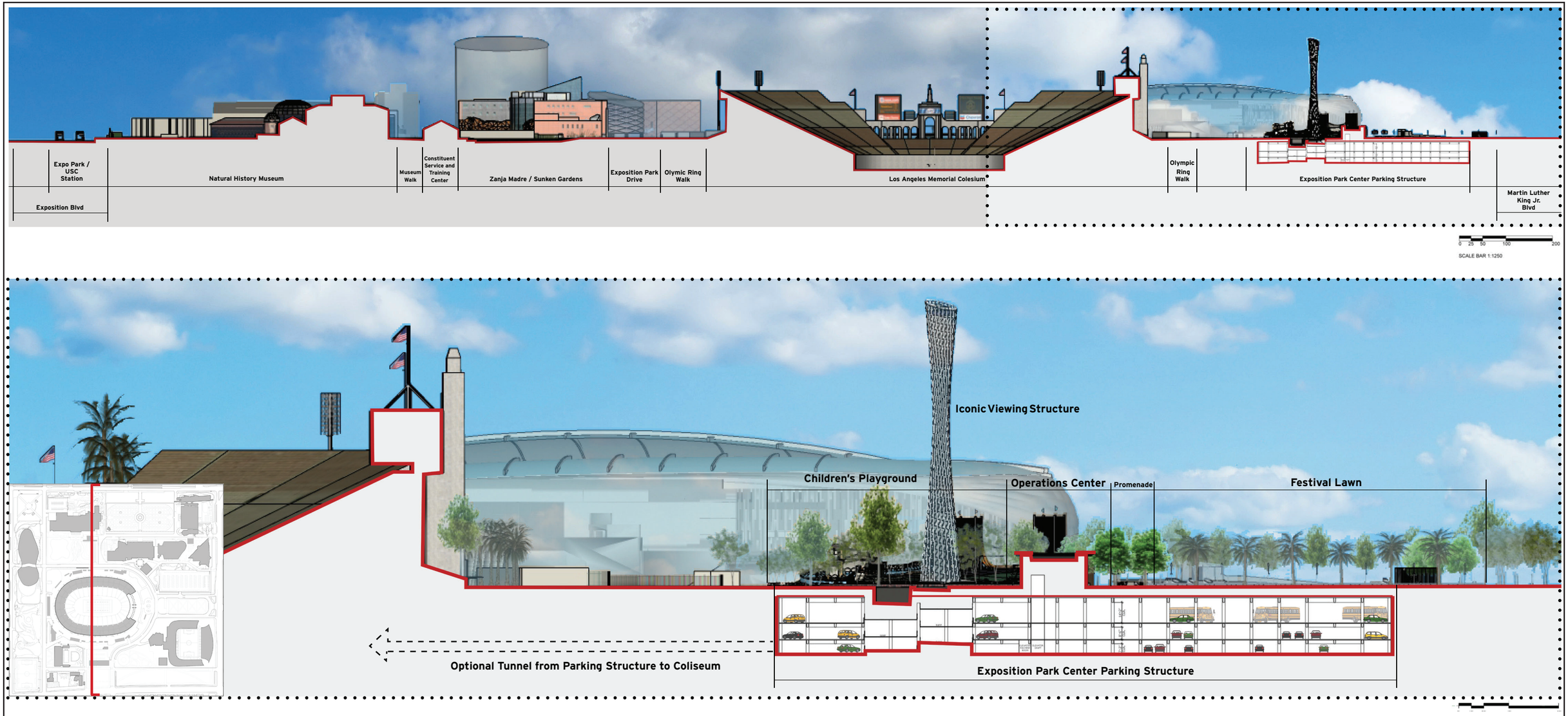
[26] Feature description per Torti Gallas + Partners' presentation documents from September 27, 2019.



SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

Not To Scale

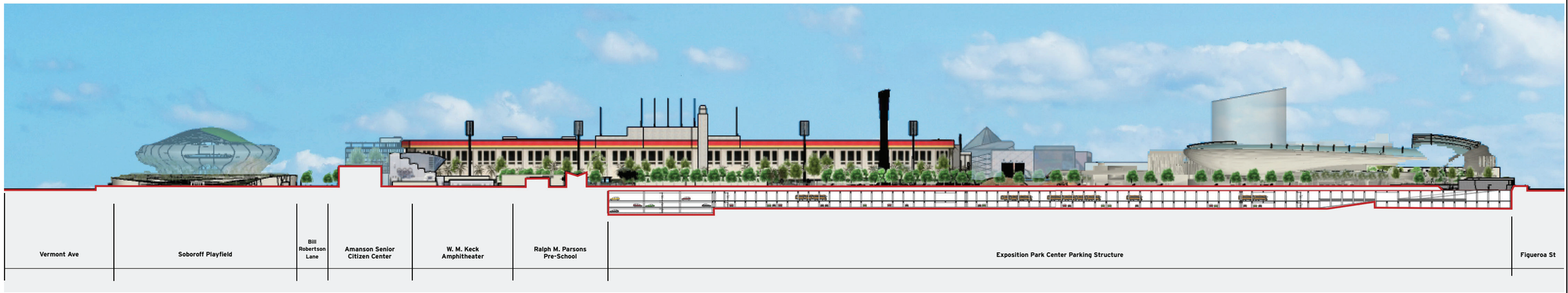
FIGURE 1.8.2-6
Proposed Master Plan Element 4 – Subterranean Garage

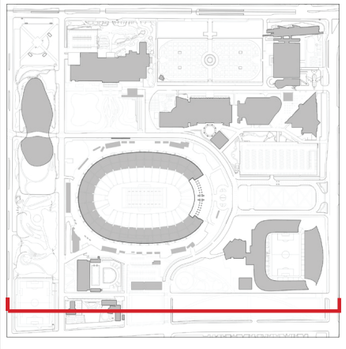


Cross Section through Proposed Subterranean Parking Garage Facing East

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-6
Proposed Master Plan Element 4 – Subterranean Garage





0 25 50 100 200

SCALE BAR 1:1250

Cross Section through Proposed Subterranean Parking Garage Facing North

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-6
Proposed Master Plan Element 4 – Subterranean Garage

Element 5 – Bill Robertson Lane

Element 5 would improve vehicular access for large groups at Exposition Park with dedicated loading zones and a bus drop-off lane. Proposed street improvements along Bill Robertson Lane, consisting of approximately 2.8 acres (123,787 square feet, or approximately 2,534 linear feet), would include a continuous left turn lane along the center of the street with demarcations of left turn, bus drop off, and loading areas; a zero curb with bollards and truncated domes; and pervious and impervious surfacing (decorative concrete paving and concrete unit pavers). In addition to bollards, vehicular and pedestrian wayfinding elements and canopy trees in vegetated planters would line the street (Figure 1.8.2-7, *Proposed Master Plan Element 5 – Bill Robertson Lane*). Element 5 would include improvements that would overlap with Element 1 – Threshold and Gateway, Element 8 – Zanja Madre, as well as the approved Lucas Museum of Narrative Art project that is currently under construction.

SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

Not To Scale

FIGURE 1.8.2-7
Proposed Master Plan Element 5 – Bill Robertson Lane

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-7
Proposed Master Plan Element 5 – Bill Robertson Lane

Element 6 – Museum Walk

Element 6 would enhance pedestrian circulation within Exposition Park through reconfiguration of State Dr. and its approximately 120 existing surface parking spaces for pedestrian use with a museum walk or promenade flanked by canopy shade trees and two seating and amenities zones. The proposed Museum Walk, consisting of approximately 2.3 acres (98,171 square feet, or approximately 1,439 linear feet), would be located between the existing Exposition Park Rose Garden and the California Science Center within the northern portion of the Master Plan Area (Figure 1.8.2-8, *Proposed Master Plan Element 6 – Museum Walk*). The Museum Walk would extend from Figueroa St. to the Natural History Museum and existing South Lawn (Element 8 – Zanja Madre, Victory Walk).

Pedestrian-oriented improvements to State Dr. would consist of re-paving of the street with concrete pavers, pervious surfacing, shade trees, understory planting, seating and other site amenities such as trash and recycling receptacles, picnic tables, and wayfinding.

Currently, there are approximately 100 existing surface Game Day VIP parking spaces along State Drive. Element 6 would accommodate occasional vehicular use along State Dr. from Figueroa St. to the southeastern corner of Exposition Park Rose Garden, shared with Element 1, to allow for pick-up and drop-off for the existing Dr. Theodore T. Alexander Jr. Science Center School and for ride-share vehicles during major events. Vehicular use would be controlled with the use of new retractable bollards beyond the existing Rose Garden. The remainder of the proposed Museum Walk would serve as a fire lane and be closed to vehicular traffic except to allow fire truck access as necessary. All current Game Day VIP parking spaces along State Dr. would be relocated and accommodated by the parking structure in Element 4 – Festival Park and Community Promenade.

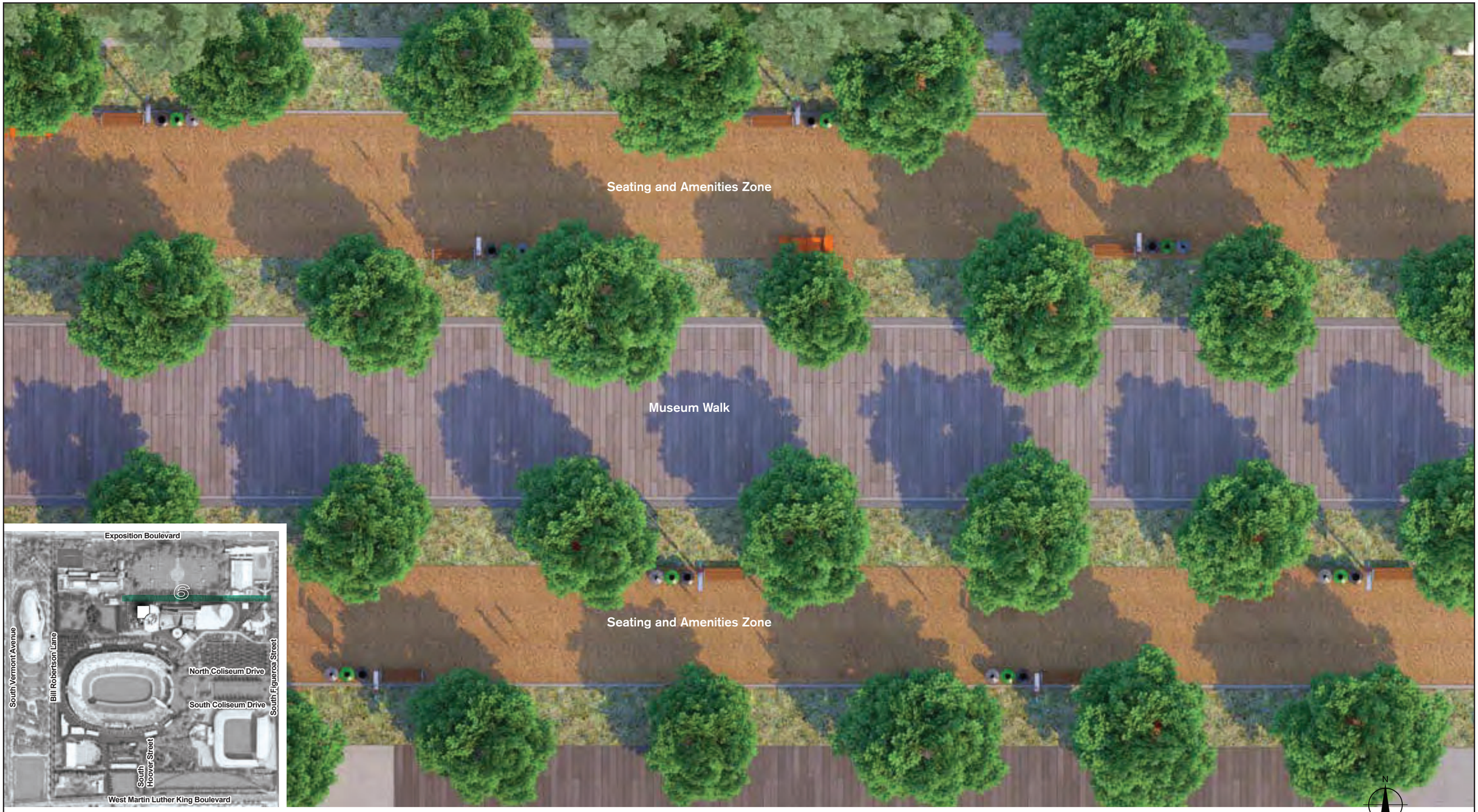
The proposed Museum walk would also incorporate stormwater treatment such as dry creek and drywell applications.

The proposed Museum Walk would border the National Register of Historic Places–designated Exposition Park Rose Garden. No aspects of Element 6 would alter the Exposition Park Rose Garden.

The Rose Garden was designated in 1991 as an excellent example of landscape architecture as part of the City Beautiful Movement and for features associated with the 1932 Olympics.[27] Character-defining features on the southern exterior of the Rose Garden include a decorative brick wall and a wrought iron gate located in the center of the brick wall constructed in 1913. Flanking the southside entrance of the garden from State Drive are two rectangular concrete bases with Art Deco light posts with inscriptions chiseled into the base.[28] The character-defining features located on the southside of the Rose Garden run parallel to the proposed Museum Walk.

[27] Tom Sitton. February 11, 1991. United States Department of the Interior National Parks Service, National Register of Historic Places Registration Form, Exposition Park Rose Garden.

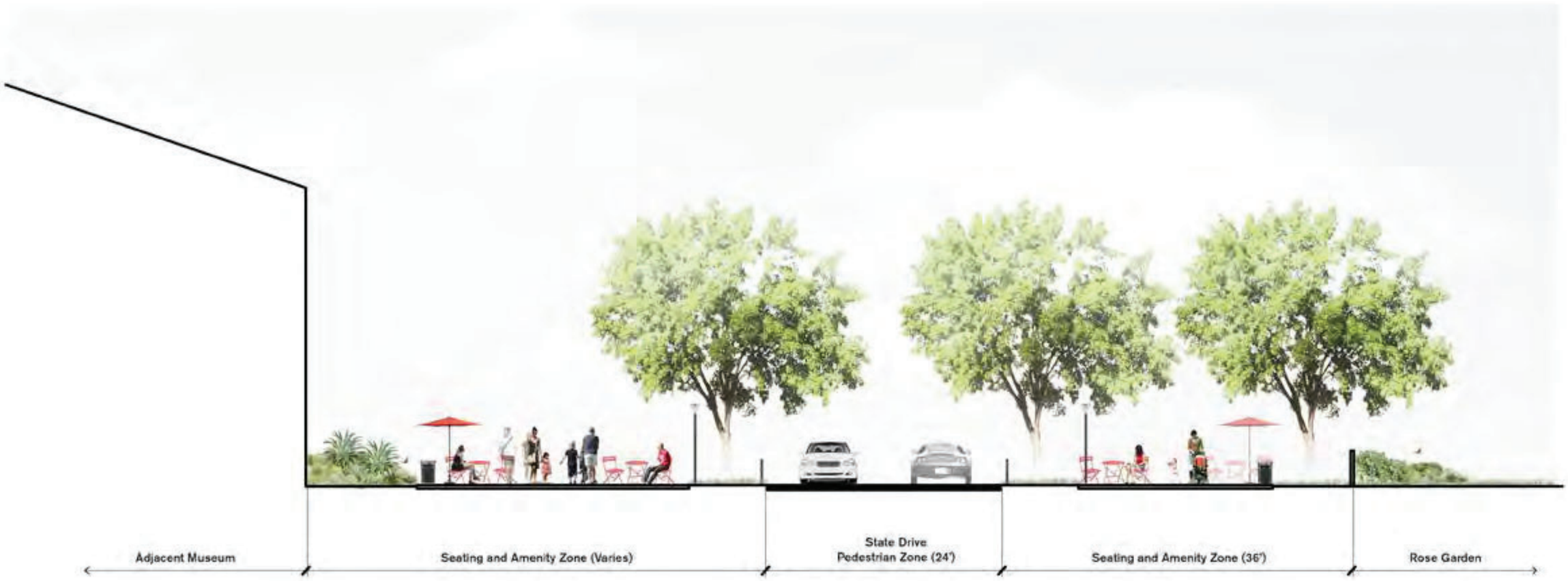
[28] Tom Sitton. February 11, 1991. United States Department of the Interior National Parks Service, National Register of Historic Places Registration Form, Exposition Park Rose Garden.



SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

Not To Scale

FIGURE 1.8.2-8
Proposed Master Plan Element 6 – Museum Walk



SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-8
Proposed Master Plan Element 6 – Museum Walk

Element 7 – California African American Museum Sculpture Garden

Element 7 would enhance the pedestrian experience in front of the existing California African American Museum (CAAM) with the provision of dining and seating amenities.

The proposed CAAM Sculpture Garden, consisting of approximately 1.0 acre (44,048 square feet), would be located north of the proposed Element 3 - Solar Garden, between the existing CAAM and Wallis Annenberg Building (Figure 1.8.2-9, *Proposed Master Plan Element 7 – California African American Museum (CAAM) Sculpture Garden*). The proposed Element 6 - Museum Walk would be located immediately north of Element 7. The existing Kinsey Auditorium (future bookstore, café, and restrooms), the existing California Science Center Administrative (East and West) Building (future SOASC) is to the west, and the existing CAAM is to the east.

The proposed CAAM Sculpture Garden would include a plaza, dining area, garden, and an enhanced entry along Figueroa St. where the proposed enhanced entry improvements would overlap with Element 1 – Threshold and Gateway.

The proposed improvements within Element 7 would consist of a fire access road that serves as a promenade (for accessing the SOASC), pervious surfacing, varied seating options, shade trees, planter areas, artwork and stormwater treatment such as a drywell. The proposed trees, in a grid form, would be planted in proposed tree wells with new open metal grates on top for drainage. Seating options would include seat walls, café/bistro style chairs and tables, plus low wood structures situated around some trees in the plaza, dining, and entry areas. Other proposed improvements would include turf and understory planting.

The proposed CAAM Sculpture Garden is located just south of the California Air and Space Museum designed by Frank Gehry to coincide with the 1984 Olympic Games. The building is significant for being "the most important example of his warehouse/collision typology" and for marking his transition from a regional architect to an international architect.[29] Character-defining features of the building include varying roof form, skylights, and sheet metal building materials. The primary façade of the building faces south, towards the CAAM Sculpture Garden, though the primary entrance is accessed on the northern façade via a ramp. No aspects of Element 7 would alter the California Air and Space Museum.

[29] State of California Department of Parks and Recreation Primary Record Form. January 2012. California Air and Space Museum.
http://ohp.parks.ca.gov/pages/1067/files/california%20air%20and%20space%20museum%20nomination%20.pdf

SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

Not To Scale

FIGURE 1.8.2-9
Proposed Master Plan Element 7 – California African American (CAAM) Sculpture Garden

Element 8 – Zanja Madre

Element 8 would enhance the pedestrian experience at the South Lawn by way of a park-like setting. This Element is named Zanja Madre or Mother Ditch, the Spanish term for and reference to the original aqueduct that brought water to the Pueblo of Los Angeles (City of Los Angeles) via Rio Porciuncula (Los Angeles River).[30]

The proposed Zanja Madre space, consisting of approximately 4.7 acres (203,132 square feet), would be in the current location of the existing South Lawn and directly south of the extension to the proposed Museum Walk and the existing Natural History Museum of Los Angeles County (NHM). The existing Bill Robertson Lane abuts the space on the west side, the existing Los Angeles Memorial Coliseum (Coliseum) on the south side, and the existing California Science Center (CSC) on the east side.

Currently, the South Lawn accommodates approximately 400 parked cars during Coliseum events as part of Game Day VIP overflow parking spaces, with the lawn area being in relatively poor condition. The proposed Zanja Madre would include a main or central plaza-like gathering space, two sunken lawn areas, a school bus drop-off/pick-up area, a prominent iconic boulder, a Victory Walk, as well as the extension of the proposed Museum Walk (Figure 1.8.2-10, *Proposed Master Plan Element 8 – Zanja Madre*). The proposed central plaza-like gathering space is aligned with the entrance to the NHM and is located directly to the south. The proposed sunken lawns flank the central plaza-like gathering space on the east and west sides. The proposed Victory Walk (located on the east side of this Element), separates the proposed eastern sunken lawn area and the existing CSC connecting visitors from the existing Coliseum to the existing NHM and the existing Exposition Park Rose Garden. The proposed school bus drop-off/pick-up area is directly in front of the new prominent iconic boulder south of the central plaza-like gather space and along Exposition Park Dr. connecting to Bill Robertson Lane on the east and N. Coliseum Dr./S. Coliseum Dr./Hoover St. to the west.

The proposed central plaza-like gathering space would include improvements such as planters, concrete seat walls, boulder seating, pervious and impervious surfacing, trees and understory planting. The proposed west sunken lawn area would contain a large specimen tree and the north, south, and west boundaries would be lined with two or more rows of trees. The proposed Victory Walk improvements would consist of an allée and the planter on the east side of the allée would encompass a grove of trees with improved surfacing materials. Other proposed improvements include stormwater treatment such as a dry creek. All the Game Day VIP overflow parking spaces at the South Lawn would be relocated and accommodated by the parking structure in Element 4 – Festival Park and Community Promenade.

[30] Water and Power Associates. Accessed December 16, 2019. Zanja Madre – LA's Original Aqueduct. https://waterandpower.org/museum/Zanja%20Madre%20(Original%20LA%20Aqueduct).html

SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

Not To Scale

FIGURE 1.8.2-10
Proposed Master Plan Element 8 – Zanja Madre

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-10
Proposed Master Plan Element 8 – Zanja Madre

Element 9 – Olympic Ring Walk

Element 9 would enhance the pedestrian experience as well as provide pedestrian circulation access during events or for traversing the site accessing other Master Plan Area features.

The proposed Olympic Ring Walk is located in the middle of the Master Plan Area surrounding the exterior of the Coliseum and bounded by Exposition Park Dr. on the north; Exposition Park Dr. and the existing Christmas Tree Lane (proposed Element 2 – Expo Festival Plaza) to the west; Bill Robertson Lane to the east; and S. Hoover St., existing Lot 4 (proposed Element 4 – Festival Park and Community Promenade), and the LA84 Foundation/John C. Argue Swim Stadium (part of the EXPO Center) to the south (Figure 1.8.2-11, *Proposed Master Plan Element 9 – Olympic Ring Walk*).

The Olympic Walk would provide a reconfigured path around the Coliseum that would provide proposed concessions and amenities integrated within the Coliseum berm and native landscaping. Other proposed features include historic markers embedded into decorative unit pavers lining the walk, additional landscaping such as trees and shrubs providing shade and a counterbalance to the hardscape as well as signature palm trees, in tree wells with tree grates, that integrate lighting and festival banners lining the edge for a full patron/event experience. Stormwater management opportunities such as a drywell are included as part of the improvements in this Element. This proposed Element has potential overlap with Elements 2 (Expo Festival Plaza), 4 (Festival Park and Community Promenade), 5 (Bill Robertson Lane), and 8 (Zanja Madre).

SOURCE: Torti Gallas + Partners. September 27, 2019. Conceptual Master Plan.

Not To Scale

FIGURE 1.8.2-11
Proposed Master Plan Element 9 – Olympic Ring Walk

SOURCE: Torti Gallas + Partners 2019

FIGURE 1.8.2-11
Proposed Master Plan Element 9 – Olympic Ring Walk

Parking

The increase in the number of parking spaces would be a minimal change to the Master Plan Area (Figure 1.8.2-12, *Parking Plan*).

According to the California Museum of Science and Industry Exposition Park Master Plan (1992 Plan), in 1992 there were approximately 6,400 paved parking spaces in Exposition Park as well as 1,600 overflow parking spaces available on lawns and the Sports Arena Gardens, for a total of approximately 8,000 parking spaces.[31] In 1992, Exposition Park experienced an average of 2,000 occupied parking spaces on weekdays and up to 5,000 occupied parking spaces for a capacity crowd. The 1992 Plan determined that 6,400 paved spaces would support events with up to 25,000 people, well below the 25,000+ paved spaces that would be required to support capacity crowds in the Coliseum if all attendees arrived by vehicle, and recommended using available parking facilities at USC (6,500 spaces in 1992) and improved mass transportation through use of the light rail (Metro Expo Line).

The South Lawn accommodates approximately 400 parked cars during Coliseum events as Game Day VIP parking spaces (called overflow parking in the 1992 Plan). The proposed project would result in a slight increase (approximately 300 spaces, or less than 5 percent) in the number of paved designated parking spaces at Exposition Park that would be constructed underground as part of Element 4 to replace the existing VIP parking on the South Lawn from development of Element 8 (Table 1.8.2-1, *Existing and Proposed Parking*). Element 4 – Festival Park and Community Promenade would increase the number of existing paved parking spaces south of the Banc of California Stadium from 1,600 to 2,000. Element 6 would replace approximately 100 existing surface Game Day VIP parking spaces along State Dr. with a pedestrian-oriented promenade while still maintaining emergency access. A consolidated subterranean parking structure under Element 4 would provide approximately 2,000 spaces and would be the replacement parking for the existing parking lots 4, 5, 6, the VIP Gold Lot parking area (currently 1,600 parking spaces), the 400 Game Day VIP parking spaces on the South Lawn, and the existing surface parking (100 Game Day VIP parking spaces) along State Dr. The replacement parking would accommodate the existing Banc of California Stadium, as well as school buses during school days (school visit during weekdays).

[31] Zimmer Gunsul Frasca Partnership. May 22, 1992. California Museum of Science and Industry Exposition Park Master Plan. Volume 1.

FIGURE 1.8.2-12

Parking Plan

TABLE 1.8.2-1
EXISTING AND PROPOSED PARKING

Master Plan Elements	Existing Conditions	Master Plan		Net Change
		Addition	Deletion	
1. Threshold & Gateway	0 parking spaces along Exposition Boulevard, Vermont Avenue, Figueroa Street, and MLK Jr. Blvd; 1 student drop-off area on Figueroa; 13 bus stops along all 4 streets; 2 Metro Expo Line stops along Exposition Blvd.	0	0	No change
2. Expo Festival Plaza	No parking allowed (directed traffic)	0	0	No change
3. Solar Garden	2,131 parking spaces (parking structure)	0	0	No change
4. Festival Park & Community Promenade	1,600 parking spaces (surface)	400 parking spaces and 17 bus parking spaces	0	Increase: 400 parking spaces (underground structure) and 17 bus parking spaces
5. Bill Robertson Lane	17 parking spaces (south of Coliseum)	0	0	No change in spaces; spaces will be also used for loading & bus drop off
6. Museum Walk	100 Game Day VIP parking spaces along State Drive on Coliseum event days only	0	100 Game Day VIP parking spaces	Decrease: 100 Game Day VIP parking spaces
7. CAAM Sculpture & Garden	No designated parking	0	0	No change
8. Zanja Madre	No official parking spaces; 400 Game Day VIP parking spaces are available on the South Lawn near the NHM on Coliseum event days only	0	400 Game Day VIP parking spaces	Decrease: 400 Game Day VIP parking spaces on lawn
9. Olympic Ring Walk	Maintenance vehicles only (storage/facilities parking)	0	0	No change anticipated
TOTAL		**400 spaces**	**500 Game Day VIP Parking Spaces**	**Replace 400 Game Day VIP parking spaces with 400 parking spaces in underground parking structure; net decrease of 100 Game Day VIP parking spaces**

NOTE: 150 Game Day VIP parking spaces along Exposition Park Drive and South Coliseum Drive would not be changed by the proposed project.

1.9 SURROUNDING LAND USES AND SETTING

The Master Plan Area is surrounded by the USC campus to the north and northeast, mixed-use residential and commercial land uses to the east; commercial and multiple dwelling residential land uses to the south; commercial land uses to the southwest; and commercial, mixed-use residential, and medical land uses to the west. The Metro Expo Line is located immediately north of the Master Plan Area, including the Expo Park/USC Station.

1.10 OTHER REQUIRED PUBLIC AGENCY APPROVALS

- City of Los Angeles

1.11 NATIVE AMERICAN CONSULTATION

Letters from the Native American Heritage Commission (NAHC) dated November 5, 2019, were received by OEPM.[32] Consultation between OEPM and tribal groups identified by the NAHC is ongoing. Six letters were transmitted by OEPM on December 6, 2019, to tribal groups identified by the NAHC indicating a formal notification to undertake a project and notification of consultation opportunity. As of December 20, 2019, no response has been received.[33] In accordance with Assembly Bill (AB) 52, the tribal groups contacted on December 6, 2019, have 30 days (i.e., until January 5, 2020) to request consultation with OEPM.

1.12 CONSTRUCTION SCENARIO

This Initial Study is based on an evaluation of the construction that would be required to build out the proposed project in the general configurations of the Master Plan. Proposed project elements in the Master Plan are conceptual and would require additional survey, design, and engineering work to support design development and ultimately project construction, operation, and maintenance. The project element designs are subject to refinement.

Exposition Park would remain open during the construction of individual project elements, with portions of the property closed off with fencing surrounding the construction activity areas. The proposed buildings and structures described in the Master Plan would be constructed within existing Master Plan Area boundaries. The proposed project includes the demolition of the surface parking lot and the construction of a subterranean parking structure in its place as well as street and pedestrian improvements.

Site preparation and construction for the proposed individual projects identified within the Master Plan would be undertaken in accordance with all federal, state, and County building codes. Daily construction activities would be undertaken Monday through Friday, between 7:00 a.m. and 9:00 p.m. and on Saturdays between 8:00 a.m. to 6:00 p.m. No work would be conducted on Sundays or any recognized federal, state, or local holidays. Exposition Park is not required to comply with the City of Los Angeles General Plan and Noise Ordinance. As per the California State Park System,[34] engine driven electric generators which can disturb others, may be operated only between the hours of 10:00 a.m. and 8:00 p.m. Loud disturbing noise is prohibited at all times and is prohibited between

[32] Native American Heritage Commission. November 5, 2019. Letter to Office of Exposition Park Management.

[33] Office of Exposition Park Management. December 6, 2019. AB 52 Letter.

[34] State of California Department of Parks and Recreation. 2019. https://www.parks.ca.gov/

10:00 p.m. and 6:00 a.m. Construction equipment would be turned off when not in use. All heavy equipment would be mobilized at night and would have no conflicts with circulation. The construction contractor shall ensure that all construction and grading equipment is properly maintained. All vehicles and compressors shall utilize exhaust mufflers and engine enclosure always covers (as designed by the manufacturer). All stockpiles shall be covered at all times when not in use.

The environmental analysis for the proposed project is based on a potential worst-case scenario for construction activities, including improvements to pedestrian and bike paths, enhancements to vehicular access and parking availability. While phasing of the individual projects proposed in the Master Plan has not yet be determined, the analysis assumes that construction activities would be completed with an overall 25-year time frame, with phasing determined based on individual projects. The construction scenario for the impact analysis assumes that construction activities for each element will occur concurrently and the direct impact area for each individual element was modeled accordingly based on a tentative construction schedule (Table 1.12-1, *Project Elements*).

TABLE 1.12-1
PROJECT ELEMENTS

Project Element	Project Element Name	Estimated Duration (months)	Square Feet per Element	Construction Square Feet per Element	Improvements Description
1	Threshold and Gateway	13	80,100	80,100	Improvements to pedestrian and cyclist entrance; New protected cycle track; New Canopy street trees, planting buffers, widening of sidewalks, and pick-up/drop-off
2	Expo Festival Plaza	8	227, 826	227,826	Enhanced gathering space
3	Solar Garden	16	173, 967	173,967	Installing solar panel poles on existing parking structure with electrical connections
4	Festival Park and Community Promenade	61	619,819	619,819	Landscaping along pedestrian circulation paths, recreational features, an expansive lawn area; Demolish surface parking lot; Construction of subterranean parking structure; Construction of Festival Park and Community Promenade; Recreational Areas consisting of playground; Bus Parking lot at street surface level
5	Bill Robertson Lane	54	123,787	123,787	Dedicated loading zones and a us drop-off lane; Street improvements along Bill Robertson Lane; Canopy trees in vegetated planters along the street

TABLE 1.12-1
PROJECT ELEMENTS

Project Element	Project Element Name	Estimated Duration (months)	Square Feet per Element	Construction Square Feet per Element	Improvements Description
6	Museum Walk	49	98,171	98,171	Enhanced pedestrian circulation; Canopy Shade trees with seating zones; Street paving
7	California African American Museum Sculpture Garden	14	44,048	44,048	Plaza, dining area, garden and enhanced entry; Sculpture garden; Fire access road for promenade
8	Zanja Madre	35	203,132	203,132	Central plaza-like gathering space; Two sunken lawn areas; School bus drop-off/pick-up area; Iconic boulder; Victory Walk; Extension of the proposed Museum Walk
9	Olympic Ring Walk	37	243,936	243,936	Reconfigured path providing concessions and amenities historic markers embedded in enhanced pedestrian paving, landscaping improvements (trees, palms, and understory planting), lighting, festival banners and stormwater management opportunities
	Total duration				**25 years**

Construction

Construction activities associated with the proposed project within Element 4, as currently conceived, would entail grading of the existing parking lot and the construction of the three-level subterranean parking structure increasing parking capacity at the Exposition Park (Table 1.12-2, *Parking Structure Construction*).

TABLE 1.12-2
PARKING STRUCTURE CONSTRUCTION

Element	Existing Surfacing to Be Removed/Graded	Existing Approx. Square Feet[1]	Proposed Master Plan Construction Activity	New Approx. Square Feet[2]
4	Four surface parking lots (lots 4, 5, 6, and VIP parking)	619,819	Replace with subterranean parking structure at same location and lawn area, pedestrian pathways, playground, plaza with iconic viewing tower, and skate park above structure at surface level	619,819

A list of the type and quantity of construction equipment that would potentially be used in the construction of one element (worst-case scenario) of the proposed project was used in assessing the potential of the proposed project to result in unanticipated significant construction impacts to air quality (Table 1.12-3, *Anticipated Worst-Case Construction Equipment*).

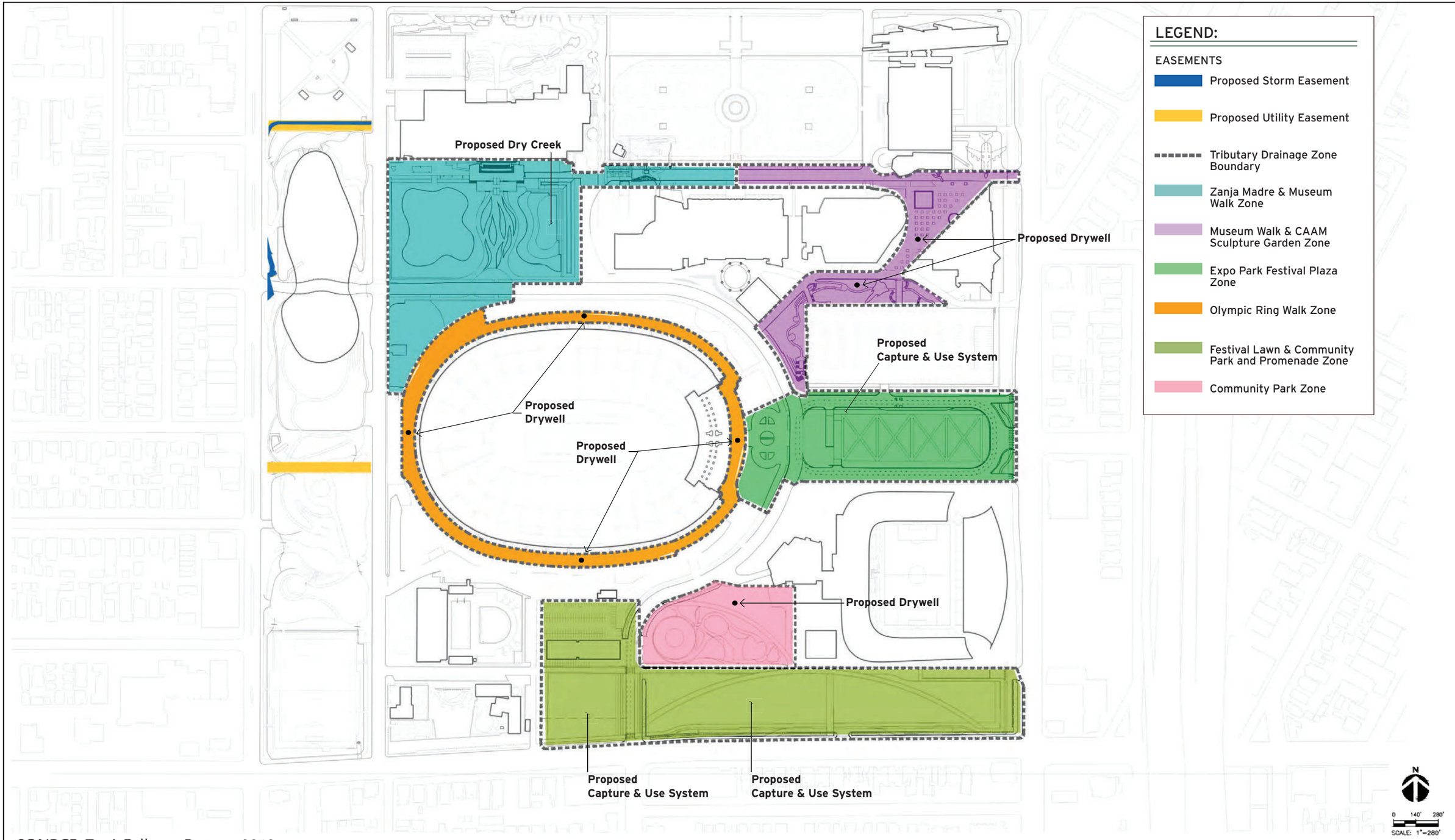
TABLE 1.12-3
ANTICIPATED WORST-CASE CONSTRUCTION EQUIPMENT

Approximate Quantities	Type of Equipment/Vehicle
3	Dump truck
1	Graders or dozers for earthwork
1	Concrete/Industrial Saws
20	Crew vehicles
2	Rubber Tired Dozers
4	Tractors/Loaders/Backhoe
10	Delivery trucks
2	Scrapers
2	Excavators
1	Cranes
3	Forklifts
1	Generator Sets
1	Welders
2	Pavers
2	Paving Equipment
2	Rollers
1	Air Compressors

1.12.1 Project Design Features

Storm Water Pollution Plan BMPs

BMPs would be utilized through the duration of the construction per the Storm Water Pollution Prevention Plan (Table 1.12.1-1, *Best Management Practices*; Figure 1.12.1-1, *Proposed Stormwater Management Measures*; Appendix A, *Hydrology and Water Quality Impact Analysis*).



SOURCE: Torti Gallas + Partners 2019

FIGURE 1.12.1-1
Proposed Stormwater Management Measures

TABLE 1.12.1-1
BEST MANAGEMENT PRACTICES

Erosion Controls
Scheduling (EC-1) • All BMPs shall be in place year-round. Construction activities shall be planned and performed to minimize the area and duration of exposure of soil to erosion by wind, rain, runoff and vehicle tracking. • The area that can be cleared or graded and left exposed at one time shall be limited to the amount of acreage that the Contractor can adequately protect prior to a predicted rainstorm. A predicted storm event is defined as a forecasted 50% chance of rain. • Timing of construction shall be considered when scheduling work to minimize soil disturbing activities and major grading operations during the rainy season. • Grading of the site shall be phased to minimize the total area of exposed soil and the duration of exposure.
Preserve Existing Vegetation (EC-2) • Existing vegetation shall be retained (EC-2) in undisturbed areas to the extent possible. If possible, vegetative buffer strips shall be left adjacent to watercourses and along the site perimeter.
Temporary Soil Stabilization (EC-3), (EC-4), (EC-7) • Erosion Control Blankets (EC-7), hydraulic mulches (EC-3) with seed (EC-4), and/or temporary vegetation shall be used on disturbed soil areas as a temporary surface cover until soils can be prepared for re-vegetation and permanent vegetation is established. At a minimum, disturbed areas shall remain bare and unworked for over two weeks. Any hydraulic soil stabilizers applied shall include mulch, so that any potential pollutant transport to the storm drain system is visually detectable.
Soil Roughening (EC-15) • Soil shall be roughened with the vehicle tracks perpendicular to the direction of flow.
Dust Control (WE-1) • Wind Erosion Controls (WE-1) shall be provided to prevent or alleviate dust generated by construction activities. Care shall be taken to prevent overwatering, which may result in runoff or erosion.
Sediment Controls
Stabilize Perimeter (SE-1, SE-5, SE-6) • To prevent transport of sediment off site, the site perimeter shall be stabilized using controls such as silt fence (SE-1), fiber rolls (SE-5), or gravel bag berms (SE-6).
Fiber Rolls (SE-5) • Fiber rolls will be used to reduce flow velocity (as slope interrupters or temporary check dams) and provide some removal of sediment, predominantly along the face or toe of erodible slopes and for perimeter sediment control. Fiber rolls are not appropriate as the only BMP at a site, should be used in conjunction with other erosion and sediment control measures to reduce pollutant discharges, and shall be maintained by the Contractor for effective sediment control.
Gravel bag berms (SE-6) • Gravel bag berms shall be used to reduce flow velocity (as slope interrupters or temporary check dams) and provide some removal of sediment. • Gravel bag barriers shall be used for perimeter site control or along streams or channels or around stockpiles to intercept sediment laden sheet flow or moderately concentrated flows**.**
Street Sweeping and Vacuuming (SE-7) • Street sweeping and vacuuming shall be used anywhere dry sediment is tracked from the Master Plan Area onto paved streets and roads, typically at points of egress.

TABLE 1.12.1-1
BEST MANAGEMENT PRACTICES

Tracking Controls (TC-1, TC-2) • A stabilized construction entrance shall be used to reduce offsite tracking (TC-1). • Construction roads shall be stabilized to prevent tracking of sediments. (TC-2).
Storm Drain Inlet Protection (SE-10) • All storm drains in the Master Plan Area and offsite where inlets can receive flow downstream of sediment tracked from the site shall be protected with appropriate storm drain inlet protection such as filter fabrics, block and gravel filters, gravel and wire mesh filters, or gravel bag barriers.

Biological Resources

In accordance with Section 46.02 of the Los Angeles Municipal Code, "no person shall relocate or remove any oak tree, as that term is defined in Section 46.01, where said oak tree is located on a lot larger than one acre in size and is not regulated pursuant to Article 7 of Chapter I of this Code, without first having applied for and obtained a permit from the Board of Public Works or its designated officer or employee, except as otherwise provided herein. Removed Oak trees shall be replaced at a minimum of a 2:1 ratio. The size and number of the replacement trees shall approximately equal that of the original removed trees."

Heritage trees, Special Habitat Value trees, Common Park trees, and Trees Protected by Los Angeles City Ordinances are all afforded certain protections to protect their value to the surrounding ecosystem. Consultation with City of Los Angeles Department of Recreation and Parks (DRP) is required prior to any activities that could cause a protected tree to become damaged, relocated, or removed.

Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

Paleontological Resources

Paleontological Resources Sensitivity Training given by a qualified paleontologist or archaeologist cross-trained in paleontology shall be required for all project personnel involved in ground-disturbing activities prior to the start of ground-disturbing activities in geologic units with a moderate to high potential to yield unique paleontological resources. This shall include a brief field training that provides an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified. This requirement extends to any new staff involved in earth disturbing that joins the project.

Construction Noise

During construction activities within a 50-foot radius of sensitive receptors, sound walls shall be installed by the contractor during the construction phase for the demolition of the two buildings and construction projects on the northeast edge of the Master Plan Area along the property boundary facing the existing residents to reduce the noise levels. Mufflers, blankets, and baffles will also be implemented to ensure the reduction of noise levels. The noise barriers shall provide noise level reductions ranging from approximately 5 dBA to 20 dBA depending of the placement and structure of the sound wall.

SECTION 2.0
ENVIRONMENTAL CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology / Water Quality	☒ Transportation
☐ Biological Resources	☐ Land Use / Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities / Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology / Soils	☐ Population / Housing	☒ Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed Project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☒ I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Ana M. Lasso
Signature

January 14, 2020
Date

Ana M. Lasso
Printed Name

General Manager, Exposition Park
Title

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☒	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest uses?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
3. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the proposed project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?	☐	☐	☐	☒
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
6. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒
7. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
8. GREENHOUSE GAS EMISSIONS -- Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) For a project located within an airport land use, plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
11. LAND USE AND PLANNING -- Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
12. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
13. NOISE -- Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed project expose people residing or working in the proposed project area to excessive noise levels?	☐	☐	☐	☒
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
15. PUBLIC SERVICES --				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☐	☒
16. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
17. TRANSPORTATION -- Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d) Result in inadequate emergency access?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐
19. UTILITIES AND SERVICE SYSTEMS -- Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

SECTION 3.0
ENVIRONMENTAL ANALYSIS

The environmental analysis provided in this section describes the information that was considered in evaluating the questions in Section 2, *Environmental Checklist*.

3.1 AESTHETICS

This analysis is undertaken to determine if the proposed project may have a significant impact to aesthetics that would require the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.[1] Aesthetics in the vicinity of the Master Plan Area was evaluated with regard to the City of Los Angeles General Plan;[2] South Los Angeles Community Plan;[3] California Department of Transportation's (Caltrans) Scenic Highway System[4] designations; previously published information regarding the visual character of the Master Plan Area, including light and glare; site reconnaissance; the City of Los Angeles' Community Planning App for South Los Angeles;[5] and a review of the conceptual site plans, renderings, and elevations for the Master Plan.

The State CEQA Guidelines recommend the consideration of four questions when addressing the potential for significant impacts to aesthetics. Would the project:

(a) Have a substantial adverse effect on a scenic vista?

The proposed project would result in less than significant impacts to aesthetics in relation to having a substantial adverse effect on a scenic view with the incorporation of mitigation measures.

The Conservation Element of the City of Los Angeles General Plan defines scenic views or vistas as "the panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features," as seen from parklands, private and publicly owned sites, and public rights-of-way.[6] Exposition Park is a developed state park located on relatively flat terrain in the urbanized Los Angeles Basin. Due to the historic use of the site, from an agricultural fairground in the late 1800s to its current use as a state park with several museums, gardens, and sports and recreation facilities, the entire Master Plan Area has been graded; there is no natural terrain, although the garden north of the Natural History Museum of Los Angeles County has been landscaped to create a naturalistic terrain and the Expositions Park Rose Garden is suppressed below the street level. The Conservation Element of the City General Plan and the South Los Angeles Community Plan do not specifically identify unique urban features.[7] The historic component of the Master Plan Area, the public accessibility to the site, and the park or recreational setting, along with educational centers and sports facilities, qualifies the site's scenic views or vistas as a unique urban and historic feature under the Conservation Element of the City's General Plan. In addition, the Conservation Element also notes, as part of the Open Space/Parks section, the importance of enhancing "urban open space … for preservation and protection of natural resources or for human activity." The proposed Master Plan is recommending retaining and enhancing upon the park setting while maintaining the historic integrity

[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[2] Los Angeles City Planning. Accessed November 21, 2019. General Plan Overview. https://planning.lacity.org/plans-policies/general-plan-overview

[3] Los Angeles Department of City Planning. November 2017. South Los Angeles Community Plan. https://planning.lacity.org/plans-policies/community-plan-area/south-los-angeles

[4] California Department of Transportation. Accessed October 18, 2019. The California Scenic Highway System: A List of Eligible (E) and Officially Designated (OD) Routes (by Route). https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

[5] Los Angeles Department of City Planning. Accessed November 20, 2019. Community Planning App South Los Angeles. https://ladcp.maps.arcgis.com/apps/View/index.html?appid=5a9db32190ef41448340989e2d4d79bf

[6] Los Angeles Department of City Planning. Adopted September 2001. City of Los Angeles Conservation Element. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf

[7] Los Angeles Department of City Planning. November 2017. South Los Angeles Community Plan. https://planning.lacity.org/plans-policies/community-plan-area/south-los-angeles

based on the proposed improvements. However, of nine Elements within the proposed Master Plan Area, five include areas with unique urban and historic features: Element 1 (Threshold & Gateway), Element 2 (Exposition Festival Plaza), Element 6 (Museum Walk), Element 8 (Zanja Madre), and Element 9 (Olympic Ring Walk). Due to the relatively flat nature of the site, these areas are visible from public rights-of-way and appear to constitute a scenic view from the City of Los Angeles, due to the presence of unique urban and historic resources.

As stated in Section 1, *Project Description*, and Section 3.5, *Cultural Resources*, there are five Historic Preservation Monuments identified by the City within the Master Plan Area (Figure 1.8.1-1, *Designated Historical Resources,* and Figure 1.8.1-2, *Eligible Historical Resources*):[8]

- Natural History Museum of Los Angeles County (HCM and OHP)
- Exposition Park Rose Garden (HCM and OHP)
- State Armory Building (HCM)
- Los Angeles Memorial Coliseum (HCM and OHP)
- Los Angeles Swimming Stadium (HCM and OHP)

The proposed project would not involve any direct changes to visibility or access to the five Historic Preservation Monuments or the Exposition Club House (see Figure 1.8.1-1).

Element 1 (Threshold & Gateway)

Element 1 – Threshold & Gateway would involve improvements to wide access paths, cycle track, water capture planters, landscaping, wayfinding signage and entry gateways. Element 1 is along Exposition Blvd. just north of the historic Exposition Park Rose Garden (Rose Garden), where a row of existing mature evergreen Morton Bay Fig trees that line the Expo East and West Lawn areas between the Rose Garden and Expositions Blvd., running the length of the Rose Garden. Three existing deciduous trees frame the northern entrance to the Rose Garden. The Expo East and West Lawns are bisected by a concrete access path along the north-south axis to the Rose Garden with continuous concrete benches on either side of the path which end in art deco light posts closer to a sidewalk along Exposition Blvd. In addition, the sidewalk along Exposition Blvd. intersects the path connecting to the Rose Garden, an informational signage in located in the middle of the parkway (between curb and sidewalk) and is located at the northeast side of the Rose Garden path, young (non-mature) street trees line Exposition Blvd. within the parkway, the LA Metro Expo Park/USC Station along Exposition Blvd. runs along the middle easement of the street, and the USC Campus is north of Exposition Blvd. between Figueroa Street and Vermont Avenue (Figure 3.1-1, *Site Photographs Map*; Figure 3.1-2, *Site Photographs*). Element 1 – Threshold & Gateway would include installation of a shared use path along Exposition Blvd. that would not affect views of the Rose Garden. The planted parkway proposed in Element 1 would also involve installation of a crossing plaza, entrance signage, and replacement of the young street trees closer in size and maturity similar to the existing Morton Bay Fig trees located approximately 75–80 feet north of the Rose Garden. Although the proposed project would reduce the visibility of the Rose Garden from Exposition Blvd., the new street trees would result in no impacts to views of the Rose Garden because the Rose Garden would remain visible from the street below the new canopy. Furthermore, it is anticipated that the new trees that would be located approximately 45 feet from Exposition Blvd. would be narrow trees such as palm trees providing a lined walkway. However, Element 1 would not obstruct vistas of the historic Rose Garden because the views would be maintained. Therefore, impacts to scenic vistas regarding Element 1 would be less than significant.

[8] Los Angeles Department of City Planning. Accessed November 20, 2019. Community Planning App South Los Angeles. https://ladcp.maps.arcgis.com/apps/View/index.html?appid=5a9db32190ef41448340989e2d4d79bf

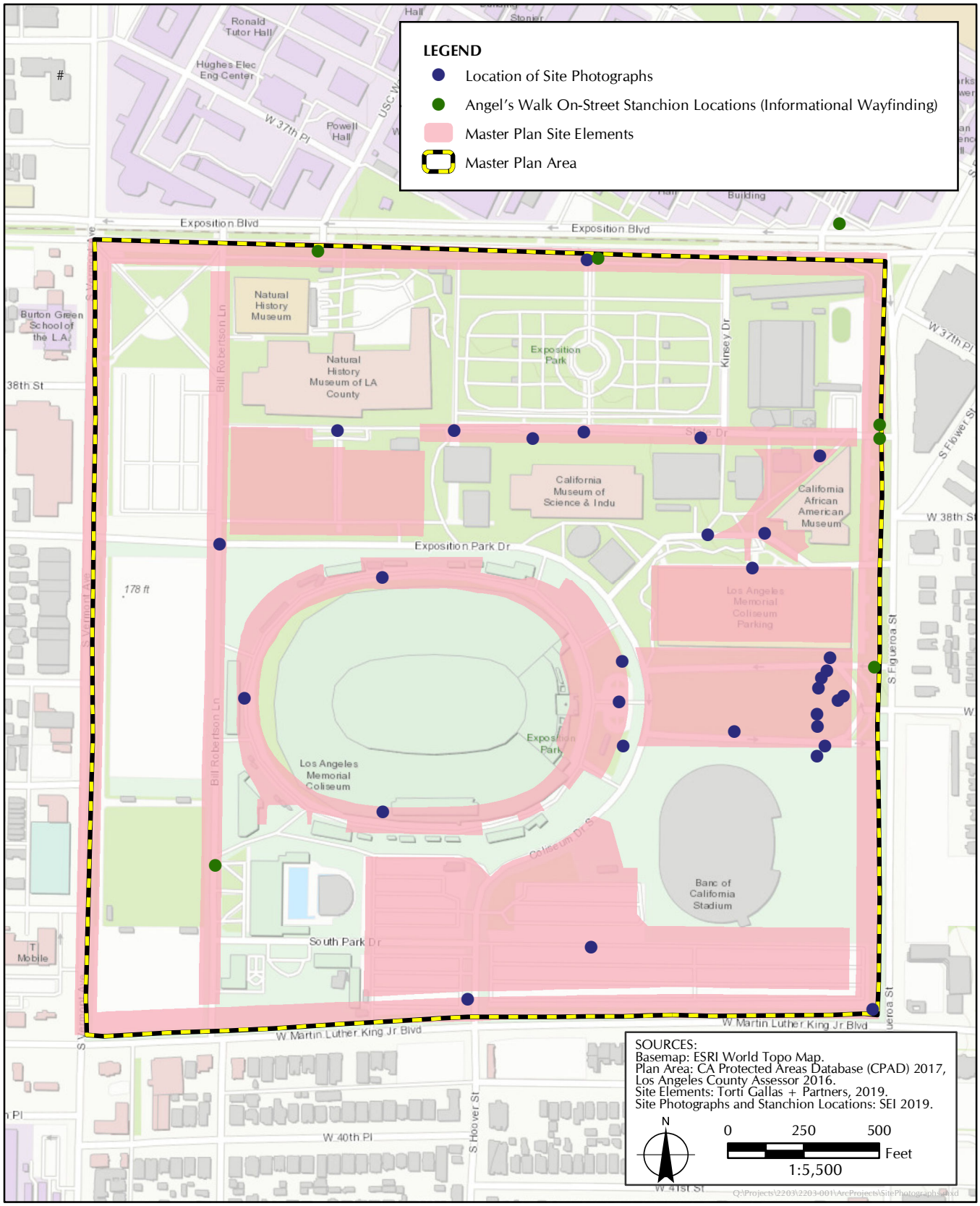


FIGURE 3.1-1

Site Photographs Map

ELEMENT 1 | PHOTO 1
Exposition Blvd. View of the Rose Garden - Southeast

ELEMENT 1 | PHOTO 2
Exposition Blvd. View of the Rose Garden - South

FIGURE 3.1-2
Site Photographs

ELEMENT 1 | PHOTO 3
Exposition Blvd. View of the Rose Garden - Southwest

ELEMENT 1 | PHOTO 4
East Side of Coliseum - West View of Entry Courtyard

FIGURE 3.1-2
Site Photographs

ELEMENT 1 | PHOTO 5
Martin Luther King Jr. Blvd. Canary Island Pine Trees West View

ELEMENT 1 | PHOTO 6
Martin Luther King Jr. Blvd. Canary Island Pine Trees East View at Figueroa

FIGURE 3.1-2
Site Photographs

ELEMENT 2 | PHOTO 7
Figueroa St. at Christmas Tree Lane View of Coliseum - West

ELEMENT 3 | PHOTO 8
Existing Parking Structure North of Christmas Tree Lane and View of Coliseum

FIGURE 3.1-2
Site Photographs

ELEMENT 4 | PHOTO 9
Parking Lot 6 East View

ELEMENT 4 | PHOTO 10
Parking Lot 6 Southeast View

FIGURE 3.1-2
Site Photographs

ELEMENT 4 | PHOTO 11
Parking Lot 6 Southwest View

ELEMENT 4 | PHOTO 12
Parking Lot 6 West View

FIGURE 3.1-2
Site Photographs

ELEMENT 4 | PHOTO 13
Parking Lot 6 and VIP Parking West View

ELEMENT 4 | PHOTO 14
Parking Lot 6 and VIP Parking Northwest View

FIGURE 3.1-2
Site Photographs

ELEMENT 4 | PHOTO 15
Parking Lot 6 and VIP Parking North View

ELEMENT 4 | PHOTO 16
Parking Lot 6 and VIP Parking Northeast View

FIGURE 3.1-2
Site Photographs

ELEMENT 4 | **PHOTO 17**
Parking Lot 6 and VIP Parking East View

FIGURE 3.1-2
Site Photographs

ELEMENT 6 | PHOTO 18A
State St. West View

ELEMENT 6 | PHOTO 18B
State St. East View

FIGURE 3.1-2
Site Photographs

ELEMENT 6 | PHOTO 19A
State St. View of Rose Garden and Decorative Wall

ELEMENT 6 | PHOTO 19B
State St. Wiew of Rose Garden and Decorative Wall

FIGURE 3.1-2
Site Photographs

ELEMENT 6 | PHOTO 20
State St. View of Rose Garden and Decorative Wall at Southern Garden Entry

ELEMENT 6 | PHOTO 21
State St. View of Rose Garden and Decorative Wall at Southern Garden Entry

FIGURE 3.1-2
Site Photographs

ELEMENT 6 | PHOTO 22
State St. View of Rose Garden and Decorative Wall at Southern Garden Entry

FIGURE 3.1-2
Site Photographs

ELEMENT 7 | **PHOTO 23**
California African American Museum Northeast View

ELEMENT 7 | **PHOTO 24**
California African American Museum Northeast View in Courtyard

FIGURE 3.1-2
Site Photographs

ELEMENT 7 | PHOTO 25
California African American Museum South View from State Dr.

ELEMENT 7 | PHOTO 26
California African American Museum Southwest View from State Dr.

FIGURE 3.1-2
Site Photographs

ELEMENT 8 | PHOTO 27
Natural History Museum at Exposition Park Drive - East View

ELEMENT 8 | PHOTO 28
Natural History Museum at Exposition Park Drive - East Parkway View

FIGURE 3.1-2
Site Photographs

ELEMENT 8 | PHOTO 29
Natural History Museum at Exposition Park Drive from West View

ELEMENT 8 | PHOTO 30
Natural History Museum South View from Entrance

FIGURE 3.1-2
Site Photographs

ELEMENT 8 | PHOTO 31
Natural History Museum South View from Entrance

ELEMENT 8 | PHOTO 32
Natural History Museum South View from Entrance of Lawn

FIGURE 3.1-2
Site Photographs

ELEMENT 9 | PHOTO 33
North Side of Coliseum East View of Slope and Concessions

ELEMENT 9 | PHOTO 34
North Side of Coliseum - East View of Concessions

FIGURE 3.1-2
Site Photographs

ELEMENT 9 | PHOTO 35
North Side of Coliseum - West View of Slope and Concessions

ELEMENT 9 | PHOTO 36
West Side of Coliseum - North View of Slope, Concessions, and Equipment

FIGURE 3.1-2
Site Photographs

ELEMENT 9 | PHOTO 37
West Side of Coliseum - South View of Slope, Concessions, and Equipment

ELEMENT 9 | PHOTO 38
South Side of Coliseum - West View of Slope, Concessions, and Equipment

FIGURE 3.1-2
Site Photographs

ELEMENT 9 | PHOTO 39
South Side of Coliseum - South View of Slope, Concessions, and Equipment

ELEMENT 9 | PHOTO 40
East Side of Coliseum - West View of Entry Courtyard

FIGURE 3.1-2
Site Photographs

ELEMENT 9 | PHOTO 41
East Side of Coliseum - West View of Entry Courtyard

ELEMENT 9 | PHOTO 42
East Side of Coliseum - West View of Entry Courtyard

FIGURE 3.1-2
Site Photographs

ELEMENTS 1 AND 5 | PHOTO 43
Angel's Walk On-Street Stanchions
(cultural and historical self-guided reference wayfinding markers)

FIGURE 3.1-2
Site Photographs

Element 2 (Expo Festival Plaza - Christmas Tree Lane)

As stated in Section 3.5, the proposed project would directly affect Christmas Tree Lane, as Element 2 (Expo Festival Plaza) would include modifications to Christmas Tree Lane, an eligible historical resource and character-defining feature of the National Register and National Historic Landmark designated Los Angeles Memorial Coliseum. The view provided from Figueroa Street to the Coliseum Plaza by way of Christmas Tree Lane is a significant character-defining feature of the Coliseum, specifically the plaza.[9] Significant elements of Christmas Tree Lane include the roadways, sidewalks, and low walls dating to 1925; the greenway between N. and S. Coliseum Drive; the mature London Plane Trees; the three Art Moderne streetlights; and the mature palm tree and the associated marker.[10,11] These features and their contribution to the setting of the Coliseum are significant to its National Register and National Historic Landmark designation. The additions of wayfinding banners and pathways would not alter the viewshed of Christmas Tree Lane from Figueroa Street to the Coliseum Plaza (see Figures 3.1-2 and Figure 3.1-3, *Visual Character Photographs*, Figure 1.8.2-3, *Proposed Master Plan Element 2 – Expo Festival Plaza*). The addition of improvements overlapping from Element 1 would impact the existing roadways and sidewalks that are character-defining resources of Christmas Tree Lane, thus requiring the implementation of Mitigation Measures CULTURAL-1 and CULTURAL-2 and adherence with the Secretary of the Interior's *Standards for Rehabilitation* (36 Code of Federal Regulations [CFR] 67) to avoid, reduce, or compensate for the impacts to visual and historical features of this alteration (see Section 3.5).

Element 3 (Solar Garden)

The current location of proposed Element 3 consists of an existing parking structure that would be outfitted with a set of artistically designed solar panels on poles, to be analogous in their spacing to an orchard of trees (Figure 1.8.2-4, *Proposed Master Plan Element 3 – Solar Garden*). Currently, the existing parking structure contains rows of light standards, for safety and security purposes, mounted on concrete plinths, with banners and wayfinding signage attached to the poles, that are spaced evenly throughout the top level of the parking structure. Additional concrete plinths, without any light poles, are spaced evenly between the light standards/poles on plinths. The top of the Visitor Parking Structure would be outfitted with a set of artistically designed solar panels on poles, part of the proposed improvements, to be analogous in their spacing to an orchard of trees. The new solar panels (Solar Garden) would involve the installation of solar panel poles to the existing parking structure along with electrical connections. Components of Element 3 would not impact the viewshed of character-defining features of Christmas Tree Lane due to the distance of the solar panels plus the double row of London Plane Trees that shields the visitor parking structure from the viewshed at Figueroa St. (see Figure 3.1-2, Figure 3.1-3, and Figure 1.8.2-3).

[9] Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure.

[10] Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure.

[11] Three Art Moderne Streetlights were documented in Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure. Streetlights not visible or locatable at indicated location on site.

ELEMENT 2 | PHOTO 1
Figueroa St. at Christmas Tree Lane View of Coliseum - West

FIGURE 3.1-3
Visual Character Photographs

ELEMENT 2 | PHOTO 2
Palm Tree at Christmas Tree Lane

FIGURE 3.1-3
Visual Character Photographs

ELEMENT 2 | **PHOTO 3**
Marker at Christmas Tree Lane

FIGURE 3.1-3
Visual Character Photographs

ELEMENT 2 | PHOTO 4
Deodar Cedars at Christmas Tree Lane

FIGURE 3.1-3
Visual Character Photographs

ELEMENT 2 | PHOTO 5
North Coliseum Drive at Christmas Tree Lane View of Coliseum

ELEMENT 2 | PHOTO 6
North Coliseum Drive at Christmas Tree Lane View of Coliseum

FIGURE 3.1-3
Visual Character Photographs

ELEMENT 2 | PHOTO 7
North Coliseum Drive at Christmas Tree Lane View of London Plane Trees Allée and Coliseum

ELEMENT 2 | PHOTO 8
Christmas Tree Lane View of Open Space, Trees, and Coliseum

FIGURE 3.1-3
Visual Character Photographs

ELEMENT 2 | PHOTO 9
Christmas Tree Lane View of Open Space, Trees, and Coliseum

ELEMENT 2 | PHOTO 10
South Coliseum Drive at Christmas Tree Lane Vew of London Plane Trees Allée and Coliseum

FIGURE 3.1-3
Visual Character Photographs

ELEMENT 2 | PHOTO 11
South Coliseum Drive View of Christmas Tree Lane and Coliseum

FIGURE 3.1-3
Visual Character Photographs

Element 6 (Museum Walk)

Element 6 – Museum Walk would involve pedestrian improvements to State Drive adjacent to and immediately to the south of the historic Rose Garden, located approximately 120–125 feet south of Exposition Blvd. The proposed improvements would include the installation of four rows of regularly spaced shade trees south of the Rose Garden. Two site visits were conducted on October 30, 2019, and November 8, 2019, to characterize baseline conditions at Exposition Park (see Figure 3.1-1 and 3.1-2). The Rose Garden is recessed approximately 3–4 feet below street level with an additional 3–4 feet above street level consisting of a decorative wall that encompasses the Rose Garden in its entirety (all four sides of the garden) that currently obstructs the views of the depressed garden. The decorative wall is composed of red decorative brick with a natural concrete cap along the entire length and wider plinths, in the same red brick and concrete cap manner, at the garden entrances to enhance the gateways. Decorative wrought iron fencing with gates provide access to the Rose Garden at its four entrances at both north-south and east-west central axes. The southern edge of the Rose Garden is currently bordered by a wall, comprising of a level planter with trees that follow the interior edge of the wall within the garden. The Rose Garden is not readily visible from State Drive except in gaps between the irregularly spaced trees and at the central location in the north-south axis facing the center of the garden where a historic fountain is located. The fountain is situated in the center of the garden intersecting both the north-south and east-west axes (see Figure 3.1-2). The proposed project would leave open the axial views of the Rose Garden from the south at its north-south axis location facing the central fountain. The proposed improvements to State Drive would result in no impact to views to or from the Rose Garden based on current conditions.

Element 8 (Zanja Madre)

As stated in Section 3.5, the proposed project would not directly affect the Natural History Museum of Los Angeles County (NHM), as Element 8 (Zanja Madre) would include enhancements to the park setting at the South Lawn Area (east and west sides) providing shade, seat walls, boulders and varying surface materials. Two site visits were conducted on October 30 and November 8, 2019, to characterize baseline conditions at Exposition Park (see Figure 3.1-1 and 3.1-2). Currently, the South Lawn is in relatively poor condition with barren soil and soil depressions throughout the lawn area as it is being used for parking during Coliseum events (see Figure 3.1-2). The South Lawn showed very little use from patrons as observed during the site visits due to the poor quality of the lawn. Per the City's Conservation Element regarding the importance of enhancing "urban open space," the proposed enhancements would improve the current park or opens space conditions for human activity, including installation of shade trees along the southern entrance path to the NHM. Therefore, there would be no impact on vistas to or from the South Lawn or the NHM.

Element 9 (Olympic Ring Walk)

Element 9 – Olympic Ring Walk would include alterations to the berm surrounding the Los Angeles Memorial Coliseum, which is a character-defining feature of the historical resource, including proposed concessions and amenities integrated within the Coliseum berm and native landscaping, historic markers embedded into decorative unit pavers lining the walk, additional landscaping such as trees and shrubs providing shade and a counter balance to the hardscape as well as signature palm trees, in tree wells with tree grates, that integrate lighting and festival banners lining the edge for a full patron/event experience. The earth berm surrounding the Coliseum holds the middle bank of stepped tiers and contributes to the "continues and rhythmic flow of pierced panels and pilasters"[12] (see Figure

[12] National Register of Historic Places Inventory. June 1984. Los Angeles Memorial Coliseum. Nomination form.

3.1-2). However, based on the two site visits conducted on October 30, 2019, and November 8, 2019, to characterize baseline conditions at Exposition Park (see Figure 3.1-1 and 3.1-2), the existing condition of Element 9 consists of various temporary concessions stands, permanent facilities structures, fencing surrounding the Coliseum and gates at several access points, maintenance vehicles, and operations and maintenance equipment as observed. During the site visits, the area appeared to be a disorganized space and similar to a maintenance yard due to temporary concessions and maintenance vehicles. The view of the existing earth berms was almost blocked by the concession stands and vehicles, particularly on the northern and western sides. The southern side was more open, and the berms were more visible. While impacts to character-defining features are identified in Section 3.5, *Cultural Resources*, the enhancements to Element 9 would provide a net benefit to the vistas of this space.

Views of Other Historic Features

Historic Preservation Monuments identified by the City within the South Los Angeles Community Planning Area surrounding the Master Plan Area include several buildings on the USC Campus across Exposition Blvd. to the north (Hancock Memorial Museum, Allan Hancock Foundation, Widney Hall, and the University of Southern California Historic District); the Zobelein Estate and Flower Drive Historic District across South Figueroa Street to the east, South Los Angeles Canary Island Pine Street Trees along Martin Luther King (MLK) Jr. Blvd. on the southern border of the Master Plan Area and across MLK Jr. Blvd. to the south, and Manual Arts High School to the southwest.[13]

The South Los Angeles Canary Island Pine Street Trees along MLK Jr. Blvd. that are on both sides of the street bear mentioning as the improvements for Element 1 overlaps the southern part of the Master Plan Area (north side of MLK Jr. Blvd.). Scenic vistas, based on "unique urban and historic features"[14] (see Figure 3.1-2), in addition to "the character of the community park is established by green edge flanking the four streets,"[15] would apply to the Canary Island Pine Street Trees as they provide the green edge along MLK Jr. Blvd. and a viewshed of the tree lined street. The proposed cycle track, pedestrian paths, and vegetation improvements from Element 1 would impact the existing Canary Island Pine Street Trees; however, these trees would be required to be retained and maintained as historic resources through adherence with the Secretary of the Interior's *Standards for Rehabilitation* (36 CFR 67) and implementation of Mitigation Measures CULTURAL-1 and CULTURAL-2 to avoid, reduce, or compensate for the impacts to visual and historical features of this alteration (see Section 3.5).

There would be no impacts to scenic vistas resulting from Elements 4, 5, or 7 of the Master Plan because there are no views of the ocean, striking or unusual natural terrain, or unique urban or historic features, as seen from parklands, private and publicly owned sites, and public rights-of-way. Therefore, the proposed project would result in less than significant impacts to aesthetics in relation to scenic vistas with the incorporation of mitigation measures.

[13] Los Angeles Department of City Planning. Accessed November 20, 2019. Community Planning App South Los Angeles. https://ladcp.maps.arcgis.com/apps/View/index.html?appid=5a9db32190ef41448340989e2d4d79bf

[14] Los Angeles Department of City Planning. Adopted September 2001. City of Los Angeles Conservation Element. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf

[15] Exposition Park. Adopted 1992. California Museum of Science and Industry Exposition Park Master Plan. https://assets.documentcloud.org/documents/553541/exposition-park-master-plan.pdf

(b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

The proposed project would result in no impacts to aesthetics in relation to state scenic highways because there are no officially designated or eligible state scenic highways on or adjacent to the Master Plan Area; nor is the Master Plan Area visible from any existing or proposed scenic highway. The California Scenic Highway Program preserves and protects scenic highway corridors from changes that would diminish their aesthetic value. Caltrans designates scenic highway corridors and establishes those highways that are eligible for the program. The program was created in 1963 with the enactment of the State Scenic Highways Law. The street and highway code includes a list of those highways that are either eligible for designation or are designated.[16] The nearest officially designated state scenic highway to the site is State Route 2 (SR-2; Angeles Crest Highway) about 15.5 miles to the northeast of the Master Plan Area (Figure 3.1-4, *Scenic Highways*). The nearest designated historic parkway is SR-110, about 5.5 miles northeast of the Master Plan Area. The nearest eligible state scenic highway is SR-1 starting at its intersection with Venice Blvd., located approximately 9.4 miles west of the Master Plan Area. The proposed project would not be visible from any designated state scenic highway due to distance and intervening urban development, ornamental street trees, and topography. Project development would not result in impacts to scenic resources within a designated state scenic highway. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations covering scenic quality?

The proposed project would result in less than significant impacts to aesthetics in relation to substantially degrading the existing visual character or quality of public views of the site and its surroundings with the incorporation of mitigation measures.

The Master Plan Area is a developed community park that serves as an open campus providing cultural, recreational, and athletic activities to the public within the Los Angeles Basin furnishing an iconic place to gather, gaze at the sky, rest in the gardens, exercise, and enjoy life. The visual character of Exposition Park is defined as a place that is meaningful and gains value with its open space and tree-shaded promenades inviting neighbors into the park where cultural rituals such as walking, playing, eating, conversing, observing, and learning happen.[17] Per the South Los Angeles Community Plan, "the plan area is characterized by diverse neighborhoods rich in cultural and historic character,"[18] and the vision of the plan is that new development "respect the existing character of the Community Plan Area.

[16] California Department of Transportation. Accessed November 25, 2019. Scenic Highways. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

[17] Exposition Park. Adopted 1992. California Museum of Science and Industry Exposition Park Master Plan. https://assets.documentcloud.org/documents/553541/exposition-park-master-plan.pdf

[18] City of Los Angeles Department of City Planning Office of Historic Resources. March 2012. Los Angeles Historic Resources Survey Report: South Los Angeles Community Plan Area. https://planning.lacity.org/odocument/903e27ff-c991-4b73-a9ac-d0b3a8aa558d/S_LA_report_HPLAEdit.pdf

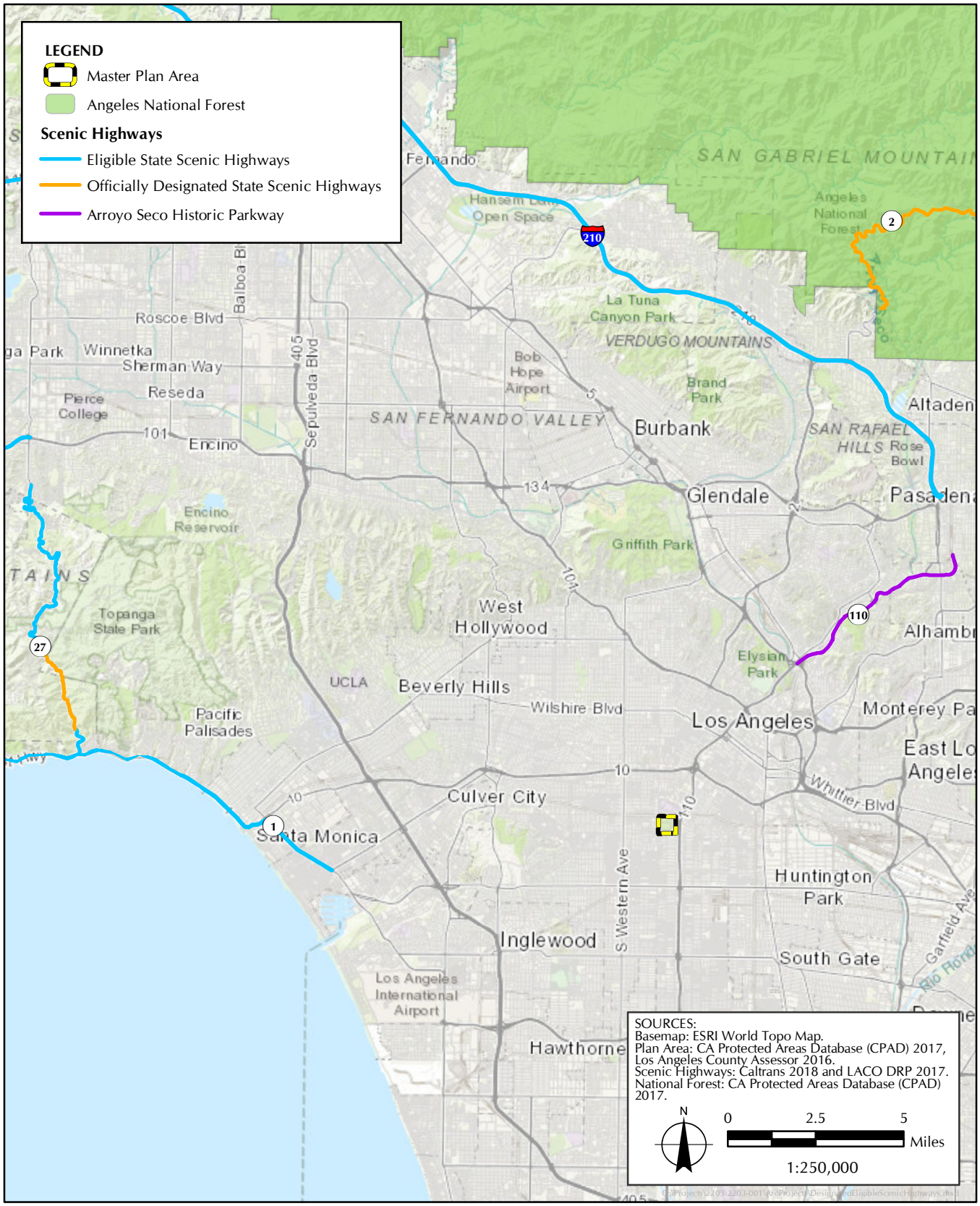


FIGURE 3.1-4

Scenic Highways

Open space is another character feature or visual character that should be protected and conserved. Conservation of such characteristics is needed to ensure the usefulness, safety, and desirability of the adjacent lands, and to maintain the overall health, safety, welfare and attractiveness of the community."[19] In addition, the 1992 Exposition Park Master Plan indicates that "the character of the Community Park is established by green edges flanking the four streets around Exposition Park."[20] There are four elements that contain historic character–defining features and thus visual character within the Master Plan Area: Elements 1 (Threshold & Gateway), 2 (Expo Festival Park), 6 (Museum Walk), and 9 (Olympic Ring Walk).

Element 1 (Threshold & Gateway)

Element 1 – Threshold & Gateway would involve improvements widening of the sidewalk, a cycle track, vegetated stormwater planters, landscaping, wayfinding signage, banners and entry gateways. Element 1 would include improvements along Exposition Blvd., S. Figueroa Street, MLK Jr. Blvd., a portion of State Drive, and Kinsey Drive. The two areas that indicate potential visual character impacts are on Exposition Blvd. at the entry to the Rose Garden and S. Figueroa Street at Christmas Tree Lane. The improvements at Exposition Blvd. just north of the Rose Garden, where a row of existing mature evergreen Morton Bay Fig trees line the Expo East and West Lawn areas between the Rose Garden and Exposition Blvd., run the length of the Rose Garden (see Figure 3.1-2). Three existing deciduous trees frame the northern entrance to the Rose Garden. Currently, the Expo East and West Lawns are bisected by a concrete access path along the north-south axis to the Rose Garden with continuous concrete benches on either side of the path and ending in art deco light posts connecting to the sidewalk along Exposition Blvd. While the widening of the sidewalk indicated a potential impact to the character-defining feature of the continuous concrete benches with art deco light posts, there would be no impact per the architectural renderings that show the adjustment to the sidewalk in order to protect the continuous concrete benches with art deco light post (see Figure 1.8.2-2, *Proposed Master Plan Element 1 – Threshold and Gateway*). On S. Figueroa Street at Christmas Tree Lane, the improvements would include similar to those indicated along Exposition Blvd. at the Rose Garden. Character-defining features of Christmas Tree Lane that would be impacted by these improvements include sidewalks, roadways, low walls dating to 1925, and the viewshed of the Los Angeles Memorial Coliseum from S. Figueroa Street looking across Christmas Tree Lane towards the Coliseum (Figure 3.1-4*;* see Figure 3.1-2). While the enhancements such as the widened paths and bicycle track at Element 1 and Christmas Tree Lane would add benefits to the park setting, alterations to character-defining features at Christmas Tree Lane such as the sidewalks, roadways, and low walls would have the potential to result in significant impacts to character-defining features. Any impacts would be reduced to below the level of significance through adherence with the Secretary of the Interior's *Standards for Rehabilitation* (36 CFR 67) and with the incorporation of Mitigation Measures CULTURAL-1 and CULTURAL-2 to avoid, reduce, or compensate for the impacts to historical features of this alteration (see Section 3.5).

Element 2 (Expo Festival Plaza – Christmas Tree Lane)

As stated in Section 3.5, the proposed project would directly affect Christmas Tree Lane, an area within proposed Element 2 (Expo Festival Plaza) and an eligible historical resource and character-defining feature of the National Register and National Historic Landmark–designated Los Angeles Memorial Coliseum. The visual character provided from Figueroa Street to the Coliseum Plaza by way of

[19] Los Angeles Department of City Planning. Adopted September 2001. City of Los Angeles Conservation Element. https://planning.lacity.org/odocument/01ea5f66-3281-488a-930b-f523712fef07/Open_Space_Element.pdf

[20] Exposition Park. Adopted 1992. California Museum of Science and Industry Exposition Park Master Plan. https://assets.documentcloud.org/documents/553541/exposition-park-master-plan.pdf

Christmas Tree Lane is a significant character-defining feature of the Coliseum, specifically the plaza.[21] Significant elements of Christmas Tree Lane include the roadways, sidewalks, and low walls dating to 1925; the greenway between N. and S. Coliseum Drive; the London Plane Trees; and the mature palm tree plus the associated marker.[22,23] These features and their contribution to the setting of the Coliseum are significant to its National Register, National Historic Landmark designation, and the community character. The additions of proposed wayfinding banners and pathways traversing the central open space would not alter the viewshed and visual character of Christmas Tree Lane from Figueroa Street to the Coliseum Plaza (see Figures 3.1-2, Figure 3.1-3, and Figure 1.8.2-3). The enhancements and retaining of the character-defining features within Christmas Tree Lane would add benefits to the park setting.

Element 6 (Museum Walk)

Element 6 – Museum Walk, would involve pedestrian improvements to State Drive immediately south of the historic Rose Garden, located approximately 120–125 feet south of Exposition Blvd., including installation of four rows of regularly spaced shade trees south of the Rose Garden. Two site visits were conducted on October 30, 2019, and November 8, 2019, to characterize baseline conditions at Exposition Park (see Figure 3.1-2). However, the Rose Garden is recessed approximately 3–4 feet below street level with an additional 3–4 feet above street level consisting of a decorative wall that encompasses the Rose Garden in its entirety (all four sides of the garden) which currently obstructs the views of the depressed garden. The decorative wall is comprised of red decorative brick with a natural concrete cap along the entire length and wider plinths, in the same red brick and concrete cap manner, at the garden entrances that enhances the gateways. Decorative wrought iron fencing with gates provide access to the Rose Garden at its four entrances, both north-south and east-west central axes. The decorative red brick wall is a character-defining feature along the Rose Garden and the northern side of State Drive. Improvements to Element 6 would not alter the character-defining feature of the Rose Garden. However, there is potential for indirect impacts to the decorative red brick wall during the removal of the adjacent concrete walkway along Museum Walk to make way for the proposed planting. Any indirect impacts to the character-defining feature would be reduced to below the level of significance through adherence with the Secretary of the Interior's *Standards for Rehabilitation* (36 CFR 67) to avoid, reduce, or compensate for the impacts to historical features of this alteration (see Section 3.5).

Element 9 (Olympic Ring Walk – Los Angeles Memorial Coliseum)

Element 9 (Olympic Ring Walk) would include alterations to the berm surrounding the Los Angeles Memorial Coliseum, which is a character-defining feature of the historical resource, including proposed concessions and amenities integrated within the Coliseum berm and native landscaping, historic markers embedded into decorative unit pavers lining the walk, additional landscaping such as trees and shrubs providing shade and a counter balance to the hardscape as well as signature palm trees, in tree wells with tree grates, that integrate lighting and festival banners lining the edge for a full patron/event experience. However, based on the two site visits conducted on October 30, 2019, and

[21] Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure.

[22] Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure.

[23] Three Art Moderne Streetlights were documented in Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure. Streetlights not visible or locatable at indicated location on site.

November 8, 2019, to characterize baseline conditions at Exposition Park (see Figures 3.1-1 and 3.1-2), the existing condition of Element 9 consists of various temporary concessions stands, permanent facilities structures, fencing surrounding the Coliseum and gates at several access points, maintenance vehicles, and operations and maintenance equipment as observed. During the site visits, this area appeared to be a disorganized space and similar to a maintenance yard due to temporary concessions and maintenance vehicles. The view of the existing earth berms was almost blocked by the concession stands and vehicles, particularly on the northern and western sides. The southern side was more open, and the berms were more visible. While impacts to character-defining features are identified in Section 3.5, the enhancements to Element 9 would provide a net benefit to the visual character of this space.

Exposition Park is not located near a City-designated Scenic Avenue.[24] The nearest City-designated Scenic Avenue is West Adams Blvd. west of South Figueroa Street, located approximately 0.5 mile northeast of the Master Plan Area, on the opposite side from the USC Campus. The proposed project would not affect the visual character of West Adams Blvd. because it is not located within the scenic corridor. No impacts to built historical resources are anticipated from Elements 3, 4, 5, 7, or 8 of the Master Plan. Any impacts to character-defining features would be reduced to below the level of significance through adherence with the Secretary of the Interior's *Standards for Rehabilitation* (36 CFR 67) and with the incorporation of Mitigation Measures CULTURAL-1 and CULTURAL-2 to avoid, reduce, or compensate for the impacts to historical features of this alteration (see Section 3.5). Therefore, the proposed project would result in less than significant impacts to aesthetics related to degradation of the existing visual character of the site and its surroundings with the incorporation of mitigation measures.

A State zoning designation has not been assigned to Exposition Park due to its location within an incorporated city. Although the State is not subject to city zoning, the City's zoning designations have been provided to inform OEPM's decision-making process and because portions of the Master Plan Area are owned or operated by the City of Los Angeles. There are three City zoning designations for the Master Plan Area: PF-1, PF-1-SN, and OS-1XL (see Figure 3.11-2, *Zoning*, in Section 3.11, *Land Use and Planning*).[25] Allowable uses within the "PF" Public Facilities Zone include any joint public and private development uses permitted in the most restrictive adjoining zones if approved by the Director utilizing the procedures described in Section 16.05 to H of the City of Los Angeles Municipal Code.[26] Allowable uses within the "OS" Open Space Zone include parks and recreation facilities, including bicycle trails, equestrian trails, walking trails, nature trails, parkland/lawn areas, children's play areas, child care facilities, picnic facilities, and athletic fields (not to exceed 200 seats in park) used for park and recreation purposes.[27] The South Los Angeles Community Plan establishes goals and policies prioritizing maintaining and improving existing recreation and park facilities in the community, as well

[24] Los Angeles Department of City Planning. Accessed November 20, 2019. Community Planning App South Los Angeles. https://ladcp.maps.arcgis.com/apps/View/index.html?appid=5a9db32190ef41448340989e2d4d79bf

[25] City of Los Angeles Department of City Planning. Accessed September 5, 2019. ZIMAS. http://zimas.lacity.org/

[26] City of Los Angeles. Accessed September 5, 2019. Official City of Los Angeles Municipal Code – Chapter I, Planning & Zoning. Section 12.04.09 "PF" Public Facilities Zone. http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpublicfacilitieszone?f=templates$fn=altmain-nf.htm$q=[field%20folio-destination-name:%2712.04.09.%27]$x=Advanced#JD_12.04.09.

[27] City of Los Angeles. Accessed September 5, 2019. Official City of Los Angeles Municipal Code – Chapter I, Planning & Zoning. Section 12.04.05 "OS" Open Space Zone. http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120405osopenspacezone?f=templates$fn=altmain-nf.htm$q=[field%20folio-destination-name:%2712.04.05.%27]$x=Advanced#JD_12.04.05.

as identifying opportunities to increase acreage of total recreational areas and improving pedestrian access to recreational facilities.[28] The proposed project would involve improvements existing parks and recreation facilities, which would be consistent with the Public Facilities – PF and Open Space – OS land use designations of the South Los Angeles Community Plan, the goals and policies of the South Los Angeles Community plan, and the City zoning designations of designations for the Master Plan Area of PF-1, PF-1-SN, and OS-1XL. Therefore, there would be no impact in relation to applicable zoning.

(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The proposed project would result in less than significant impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the vicinity of the Master Plan Area. As Exposition Park is a state park located in the incorporated City of Los Angeles and includes City property, both state and city standards have been referenced. Under Chapter six of the *2019 Lighting Energy Standards Nonresidential Compliance Manual for the State of California*, which are adhered to by the city, Lighting Zones are defined as the allowance of "outdoor lighting power on the brightness of the surrounding conditions" and contains allowances for new lighting dependent on lighting zones.[29] Furthermore, section 10-114 (Determination of Outdoor Lighting Zones and Administrative Rules for Use) together with Section 140.7 of the California Code of Regulations Title 24, Part 6, notes that in California, lighting varies by Lighting Zone (LZ) based on the relative ambient illumination level identified. There are five levels of Lighting Zones that include LZ0, LZ1, LZ2, LZ3, and LZ4. The LZ levels consist of LZ0 – Very Low intensity such as national parks or undeveloped areas that are very dark at night; LZ1 – Low intensity such as rural areas; LZ2 – Moderate intensity such as rural areas per 2010 Census; LZ3 – Moderately High intensity such as urban areas per 2010 Census; and LZ4 – High for high intensity nighttime use such as entertainment or commercial district or areas with special security considerations requiring very high light levels.[30,31] Based on these definitions, the Master Plan Area is LZ4. The City enforces the California Code of Regulations Title 24, Part 6 (California Energy Code) and Part 11(California Green Building Standards Code)[32] but also includes City Code Regulations such as Section 1.2.12, Section 9.3.93.0117 and under Division 62 Section 91.6205.[33] The Master Plan Area is located in an urbanized area that is situated on a 152-acre site in the City of Los Angeles, California (see Figure 1.4-1, *Regional Vicinity Map*). The Master Plan Area is a developed community park that serves as an open campus providing cultural, recreational, and athletic activities to the public within the Los Angeles Basin furnishing an iconic place to gather, gaze at the sky, rest in the gardens, exercise, and enjoy life.

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[28] City of Los Angeles Department of City Planning. Adopted November 22, 2017. South Los Angeles Community Plan. General Plan Land Use Map. https://planning.lacity.org/complan/central/PDF/slaplanmap.pdf

[29] State of California Energy Commission. January 2019. 2019 Nonresidential Compliance Manual. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-1

[30] State of California Energy Commission. December 2018. 2019 Building Energy Efficiency Standards for Residential and Nonresidential buildings. https://ww2.energy.ca.gov/2018publications/CEC-400-2018-020/CEC-400-2018-020-CMF.pdf

[31] State of California Energy Commission. January 2019. 2019 Nonresidential Compliance Manual. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-1

[32] County of Los Angeles. June 2014. IV: Environmental Impact Analysis for Ford Theaters Project (SCH No. 2014021013). http://file.lacounty.gov/SDSInter/dpr/215035_IV.A.AestheticsViewsLightandGlare.pdf

[33] City of Los Angeles. 2016. L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analysis in Los Angeles. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

Due to its urban context, the Los Angeles Basin experiences a very high nighttime sky glow and as well as nighttime and daytime glare (Figure 3.1-5, *Existing Nighttime Light Levels*). Two site visits were conducted on October 30 and November 8, 2019 to characterize baseline conditions at Exposition Park (see Figure 3.1-2 and 3.1-4). Overhead street lights surround the Master Plan Area on the northern, southern, eastern, and western sides. All four perimeter sides of the Master Plan Area including within the site (Bill Robertson Lane, S. Hoover Street, N. and S. Coliseum Drive, and State Drive), contain street lights that line the opposite side of the street, along the perimeter, and line both sides of the street within the Master Plan Area. The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb. The Master Plan Area's current uses generate nighttime light from security lighting, parking lot lights, and exterior building lights plus stadium lighting during event days. Surrounding land uses also generate significant light from traffic lights, street lights, vehicle lights, parking lot lights, and exterior building security lights as well as lighted signage and electrical billboards. There are five proposed project Elements (3, 4, 7, 8, and 9) within the Master Plan Area that deal with daytime light, daytime glare and nighttime light that have been identified.

Element 3 (Solar Garden)

The current location of proposed Element 3 consists of an existing parking structure that would be outfitted with a set of artistically designed solar panels on poles, to be analogous in their spacing to an orchard of trees (Figure 1.8.2-4). Currently, the existing parking structure contains rows of light standards (painted black), for safety and security purposes, mounted on concrete plinths (painted white) approximately 3 feet tall, with banners and wayfinding signage attached to the poles, that are spaced evenly throughout the top level of the parking structure. Concrete plinths, without any light poles, are spaced evenly between the light standards/poles. The structure's impervious surfacing, natural concrete (20–30 percent Reflection Factor),[34] with white and yellow striping on the ground surface along with the white light pole plinths (75–85 percent Reflection Factor)[35] emit glare creating a discomfort to the eye when moving through the space as observed during the October 30 and November 8, 2019, site visits. The vehicles that park in the structure emit glare as well. Currently, the top level of the parking structure is lit with security lighting at night. The proposed solar panels while promoting energy production would create shade underneath to the structure during the daytime, minimizing the glare from vehicles and light reflection from the concrete surface. During nighttime, the solar panels would prevent the light from traveling upward and decreasing nighttime light pollution thus adding a net benefit while adhering to the California Code of Regulations Title 24, Part 6 (California Energy Code) and Part 11(California Green Building Standards Code),[36] and the City Code Regulations Section 1.2.12, Section 9.3.93.0117 and under Division 62 Section 91.6205.[37] Therefore, impacts would be less than significant.

[34] The Engineering ToolBox. Accessed November 27, 2019. Materials – Light Reflecting Factors. https://www.engineeringtoolbox.com/light-material-reflecting-factor-d_1842.html

[35] The Engineering ToolBox. Accessed November 27, 2019. Materials – Light Reflecting Factors. https://www.engineeringtoolbox.com/light-material-reflecting-factor-d_1842.html

[36] County of Los Angeles. June 2014. IV: Environmental Impact Analysis for Ford Theaters Project (SCH No. 2014021013). http://file.lacounty.gov/SDSInter/dpr/215035_IV.A.AestheticsViewsLightandGlare.pdf

[37] City of Los Angeles. 2016. L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analysis in Los Angeles. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

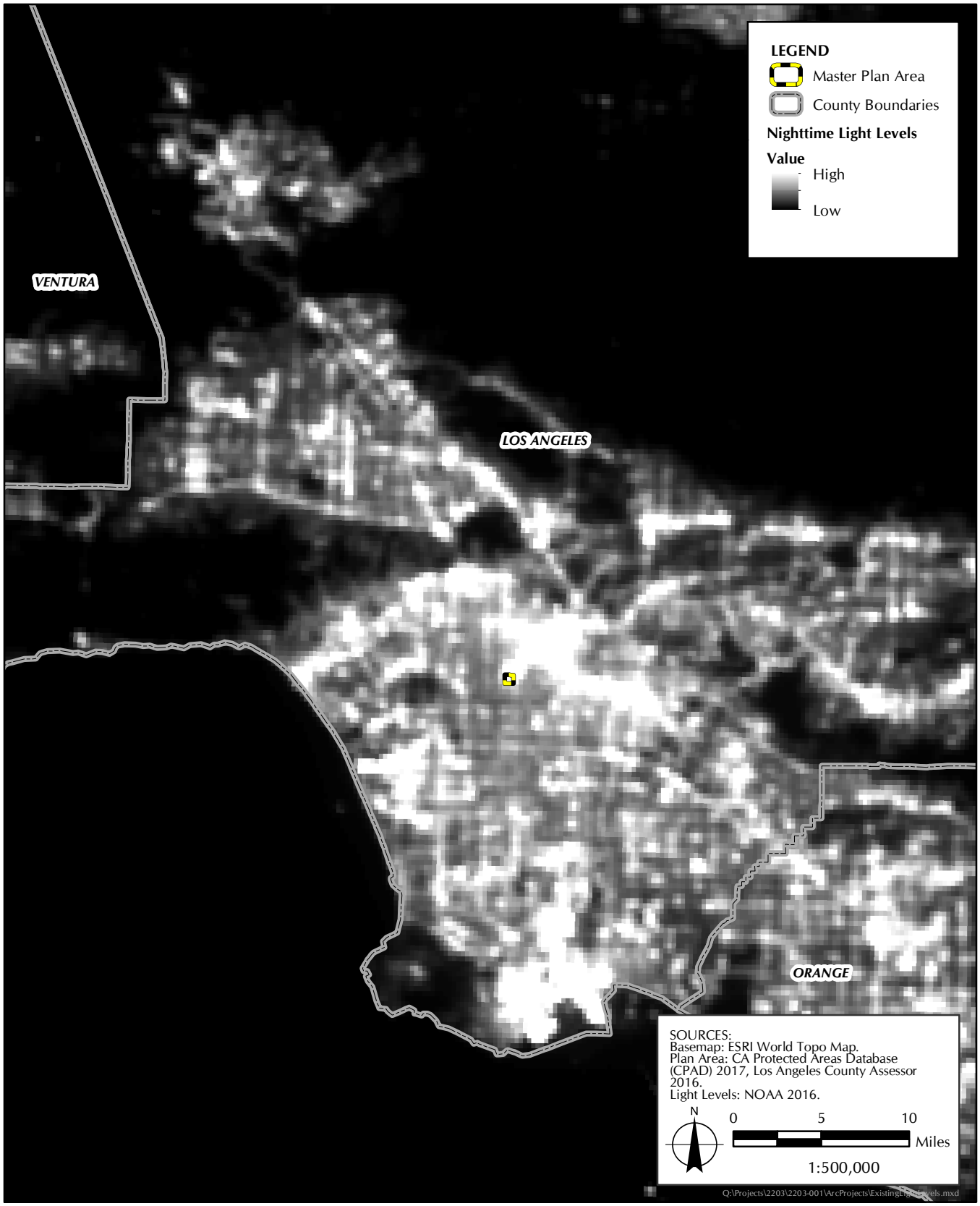

FIGURE 3.1-5

Existing Nighttime Light Levels

Element 4 (Festival Park and Community Promenade)

The current location of proposed Element 4 consists of existing surface parking lots (parking lots 4, 5, 6, and VIP parking) that would essentially be moved below grade to an underground parking structure. The existing surface parking lots 4, 5 and 6 consist of impervious surfacing (asphalt), overhead utility lines, and parking lot light standards with banners (Figure 1.8.2-1, *Master Plan Area – Existing Conditions*; Figure 3.1-2). The existing VIP parking lot also includes the previous items (impervious surfacing, overhead utilities and lighting) along with fuel pump stations, yellow bollards, an automated visitor ticket gate, as well as parking lot trees, shrubs and vegetated stormwater planters. The existing VIP parking lot that is vegetated, was comfortable to walk through during the November 8, 2019 site visit whereas parking lots 4, 5, and 6 were relatively barren, warm and difficult to see with the sun reflection from the asphalt (8% Reflection Factor).[38] The proposed Element 4 would relocate the parking spaces to below grade and incorporate a Festival Park and Promenade that includes primarily trees, shrubs and lawn over the structure at street level. The trees, shrubs and lawn (20% Reflection Factor)[39] would provide relief from the sun and shield reflection from the surrounding area during daytime as well as provide shade creating a cooler space than current conditions. In addition, during nighttime, the tree canopies would shield the light from traveling upward and decreasing nighttime light pollution thus adding a net benefit while adhering to the California Code of Regulations Title 24, Part 6 (California Energy Code) and Part 11(California Green Building Standards Code),[40] and the City Code Regulations Section 1.2.12, Section 9.3.93.0117 and under Division 62 Section 91.6205.[41] Therefore, impacts would be less than significant.

Element 7 (CAAM)

The current location of proposed Element 7 consists primarily of concrete surfacing (20–30% Reflection Factor)[42] and little shade. The courtyard reflects sunlight and based on the two site visits, it was quite warm and tiresome to walk through and with difficulty seeing without squinting (see Figure 3.1-2). The entrance to the museum is elevated approximately 16–18 inches from the surrounding paved areas and an additional approximately 6 inches toward State Street, security and some pedestrian lighting plus very little seating opportunities are provided. The proposed improvements for Element 7 would include a plaza, dining area, garden, and an enhanced entry along Figueroa Street where the proposed enhanced entry improvements would overlap with Element 1 – Threshold and Gateway. The varied materials from the proposed improvements such as the trees for shade (20% Reflection Factor)[43], seating opportunities and the different paving materials (wood: 20–40%; granite & concrete 20–25% Reflective Factor)[44] would alleviate and soften the hard surface, starkness, light, heat and glare of the space. While it appears that the reflective factor percentage would be a trade-off, there

[38] Huerneter, H.L., D. Heterbrij, D., and J. Elfring, E&E Congress 2016. June 2016. Design of Reflective Payment for Roads. https://www.h-a-d.hr/pubfile.php?id=1135

[39] Homer Energy Pro 3.13. Accessed December 2, 2019. Ground Reflectance. https://www.homerenergy.com/products/pro/docs/latest/ground_reflectance.html

[40] County of Los Angeles. June 2014. IV: Environmental Impact Analysis for Ford Theaters Project (SCH No. 2014021013). http://file.lacounty.gov/SDSInter/dpr/215035_IV.A.AestheticsViewsLightandGlare.pdf

[41] City of Los Angeles. 2016. L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analysis in Los Angeles. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

[42] The Engineering ToolBox. Accessed November 27, 2019. . Materials – Light Reflecting Factors. https://www.engineeringtoolbox.com/light-material-reflecting-factor-d_1842.html

[43] Homer Energy Pro 3.13. Accessed December 2, 2019. Ground Reflectance. https://www.homerenergy.com/products/pro/docs/latest/ground_reflectance.html

[44] The Engineering ToolBox. Accessed November 27, 2019. Materials – Light Reflecting Factors. https://www.engineeringtoolbox.com/light-material-reflecting-factor-d_1842.html

would be more vegetation added in the improvements than current conditions creating a cooler space by providing shade. In addition, the trees would provide shade during the day thus reducing the daytime light and glare and the tree canopies would shield the lighting during nighttime from traveling upward thus a net benefit while adhering to the California Code of Regulations Title 24, Part 6 (California Energy Code) and Part 11(California Green Building Standards Code),[45] and the City Code Regulations Section 1.2.12, Section 9.3.93.0117 and under Division 62 Section 91.6205.[46] Therefore, impacts would be less than significant.

Element 8 (Zanja Madre)

Element 8 improvements would include trees, understory planting, walls and rocks for seating purposes, varied paving materials and sunken lawn areas. Currently, the South Lawn is in poor condition with barren soil and soil depressions throughout the lawn area as it is being used for parking during events. Based on the two site visits that were conducted on October 30 and November 8, 2019 to characterize baseline conditions at Exposition Park indicated that the South Lawn is worn and needs upgrades and maintenance (see Figure 3.1-2). In walking through the space, while there are existing trees and turf within the South Lawn Area it reflects light from the white building (75–85 percent Reflection Factor) [47] making the space uncomfortable to the eye. Currently there is no seating near the building except the light gray to white concrete benches (75–85 percent Reflection Factor) [48] some distance away along the sidewalk along Exposition Park Drive with few deciduous trees providing little relief from the sun. There is pedestrian lighting lining both sides of the middle path, centered on the building, that extends to Exposition Park Drive plus additional pedestrian lighting in a perpendicular fashion along the parkway on the north side of Exposition Park Drive and street lighting on the south side of Exposition Park Drive plus street lighting on the west side of the Element along Bill Robertson Lane. The proposed trees, planting, new lawn, and varied paving materials would help reduce the reflection, daylight and sunlight issues currently apparent at Element 8 of the Master Plan Area. While it appears that the reflective factor percentage would be a trade-off, there would be more vegetation added in the improvements than current conditions creating a cooler space by providing shade. In addition, the trees would provide shade during the day thus reducing the daytime light and glare and the tree canopies would shield the lighting during nighttime from traveling upward thus a net benefit while adhering to the California Code of Regulations Title 24, Part 6 (California Energy Code) and Part 11 (California Green Building Standards Code),[49] and the City Code Regulations Section 1.2.12, Section 9.3.93.0117 and under Division 62 Section 91.6205.[50] Therefore, impacts would be less than significant.

[45] County of Los Angeles. June 2014. IV: Environmental Impact Analysis for Ford Theaters Project (SCH No. 2014021013). http://file.lacounty.gov/SDSInter/dpr/215035_IV.A.AestheticsViewsLightandGlare.pdf

[46] City of Los Angeles. 2016. L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analysis in Los Angeles. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

[47] The Engineering ToolBox. Accessed November 27, 2019. Materials – Light Reflecting Factors. https://www.engineeringtoolbox.com/light-material-reflecting-factor-d_1842.html

[48] The Engineering ToolBox. Accessed November 27, 2019. Materials – Light Reflecting Factors. https://www.engineeringtoolbox.com/light-material-reflecting-factor-d_1842.html

[49] County of Los Angeles. June 2014. IV: Environmental Impact Analysis for Ford Theaters Project (SCH No. 2014021013). http://file.lacounty.gov/SDSInter/dpr/215035_IV.A.AestheticsViewsLightandGlare.pdf

[50] City of Los Angeles. 2016. L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analysis in Los Angeles. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

Element 9 (Olympic Ring Walk) improvements

Currently, the existing conditions of the surrounding area of the Coliseum, referenced as the proposed Element 9 – Olympic Ring Walk, consists of concessions and some amenities but are not well organized around the stadium and nor in sync with the berms and entrance gates to the Coliseum. In addition, existing asphalt (8 percent Reflection Factor)[51] lines the ground completely around the entire perimeter of the Coliseum within the gated area. The black top or asphalt can exude glare and the asphalt made the area feel quite warm. During the two site visits that were conducted on October 30 and November 8, 2019, to characterize baseline conditions at Exposition Park, the asphalt surfacing from south side of the Coliseum after 12 p.m. had substantial sunlight that illustrated the glare and radiated heat from the sun. The northern side was less so as it was primarily in the shade (see Figure 3.1-2). Element 9 improvements, which would be concentrated around the Coliseum, would include a reconfigured path around the Coliseum to provide a more organized and aesthetically pleasing proposed concessions and amenities integrated within the Coliseum berm and native landscaping. Other proposed features include historic markers embedded into decorative unit pavers (25–35 percent Reflection Factor) [52] lining the walk, additional landscaping such as trees and shrubs providing shade and a counterbalance to the hardscape as well as signature palm trees, in tree wells with tree grates, that include lighting and festival banners lining the edge of the walk. The improvements would provide relief from the sunlight and glare by incorporating trees. While there will be an increase of reflection going from asphalt to the proposed decorative unit pavers, there will be proposed trees that will help reduce the daytime light and glare and the tree canopies would reduce the nighttime light into the sky. More lighting is anticipated for this Element it would adhere to the state and city light standards: Title 24, Part 6 (California Energy Code) and Part 11(California Green Building Standards Code),[53] and the City Code Regulations Section 1.2.12, Section 9.3.93.0117 and under Division 62 Section 91.6205.[54] Therefore, impacts would be less than significant.

No impacts to light or glare are anticipated from Elements 1, 2, 5, or 6 of the Master Plan because current light levels for the Master plan area are high per Lighting Zone 4 (LZ4) designation intended for entertainment, commercial districts or areas requiring special security considerations of very high light levels (see Figure 3.1-5). [55] Therefore, the proposed project would result in less than significant impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the proposed project area. No mitigation or further analysis is warranted.

[51] Huerneter, H. L., D. Heterbrij, and J. Elfring, J., E&E Congress 2016. June 2016. Design of Reflective Payment for Roads. https://www.h-a-d.hr/pubfile.php?id=1135

[52] The Engineering ToolBox. Accessed November 27, 2019. Materials – Light Reflecting Factors. https://www.engineeringtoolbox.com/light-material-reflecting-factor-d_1842.html

[53] County of Los Angeles. June 2014. IV: Environmental Impact Analysis for Ford Theaters Project (SCH No. 2014021013). http://file.lacounty.gov/SDSInter/dpr/215035_IV.A.AestheticsViewsLightandGlare.pdf

[54] City of Los Angeles. 2016. L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analysis in Los Angeles. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

[55] State of California Energy Commission. January 2019. 2019 Nonresidential Compliance Manual. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-1

3.2 AGRICULTURE AND FORESTRY RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to agriculture and forestry resources, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.[1] Agriculture and forestry resources at the proposed Master Plan Area were evaluated with regard to the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP),[2,3] City of Los Angeles (City) General Plan,[4] South Los Angeles Community Plan,[5] City Zoning Code,[6] Public Resource Codes 12220 and 4526,[7,8] and Government Code 51104.[9]

State CEQA Statutes (§21060.1(a) Public Resources Code 21000-21177) define agricultural land to mean "prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture (USDA) land inventory and monitoring criteria, as modified for California," and is herein collectively referred to as "Farmland."

"Forest land" is defined in Public Resources Code § 12220 (g) as land that can support 10 percent native tree cover of any species including hardwoods, under natural conditions, and that allows for management of one of more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

"Timberland" is defined in Public Resources Code § 4526 as land other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products.

A "Timberland Production Zone" (TPZ) is defined in Government Code § 51104 (g) as an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses.

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[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[2] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, Important Farmland Finder. Accessed September 27, 2019. 2016 Data. https://maps.conservation.ca.gov/DLRP/CIFF/

[3] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, Los Angeles County Farmland Data. Accessed September 27, 2019. 2006–2016 Data. https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx

[4] City of Los Angeles Planning Department. Accessed September 27, 2019. City of Los Angeles General Plan. https://planning.lacity.org/plans-policies/general-plan-overview

[5] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan.

[6] City of Los Angeles. Accessed October 11, 2019. Official City of Los Angeles Municipal Code – Chapter I Planning & Zoning Code. http://www.amlegal.com/codes/client/los-angeles_ca/

[7] California Public Resources Code, Division 10.5 California Forest Legacy Program Act of 2007 [21200-12276], Chapter 1. General provisions [12200-12231], Article 3. Definitions § 12220 (g). Accessed September 27, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

[8] California Public Resources Code, Division 4. Forests, Forestry and Range and Forage Lands [4001-4958], Chapter 8. Z'berg-Nejedly Forest Practice Act of 1973 [4511-4630.2], Article 2. Definitions [4521-4529.5], § 4526. Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

[9] California Government Code, Title 5. Local Agencies [50001-57550], Chapter 6.7. Timberland [51100-51155], Article 1. General Provisions [51100-51104], § 51104 (g). Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

The State CEQA Guidelines recommend the consideration of five questions when addressing the potential for significant impacts to agriculture resources. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The proposed project would result in no impacts to agriculture and forestry resources in relation to converting Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to non-agricultural use. The CDC, Division of Land Resource Protection, FMMP provides an interactive mapping tool, the California Important Farmland Finder, which serves as the current inventory (2016) of agricultural land resources mapping and data. The most recent mapping of the City for Farmland undertaken by the CDC FMMP (2016) and available maps prepared prior to 2016 were reviewed for the proposed Master Plan Area. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the Master Plan Area.[10,11] Similarly, due to underlying soils and the long history of urban uses, the Master Plan Area is not suitable for designation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Prime Farmland in the City is limited to the San Fernando Valley; the nearest Prime Farmland to the proposed Master Plan Area is located approximately 15 miles to the northwest in the Sepulveda Basin located in Encino, California. The CDC FMMP does not designate any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance east of the I-405 Freeway or south of the San Gabriel Mountains in Los Angeles County at the statewide scale, and the area east of the I-405 and south of the San Gabriel Mountains has not been recently surveyed at the county scale. The Master Plan Area falls outside of the soil survey boundary and is not located within an area mapped by the FMMP. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(b) Conflict with existing zoning for agricultural use, or with a Williamson Act contract?

The proposed project would result in no impacts to agriculture and forestry resources in relation to a conflict with existing zoning for agricultural use or with a Williamson Act contract. The evaluation of zoning for agricultural use was undertaken in relation to the City Zoning Code, the City General Plan, and the Williamson Act Program. The Williamson Act Program enters local governments and private landowners in a contract to restrict agricultural and open space lands to farming and ranching uses through the CDC, Division of Land Resource Protection.

[10] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, Important Farmland Finder. Accessed September 27, 2019. 2016 Data. https://maps.conservation.ca.gov/DLRP/CIFF/

[11] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, Los Angeles County Farmland Data. Accessed September 27, 2019. 2006-2016 Data. https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx

There are three City zoning designations for the Master Plan Area: PF-1, PF-1-SN, and OS-1XL.[12] Although farming is an allowable use in City zoning designations for the Master Plan Area, there are no designated agricultural zones in the Master Plan Area. The "PF" Public Facilities Zone permitted uses include joint public and private development, public service facilities (such as fire and police stations, public libraries, post offices, hospitals, schools, etc.), and farming and nurseries.[13] The "OS" Open Space Zone allowable uses include parks and recreation facilities, natural resource preserves, marine and ecological preserves, sanitary landfill sites, public water supply reservoirs, and water conservation areas.[14] Although farming is a permitted Public Facilities use, the zoning designation is different than a specifically zoned Agricultural Zone. Furthermore, although farming is a permitted use, there are no farms in the Master Plan Area, as shown by the FMMP[15] and the City's South Los Angeles Community Plan, which has no mention of farming for agriculture use in Master Plan Area.[16] Based on the review of the City General Plan, South Los Angeles Community Plan, the FMMP, and Williamson Act contracts, there is no Farmland located in or immediately adjacent to the Master Plan Area. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?

The proposed project would result in no impacts to agriculture and forestry resources in relation to conflict with existing zoning or rezoning of forest land, timberland, or timberland zoned Timberland Production. Based on a review of Public Resources and Government Code, the Master Plan Area does not meet the definition of forest land, timberland, or a TMZ.[17,18,19] The Master Plan Area and associated facilities do not include trees for the purpose of harvesting as a timberland or forestry resource for commercial use. The property is not suitable for forestry or timberland development and there are no areas zoned as any type of forestland located within or surrounding the Master Plan Area.

[12] City of Los Angeles Department of City Planning. Accessed October 11, 2019. ZIMAS. http://zimas.lacity.org/

[13] City of Los Angeles. Official City of Los Angeles Municipal Code – Chapter I Planning & Zoning Code, Chapter I General Provisions and Zoning, Article 2 Specific Planning – Zoning and Comprehensive Zoning Plan, Section 12.04.09 "PF" Public Facilities Zone. Accessed October 11, 2019. http://www.amlegal.com/codes/client/los-angeles_ca/

[14] City of Los Angeles. Official City of Los Angeles Municipal Code – Chapter I Planning & Zoning Code, Chapter I General Provisions and Zoning, Article 2 Specific Planning – Zoning and Comprehensive Zoning Plan, Section 12.04.05 "OS" Open Space Zone. Accessed October 11, 2019. http://www.amlegal.com/codes/client/los-angeles_ca/

[15] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, Important Farmland Finder. Accessed September 27, 2019. 2016 Data. https://maps.conservation.ca.gov/DLRP/CIFF/

[16] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan.

[17] California Public Resources Code, Division 10.5 California Forest Legacy Program Act of 2007 [21200-12276], Chapter 1. General provisions [12200-12231], Article 3. Definitions § 12220 (g). Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

[18] California Public Resources Code, Division 4. Forests, Forestry and Range and Forage Lands [4001-4958], Chapter 8. Z'berg-Nejedly Forest Practice Act of 1973 [4511-4630.2], Article 2. Definitions [4521-4529.5], § 4526. Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

[19] California Government Code, Title 5. Local Agencies [50001-57550], Chapter 6.7. Timberland [51100-51155], Article 1. General Provisions [51100-51104], § 51104 (g). Accessed September 23, 2019. Available at https://leginfo.legislature.ca.gov/faces/codes.xhtml

The City has designated the Master Plan Area as PF-1, PF-1-SN, and OS-1XL.[20] The "PF" Public Facilities Zone permitted uses include joint public and private development, public service facilities (such as fire and police stations, public libraries, post offices, hospitals, schools, etc.), and farming and nurseries.[21] The "OS" Open Space Zone allowable uses include parks and recreation facilities, natural resource preserves, marine and ecological preserves, sanitary landfill sites, public water supply reservoirs, and water conservation areas.[22] The proposed project would be undertaken in a manner that conforms with the City existing zoning designations. Although nurseries are a permitted Public Facilities use, the Master Plan Area does not include timber or forest resources for this purpose, and the implementation of the proposed Master Plan would not require rezoning of existing designated forest land, timberland, or a TMZ. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(d) Result in the loss of forest land or conversion of forest land to non-forest use?

The proposed project would result in no impacts to agriculture and forestry resources in relation to the loss of forest land or conversion of forest land to non-forest use. Based on a review of the South Los Angeles Community Plan, there is no zoning within the community for forest land, and there are no mentions of timber or forestry uses.[23] Furthermore, the Master Plan Area does not meet the definition of forest land by California Public Resources and Government Code, and none of its associated facilities include trees for the purpose of harvesting as a timberland or forestry resource for commercial use. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The proposed project would result in no impacts agriculture and forestry resources involving other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. A review of the FMMP shows that the Master Plan Area is not categorized as Farmland,[24] and review of Public Resources and Government Code shows that it does not meet the definitions of forestry-related

[20] City of Los Angeles Department of City Planning. Accessed October 11, 2019. ZIMAS. http://zimas.lacity.org/

[21] City of Los Angeles. Official City of Los Angeles Municipal Code – Chapter I Planning & Zoning Code, Chapter I General Provisions and Zoning, Article 2 Specific Planning – Zoning and Comprehensive Zoning Plan, Section 12.04.09 "PF" Public Facilities Zone. Accessed October 11, 2019. http://www.amlegal.com/codes/client/los-angeles_ca/

[22] City of Los Angeles. Official City of Los Angeles Municipal Code – Chapter I Planning & Zoning Code, Chapter I General Provisions and Zoning, Article 2 Specific Planning – Zoning and Comprehensive Zoning Plan, Section 12.04.05 "OS" Open Space Zone. Accessed October 11, 2019. http://www.amlegal.com/codes/client/los-angeles_ca/

[23] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan.

[24] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, Important Farmland Finder. Accessed September 27, 2019. 2016 Data. https://maps.conservation.ca.gov/DLRP/CIFF/

uses.[25,26,27] As described in the City General Plan and South Los Angeles Community Plan, there is no existing zoning for agricultural or forestry use in the Master Plan Area.[28,29] Therefore, there would be no impact. No mitigation or further analysis is warranted.

[25] California Public Resources Code, Division 10.5 California Forest Legacy Program Act of 2007 [21200-12276], Chapter 1. General provisions [12200-12231], Article 3. Definitions § 12220 (g). Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

[26] California Public Resources Code, Division 4. Forests, Forestry and Range and Forage Lands [4001-4958], Chapter 8. Z'berg-Nejedly Forest Practice Act of 1973 [4511-4630.2], Article 2. Definitions [4521-4529.5], § 4526. Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

[27] California Government Code, Title 5. Local Agencies [50001-57550], Chapter 6.7. Timberland [51100-51155], Article 1. General Provisions [51100-51104], § 51104 (g). Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

[28] County of Los Angeles Board of Supervisors. Adopted October 6, 2015. Los Angeles County 2035 General Plan. Chapter 9: Conservation and Natural Resources Element.

[29] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan.

3.3 AIR QUALITY

This analysis is undertaken to determine if the proposed project may have a significant impact to air quality, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Air quality at the Master Plan Area was evaluated with regard to the City of Los Angeles General Plan, the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), and the Clean Air Act (CAA). Data on existing air quality in the South Coast Air Basin (SCAB), in which the Master Plan Area is located, is monitored by a network of air monitoring stations operated by the California Environmental Protection Agency (CalEPA), California Air Resources Board (CARB), and South Coast Air Quality Management District (SCAQMD). Technical analysis was conducted using air quality modeling (Appendix B, *CalEEMod Data*).

The State CEQA Guidelines recommend the consideration of four questions when addressing the potential for significant impacts to air quality. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

(a) Conflict with or obstruct implementation of the applicable air quality plan?

The proposed project would result in less than significant impacts to air quality in relation to conflict with or obstruction of implementation of the applicable air quality plan. Air quality compliance with NAAQS and CAAQS is overseen by the SCAQMD pursuant to the Air Quality Management Plan (AQMP).[1] There are four primary components of the Air Toxic Control strategy in the SCAQMD AQMP:

- Continue efforts to reduce diesel particulate matter
- Control volatile organic compound (VOC) emissions that are most reactive in ozone and/or fine particulate matter ($PM_{2.5}$) formation
- Mobile source control strategies that are designed to reduce nitrogen oxide (NO_x), reactive organic gases (ROG), and PM emissions in order to meet the State Implementation Plan (SIP) commitments in the 2016 AQMP, while also producing co-benefits for a variety of toxic air contaminants (tacs)
- Stationary source control strategies that are implemented by the SCAQMD in order to primarily reduce TACs that can create localized impacts to nearby communities.[2]

The potential air quality impacts occurring during the construction and operation of the proposed project is evaluated using the CEQA Guidelines and the quantitative thresholds of significance established by the SCAQMD (Table 3.3-1, *SCAQMD Air Quality Significance Thresholds*).

[1] South Coast Air Quality Management District. March 2017. Final 2016 Air Quality Management Plan. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15

[2] South Coast Air Quality Management District. March 2017. Final 2016 Air Quality Management Plan. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15

TABLE 3.3-1
SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds		
Pollutant	**Construction**	**Operation**
NO_x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and noncarcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO_2eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants[a]		
NO_2 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual average	 10.4 $\mu g/m^3$ (construction)[b] & 2.5 $\mu g/m^3$ (operation) 1.0 $\mu g/m^3$	
$PM_{2.5}$ 24-hour average	 10.4 $\mu g/m^3$ (construction)[b] & 2.5 $\mu g/m^3$ (operation)	
SO_2 1-hour average 24-hour average	 0.25 ppm (state) & 0.075 ppm (federal – 99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 $\mu g/m^3$ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day average Rolling 3-month average	 1.5 $\mu g/m^3$ (state) 0.15 $\mu g/m^3$ (federal)	

NOTE: lbs/day = pounds per day; ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter; MT/year CO_2eq = metric tons per year of CO_2 equivalents; NO_x = nitrogen oxide; VOC = volatile organic compounds; PM_{10} = particulate matter 10 microns or less in diameter (coarse PM); $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter (fine PM); SO_X = sulfates; CO = carbon monoxide; TACs = toxic air contaminants; GHG = greenhouse gases; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide.
[a] Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.
[b] Ambient air quality threshold based on SCAQMD Rule 403.
SOURCE: South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook.

The construction, operation, and maintenance of the proposed project would not cause a violation of the SCAQMD AQMP because it would not impede the ability of the basin to achieve the NAAQS attainment deadlines for those pollutants not in attainment. Designations for attainment are determined from the ambient air quality. The proposed project would be consistent with the

AQMP's goals to invest in strategies that improve air quality by supporting transportation control measures to reduce vehicle miles traveled (VMT).

During operations, the proposed project would not significantly increase the number of vehicles coming to and from the park. Trips to the Master Plan Area would continue to be recreational or educational in purpose, occurring mainly on weekends and/or outside peak hour traffic, and therefore not causing additional traffic compared to the existing condition. The proposed project includes the provision of underground parking to support the existing land uses at Exposition Park. The existing surface parking lots along MLK Jr. Blvd. between Figueroa St. and Ralph M. Parsons Pre-School/Expo Center (parking lots 4, 5, 6, and VIP parking) that provide 1,600 vehicular parking spaces would be demolished and replaced underground with a subterranean three-level parking structure that would accommodate 2,000 vehicular parking spaces. As the proposed project would remove 500 existing Game Day VIP parking spaces on the South Lawn and along State Drive (only allowed for overflow parking for Coliseum events) with installation of Elements 6 and 8, the proposed project would result in a net decrease of 100 parking spaces during Coliseum events and a net increase of 400 parking spaces and 17 bus parking spaces during non-event days compared to the existing condition (see Table 1.8.2-1, *Existing and Proposed Parking*). The parking structure would also allow up to 94 buses during the weekdays, reducing the availability for vehicles.

The proposed project would not conflict with the major air toxic control strategies articulated in the SCAQMD AQMP and would not have a long-term consequence on achieving attainment deadlines for criteria pollutants that are not in attainment because construction and operational emissions are below the level of significance. The Master Plan is aligned with the SCAG 2016-2040 RTP/SCS because it would reduce VMT and encourage nearby recreation use. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The proposed project would result in less than significant impacts to air quality regarding resulting in cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment.

Construction Emissions

The CARB-maintained air monitoring stations measure SCAB air pollutant levels. The nearest monitoring station to the Master Plan Area is the Los Angeles North Main Street Monitoring Station, located at 1630 North Main Street, Los Angeles, CA 90012, which is approximately 5 miles northeast. The most recent three years of available data for this location include measurements for ozone, $PM_{2.5}$, PM_{10}, and nitrogen dioxide (NO_2) (Table 3.3-2, *Summary of Ambient Air Quality at the Los Angeles North Main Street Monitoring Station*).

TABLE 3.3-2
SUMMARY OF AMBIENT AIR QUALITY AT LOS ANGELES-NORTH MAIN STREET MONITORING STATION

Pollutant	Year		
	2016	2017	2018
Ozone			
Maximum 1-hr concentration (ppm)	0.103	0.116	0.098
Days exceeding CAAQS (0.09 ppm)	2	6	2
Days exceeding NAAQS (no standard)	0	0	0
State Maximum 8-hour concentration (ppm)	0.078	0.086	0.073
National Maximum 8-hour concentration (ppm)	0.078	0.086	0.073
Days exceeding CAAQS (0.070 ppm)	4	14	4
Days exceeding NAAQS (0.070 ppm)	1	9	0
$PM_{2.5}$			
National maximum 24-hour concentration ($\mu g/m^3$)	44.3	54.9	61.4
State maximum 24-hour concentration ($\mu g/m^3$)	49.4	61.7	65.3
Measured days exceeding NAAQS (35 $\mu g/m^3$)	2	6	6
AAM ($\mu g/m^3$)	11.7	12.0	12.8
Does measured AAM exceed NAAQS (15 $\mu g/m^3$)?	*	*	*
Does measured AAM exceed CAAQS (12 $\mu g/m^3$)?	*	*	Yes
PM_{10}			
National maximum 24-hour concentration ($\mu g/m^3$)	64.0	64.6	68.2
State maximum 24-hour concentration ($\mu g/m^3$)	74.6	96.2	81.2
Measured days exceeding NAAQS (150 $\mu g/m^3$)	0	0	0
Measured days exceeding CAAQS (50 $\mu g/m^3$)	*	*	31.8
AAM ($\mu g/m^3$)	*	*	34.0
Does measured AAM exceed NAAQS (no standard)?	No	No	No
Does measured AAM exceed CAAQS (20 $\mu g/m^3$)?	*	*	Yes
NO_2			
National maximum 1-hour concentration (ppb)	64.7	80.6	70.1
State maximum 1-hour concentration (ppb)	64.0	80.0	70.0
Days exceeding NAAQS (0.100 ppm)	0	0	0
Days exceeding CAAQS (0.18 ppm)	0	0	0
State AAM (ppb)	15	15	14
Does measured AAM exceed NAAQS (0.053 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
CO (not measured at Los Angeles monitoring station)			
SO_2 (not measured at Los Angeles monitoring station)			
HS (not measured at Los Angeles monitoring station)			

NOTE: ppm = parts per million by volume; $\mu g/m^3$ = micrograms per cubic meter; AAM = annual average; CO = carbon monoxide; SO_2 = sulfur dioxide; HS = hydrogen sulfide; CAAQS = California Ambient Air Quality Standards; NAAQS = the National Ambient Air Quality Standards; ppb = parts per billion by volume

* Denotes insufficient data.

SOURCE: California Air Resources Board. Accessed November 26, 2019. Top 4 Summary: Select Pollutant, Years, & Area. http://www.arb.ca.gov/adam/topfour/topfour1.php

Construction emissions were quantified using CalEEMod 2016.3.1 (see Appendix B). CalEEMod is a statewide land use emissions computer model that calculates both construction and operation emissions from land use projects such as the proposed project. For the proposed project, the operation emissions were calculated separately given the quantity and complexity of specific

industrial machinery. CalEEMod was used for only construction. Inputs into the model included the construction duration based on a three-years-per-phase worst-case scenario schedule for the approximately 8.03-acre underground parking garage (Element 4). The number of vendor and hauling trips vendor and hauling trips were assumed to be 20 percent of the daily worker round trips. The construction phase of the proposed project would result in less than significant impacts to air quality related to violating any air quality standard or contributing substantially to an existing or projected air quality violation with regard to construction (see Tables 3.3-3 through 3.3-11, Elements 1–9: *Estimated Daily Construction Emissions*).

TABLE 3.3-3
ELEMENT 1: ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2021 maximum daily emissions	3.6	37.2	22.8	0.04	4.6	7.3
2022 maximum daily emissions	37.4	6.8	9.3	0.01	0.4	0.5
Maximum	37.4	37.2	22.8	0.04	4.6	7.3
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix B.1.

TABLE 3.3-4
ELEMENT 2: ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2020 maximum daily emissions	0	0	0	0	0	0
2022 maximum daily emissions	36.6	44.9	29.7	0.1	8.7	14.5
2023 maximum daily emissions	35.5	1.3	1.3	0.2	0.1	0.3
Maximum	36.6	44.9	29.7	0.2	8.7	14.5
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix B.2.

TABLE 3.3-5
ELEMENT 3: ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
2022 maximum daily emissions	3.2	33.1	20.3	0.04	11.5	19.9
2023 maximum daily emissions	2.7	27.6	19.2	0.04	11.2	19.5
2024 maximum daily emissions	1.8	15.6	18.9	0.08	0.9	1.6
Maximum	3.2	33.1	20.3	0.04	11.5	19.9
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix B.3.

TABLE 3.3-6
ELEMENT 4: ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
2024 maximum daily emissions	2.3	20.9	20.1	0.04	0.9	1.1
2025 maximum daily emissions	5.5	53.2	45.3	0.10	15.7	29.4
2026 maximum daily emissions	5.5	53.2	45.2	0.12	15.7	29.4
2027 maximum daily emissions	2.3	19.7	24.3	0.07	1.5	4.1
2028 maximum daily emissions	24.3	19.6	23.9	0.07	1.5	4.1
2029 maximum daily emissions	24.3	9.8	17.8	0.03	0.6	1.2
Maximum	24.3	53.2	45.3	0.12	15.7	29.4
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix B.4.

TABLE 3.3-7
ELEMENT 5: ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
2029 maximum daily emissions	1.2	10.6	10.9	0.02	0.5	0.6
2030 maximum daily emissions	2.6	15.2	23.2	0.06	3.9	7.2
2031 maximum daily emissions	2.6	15.2	23.2	0.06	3.9	7.2
2032 maximum daily emissions	1.4	9.2	14.9	0.04	0.3	0.9
2033 maximum daily emissions	7.8	6.0	12.7	0.02	0.3	0.4
2034 maximum daily emissions	7.8	0.9	2.0	3.7e-003	0.1	0.1
Maximum	7.8	15.2	23.2	15.1	16.8	28.7
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix B.5.

TABLE 3.3-8
ELEMENT 6: ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
2034 maximum daily emissions	1.4	8.0	13.2	0.03	0.3	0.4
2035 maximum daily emissions	1.2	6.6	13.1	0.03	3.5	6.3
2036 maximum daily emissions	1.2	8.2	14.5	0.03	3.5	6.3
2037 maximum daily emissions	1.2	8.1	14.5	0.03	0.2	0.6
2038 maximum daily emissions	9.2	4.6	12.7	0.02	0.2	0.3
Maximum	9.2	8.2	14.5	0.03	3.5	6.3
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix B.6.

TABLE 3.3-9
ELEMENT 7: ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
2038 maximum daily emissions	2.0	10.4	18.4	0.04	5.6	9.9
2039 maximum daily emissions	1.9	10.4	22.1	0.04	3.2	5.8
2040 maximum daily emissions	6.9	6.7	12.4	0.02	0.1	0.1
Maximum	6.9	10.4	22.1	0.04	5.6	9.9
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix B.7.

TABLE 3.3-10
ELEMENT 8: ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
2040 maximum daily emissions	2.0	8.0	18.8	0.05	10.2	18.5
2041 maximum daily emissions	2.0	9.0	17.8	0.05	10.2	18.5
2042 maximum daily emissions	1.4	9.0	17.8	0.04	0.4	1.2
2043 maximum daily emissions	31.5	4.0	13.3	0.02	0.2	0.3
Maximum	31.5	9.0	18.8	0.05	10.2	18.5
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix B.8.

TABLE 3.3-11
ELEMENT 9: ESTIMATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
2043 maximum daily emissions	1.7	5.3	18.8	0.05	6.8	12.4
2044 maximum daily emissions	1.4	9.5	18.1	0.05	6.8	12.4
2045 maximum daily emissions	1.4	9.5	18.0	0.05	0.5	1.5
2046 maximum daily emissions	28.4	3.7	16.0	0.03	0.2	0.3
Maximum	28.4	9.5	18.8	0.05	6.8	12.4
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix B.9.

The proposed project would be expected to increase the number of visitors that would attend the park but would be serviced by public transit, a drop-off area, and other amenities to provide access. Operational emissions associated with the proposed project are expected to be below the level of significance as determined by the SCAQMD and would not cause a cumulatively considerable net increase of an criteria pollutant. Short-term cumulative impacts related to air quality could occur if project construction and nearby construction activities were to occur simultaneously.

The results show that the construction and operational impacts would be less than significant and under the state thresholds and impacts associated with air quality standards and the potential to contribute substantially to existing or projected air violations (see Tables 3.3-3 through 3.3-11). Compared to the NAAQS, the Los Angeles County portion of the SCAB is a nonattainment area for 1-hour ozone, 8-hour ozone, fine particulate matter ($PM_{2.5}$), and lead for near-source monitors (Appendix B). Compared to the California Ambient Air Quality Standards (CAAQS), the County portion of the South Coast Air Basin is a nonattainment area for 1-hour ozone, 8-hour ozone, $PM_{2.5}$, and respirable particulate matter (PM_{10}) (Appendix B). The proposed project would generate these pollutants during the construction of proposed project improvements. The operations and maintenance phases of the proposed Master Plan would not cause a cumulatively considerable net increase of any criteria pollutant. The nine elements would not all occur at one time and the worst-case elements with the highest potential air quality effects would not trigger significant impacts. Short-term cumulative impacts related to air quality could occur if project construction and nearby construction activities were to occur simultaneously. In particular, with respect to local impacts, cumulative construction particulate matter (i.e., fugitive dust) impacts are considered when projects are located within a few hundred yards of each other. The proposed construction would not exceed the thresholds (see Tables 3.3-1 and 3.3-3 through 3.3-11). During construction, there would be dust from native soils and not from diesel particulate matter. Therefore, the construction and operation of the proposed project would not violate the SCAQMD air toxic control strategy. Many of the related projects located within the vicinity are residential subdivisions that would not create significant air quality impacts cumulatively during the construction phase. The current construction of the LMNA is not anticipated to coincide with the construction of Master Plan elements. There may be schedule overlap with other projects at Exposition Park, such as the California Science Center SOASC near the CAAM (proposed Element 7). The proposed project would be consistent with the strategies in the 2016–2040 RTP/SCS for reducing VMT and enhancing public health. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(c) Expose sensitive receptors to substantial pollutant concentrations?

The proposed project would result in less than significant impacts to air quality in relation to exposing sensitive receptors to substantial pollutant concentrations. Land uses identified to be sensitive receptors by SCAQMD in the CARB's Air Quality Handbook include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.[3] There are multi-family residential buildings surrounding the Master Plan Area including 800 parcels designated for multi-family residential within a quarter-mile of Exposition Park (Figure 3.3-1, *Sensitive Receptors*). Exposure of sensitive receptors to potential emissions would vary from day to day, depending on the amount of work being conducted, the weather conditions, the location of receptors, and the length of time that receptors would be exposed to air emissions. Best management practices, including sediment and erosion control, would be required for dust suppression, pursuant to County building codes (see Table 1.12-1, *Best Management Practices*). On-road and off-road construction equipment would be required to comply with CARB tier standards for NO_x, CO, PM, and non-methane hydrocarbons (NMHC) emissions. Due to the short-term nature of project construction, sensitive receptors would not be expected to be adversely affected by construction. The following existing sensitive receptors are within a quarter mile of the study area: Manual Arts Senior High School is located 0.2 mile south of the Master Plan area, Menlo Avenue Elementary School is located 0.2 mile south of the Master Plan Area, and Saint Marks Lutheran Church is located 0.25 mile northwest of the Master Plan Area. There are also 800 parcels classified as multi-family residential that include USC student housing. During operations and maintenance of the proposed Master Plan, sensitive receptors would not experience a longer duration of exposure. These emissions, as shown in Table 3.3-2, would also below the level of significance and would decrease rapidly with distance from the proposed Master Plan area. Therefore, impacts would be less than significant regarding exposing sensitive receptors to substantial pollutant concentrations, and mitigation would not be required.

(d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?

The proposed Master Plan would result in no impacts to air quality in relation to resulting in other emissions (such as those leading to odors adversely affecting a substantial number of people). According to the CARB's Air Quality Handbook,[4] land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The construction, operation, and maintenance of the proposed project would not involve the type of land uses or industrial operations typically associated with odor nuisance. There are no land uses typically associated with the generation of nuisance odors in the Master Plan Area. Therefore, there would be no impact. No mitigation or further analysis is warranted.

[3] California Air Resources Board. April 2005. Air Quality and Land Use Handbook: A Community Health Perspective. http://www.arb.ca.gov/ch/handbook.pdf

[4] California Air Resources Board. April 2005. Air Quality and Land Use Handbook: A Community Health Perspective. http://www.arb.ca.gov/ch/handbook.pdf

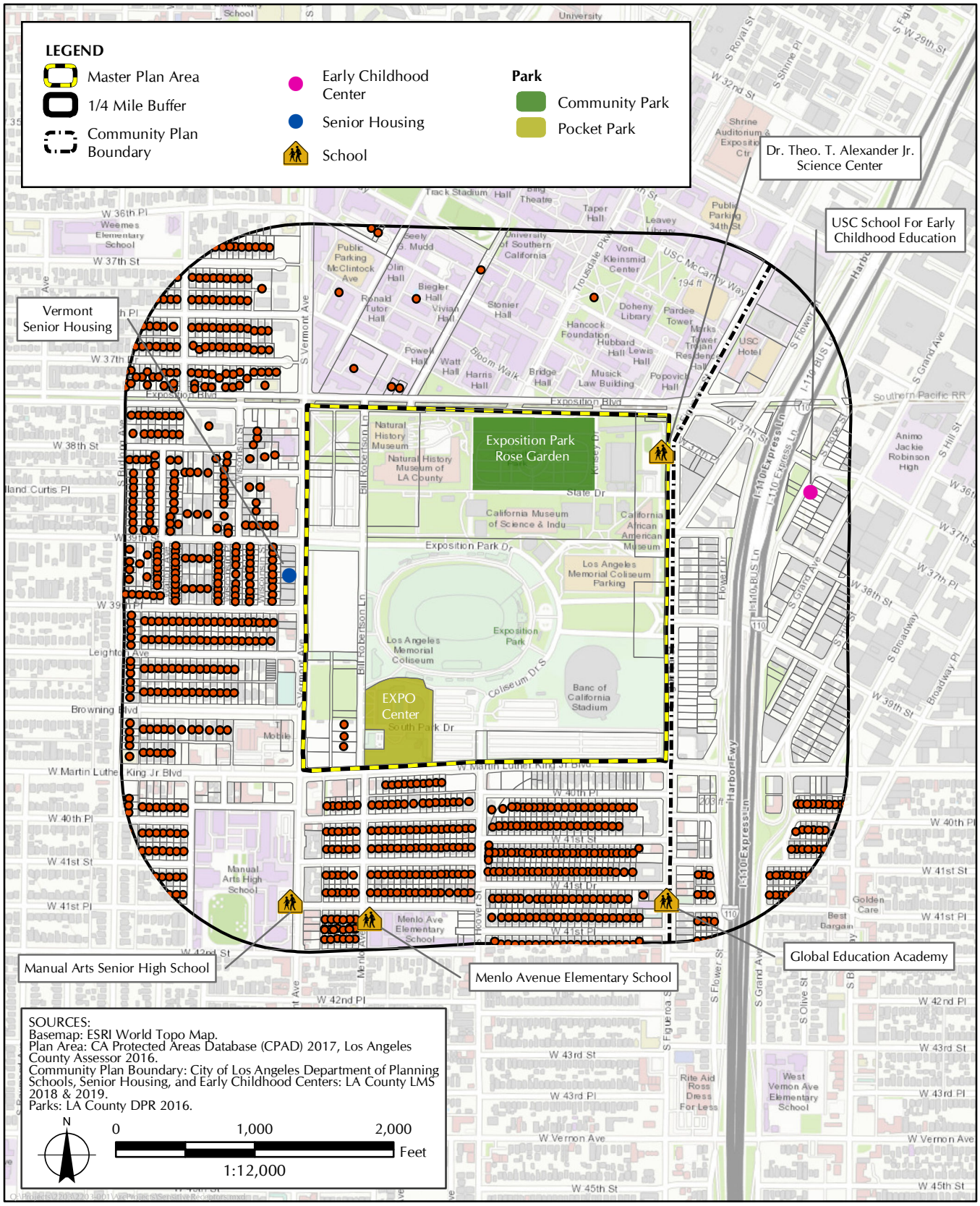

FIGURE 3.3-1

Sensitive Receptors

3.4 BIOLOGICAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact on biological resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Biological resources at the Master Plan Area were evaluated with regard to the Los Angeles County General Plan 2035;[1] City of Los Angeles General Plan;[2] South Los Angeles Community Plan;[3] a query of the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) database;[4] the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB);[5] and the California Native Plant Society (CNPS)[6] Electronic Inventory for the USGS 7.5-minute series topographic Hollywood quadrangle[7] where the project is located, and all surrounding USGS 7.5-minute series topographic quadrangles: Burbank, Van Nuys, Pasadena, Beverly Hills, Los Angeles, Venice, Inglewood, Southgate;[8] a review of published and unpublished literature germane to the proposed project; and site visits, which were conducted on October 30 and November 8, 2019.

The State CEQA Guidelines recommend the consideration of six questions when addressing the potential for significant impacts to biological resources. Would the project:

(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?

Listed Species

The proposed project would result in less than significant impacts to biological resources in relation to having a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or species status species in local or regional plans, policies, or regulations, or by CDFW and USFWS. To identify special status species having the potential to occur at the proposed project site, a records search was conducted of the CNDDB[9] and the CNPS.[10] An electronic inventory search was conducted for the USGS 7.5-minute series Hollywood topographic quadrangle where the proposed project is located and all eight surrounding topographic quadrangles. Additionally, an

[1] County of Los Angeles Board of Supervisors. Adopted October 6, 2015. Los Angeles County 2035 General Plan, Chapter 9: Conservation and Natural Resources Element.

[2] City of Los Angeles Planning Department. Adopted September26, 2001. City of Los Angeles General Plan. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6 dfa967b2a1ee/Conservation_Element.pdf

[3] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan.

[4] U.S. Fish and Wildlife Service. Accessed October 16, 2019. Environmental Conservation Online System: Information for Planning and Conservation. https://ecos.fws.gov/ipac/

[5] California Department of Fish and Wildlife. 2016. Rarefind 5: California Natural Diversity Database.

[6] California Native Plant Society. Accessed October 16, 2019. CNPS Electronic Inventory. www.cnps.org

[7] U.S. Geological Survey. Accessed October 16, 2019. 7.5-Minute Series, Hollywood Topographic Quadrangle. https://www.usgs.gov/core-science-systems/ngp/tnm-delivery/topographic-maps

[8] U.S. Geological Survey. Accessed October 16, 2019. 7.5-Minute Series, Topographic Quadrangles. https://www.usgs.gov/core-science-systems/ngp/tnm-delivery/topographic-maps

[9] California Department of Fish and Wildlife. Accessed October 16, 2019. California Natural Diversity Database search results.

[10] California Native Plant Society. Accessed October 16, 2019. CNPS Electronic Inventory. www.cnps.org

official species list was requested and received from the USFWS on October 16, 2019.[11] The potential for the occurrence of the listed species within the proposed project site was determined by conducting a desktop analysis of habitat requirements. Site visits confirmed the desktop determinations.

Records searches identified 28 species of plants and animals known to occur within the vicinity of the Master Plan Area that are listed as threatened or endangered pursuant to the federal Endangered Species Act (FESA) and the California Endangered Species Acts (CESA) (see Appendix C, *Protected Species within the Vicinity of the Master Plan Area*). This includes 13 plant species and 15 wildlife species (1 mammal, 1 amphibian, 2 invertebrates, and 11 bird species). No USFWS-designated critical habitat for listed species was found to exist within 5 miles of the Master Plan Area. Based on desktop analyses, absence of existing suitable habitat, and surveys conducted during site visits on October 30 and November 8, 2019, none of the 28 FESA- and CESA-listed species were determined to be present within the Master Plan Area. Therefore, the proposed project would not result in significant impacts to these species.

Sensitive Species

The records searches identified 44 other sensitive species that are not listed pursuant to FESA and CESA but are afforded special recognition by the CDFW, USFWS, or other resource agencies and organizations, including 11 plant species and 33 wildlife species (5 bird, 2 amphibian, 6 reptile , 7 invertebrate, 13 mammal) (Appendix C). Based on the desktop analysis and site visits, none of the sensitive species that were identified as having the potential to occur within the region were determined to be present within the Master Plan Area due to an absence of suitable habitat for these species. Therefore, the proposed project would not result in significant impacts to these species.

Local or Regional Plans or Regulations

After conducing site surveys, Oak trees (*Quercus sp.*) and Western sycamore (*Platanus racemosa*) were identified within the Master Plan Area. Both the County of Los Angeles and City of Los Angeles have Oak Tree Ordinances set forth to protect the historic, ecological, and aesthetic resources that oaks provide. Additionally, Western sycamores are afforded protected under the City of Los Angeles Tree Ordinance.

Any relocation or removal of the previously mentioned protected tree species within the Master Plan Area would be required to be permitted according to the City of Los Angeles Municipal Code and under authorization from the City of Los Angeles Department of Public Works. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No mitigation or further analysis is warranted.

[11] U.S. Fish and Wildlife Service, Carlsbad Office. October 16, 2019. Search results provided to Sapphos Environmental, Inc. Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project.

(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

The proposed project would result in no impacts to biological resources in relation to having a substantial adverse effect on any riparian habitat or other sensitive natural communities. The Master Plan Area is located within a highly urbanized section of the City. The Master Plan Area is surrounded entirely by well-developed areas consisting of streets, sidewalks, parking lots, and existing buildings. The City General Plan contains provisions for native trees including oak trees, western sycamore, California bay (*Umbellularia californica*), and southern California black walnut (*Juglans californica*). In total, 18 oaks and 11 western sycamore trees were identified within the Master Plan Area based on site surveys performed on October 30, 2019, and November 8, 2019 (Figure 3.4-1, *Protected Trees*).

A review of the USGS 7.5 minute series, Hollywood, topographic quadrangle in which the Master Plan Area is located showed no blue-line drainages on or adjacent to the site. A search of the National Wetlands Inventory (NWI)[12] showed no wetlands or aquatic resources within the Master Plan Area. Site visits confirmed that no wetlands, riparian habitat, or aquatic resources are present on the Master Plan Area. The nearest blue-line drainage is the Los Angeles River, located approximately 3.5 miles to the east. The Master Plan Area is entirely developed with no riparian habitat or other state-designated natural plant communities present. The County General Plan showed no Significant Ecological Areas (SEAs) within or adjacent to the Master Plan Area; the nearest SEA is Griffith Park, 4.2 miles to the north. Additionally, there are no identified species afforded protection by the County General Plan within the Master Plan Area. The City General Plan showed no Environmental Sensitive Habitat Areas (ESHA) within or adjacent to the Master Plan Area; the nearest ESHA is within the Santa Monica Mountains National Recreation Area approximately 20 miles to the west. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The proposed project would result in no impact to biological resources in relation to having a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. The Hollywood USGS 7.5-minute topographic quadrangle map, all eight surrounding topographic quadrangle maps, and the NWI[13] were reviewed to identify the nearest wetlands to the Master Plan Area subject to protection under Section 404 of the Clean Water Act.

[12] U.S. Fish and Wildlife Service. n.d. National Wetlands Inventory Map. http://www.fws.gov/wetlands/Wetlands-Mapper.html

[13] U.S. Fish and Wildlife Service. n.d. National Wetlands Inventory Map. http://www.fws.gov/wetlands/Wetlands-Mapper.html

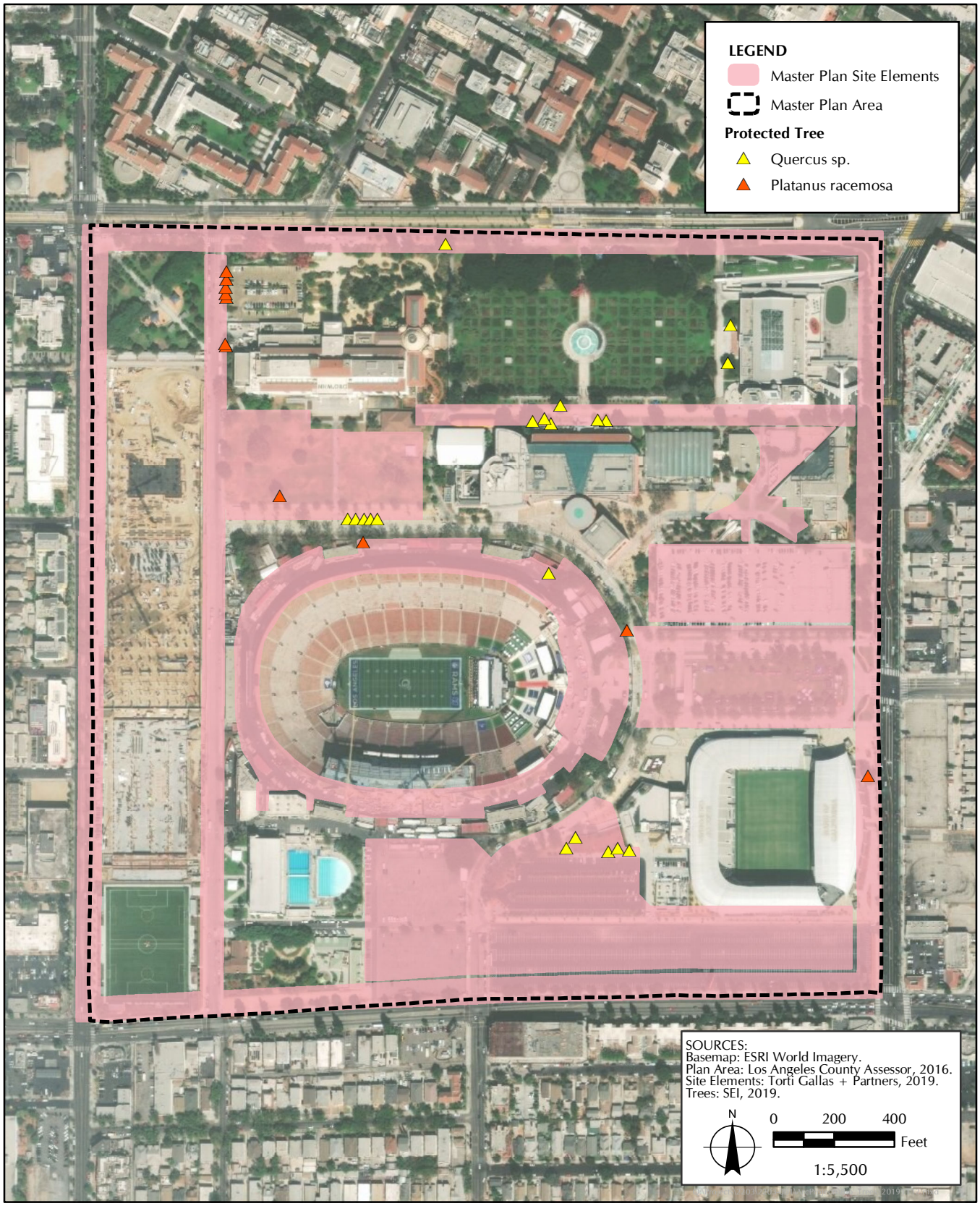

FIGURE 3.4-1

Protected Trees

No historic or currently existing federal jurisdictional wetlands were identified within, or immediately adjacent to, the Master Plan Area. The nearest blue-line drainage is the Los Angeles River, located approximately 3.5 miles to the east. As a result of the desktop analysis and site visits, it was determined that federal jurisdictional wetlands are absent from the Master Plan Area and its immediate vicinity. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The proposed project would result in no impacts to biological resources regarding the movement of any native resident or migratory fish and/or wildlife species or established native resident or migratory wildlife corridors, or native wildlife nursery sites. A desktop analysis, including review of aerial photographs, and site visits by a qualified biologist were conducted to identify any potential wildlife movement corridors and nursery sites within the Master Plan Area. The Master Plan Area is located within a highly urbanized region surrounded by developed areas consisting of streets, sidewalks, parking lots, existing buildings, and street landscaping with non-native plant species. There are no prominent topographic or vegetative features associated with or surrounding the Master Plan Area that would funnel wildlife through the area; nor is there any contiguous natural habitat through which wildlife would be expected to move. In Los Angeles County, regions zoned as SEAs have substantial ecological value and, thus, have the potential for use as wildlife corridors. No wildlife movement corridors were identified in the vicinity of the proposed project. In addition, due to the highly urbanized condition of the site, no native wildlife nursery sites would be expected to occur on the Master Plan Area. The nearest SEA is Griffith Park, located 4.2 miles to the north. The nearest ESHA is within the Santa Monica Mountains National Recreation Area, approximately 20 miles to the west. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The proposed project would result in potentially significant impacts to biological resources in relation to conflict with local policies and ordinances protecting biological resources. Impacts would be reduced to below the level of significance with incorporation of mitigation measures.

Under the City of Los Angeles Municipal Code, a protected tree is defined as any of the following Southern California native tree species with a cumulative diameter greater than 4 inches at breast height (diameter at breast height, or DBH)[14]:

- Southern California black walnut
- Western sycamore
- Oak, including Valley oak and California live oak, or any other tree of the oak genus indigenous to California but excluding the scrub oak
- California bay

[14] City of Los Angeles Department of City Planning. Accessed December 3, 2019. Protected Tree Code Amendment. https://planning.lacity.org/ordinances/docs/ProtectedTree/QandA.pdf

Site surveys performed on October 30, 2019, and November 8, 2019, confirmed the presence of 18 oak trees and 11 western sycamore trees protected under the City of Los Angeles Municipal Code within the boundaries of the Master Plan Area (Figure 3.4-1). It is unlikely that a protected tree would need to be removed or relocated. Should the need arise to relocate a protected species, a permit shall be obtained from the City of Los Angeles Department of Public Works. Should any protected species be removed, an additional permit shall be obtained from the City of Los Angeles Department of Public Works. Per permit specifications, all protected species would be replaced within the property at a ratio of at least 2:1 and be similar in size and number of the removed species.

Sixty-eight trees in Element 2 (Expo Festival Plaza) and 84 trees in Element 9 (Olympic Ringwalk) are classified as Heritage trees, due to their historical significance to the Los Angeles Coliseum and the surrounding areas (Table 3.4-1, *Heritage Trees in the Master Plan Area*). The Heritage trees include species such as the Mexican fan palm (*Washingtonia robusta*) and the camphor tree (*Cinnamomum camphora*) (Figure 3.4-2, *Historic Trees*). Heritage trees are afforded protections and require approval from the City of Los Angeles Department of Regional Planning (DRP) General Manager prior to any activities that could cause the tree to be damaged, removed, or relocated. No heritage trees are anticipated to be removed at this time. However, should a historic tree need to be removed, a permit shall be obtained from DRP. Permits for the removal of any tree would not be issued unless the applicant agrees to at least a 1:1 replacement ratio. The exact type and quality of the replacement trees would be at the discretion of the DRP manager.[15]

TABLE 3.4-1
HERITAGE TREES IN THE MASTER PLAN AREA

Element	Common Park Trees	City Protected Trees	Historic Trees
1	14 *Platanus* sp. 108 *Ulmus* sp. 112 *Washingtonia robusta* 3 *Magnolia* sp. 10 *Parkinsonia* sp. 3 *Mrytus* sp. 21 *Ceratonia* sp. 5 *Geijera* sp. 12 *Tabebuia* sp. 1 *Cedrus deodara* 30 *Pinus canariensis*	1 *Quercus* sp. 1 *Platanus racemosa*	None
2	12 *Cedrus deodara*		67 *Platanus* sp. 1 *Washingtonia robusta*
3	None	None	None
4	14 *Platanus* sp. 88 *Tipuana* sp. 2 *Fraxinus* sp. 14 *Acacia* sp. 15 *Prosopis* sp. 8 *Pittosporum* sp. 3 *Prunus* sp.	5 *Quercus* sp.	

[15] Los Angeles County, CA, Code of Ordinances, sec 16.76.030.

TABLE 3.4-1
HERITAGE TREES IN THE MASTER PLAN AREA

Element	Common Park Trees	City Protected Trees	Historic Trees
5	1 *Jacaranda* sp. 7 *Podocarpus* sp. 3 *Magnolia* sp. 1 *Albizia* sp.	7 *Platanus racemosa*	None
6	12 *Ficus* sp.	6 *Quercus* sp.	
7	None	None	None
8	20 *Platanus* sp. 8 *Jacaranda* sp. 6 *Magnolia* sp. 1 *Ulmus* sp. 1 *Cedrus deodara* 3 *Eucalyptus* sp. 1 *Juniperus* sp.	5 *Quercus* sp. 1 *Platanus racemosa*	None
9	None	1 *Quercus* sp. 1 *Platanus racemosa*	2 *Fraxinus* sp. 1 *Camellia* sp. 40 *Cinnamomum camphora* 11 *Cupaniopsis anacardioides* 2 *Chamaerops* sp. 4 *Cordyline* sp. 3 *Strelitzia nicolai* 1 *Juniperus* sp. 1 *Liquidambar* sp. 8 *Platanus* sp. 1 *Magnolia* sp. 5 *Washingtonia robusta* 1 *Prunus* sp. 1 *Quercus* 1 *Platanus racemosa* 2 *Yucca* sp.

Common park trees are trees that are not designated under a protected group of trees but are still important for other economic, environmental, sentimental, and aesthetic values. Should a common park tree need to be relocated or removed, a permit shall be obtained from DRP. DRP operates under a "no net loss" policy and requires a 1:1 ratio at minimum. Park trees were identified in all the elements of the Master Plan except for Elements 2, 3, and 7 (Table 3.4-1). It is anticipated that up to 12 *Cedrus deodara* will need to be removed within Element 2. During two site visits that were conducted on October 30, 2019, and November 8, 2019, to characterize baseline conditions at Exposition Park, these 12 trees ranged in size from 5 feet to 15 feet. All of the trees were young and in poor health. Although near other historic resources, these Deodar Cedar trees are less than 50 years of age, making them ineligible to be listed as a historic resources (see Section 3.5, *Cultural Resources*). Their removal would have negligible impacts to the surrounding biological resources.

Any relocation or removal of protected trees, Heritage trees, or common park trees under the Master Plan would be permitted and mitigated according the City of Los Angeles Municipal Code and under authorization from the City of Los Angeles Department of Public Works. Therefore, impacts would be less than significant.

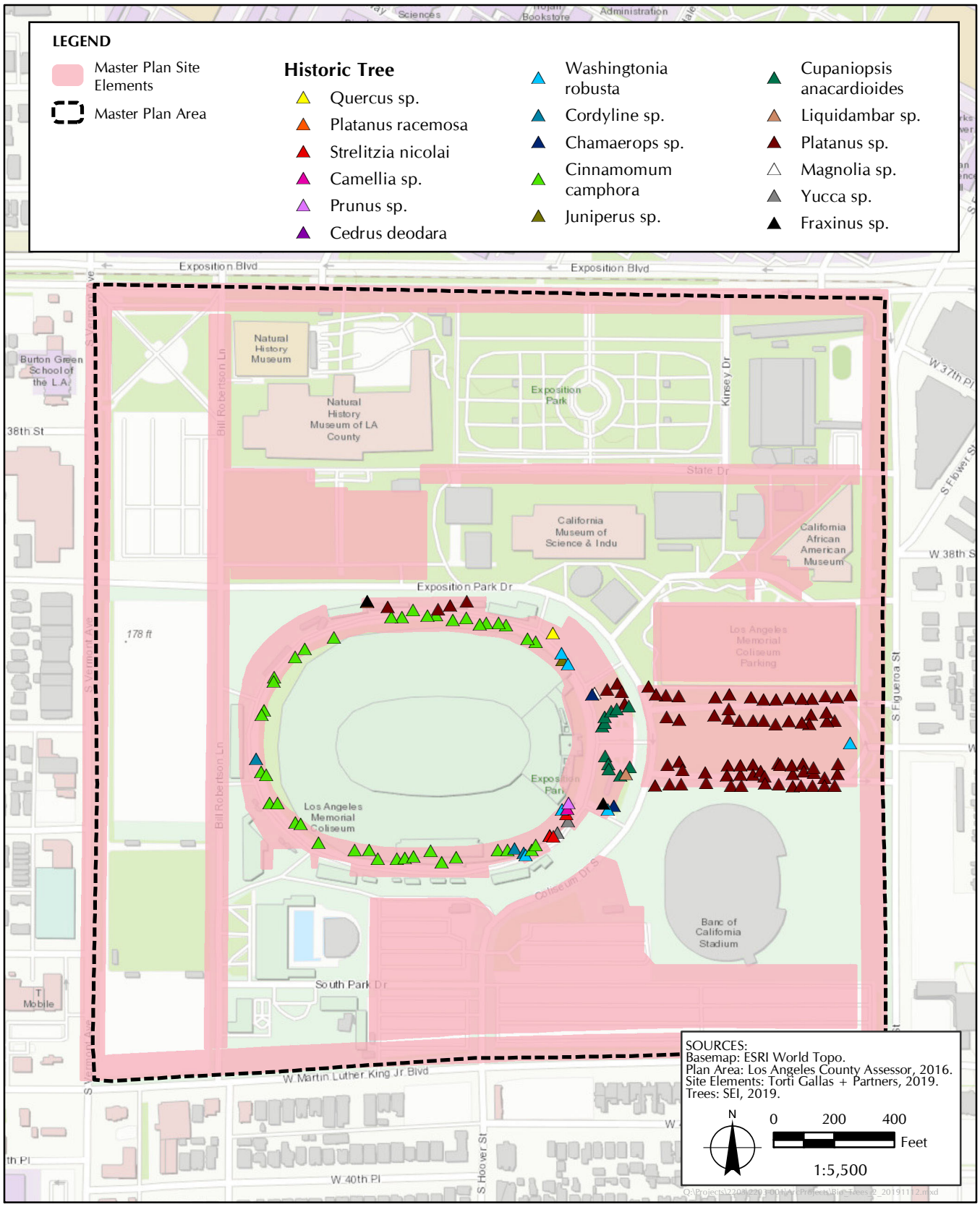

FIGURE 3.4-2

Historic Trees

The Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit the take of all birds and their active nests including raptors and other migratory nongame birds.[16,17] The proposed project would have the potential to impact nesting birds afforded protection pursuant to the MBTA and California Fish and Game Code. Implementation of Mitigation Measure BIO-1 would require nesting bird surveys by a qualified biologist in the event of construction activities occurring during the nesting bird season (generally February 15–September 1). With incorporation of Mitigation Measure BIO-1, impacts would be reduced to below the level of significance.

Mitigation Measure BIO-1: To avoid impacts to nesting birds protected under the MBTA:

- Construction related to proposed projects should take place outside of the nesting bird season, which generally occurs between February 15 and September 1.
- If construction activities cannot avoid the nesting bird season, pre-construction nesting bird surveys shall be conducted by a qualified biologist a maximum of three days prior to the start of construction.
- Should nesting birds be discovered within or adjacent to the construction footprint during these surveys, a non-disturbance buffer shall be placed on the active nest as determined by the biologist to prevent impacts to nesting birds.
- Construction shall be halted within the non-disturbance buffer of 250 feet of songbirds and 500 feet for raptors until the biologist has determined that the young have fledged and are flying well enough to avoid the proposed construction activities.
- Additionally, if signs of stress are identified, the biologist shall halt activity in the immediate area until the birds resume their normal behavior or until the nest has been determined to no longer be active.

(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The proposed project would result in no impacts to biological resources in relation to conflicts with the provisions of an adopted or proposed Habitat Conservation Plan (HCP); Natural Community Conservation Plan (NCCP);[18] or other approved local, regional, or state habitat conservation plan. A review of the CDFW NCCP Regional Conservation Plans Map showed that no new HCPs have been proposed or included adjacent to the Master Plan Area; nor has the County of Los Angeles or the City of Los Angeles enrolled in, or made future plans to be enrolled in, an NCCP program.[19] Therefore, there would be no impact. No mitigation or further analysis is warranted.

[16] Migratory Bird Treaty Act, 50 § § FR 13710 (Apr. 5, 1985).

[17] California Fish and Game Code §§ 3503 & 3513 (2019).

[18] California Regional Conservation Plans. Accessed November 27, 2019 https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline.

[19] California Department of Fish and Wildlife. 2016. Natural Community Conservation Planning (NCCP), California Regional Conservation Plans Map. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline

3.5 CULTURAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to cultural resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Cultural resources at the Master Plan Area were evaluated with regard to a query of the South Central Coastal Information Center (SCCIC) and the Native American Heritage Commission (NAHC) for the USGS 7.5-minute series, Hollywood, topographic quadrangle in which the proposed project is located and a desktop review, including SurveyLA, the city-wide historic survey of Los Angeles completed in 2014; the 2003 Los Angeles Memorial Coliseum Environmental Impact Report; and subsequent addenda from 2011, 2015, and 2016. There are known historic resources that are designated or eligible for designation at the federal, state, or local level where the proposed project is located and within a 0.3-mile radius.

The State CEQA Guidelines recommend the consideration of three questions when addressing the potential for significant impacts to cultural resources. Would the project:

(a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?

The proposed project would result in potentially significance impacts to cultural resources in relation to causing a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5. Incorporation of mitigation measures would reduce impacts to below the level of significance.

Nine historical resources have been recorded within the Master Plan Area, including the Los Angeles Memorial Coliseum; Los Angeles County Museum of History, Science, and Art (name changed to the Los Angeles County Natural History Museum in 1965); Wallis Annenberg Building; Exposition Park Rose Garden; Exposition Clubhouse; Los Angeles Swimming Stadium; Christmas Tree Lane; the California Air and Space Museum (designed by Frank Gehry in 1984 to coincide with the 1984 Olympic Games in Los Angeles); and the California State Museum of Science and Industry (name changed to the California Science Center in 1996) (Table 3.5-1, *Historic Resources Located within the Master Plan Area*). The Exposition Park Historic District shares the same boundaries as the proposed project and is another eligible historic resource.

TABLE 3.5-1
HISTORIC RESOURCES LOCATED WITHIN THE MASTER PLAN AREA

Site Number	Resource	Character-Defining Features
19-162310	Los Angeles Memorial Coliseum	Peristyle; panels and pilasters around exterior; compact exterior berm
19-166836	Los Angeles County Natural History Museum	Exterior terra cotta trim; brick exterior; central rotunda; mosaic dome and surrounding domes; 16 scagliola columns; second-story mezzanine; stained glass skylight; exterior 20-foot marble walls
19-166837	Wallis Annenberg Building	Tapestry brick facing; terra cotta and stone trim; two pillars flanking the entrance; pair of cannons along primary stairway; open drilling court within the building
19-174079	Exposition Park Rose Garden	Decorative brick wall along the perimeter; water fountain at the center; wide concrete walkways in the interior; 166 concrete lined flower beds; art deco light posts on the southern and northern boundary; Olympic-related reliefs on the northern boundary; concrete benches that end in art deco light posts
19-167079	Exposition Park Club House	Arcade with decorative tiles on the baseboard and freeze; decorative bars on windows
19-145241	Los Angeles Swimming Stadium	Stepped piers, entry surrounds; industrial sash windows; decorated spandrels' chevron grilles; medallions
Not on file with SCCIC	Christmas Tree Lane	Roadways, sidewalks, and low walls dating to 1925; the greenway between N. and S. Coliseum Dr.; the two rows of mature Deodar Cedars; the London Plane Trees; the three Art Moderne streetlights; and the mature palm tree and its associated marker
Not on file with SCCIC	California Air and Space Museum	Steel structural system; viewing tower; sheet metal exterior; complex roofline; skylight enclosures
19-187075	California Science Center	Dark red tapestry brick ornamented with terra-cotta; large glass paneled walls

A number of designated or eligible resources can be found within a 0.3-mile radius of the Master Plan Area. An SCCIC record search identified 22 historical resources either within the proposed project site or within a 0.3-mile radius including 20 individual resources and two districts. Seven of the 20 individual resources identified in the SCCIC record search are within the Master Plan Area and contribute to the Exposition Park Historic District, and an additional two not on file with the SCCIC are within the Master Plan Area. Additionally, 36 individual resources were identified by SurveyLA. The Flower Drive District to the east includes 17 contributing resources, and the University of Southern California Historic District to the north contains 49 contributing resources.[1,2] Overall, 122 identified historical resources, either designated, eligible for designation, or contributing to a historic district, are in a 0.3-mile radius of the Master Plan Area (Table 3.5-2, *Historical Resources within Master Plan Area or 0.3-Mile Radius*).

[1] City of Los Angeles Department of City Planning, Office of Historic Resources. March 2012. Historic Resources Survey Report–South Los Angeles Community Plan Area. Prepared by Architectural Resources Group, Inc. https://preservation.lacity.org/sites/default/files/S%20LA%20report_HPLAEdit.pdf.

[2] SCCIC record search result completed on October 30, 2019.

TABLE 3.5-2
HISTORICAL RESOURCES WITHIN MASTER PLAN AREA OR 0.3-MILE RADIUS

	Resource	Individually Designated	Within Boundary
Exposition Park Historic District[3]	Los Angeles Memorial Coliseum	X	X
	Los Angeles County Natural History Museum	X	X
	Wallis Annenberg Building		X
	Exposition Park Rose Garden	X	X
	Exposition Park Club House		X
	Los Angeles Swimming Stadium		X
	Christmas Tree Lane		X
	California Science Center		X
	California Air and Space Museum		X
University of Southern California Historic District[4]	Widney Alumni House	X	
	Joint Education Project House		
	George F. Bovard Admission Building	X	
	Stoops Education Library		
	John Hubbard Hall		
	Leventhal School of Accounting		
	Stonier Hall		
	Bridge Memorial Hall		
	Gwynn Wilson Student Union		
	Zumberge Hall of Science		
	Seeley Wintersmith Mudd Hall of Philosophy	X	
	Town & Gown Building		
	Physical Education Building	X	
	University United Church		
	Doheny Memorial Library	X	
	Biegler Hall of Engineering		
	Harris Hall of Engineering		
	Harris Hall and Fisher Gallery		
	Allan Hancock Foundation	X	
	Tommy Trojan Statue		
	Elisabeth Von KleinSmid Residence Hall		
	Harris Residence Hall		
	Neely Petroleum and Chemical Engineering Building		
	Ahmanson Center for Biological Research		
	Birnkrant Residence Hall		
	College Residence Hall		
	Olin Hall of Engineering	X	
	University Residence Hall		
	Booth Ferris Memorial Hall		
	University Religious Center	X	
	John Stauffer Hall of Science		

[3] Historic Resources Group. August 2015. Los Angeles Memorial Sports Arena Historic Resources Technical Report.

[4] Historic Resources Group. July 31, 2014. University of Southern California Historic District. http://www.ohp.parks.ca.gov/pages/1067/files/usc%20historic%20district%20nr%20draft.pdf

TABLE 3.5-2
HISTORICAL RESOURCES WITHIN MASTER PLAN AREA OR 0.3-MILE RADIUS

	Resource	Individually Designated	Within Boundary
	Hoffman Hall of Business Administration		
	Rufus B. von KleinSmid Center of International and Public Affairs	X	
	Vivian Hall of Engineering		
	Social Sciences Building		
	Waite Phillips Hall of Education		
	Heritage Hall		
	Frank R. Seaver Science Center		
	Seaver Science Library		
	Ethel Percy Adrus Gerontology Center		
	Charles Lee Powell Hall		
	Virginia Ramo Hall of Music		
	Davidson Conference Center		
	Albert S. Raubenheimer Music Faculty Building		
	Annenberg School of Communication	X	
	Bing Theater		
	Hazel & Stanley Hall Financial Services Building		
	Eileen Norris Cinema Theater		
	Henry Salvatori Computer Science Center		
Flower Drive Historic District[5]	3941 Flower Drive		
	3937 Flower Drive		
	3931 Flower Drive		
	3927 Flower Drive		
	3923 Flower Drive		
	3915 Flower Drive		
	3907 Flower Drive		
	3801 Flower Drive		
	3813 Flower Drive		
	3819 Flower Drive		
	3821 Flower Drive		
	3825 Flower Drive		
	3831 Flower Drive		
	3835 Flower Drive		
	3843 Flower Drive		
	3847 Flower Drive		
	3855 Flower Drive		
SCCIC Individual Resources[6]	Universal Service Auto Repair		
	3744-3760 S. Flower Street		
	3762-3770 S. Flower Street		
	3742-3744 S. Flower Street		
	459-461 W. 38th Street		

[5] Peter Moruzzi. February 2007. Flower Drive Historic District. Available through the SCCIC record search.

[6] SCCIC record search completed on October 30, 2019.

TABLE 3.5-2
HISTORICAL RESOURCES WITHIN MASTER PLAN AREA OR 0.3-MILE RADIUS

	Resource	Individually Designated	Within Boundary
	Loft for The Llyod Corporation		
	Basset Elementary School	**X**	
	4126 S. Figueroa Street	**X**	
	1139 ½ Exposition Boulevard	**X**	
	1141 Exposition Boulevard	**X**	
	1147 Exposition Boulevard	**X**	
SurveyLa Resources[7]	4131; 4256 Vermont Avenue		
	1143 W 37th Drive		
	1216 W 37th Street		
	3973; 3975; 3992 S. Budlong Avenue		
	1193; 1340 W 36th Place		
	1142; 1143; 1153; 1156 W 36th Street		
	1309 W 35th Place		
	1168; 1224 W 35th Place		
	544; 918 W 40th Street		
	707; 1119 W 41st Place		
	1107; 1307 W 41st Street		
	848; 852; 950 W 42nd Place		
	1018; 1022 W 42nd Street		
	870 W 43rd Street		
	4156 Menlo Avenue		
	4180; 4214 Hoover Street		
	4115; 4153 South Figueroa Street		
	874 W Martin Luther King Jr. Boulevard		
	915; 1332 Jefferson Boulevard		

Twenty-four reports within the project boundary or within a 0.3-mile radius were reviewed from the SCCIC dating from 1990 to 2016 (Table 3.5-3, *SCCIC Report Search Results for Historical Resources*).[8]

[7] City of Los Angeles Department of City Planning, Office of Historic Resources. March 2012. Historic Resources Survey Report–South Los Angeles Community Plan Area. Prepared by Architectural Resources Group, Inc. https://preservation.lacity.org/sites/default/files/S%20LA%20report_HPLAEdit.pdf

[8] The SCCIC reports may also contain studies that included archaeological resources.

TABLE 3.5-3
SCCIC REPORT SEARCH RESULTS FOR HISTORICAL RESOURCES

Report Number	Name	Year	Within Project Boundary
LA04667	Historic Resource Evaluation Report Exposition Boulevard Right-of-Way Regional Bikeway Project Los Angeles County, California	1999	
LA-05335	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 438-06, County of Los Angeles, California	2000	
LA-06387	Science Building University of Southern California Historic Resources Survey (excerpt)	1995	
LA-06454	Cultural Resources Record Search and Literature Review Report for an At&t Telecommunications Facility: Number D383 Exposition Boulevard City ad Count of Los Angeles, California	2001	
LA-07383	CA-8018b/exposition 1029 W. Martin Luther King Blvd, Los Angeles, Ca, Los Angeles County	2004	
LA-07768	Records Search Results, Site Visit, and Historic Architectural Assessment of Direct Ape for Spring Telecommunications Facility Candidate La55xc666a (USC Park Campus), 3551 Trousdale Pkwy, Los Angeles, Los Angeles County, California	2004	
LA-07791	Indirect Ape Historic Architectural Assessments for Sprint Telecommunications Facility Candidate La 60xc508d (victory Outreach) 13588 Osborne Street, Arleta, Los Angeles County, California	2004	**X**
LA-07880	Record Search and Field Reconnaissance for the Proposed Royal Street Communications Wireless Telecommunications Site La0202a (Figueroa arms) Located at 4125 South Figueroa Street, Los Angeles, California 90037	2006	
LA-08764	Cultural Resources Study of the St. Anthony Grand Lodge Project, Royal Street Communications Site No. La-0202b, 4126 S. Figueroa Street, Los Angeles, Los Angeles County, California 90037	2007	
LA-08907	Cultural Resources Study of McDonald's Project Sprint Site No. La73xc130x, 447 W. 40th Place And/or 4000 S. Figueroa Street, Los 2008Angeles, Los Angeles County, California, 90037	2007	
LA09494	Proposed Bechtel Wireless Telecommunications Site LAT383 (USC Parking Structure) Located at 1020 West Downey Way, Los Angeles, California 90007	2008	
LA-09803	Harbor Freeway Transitway, 37th St. Ramps, Supplemental Report	1990	
LA-10249	Cultural Resources Records Search and Sie Visit Results for T-Mobile USA Candidate SV12017B (University 7th Day Adventist) 1135 West Martin Luther King Jr., Boulevard, Los Angeles, Los Angeles County, CA	2009	
LA-10393	Verizon Cellular Communications Tower Site, Los Angeles Memorial Coliseum 3911 Figueroa St. Los Angeles, CA	2009	
LA-10574	Bridge Evaluation Report: Exposition Boulevard Right of way Regional Bikeway Project, Los Angeles County, California	1999	
LA10575	Historic Property Survey Report- Exposition Boulevard Right of way Regional Bikeway Project, Los Angeles County, California	1999	
LA-10860	Exposition Corridor Light Rail Transit Project Construction Phase Cultural Resources Monitoring and Treatment Plan	2007	

TABLE 3.5-3
SCCIC REPORT SEARCH RESULTS FOR HISTORICAL RESOURCES

Report Number	Name	Year	Within Project Boundary
LA-10887	Historic Property Survey Report for the North Outfall Sewer-East Central Interceptor Sewer, City of Los Angeles, County of Los Angeles, California	2001	
LA-10913	Collocation submission packet: St. Anthony Grand Lodge, LA-0202B, Resubmittal	2008	
LA-11733	Cultural Resources Records Search and Site Visit Results for Spring Nextel Candidate LA55XC666 (USC Park Campus), 3551 Trousdale Parkway, Los Angeles, Los Angeles County, California	2012	
LA-11941	Cultural Resources Records Search Site Visit and Direct APE Historic Architectural Assessment for Next G Networks, Inc. Candidate Los Angeles Memorial Coliseum DAS Project, 3911 South Figueroa Avenue, Los Angeles, Los Angeles County, California	2012	**X**
LA-12396	Cultural Resources Records Search and Site Visit Results for T Mobile West, LLC Candidate SV23017B (University 7th Day Adventist) 1135 West Martin Luther King Jr. Boulevard, Los Angeles, Los Angeles County, California	2012	
LA-12749	Cultural Resources Records Search and Site Visit Results for Spring Nextel Candidate LA55XC666 (USC Park Campus) 3551 Trousdale Parkway, Los Angeles, Los Angeles County, California	2014	
LA-13267	Historic American Buildings Survey, Los Angeles Memorial Sports Arena	2016	**X**

Element 2 – Expo Festival Plaza would include modifications to Christmas Tree Lane, an eligible historical resource and character-defining feature of the National Register and National Historic Landmark designated Los Angeles Memorial Coliseum. The view provided from Figueroa Street to the Coliseum Plaza by Christmas Tree Lane is a significant character-defining feature of the Coliseum, specifically the plaza.[9] Significant elements of Christmas Tree Lane include the roadways, sidewalks, and low walls dating to 1925; the greenway between N. and S. Coliseum Dr.; the two rows of mature Deodar Cedars; the London Plane Trees; the three Art Moderne streetlights; and the mature palm tree and its associated marker.[10,11] These features and their contribution to the setting of the Coliseum are significant to its National Register and National Historic Landmark designation. The additions of wayfinding banners and shade trees would not alter the viewshed of Christmas Tree Lane from Figueroa Street to the Coliseum Plaza as per renderings (Figure 1.8.2-3, *Proposed Master Plan Element 2 – Expo Festival Plaza*).

[9] Myra L. Frank & Associates, Inc.. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure.

[10] Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure.

[11] Three Art Moderne Streetlights were documented in Myra L. Frank & Associates, Inc. March 2001. Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure. Streetlights not visible or locatable at indicated location on-site.

The addition of vehicular circulation islands and walking paths would impact the existing roadways and sidewalks that are character-defining resources of Christmas Tree Lane, thus requiring the consideration of mitigation to avoid, reduce, or compensate for the impacts of this alteration.

Element 9 – Olympic Ring Walk would include alterations to the berm surrounding the Los Angeles Memorial Coliseum, which is a character-defining feature of the historical resource, including proposed concessions and amenities integrated within the Coliseum berm and native landscaping, historic markers embedded into decorative unit pavers lining the walk, additional landscaping such as trees and shrubs providing shade and a counter balance to the hardscape as well as signature palm trees, in tree wells with tree grates, that integrate lighting and festival banners lining the edge for a full patron/event experience. The earth berm surrounding the Coliseum holds the middle bank of stepped tiers and contributes to the "continuous and rhythmic flow of pierced panels and pilasters."[12] Thus alterations to the berm would require the consideration of mitigation to avoid, reduce, or compensate for the impacts.

No impacts to built environment historical resources are anticipated from Elements 1, 3, 4, 5, 6, 7, or 8 of the Master Plan.

Components of Element 2 that would impact character-defining features of Christmas Tree Lane include alterations to the sidewalks; center open space; and promenades. Character-defining features of Christmas Tree Lane that would be impacted by these alterations include sidewalks and roadways, low walls dating to 1925, the greenway between N. and S. Coliseum Dr., the two rows of Deodar cedars, and the mature London Plane trees. During two site visits that were conducted on October 30, 2019, and November 8, 2019, to characterize baseline conditions at Exposition Park (see Figures 3.1-1 and 3.1-2), the Deodar Cedars within the Christmas Tree Lane were observed to be in poor health. They are young and range between an approximate height of 5 feet and 15 feet. Deodar Cedars in other community parks and gardens in Southern California have reached 60 feet to 80 feet in height.[13] Deodar Cedars can reach 150 feet in its native habitat. As the Deodar Cedar trees are less than 50 years of age, they are not eligible as historical resources. Impacts to sidewalks and roadways, low walls dating to 1925, and the greenway between N. S. Coliseum Dr. would be reduced to below the level of significance through adherence with the Secretary of the Interior *Standards for Rehabilitation*. Design review by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards will be required to determine the work follows the Standards for Rehabilitation prior to the initiation of construction of Element 2 of the Master Plan.

Components of Element 9 that would impact character-defining features of the Los Angeles Coliseum include proposed concessions and amenities integrated within the Coliseum berm and native landscaping and additional landscaping such as trees and shrubs providing shade. Character-defining features of the Los Angeles Coliseum that would be impacted by these alterations include the berm surrounding the Coliseum. Impacts to character-defining features would be reduced to below the level of significance through adherence with the Secretary of the Interior's *Standards for Rehabilitation*. Integration of concessions and amenities within the berm should avoid impacts to the structural support of the berm to the Coliseum. Additionally, all concessions and amenities added to the berm should be reversable, where if removed the berm is restored to its original

[12] National Register of Historic Places Inventory Nomination Form. June 1984. Los Angeles Memorial Coliseum.

[13] Perry, Robert C. 2010. Landscape Plants for California Gardens: An Illustrated Reference of Plants for California Landscapes.

condition and materials. Design review by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards will be required to determine the work follows the Standards for Rehabilitation prior to the initiation of construction of Element 9 of the Master Plan.

Potential impacts to cultural resources related to a substantial adverse change in the significance of a historical resource would be reduced to below the level of significance with the incorporation of Mitigation Measures CULTURAL-1 and CULTURAL-2.

Mitigation Measure CULTURAL-1: *Archaeological and Historical Resources – Avoidance and Monitoring*. Completion of a Worker Education and Awareness Program (WEAP) for all personnel who will be engaged in ground-disturbing activities shall be required prior to the start of ground-disturbing activities. This shall include training that provides an overview of cultural resources that might potentially be found and the appropriate procedures to follow if cultural resources are identified. This requirement extends to any new staff prior to engaging in ground-disturbing activities.

Prior to the initiation of ground-disturbing activities in Elements Four (Festival Park and Community Promenade) and Eight (Zanja Madre), the OEPM shall review the construction plans to ensure that any known cultural resources that are required to be avoided have been marked as "off-limits" areas for construction and construction staging. In addition, OEPM shall require monitoring of all ground-disturbing activities by a qualified archaeologist within 60 feet of a known extant unique archaeological resource or significant historical resource.

In the event that previously unknown unique archaeological resources or significant historical resources are encountered during construction, the resources shall either be left *in situ* and avoided, or the resources shall be salvaged, recorded, and reposited at the County of Los Angeles Natural History Museum (NHM) or other repository consistent with the provisions of a Phase III data recovery program and the provisions of the *Parks and Recreation Facilities Cultural Resources Management Plan*.[14] OEPM has the delegated authority to deed archaeological or historical resources found during construction to the NHM. Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate substantial adverse changes to historical and archaeological resources eligible or listed under CRHR Criterion 4, as it preserves important information that will otherwise be lost.

Mitigation Measure CULTURAL-2: *Pre-Construction Surveys*. At the time that any construction activity is proposed that would require ground-disturbing activities in Elements 4 (Festival Park and Community Promenade) and 8 (Zanja Madre) in soils that have been predominantly *in situ* during the past 50 years, records and archival information shall be reviewed to determine if there are any recorded unique archaeological resources and significant historical resources as defined in Section 15064.5(a) of the CEQA Guidelines. At a minimum, the records and archival review shall include a search of the SCCIC if more than 5 years have passed since the previous records search. The appropriate course of action shall be undertaken considering the results of the records search:

(A) Where the project study area has been subject to a Phase I Walkover Survey within two years of the proposed activity and no unique archaeological resources or significant historical resources are known within the project footprint, work shall proceed per the provision of Mitigation Measure CULTURAL-1.

[14] County of Los Angeles Department of Parks and Recreation. 2018. Parks and Recreation Facilities Cultural Resources Management Plan. Available at the County of Los Angeles Department of Parks and Recreation.

(B) Where all or a portion of the project footprint has not been surveyed for cultural resources within two years of a proposed ground-disturbing activity, a qualified archaeologist who meets the Secretary of the Interior's *Professional Qualification Standards* for Archaeology and shall conduct a Phase I Walkover Survey to ascertain the presence or absence of unique archaeological and/or significant historical resources, as defined in Section 15064.5(a) of the CEQA Guidelines.

If the survey and record searches determine no unique archaeological resources or significant historical resources, including potential Tribal cultural resources, then the work shall proceed consistent with the provisions of Mitigation Measure CULTURAL-1.

a. If the survey determines potential unique archaeological resources or significant historical resources, then one of two courses of action shall be employed:

i. Where avoidance is feasible, construction should avoid the potentially significant cultural resource, and the work shall then proceed consistent with the provisions of Mitigation Measure CULTURAL-1. The project area shall be surveyed by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior. An archaeological monitor under direction of a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior shall be present during ground-disturbing activities within 60 feet of previously recorded cultural resources.

ii. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior to determine the significance of the archaeological resource. If the Phase II investigation identifies a unique/eligible archaeological resource within the area proposed for ground-disturbing work, the County shall determine whether to avoid the resource through redesign or to proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of Mitigation Measure CULTURAL-1.

(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

The proposed project would result in potentially significant impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource. Incorporation of mitigation measures would reduce impacts to below the level of significance.

Due to the lack of survey coverage and early urbanization of the area, there is a high sensitivity for archaeological resources in native soil below existing development. Although there are no previously recorded archaeological resources in the Master Plan Area, recent findings in nearby construction revealed a significant cultural resource.

Archaeological resources at the proposed project site were evaluated with regard to a query of the SCCIC[15] and the NAHC. Historic quadrangle maps were reviewed during the supplemental research and included the following USGS maps:

- 7.5-minute series, Hollywood topographic quadrangle, 1953, 1966, 1981
- 62,500:1 Los Angeles topographic quadrangle, 1894, 1900, 1928
- 62,500:1 Santa Monica topographic quadrangle, 1896, 1898, 1902, 1921

Based upon the results of the record searches and review of the topographic maps, there are no known archaeological resources that may be eligible for designation at the federal, state, or local level where the proposed project is located or within a 0.3-mile radius. One archaeological resource was identified during the record search and was an historic period artifact scatter (P19-004191)[16] recovered during construction monitoring at the Museum of Natural History (part of Exposition Park) in 2009, and likely represents secondary or tertiary fill episodes. This resource was destroyed during construction and was not considered eligible for the California Register of Historical Resources. Letters from the NAHC dated November 5, 2019, were received by OEPM and indicated that the Sacred Land Files check was negative for the proposed project.[17]

The location of the Master Plan Area is within a highly urbanized section of the City and County of Los Angeles. The Master Plan Area is surrounded entirely by well-developed areas consisting of streets, sidewalks, parking lots, and existing buildings. Due to the urbanization of the area, very little of the original (i.e., unpaved) ground surface has been adequately surveyed for archaeological resources, and as a result archaeological resources may be present beneath the surface. Potential impacts to archaeological resources are dependent on whether the proposed project will involve ground disturbance and whether that ground disturbance will penetrate native (undisturbed) soils. If the depth of ground disturbance is less than the verifiable depth of previous ground disturbance, then there would be no impact to archaeological resources.

Ten archaeological studies have been undertaken within the Master Plan Area or within a 0.3-mile radius (Table 3.5-4, *Report Search Results for Archaeological Resources*).

[15] SCCIC record search completed on October 30, 2019.

[16] Department of Parks and Recreation Primary Form for P-19-004191, available through the SCCIC record search.

[17] Native American Heritage Commission. November 5, 2019. Letter to Office of Exposition Park Management.

TABLE 3.5-4
REPORT SEARCH RESULTS FOR ARCHAEOLOGICAL RESOURCES

Report Number	Name	Year	Within Project Boundary
LA-12792	Archeological Monitoring of Earth-Moving Activities University High School Sewer Improvements Project CRM Tech Contract No 2676	2013	
LA-11409	Construction Phase Cultural Resources Monitoring and Treatment Plan for the City of Los Angeles North Outfall-East Central Interceptor Sewer Project	2000	
LA-10988	Final Letter Report of Findings for Archeological Monitoring Services at the Natural History Museum of Los Angeles (Technical Report 11-04)	2011	**X**
LA-10536	Archeological Survey for the Proposed Vermont Avenue Relief Sewer, City of Los Angeles, California	2003	
LA-10506	Cultural Resources Monitoring: North Outfall Sewer- East Central Interceptor Sewer Project	2004	
LA-07849	Archeological Survey Report for the Southern California Edison Company Replacement of 71 Deteriorated Poles on the Patricia 16kv, Thatcher 16kv, Matilda 16kv, Tico 16kv, Seaquit 16kv, Maguire 16kv, Galahad 16kv, Brennan B4 16kvm, Strathem 16kvm Gabbert B2	2006	
LA-07358	Archeological Investigation for Vermont Seniors Project City of Los Angeles, California	2004	
LA-05444	Negative Archeological Survey Report: 07-la-110-20.0/22.1-07-173-1y2901	2000	
LA-04836	Phase I Archeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project	2000	
LA-00201*	Evaluation of the Archeological Resources and Potential Impact of the Proposed Development of Site 7, UCLA on-Campus Housing, Los Angeles, California	1976	

NOTE: * LA-201 appears to be mis-mapped at the SCCIC, and likely is not actually within the record search area for this proposed project.

There are two proposed elements of the project that would involve ground-disturbing activities in native soil:

Element 4 – Festival Park and Community Promenade. Among other proposed improvements for this element, Element 4 proposes construction of a subterranean three-level parking structure located at the current locations of parking lots 4, 5, and 6. The proposed parking structure would accommodate 2,000 vehicular parking spaces and incorporate vehicular ramped ingress and egress access. The construction of this subterranean parking structure and associated ramps will likely extend below any previous ground disturbance in this area, thus requiring the consideration of mitigation to avoid, reduce, or compensate for the impacts of this construction.

Element 8 – Zanja Madre. The proposed central plaza-like gathering space would include improvements such as planters, concrete seat walls, boulder seating, pervious and impervious surfacing, trees, and understory planting. The proposed west sunken lawn area would contain a large specimen tree and the north, south, and west boundaries would be lined with two or more rows of trees. The proposed Victory Walk improvements would consist of an allée and the planter on the east side of the allée would encompass a grove of trees with improved surfacing materials.

Other proposed improvements include stormwater components such as a dry creek. The construction of these elements could extend below any previous ground disturbance in these areas, thus requiring the consideration of mitigation to avoid, reduce, or compensate for the impacts of this construction.

Due to very shallow excavations into previously disturbed soils, or due to no excavation at all, it is not anticipated there will be impacts to archaeological resources from Elements 1, 2, 3, 5, 6, 7, or 9 of the Master Plan. If more details emerge during the on-going design of the project that illustrate an element's construction activities involving excavation into native (undisturbed) soils, that element would require consideration of mitigation to avoid, reduce, or compensate for the impacts of this construction.

Impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource from the proposed project would be reduced to below the level of significance with the incorporation of Mitigation Measures CULTURAL-1 and CULTURAL-2.

(c) Disturb any human remains, including those interred outside of dedicated cemeteries?

The proposed project would result in less than significant impact to cultural resources in relation to disturbance of human remains. The record search and supplemental research did not reveal any known cemeteries or burial sites within the Master Plan Area. No formal historic or modern cemeteries were identified within the Master Plan Area or a 0.3-mile radius. Historic quadrangle maps were reviewed during the supplemental research and included the following USGS maps:

- 7.5-minute series, Hollywood topographic quadrangle, 1953,1966,1981
- 62,500:1 Los Angeles topographic quadrangle, 1894,1900,1928
- 62,500:1 Santa Monica topographic quadrangle, 1896,1898,1902,1921

In the unlikely event human remains are encountered, they would be handled in accordance with Section 7050.5 of the California Health and Safety Code (please see discussion regarding the inadvertent discovery of human remains in Section 1, *Project Description*). Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

3.6 ENERGY

This analysis is undertaken to determine if the proposed project may have a significant impact to energy that would require the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines. The proposed project was evaluated with regard to the California Green Building Standards Code (CALGreen),[1] the California Energy Commission Guidebook for the Renewable Portfolio Standard Eligibility,[2] and SCAG's 2016-2040 RTP/SCS.[3]

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impact to energy. Would the project:

(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The proposed project would result in no impacts to energy in relation to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The goals of the 2016-2040 RTP/SCS include protecting the environment, improving air quality, and promoting energy efficiency. Some of the key SCAG SCS policies include striving for sustainability; protecting and preserving existing transportation infrastructure; increasing capacity though improved systems management; providing transportation choices; and promoting economic growth, environmental protection, and public health.

Electrical power in the City of Los Angeles, including the Master Plan Area, is supplied by the Los Angeles Department of Water and Power (LADWP). Electricity provided by the LADWP is generated from a diverse mix of power sources, including coal, natural gas, nuclear, and large hydropower, in addition to renewable sources such as wind, solar, small hydroelectric, biomass and bio-waste, and geothermal.[4] Existing energy use levels are relatively high at Exposition Park. Existing energy uses in the Master Plan Area include Christmas Tree Lane (proposed Element 2, Expo Festival Plaza), lighting within and surrounding the Master Plan Area, water uses for the landscaping throughout Exposition Park, and operational energy uses of the museums and administrative buildings (e.g., NHM, Science Center, Wallis Annenberg Building) and sports and recreation facilities (e.g., EXPO Center, Coliseum, and Banc of California Stadium) at Exposition Park (please see Section 3.1, *Aesthetics*, for more information regarding existing sources of light). Four (4) surface parking lots, two above-ground parking structures, and parking spaces along the EXPO Center, Coliseum, and State Drive reflect heat off asphalt and concrete surfaces.

The proposed project would introduce energy upgrades as well as solar panels on poles at the existing parking structure (Element 3 – Solar Garden) that would provide shade over one of the above-ground parking structures and help reduce energy use at Exposition Park. The proposed project would require replacement of lighting in the underground parking structure (Element 4 –

[1] California Building Standards Commission. Effective January 1, 2017. 2016 California Green Building Standards Code. CALGreen (Part 11 of Title 24). http://www.bsc.ca.gov/Home/CALGreen.aspx

[2] California Energy Commission. January 2017. Renewables Portfolio Standard Eligibility; Ninth Edition, Commission Guidebook.

[3] Southern California Association of Governments. April 2016. 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategies; A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf

[4] Los Angeles Department of Water and Power. Accessed December 3, 2019. Sources of Supply. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply

Festival Park & Community Promenade). New lighting and associated energy infrastructure would be required to comply with the most recent version of California Code of Regulations Title 24, Part 6 (California Energy Code) and Part 11 (California Green Building Standards Code),[5] potentially as well as City Code Regulations such as Section 1.2.12, Section 9.3.93.0117 and under Division 62 Section 91.6205.[6] Therefore, any new energy infrastructure would have the same energy efficiency or greater energy efficiency than the existing infrastructure at Exposition Park.

The proposed project would guide the development of Exposition Park during a 25-year period to link Exposition Park to the City of Los Angeles around it; connect the park's segments to one another; and encourage visitors and locals to linger with more plentiful pathways, plantings, and visitor amenities. The proposed project would connect the park's segments by improving pedestrian and recreational use of the spaces between its buildings and moving surface parking spaces underground. The Master Plan Area is served by public transit bus, light rail, pedestrian access, and bicycle paths. The proposed project would improve vehicular access for large groups with dedicated loading zones and bus drop-off areas. The improvements would be constructed consistent with the 2016-2040 RTP/SCS goals by promoting energy efficiency through design enhancements and providing opportunities for open space served by public transit in close proximity to transit stops. The proposed project would enhance pedestrian and bicyclist access to Exposition Park and within the community. New protected cycle tracks would be installed along Exposition Blvd. and MLK Jr. Blvd. Pedestrian gathering spaces and access would be enhanced including extending the Expo Festival Plaza to include promenades and zero curb sidewalks. As explained in Section 1, *Project Description*, and analyzed in Section 3.3, *Air Quality*, the motorized equipment used during construction would comply with CARB regulations for diesel programs relating to mobile source, stationary engines, and portable equipment. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project would result in no impacts to energy in relation to conflicting with or obstructing a state or local plan for renewable energy or energy efficiency. The proposed project would involve adopting a Master Plan to provide a unified vision for the site in order to help guide the long-term development, growth, and financial and environmental sustainability of Exposition Park. The proposed Master Plan includes nine elements that would be required to comply with the more energy-efficient provisions of the current California Building Standards Code (Title 24, California Code of Regulations [CCR]) and applicable California Green Building Standards Code (CALGreen; CCR Title 24, Part 11) mandatory measures.[7] The proposed project would be consistent with California Energy Code goals by incorporating solar panels as appurtenant to other uses within Exposition Park to generate electricity. Element 3 is a Solar Garden that would shade visitors with artistically designed solar panels. This would involve the installation of solar panel poles to the existing parking structure along with electrical connections. This energy upgrade would improve energy uses and increase energy efficiency, providing a benefit to the environment consistent with the goals of CALGreen. Additionally, the proposed project would involve enhancements to the ecological function through landscaping and pedestrian access at the property

[5] County of Los Angeles. June 2014. IV: Environmental Impact Analysis for Ford Theaters Project (SCH No. 2014021013). http://file.lacounty.gov/SDSInter/dpr/215035_IV.A.AestheticsViewsLightandGlare.pdf

[6] City of Los Angeles. 2016. L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analysis in Los Angeles. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

[7] California Building Standards Commission. Effective January 1, 2017. 2016 California Green Building Standards Code. CALGreen (Part 11 of Title 24). http://www.bsc.ca.gov/Home/CALGreen.aspx

and would provide more parking spaces to reduce the consumption of energy on-site. Provision of parking spaces, bus parking spaces, and a drop-off location would reduce traffic congestion and energy use as a result of congestion.

The goals of the SCAG 2016-2040 RTP/SCS include protecting the environment, improving air quality, and promoting energy efficiency. Some of the key SCAG SCS policies include striving for sustainability; protecting and preserving existing transportation infrastructure; increasing capacity though improved systems management; providing transportation choices; and promoting economic growth, environmental protection, and public health. The 2016 Power Integrated Resources Plan (IRP) is a 20-year roadmap guiding LADWP's Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The IRP assumes that new construction and replacement construction would increase energy efficiency by 15 percent as part of the overall attainment strategy.[8] New lighting and associated energy infrastructure would be required to comply with the most recent version of 24 CCR Part 6 (California Energy Code) and Part 11 (CALGreen),[9] as well as City Code Regulations such as Section 1.2.12, Section 9.3.93.0117, and Division 62 Section 91.6205.[10]

As described in Section 1, *Project Description*, and analyzed in Section 3.3, *Air Quality*, the motorized equipment used during construction would comply with CARB regulations for diesel programs relating to mobile source, stationary engines, and portable equipment. The operation of the proposed project would involve both the use of the recreational activities by residents and visitors, as well as the maintenance of the facilities. The anticipated energy use during operation, including maintenance, would be similar to existing uses and would further utilize renewable energy sources. The proposed project would comply with all applicable state and local plans for renewable energy efficiency. Therefore, there would be no impact. No mitigation or further analysis is warranted.

[8] Los Angeles Department of Water and Power. 2016. 2016 Power Integrated Resource Plan.

[9] County of Los Angeles. June 2014. IV: Environmental Impact Analysis for Ford Theaters Project (SCH No. 2014021013). http://file.lacounty.gov/SDSInter/dpr/215035_IV.A.AestheticsViewsLightandGlare.pdf

[10] City of Los Angeles. 2016. L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analysis in Los Angeles. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

3.7 GEOLOGY AND SOILS

This analysis is undertaken to determine if the proposed project may have a significant impact to geology and soils, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Geology and soils at the Master Plan Area were evaluated with regard to the City of Los Angeles General Plan Safety Element;[1] the South Los Angeles Community Plan;[2] the USGS 7.5-Minute Series Hollywood Topographic Quadrangle;[3] the U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division, Online Web Soil Survey;[4] and Alquist-Priolo Earthquake Fault Zoning (APEFZ) Maps.[5]

The State CEQA Guidelines recommend the consideration of six questions when addressing the potential for significant impact to geology and soils. Would the project:

(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

The proposed project would result in no impacts to geology and soils in relation to exposing people or structures to potential substantial effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. No known active faults are located within the Master Plan Area, and the project study area is not located within the 2014 CGS Earthquake Fault Zones and Seismic Hazard Zones map[6] or City of Los Angeles Safety Element Fault Rupture Study Areas[7] (see Figure 3.7-1, *Earthquake Fault Zones*).

[1] City of Los Angeles Department of City Planning. Adopted November 26, 1996. Safety Element of the Los Angeles City General Plan, City Plan Case No. 95-0371. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf

[2] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan.

[3] U.S. Geological Survey. Accessed December 3, 2019. Current and Historical Topo Maps of the US. https://viewer.nationalmap.gov/basic/?basemap=b1&category=histtopo,ustopo&title=Map%20View

[4] U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division. Accessed December 3, 2019. Online Web Soil Survey. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/

[5] California Geological Survey. 2014. Earthquake Fault Zones and Seismic Hazard Zones Hollywood 7.5 Minute Quadrangle, CGS Information Warehouse: Regulatory Maps.

[6] California Geological Survey. 2014. Earthquake Fault Zones and Seismic Hazard Zones Hollywood 7.5 Minute Quadrangle, CGS Information Warehouse: Regulatory Maps.

[7] City of Los Angeles Department of City Planning. Adopted November 26, 1996. Safety Element of the Los Angeles City General Plan, City Plan Case No. 95-0371.

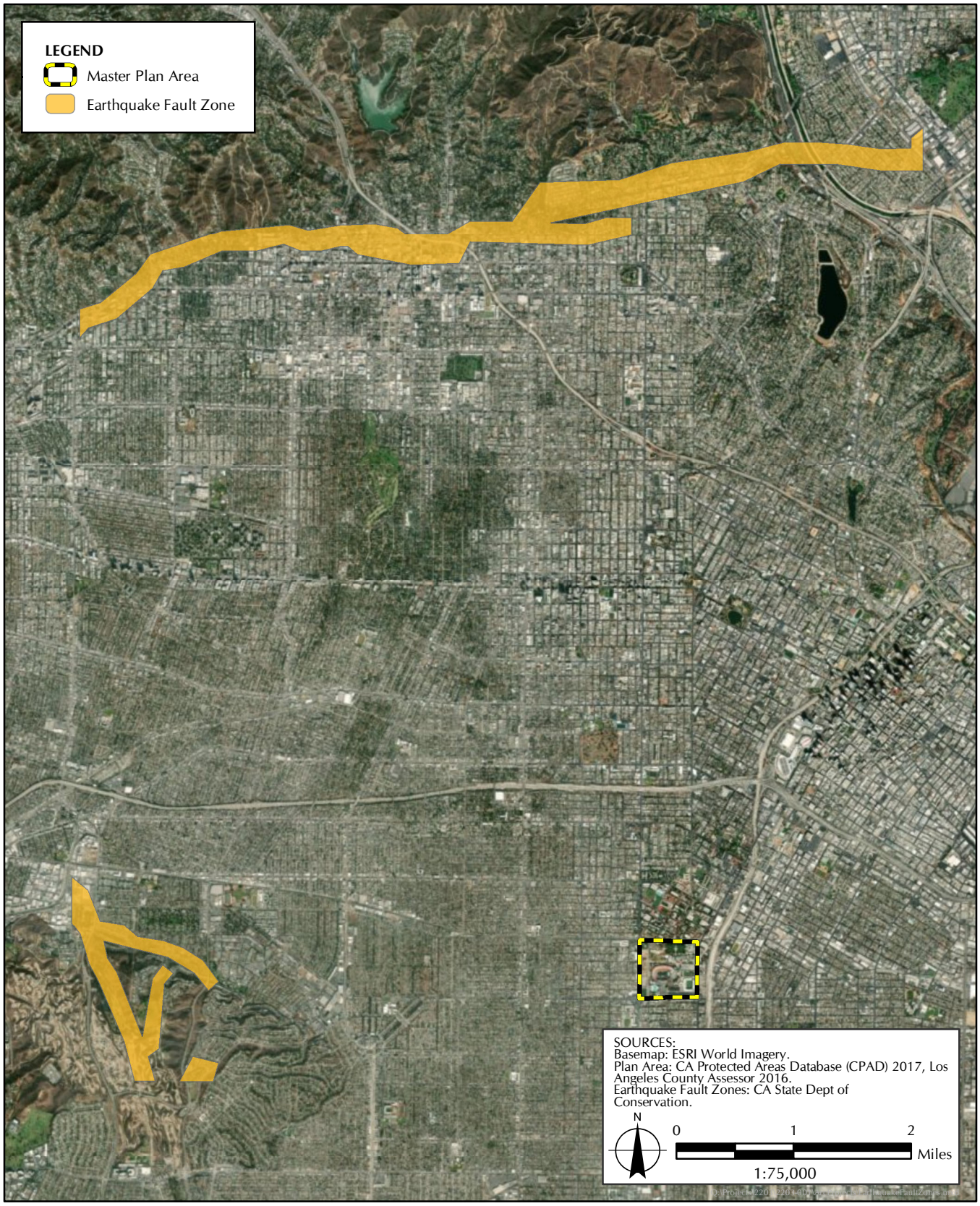

FIGURE 3.7-1

Earthquake Fault Zones

Mapped active or potentially active faults do not cross or project towards the Master Plan Area. Faults do exist within Los Angeles County, and seismic events can impact the Master Plan Area due to ground shaking and/or vibration that are considered indirect impacts. The western coast of California lies within one of most seismically active regions on earth. The San Andreas Fault, located 40 miles to the northeast; the Sierra Madre Fault Zone, located 1.5 miles to the north; the Raymond Fault, located approximately 7 miles to the southeast; and the San Fernando Fault, located 20 miles to the northwest, are active faults near the Master Plan Area. However, because these faults do not pass directly through the Master Plan Area, significant concerns attributable to them are limited to ground shaking and aftereffects.[8] As such, the Master Plan would not be at risk of damage from surface fault ruptures of any known faults; nor would the proposed project exacerbate the risk of rupture of a known earthquake fault. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(ii) Strong seismic ground shaking?

The proposed project would result in less than significant impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. While the proposed project is in a seismically active region and would result in a change to the surface structure and use of some portions of the project area, it would not represent a change in land use from the existing environment. As such, the proposed project would not exacerbate the Master Plan Area's existing vulnerability to strong seismic ground shaking events. Ground shaking could occur at the proposed site if a seismic event occurred along the Sierra Madre Fault. However, there are numerous variables (depth and magnitude of seismic event, condition and structure of buildings being impacted, relevant radius of aftershocks and their magnitude, etc.) that determine the level of damage to a specific location. Although the Master Plan Area could be subjected to strong ground shaking in the event of a nearby or more distant regional earthquake, this hazard is common in Southern California, and the effects of ground shaking would be limited by proper engineering design and construction in conformance with current building codes and engineering practices. In addition, the proposed project would comply with all applicable California Building Standard Code (California Code of Regulations, Title 24), Los Angeles Building Code (Building Code) and Grading Codes and the requirements of the project-level geotechnical reports to minimize any potential risk related to seismic hazards, and all structures will be designed in accordance with appropriate industry standards, including established engineering and construction practices and methods. Use of the Master Plan Area would remain similar to the existing condition. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

[8] California Geological Survey. Revised 1999. Fault-Rupture Hazard Zones in California. Special Publication 42.

(iii) Seismic-related ground failure, including liquefaction?

The proposed project would result in less than significant impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Liquefaction within the study area during a seismic event would result in the loss of structural integrity of the perimeter improvements and the surrounding structures. Damage or collapse of these structures would put human lives in the vicinity at risk of bodily injury or death. The majority of the Master Plan Area is not located within a CGS-mapped liquefaction zone[9] (see Figure 3.7-2, *Liquefaction and Landslide Zones*). A small area of the southwest portion of the Master Plan Area is located within a liquefaction area located nearest the site of the Bill Robertson Lane street improvements.[10] However, the proposed Master Plan elements are not located within a liquefaction hazard area as delineated by CGS. All proposed improvements associated with development of Element 5 of the proposed Master Plan have been designed to avoid the areas subject to liquefaction.[11] Thus, the proposed project elements would not expose buildings or structures to seismic-related ground failure, in relation to liquefaction. In addition, the proposed project would comply with all applicable City Building and Grading Codes and the requirements of the site-specific geotechnical reports to minimize any potential risk related to liquefaction. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(iv) Landslides?

The proposed project would result in no impacts to geology and soils in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. The Master Plan Area is relatively flat and highly urbanized and lacks geologic or topographic features such as hilltops, ridges, and hill slopes. The Master Plan Area is not located within a landslide zone area on the CGS-mapped landslide hazards zone[12] (see Figure 3.7-2). Thus, the proposed project it is unlikely to be susceptible to landslide. In addition, the proposed Master Plan would comply with all applicable Los Angeles Building Code (Building Code) and Grading Codes and the requirements of the project-level geotechnical reports to minimize any potential risk related to landslides. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(b) Result in substantial soil erosion or the loss of topsoil?

The proposed project would result in less than significant impacts to geology and soils in relation to substantial soil erosion or the loss of topsoil. Factors that contribute to potential soil erosion include climate, physical characteristics of the soils, topography, slope and terrain steepness, and soil disturbance including construction activities that can increase soil erosion potential. The Master Plan Area is within a highly urbanized areas covered by impermeable surfaces, and thus, the potential for erosion is relatively low.

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[9] City of Los Angeles. Accessed November 15, 2019. City of Los Angeles Open Data. Earthquake Hazards, Liquefaction Zones (ID: 9). http://geohub.lacity.org/datasets/8b5ae7c5bc794e1bb97fc213ab1c6268_5

[10] City of Los Angeles. Accessed November 15, 2019. City of Los Angeles Open Data. Earthquake Hazards, Liquefaction Zones (ID: 9). http://geohub.lacity.org/datasets/8b5ae7c5bc794e1bb97fc213ab1c6268_5

[11]City of Los Angeles. Accessed November 15, 2019. City of Los Angeles Open Data. Earthquake Hazards, Landslide Zones. https://geohub.lacity.org/datasets/37fc7990a4bf42efb1f6d3482c43852b_8

[12] City of Los Angeles. Accessed November 15, 2019. City of Los Angeles Open Data. Earthquake Hazards, Landslide Zones. https://geohub.lacity.org/datasets/37fc7990a4bf42efb1f6d3482c43852b_8

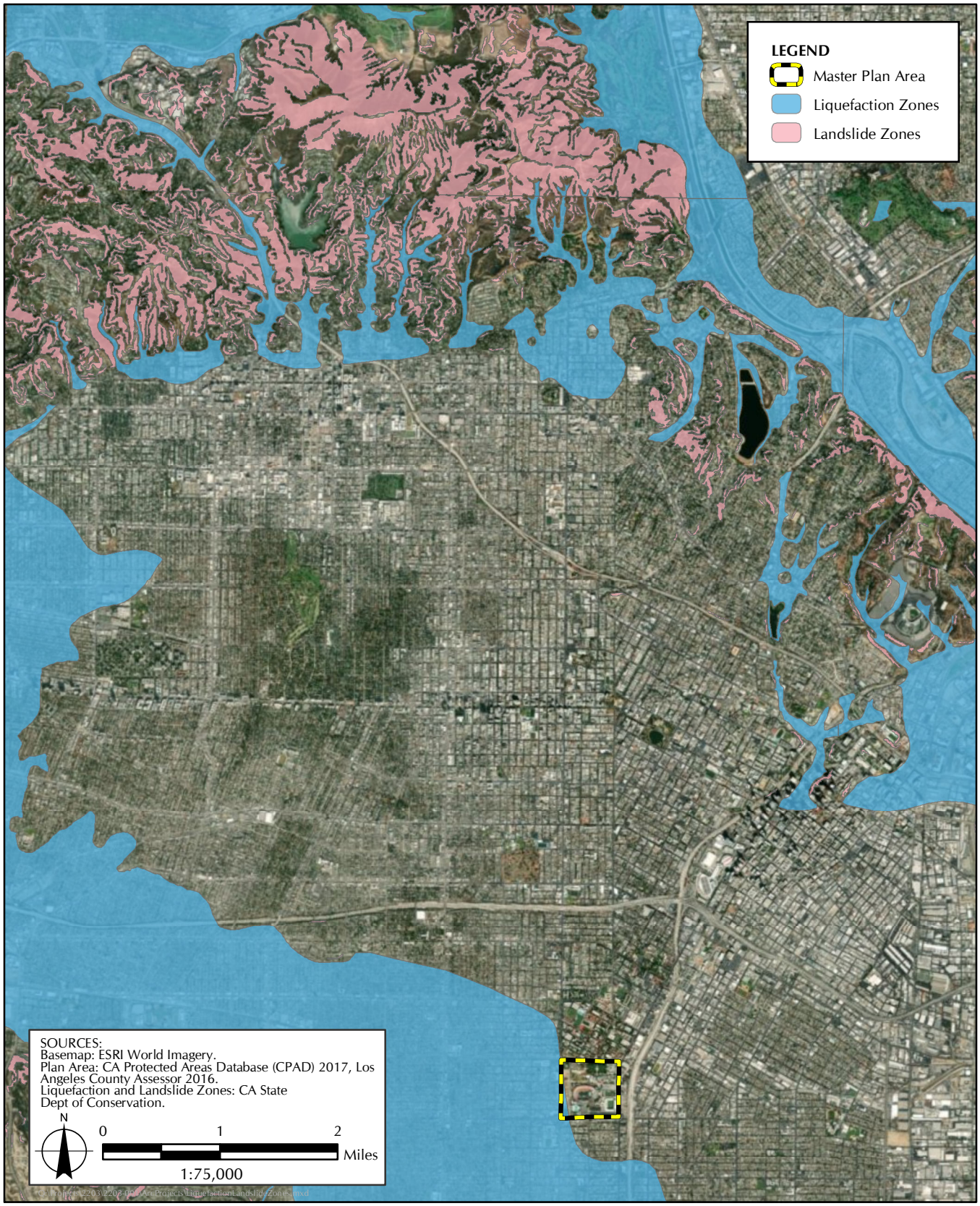

FIGURE 3.7-2

Liquefaction and Landslide Zones

The area encompassing the Master Plan Area contains soil of the Hanford Association.[13] The Master Plan Area is underlain by a thick alluvium, primarily composed of sand and silt.[14] The Hanford Association soil is a pale brown, course sandy loam located on gently sloping alluvial fans.[15] Hanford Association soil is known to have good natural drainage properties and a slight erosion hazard.[16]

The proposed project is in a relatively flat (0–2 percent slope), highly urbanized area, with an extensive drainage system and impervious surfaces.[17] The Master Plan Area is not subject to high levels of wind or rain with a rare frequency of flooding,[18] factors that may result in soil erosion. In addition, the proposed project would comply with all applicable Los Angeles Building Code and Grading Codes regulating grading, excavations, landfill, and other construction activities that might cause or be impacted by slope or ground instability, erosion, or flooding and the requirements of the project-level geotechnical reports to minimize any potential risk related to soil erosion or loss of topsoil.

In addition, an SWPPP, as required by the RWQCB, would be required to include stormwater BMPs (structural and operational measures) and would be prepared for the construction and operation phase of each nine element of the proposed Master Plan in keeping with the City's LID ordinance. The SWPPP would specify BMPs that would be used to control quality and quantity of stormwater runoff and erosion and sedimentation control. These BMPs include but are not limited to Scheduling (EC-1), Preserve Existing Vegetation (EC-2), Temporary Soil Stabilization (EC-2),(EC-4), (EC-7), Soil Roughening (EC-15) Dust Control (WE-1), Stabilized Perimeter (SE-1, SE-5, SE-6), Fiber Rolls (SE-5), Gravel bag berms (SE-6), Street Sweeping and Vacuuming (SE-7), Tracking Controls (TC-1), (TC-2), and Storm Drain Inlet Protection (SE-10) (see Section 1, *Project Description*). The SWPPP and BMPs would be modified for each element and construction phase.

Furthermore, implementation of the Master Plan would include stormwater management measures to reduce surface runoff and therefore reduce the potential for erosion (see Table 1.12.1-1, *Best Management Practices*). Proposed stormwater management measures include the installation of a storm easement and a utility easement to be located west of Bill Robertson Lane within the site of the Lucas Museum of Narrative Art; installation of a dry creek in the Zanja Madre and Museum Walk Zone; installation of three capture and use systems (one proposed in the Expo Park Festival Plaza Zone and two proposed in the Festival Lawn and Community Park and Promenade Zone); and installation of seven drywells (two drywells proposed in the Museum Walk and California African American Sculpture Garden Zone, four drywells proposed in the Olympic Ring Walk Zone, and one drywell proposed in the Community Park Zone) (see Figure 1.12.1-1, *Proposed*

[13] County of Los Angeles. Accessed November 18, 2019. LA County Soil Types. https://data.lacounty.gov/Shape-Files/LA-County-Soil-Types/sz94-meiu

[14] U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division. Accessed December 3, 2019. Online Web Soil Survey. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/

[15] U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division. Accessed December 3, 2019. Online Web Soil Survey. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/

[16] U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division. Accessed December 3, 2019. Online Web Soil Survey. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/

[17] U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division. Accessed December 3, 2019. Online Web Soil Survey. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/

[18] U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division. Accessed December 3, 2019. Online Web Soil Survey. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/

Stormwater Management Measures). Installation of the stormwater management measures for various areas of the park would reduce and control excess surface runoff through methods such as allowing water to percolate into the soil zone and subsequently into groundwater, as opposed to water remaining on the surface as runoff. In addition, the implementation of the proposed Master Plan would reduce the overall volume of surface runoff for the Master Plan Area due to decreased impervious surfaces (see Section 3.10, *Hydrology and Water Quality*). Therefore, the reduced impervious areas, the SWPPP and BMPs, and the numerous stormwater management measures would further reduce the volume of surface runoff such that it would not result in substantial soil erosion. All proposed Master Plan elements would be required to comply with the NPDES permit process, City of Los Angeles standard grading and building permit requirements, and applicable BMPs. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The proposed project would result in less than significant impacts to geology and soils in relation to location on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The potential for landslides within the Master Plan Area is minimal due to the area's relatively flat topography and absence of major hills or landforms. Additionally, there are no areas within the Master Plan Area located within a landslide zone area on the CGS-mapped landslide hazards zone.[19]

Lateral spreading occurs when large blocks of intact soil move downslope in a rapid fluid-like flow movement, primarily as a result of liquefaction. Lateral spreading often occurs along riverbanks and shorelines where loose, saturated sandy soils are commonly encountered, as well as in liquefaction-prone areas. The majority of the Master Plan Area is not located within a CGS-mapped liquefaction zone. A small area of the southwest portion of the Master Plan Area is located within a liquefaction area located nearest the site of the Bill Robertson Lane street improvements. However, the proposed Master Plan elements are not located within a liquefaction hazard area as delineated by CGS. Thus, the proposed project it is unlikely to be susceptible to liquefaction or lateral spreading.

Subsidence occurs as a localized mass movement that involves the gradual downward settling of or sinking of the ground surface, resulting from the mineral resources extraction, subsurface oil extraction, natural gas extraction or ground eater extraction. Collapse is a visible depression of the ground which is usually caused by the extraction of subsurface liquids or mining of mineral resources. There are currently no subsurface mineral, oil, natural gas, groundwater or other subsurface liquid extraction facilities within the Master Plan Area. Additionally, no mining activities or extraction of mineral resources occur within Mater Plan Area (see Section 3.12, *Mineral Resources*). Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

[19] City of Los Angeles. Accessed November 15, 2019. City of Los Angeles Open Data. Earthquake Hazards, Landslide Zones. https://geohub.lacity.org/datasets/37fc7990a4bf42efb1f6d3482c43852b_8

(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

The proposed project would result in less than significant impacts to geology and soils in relation to location on expansive soil creating substantial risks to life or property. Soils with a certain percentage of clay have the potential to expand when water is added and shrink when water is lost, resulting in expansive soils. Expansive soils can result in damage to overlying structures. The area encompassing the Master Plan Area contains soil of the Hanford Association.[20] The Master Plan Area is underlain by a thick alluvium, primarily composed of sand and silt.[21] The Hanford Association soil is a pale brown, course sandy loam located on gently sloping alluvial fans.[22] Hanford Association soil is known to have good natural drainage properties and a slight erosion hazard.[23] Hanford Association soil is not expansive and occurs on gently sloping alluvial fans between elevations near sea level and 3,500 feet above MSL.[24] Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The proposed project would result in no impact to geology and soils in relation to having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The proposed project's sanitary sewer flows will be connected to municipal sewer systems, and no septic tanks or alternative wastewater disposal systems are proposed. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The proposed project would result in potentially significant impacts to geology and soils in relation to directly or indirectly destroying a unique paleontological resource or site or unique geological feature. Incorporation of mitigation measures would reduce impacts to below the level of significance.

Master Plan Elements 4 and 8 and the Parking Plan (see Section 1, *Project Description*), which involve excavation and grading in Quaternary Alluvial and marine sediments deposited during the Pleistocene, have the potential to encounter unique paleontological resources. Excavations in the

[20] County of Los Angeles. Accessed November 18, 2019. LA County Soil Types. https://data.lacounty.gov/Shape-Files/LA-County-Soil-Types/sz94-meiu

[21] U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division. Accessed December 3, 2019. Online Web Soil Survey. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/

[22] U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division. Accessed December 3, 2019. Online Web Soil Survey. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/

[23] U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division. Accessed December 3, 2019. Online Web Soil Survey. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/

[24] U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division. Accessed December 3, 2019. Online Web Soil Survey. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/

areas surrounding the Master Plan Area have encountered significant paleontological resources.[25] Elements 1–3, 5–7, and 9 are not anticipated to requires subsurface ground disturbance. Construction of the proposed Master Plan Element 4 and the Parking Plan would include grading and excavation to install underground parking features in areas composed of previously disturbed, paved, surface parking areas, and associated sidewalks and landscape area. Construction of proposed Master Plan Element 8 includes grading and excavation to install two sunken lawns (Table 3.7-1, *Potential for Impact to Paleontological Resources*).

TABLE 3.7-1
POTENTIAL FOR IMPACT TO PALEONTOLOGICAL RESOURCES[26]

Parent Formation/ Sediment Deposit	Age of Deposit	Known Potential to Contain Paleontological Resources	Known Depth of Sediment Deposit	Project Element Potential Impact to Paleontological Resources									
				1	2	3	4	5	6	7	8	9	Parking Plan
Quaternary Alluvium	Holocene	Low to high	Surficial–415 feet				X				X		X
Shallow Marine deposits	Pleistocene		100–200 feet										X
Upper Member of the Fernando Formation	Late Pliocene to Early Pleistocene	High	200–14,000 feet										
Lower Member of the Fernando Formation	Early to Middle Pliocene	High	4,300–14,000 feet										
Puente Formation	Late to Middle Miocene, possibly earliest Pliocene	High	16,000–24,000 feet										

Under CEQA, impacts to paleontological resources would be considered significant if there is a high likelihood of encountering unique paleontological resources that could be damaged or destroyed as a result of excavation. Younger Quaternary alluvial deposits have a low potential to yield significant paleontological resources. However, Older Plio-Pleistocene marine and non-marine deposits have a high potential to yield significant paleontological resources based on existing known resources contained within these sediments. Potential impacts to unique paleontological resources contained within older marine and non-marine deposits would be

[25] Association of Environmental and Engineering Geologists and the Geological Society of America. May 2007. Geology of Los Angeles, California, United States of America. P. 107–110. https://www.earthconsultants.com/cms/pdf/Geology_of_Los_Angeles.pdf

[26] Association of Environmental and Engineering Geologists and the Geological Society of America. May 2007. Geology of Los Angeles, California, United States of America. P. 107–110. https://www.earthconsultants.com/cms/pdf/Geology_of_Los_Angeles.pdf

reduced to below the level of significance with incorporation of Paleontological Resources Sensitivity Training (please see discussion regarding paleontological resources in Section 1, *Project Description*) and implementation of Mitigation Measure PALEO-1.

Mitigation Measure PALEO-1: *Paleontological Resources – Paleontological Monitoring*. Impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed master plan shall be reduced to below the level of significance by monitoring, salvage, and curation at the Los Angeles County Natural History Museum. Unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located five or more feet below the ground surface that would have the potential to contact geologic units with a high to moderate potential to yield unique paleontological resources. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, the Office of Exposition Park Management shall require and be responsible for salvage and recovery of those resources by a qualified paleontologist consistent with standards for such recovery established by the Society of Vertebrate Paleontology.[27]

Construction monitoring by a qualified monitor (archaeologist cross-trained in paleontology or paleontologist) shall be implemented during all ground-disturbing activities that affect previously undisturbed geologic units 12 or more inches below the ground surface and have the potential to encounter geologic units with a moderate to high potential to yield unique paleontological resources. In the event that a paleontological resource is encountered during construction, all ground-disturbing activity within 100 feet of the find shall be halted until a qualified paleontologist can evaluate the significance of the discovery. Additional monitoring recommendations may be required. If the resource is found to be significant, the paleontologist shall determine the most appropriate treatment and method for stabilizing and collecting the specimen. Curation of the any significant paleontological finds shall be housed at a qualified repository, such as the Natural History Museum of Los Angeles County (LACM).

Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation monitoring report shall be submitted to the Office of Exposition Park Management with an appended, itemized inventory with representative snapshots of specimens. The report and inventory, once submitted, shall signify the completion of the program to mitigate impacts to paleontological resources. A copy of the report/inventory shall be filed with the County of Los Angeles Planning and Development Agency and the Natural History Museum of Los Angeles County.

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[27] A Qualified Professional Paleontologist (Principal Investigator, Project Paleontologist) is a practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A paleontological Principal Investigator shall have the equivalent of the following qualifications:

1. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.

2. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.

3. Proficiency in recognizing fossils in the field and determining their significance.

4. Expertise in local geology, stratigraphy, and biostratigraphy.

5. Experience collecting vertebrate fossils in the field.

3.8 GREENHOUSE GAS EMISSIONS

This analysis is undertaken to determine if the proposed project may have a significant impact to greenhouse gas (GHG) emissions, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. The proposed project was evaluated in accordance with federal energy policies, state building codes, and local energy efficiency policies. GHG emissions at the Master Plan Area were evaluated with regard to the City of Los Angeles General Plan,[1] the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), the Clean Air Act (CAA), and the 2016 Southern California Association of Government (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).[2]

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impacts to GHG emissions. Would the project:

(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The proposed project would result in less than significant impacts to GHG emissions in relation to generating GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The proposed project is located within a SCAG-mapped High Quality Transit Area (HQTA) in an urbanized location and is in close proximity to high-density urban development.[3] The proposed project would help to achieve GHG reduction goals by bringing recreation closer to where people live, enhancing ecological functions, and improving existing facilities.

Construction Phase

The proposed project includes improvements to several bike paths; pedestrian entryways; drop-off areas; the construction of a subterranean parking structure, which consists of two to three levels, to reduce traffic congestion; and solar panels installed on the existing parking structures to increase energy efficiency in the Master Plan Area (see Figure 1.8.2-6, *Proposed Master Plan Element 4 – Subterranean Garage*). As discussed in Section 3.3, *Air Quality*, a reasonable "worst-case" scenario for the construction phase, 3 years per phase, was developed. GHG emissions for each construction year were estimated with CalEEMod, Version 2016.3.2. Construction emission results are based on the annual emissions output from CalEEMod (Table 3.8-1, *Construction GHG Emissions in $MTCO_2e$ per Year*). The amortized annual GHG emissions are 69 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year, which are well below the threshold of 3,000 $MTCO_2e$ set by the South Coast Air Quality Management District (SCAQMD). Therefore, impacts during construction would be less than significant.

[1] City of Los Angeles Planning Department. Accessed November 27, 2019. City of Los Angeles General Plan. https://planning.lacity.org/plans-policies/general-plan-overview

[2] Southern California Association of Governments. April 2016. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies; A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf

[3] Southern California Association of Governments. Accessed December 3, 2019. High Quality Transit Areas (HQTA) 2045 – SCAG Region. http://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-118.328%2C34.008%2C-118.247%2C34.021

TABLE 3.8-1
CONSTRUCTION GHG EMISSIONS IN $MTCO_2e$ PER YEAR

	Construction Year			
	2022	**2023**	**2024**	**Total**
Construction Annual Emissions	431.5	240.0	13.3	684.8
Amortized Annual Emissions (over 30 years)	69.0	—	—	—
SCAQMD Threshold	3,000	3,000	3,000	3,000
Exceeds Threshold?	**No**	**No**	**No**	**No**

NOTE: Amortized annual emissions apply to the total emissions from 2022 to 2024.

Operation Phase

The proposed project includes improvement of ecological functions of existing gardens and facilities as well as the implementation of new and improved parking structure and bike and pedestrian access, while utilizing solar panels installed on the existing parking garage and educational efforts that would encourage sustainability practices and reduce energy usage and GHG. With these improvements, operational use of the proposed project would reduce GHG emissions from the existing condition. The proposed project would promote sustainability in land use design. Therefore, impacts during operation would be less than significant. No mitigation or further analysis is warranted.

(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The proposed project would result in no impacts to GHG emissions in relation to conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The primary applicable plan is the RTP/SCS.[4] The California Air Resources Board (CARB) has set a GHG reduction target for the SCAG region of 8 percent below 2005 levels by 2020 and 13 percent by 2035. The proposed project would meet the requirements of Assembly Bill (AB) 32, which was implemented to meet California's goals to reduce GHG emissions. Furthermore, the project would be consistent with SCAQMD's plans to promote energy efficiency and GHG emissions reductions. In addition, the proposed Master Plan would be consistent with the SCAG 2016 SCS for the provision of recreation resources for communities within one-half mile from major transit stops, high-quality transit corridors (HQTCs) and developed areas based on Senate Bill 375.[5] The proposed project would retain or enhance the achievement of six goals established in SCAG's 2016 SCS (Table 3.8-2, *SCAG 2016 SCS Goals in Relation to the Proposed Project*).[6]

[4] Southern California Association of Governments. April 2016. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies; A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf

[5] Southern California Association of Governments. Accessed December 3, 2019. High Quality Transit Areas (HQTA) 2045 – SCAG Region. http://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-118.328%2C34.008%2C-118.247%2C34.021

[6] California Air Resources Board. Accessed November 27, 2019. What Are Sustainable Communities Strategies? https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/what-are-sustainable-communities-strategies

TABLE 3.8-2
SCAG 2016 SCS GOALS IN RELATION TO THE PROPOSED PROJECT

SCS Goals	Proposed Project
1. Focus housing and job growth within existing urbanized areas giving people greater accessibility to job opportunities, high quality transit and active transportation options, and amenities.	The proposed project does not introduce any housing or job opportunities. The proposed project would retain the existing opportunities.
2. Utilize infill opportunities to conserve natural resources and farmlands.	Natural resources would be conserved in the existing urban open space. The proposed project would contribute to the preservation of natural resources and habitat protection.
3. Invest in expanded transit networks and service frequency.	Transit networks and service frequency would remain the same. Loading zones and a bus drop-off lane will be added to enhance accessibility.
4. Invest in biking and walking infrastructure to improve active transportation options.	Biking and pedestrian infrastructure and entryways would be improved to provide more access.
5. Invest in transportation demand management programs such as carpool/vanpool, carshare, and parking supply management.	Drop-off area would be designated or constructed to facilitate transportation congestion of visitors.
6. Plan for homes at a range of densities and affordability levels near job centers.	No new homes would be introduced.

CARB has prepared a Climate Change Scoping Plan[7] that lays out the GHG emission reduction goals for the state. This 2017 plan calls for an ambitious but achievable reduction in California's carbon footprint. Reducing GHGs to 1990 levels means cutting approximately 30 percent from "business-as-usual" emission levels projected for 2020, or about 15 percent from current (2019) levels. The proposed project would help achieve these GHG reduction goals by enhancing ecological functions and improving existing facilities, thereby reducing emissions. The proposed project would improve gateways and pedestrian, bicycle, and vehicular thoroughfares with an emphasis on highlighting public transportation options. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation related to reducing GHG emissions. No mitigation or further analysis is warranted.

[7] California Air Resources Board. Accessed November 27, 2019. California's 2017 Climate Change Scoping Plan. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf

3.9 HAZARDS AND HAZARDOUS MATERIALS

This analysis is undertaken to determine if the proposed project may have a significant impact to hazards and hazardous materials, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Hazardous wastes are by-products of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. Hazardous wastes possess at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or appears on special U.S. Environmental Protection Agency (EPA) lists. Hazards and hazardous materials at the Master Plan Area were evaluated based on expert opinion supported by facts, review of an Environmental Data Resources, Inc. EDR Radius Map Report with GeoCheck (included as Appendix D to the Initial Study), City of Los Angeles General Plan Land Use Element,[1] South Los Angeles Community Plan,[2] and the Coliseum Specific Plan.[3]

The State CEQA Guidelines recommend the consideration of seven questions when addressing the potential for significant impact to hazards and hazardous materials. Would the project:

(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The proposed project would result in less than significant impacts to hazards and hazardous materials related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The proposed project is limited to landscape improvements, the creation of public open space, parking, and pedestrian and cycling improvements. The transport, use, and storage of hazardous materials are governed by a range of federal, state, and local statutes and regulations. The use, transport, and disposal of hazardous materials within the Master Plan Area would be comparable to those used in commercial, retail, residential, industrial, and manufacturing land uses within and adjacent to the Master Plan Area, such as cleaning supplies, fuels, herbicides, and pesticides. The transport, use, and storage of hazardous materials are governed by a range of federal, state, and local statutes and regulations. The Master Plan Area is owned by a public agency, the OEPM; thus, the use and storage of these materials is regulated by a Business Plan. The purpose of a Business Plan is to prevent or minimize the damage to public health and safety and the environment from a release or threatened release of hazardous materials. It also satisfies community right-to-know laws. This is accomplished by requiring businesses that handle hazardous materials in quantities equal to or greater than 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, or extremely hazardous substances above the threshold planning quantity to (1) inventory their hazardous materials, (2) develop a site map, (3) develop an emergency plan, and (4) implement a training program for employees. Businesses must submit this information electronically to the statewide information management system (California Environmental Reporting System, or CERS).[4] Once the submittal has been made, the local implementing agency (Certified Unified Program Agency, or

[1] Los Angeles Department of City Planning. Accessed November 27, 2019. City of Los Angeles General Plan 2035. https://planning.lacity.org/plans-policies/general-plan-overview

[2] Los Angeles Department of City Planning. November 2017. South Los Angeles Community Plan. https://planning.lacity.org/plans-policies/community-plan-area/south-los-angeles

[3] Los Angeles Department of City Planning. June 30, 2017. Coliseum Specific Plan.

[4] California Health and Safety Code. Accessed November 27, 2019. Chapter 6.8, §25500 et seq. (1985, as amended). Hazardous Materials Release Response Plans and Inventory Law of 1986 (Business Plan Act). http://www.aroundthecapitol.com/code/code.html?sec=hsc&codesection=25404-25404.9

CUPA) will verify the information and provide it to agencies responsible for the protection of public health and safety and the environment.[5] These agencies include Fire Departments, Hazardous Materials Response Teams, or local environmental regulatory agencies. The application of herbicides and pesticides must be performed under the supervision of a licensed applicator, consistent with the specifications of the Materials Data Safety Sheet.[6] The use, transport, and disposal of hazardous materials within the Master Plan Area as a result of the proposed improvements would be comparable to existing conditions with regard to the use, transport, and disposal of hazardous materials within the Master Plan Area. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The proposed project would result in potentially significant impacts to hazards and hazardous materials during construction in relation to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be reduced to below the level of significance with incorporation of mitigation measures.

Construction

The proposed project has the potential to release hazardous materials into the environment during excavation and off-site soil disposal through accident conditions. The use of hazardous materials is typically associated with industrial land uses. Activities such as manufacturing, plating, cleaning, refining, and finishing frequently involve chemicals that are considered hazardous when accidentally released into the environment. A hazardous sites records search was compiled by EDR for the Master Plan Area on November 16, 2019 (see Appendix D). The EDR report included two radius maps, one with concentric ellipses indicating the search distances of 0.25, 0.5, 1, and 2 miles from the perimeter of the Master Plan Area, and the other for the target property and one-quarter mile only. The EDR package included certified Sanborn Fire Insurance Maps, historical aerial photographs, historical topographic maps, high-risk historical records, and recovered government archives. A review of the EDR package indicated that recognized environmental concerns (RECs) would not constrain development within the Master Plan Area. The search returned known sources of hazards or hazardous materials in or in the vicinity of the Master Plan Area. The review of the California Department of Toxic Substances Control (DTSC) environmental regulatory database compilation does not indicate that the Master Plan Area is included on a list of hazardous materials sites compiled pursuant to the Government Code Section 65962.5.[7]

[5] California Health and Safety Code. Accessed November 27, 2019. Chapter 6.8, §25500 et seq. (1985, as amended). Hazardous Materials Release Response Plans and Inventory Law of 1986 (Business Plan Act). http://www.aroundthecapitol.com/code/code.html?sec=hsc&codesection=25404-25404.9

[6] OSHA, 29 Code of Federal Regulations. Material Safety Data Sheets (MSDSs).

[7] Department of Toxic Substance Control (DTSC), Accessed December 20, 2019. Envirostor Database. https://www.envirostor.dtsc.ca.gov/public/map/?global_id=38330005

The EDR report identifies a total of 80 unique hazardous materials sites (at 35 recorded addresses) that are located within or adjacent to the Master Plan Area, 39 of which are active, open, or not reported (Table 3.9-1, *Hazardous Materials Sites Within or Adjacent to the Master Plan Area*; Figure 3.9-1, *Active Hazardous Materials Sites Within or Adjacent to Master Plan Area*):

- 45 sites (22 active/open/not reported) are located within or adjacent to proposed Element 1
- 19 sites (7 active/not reported) are located within or adjacent to proposed Element 2
- 3 sites (3 active) are located within or adjacent to proposed Element 3
- 7 sites (0 active) are located within or adjacent to proposed Element 4
- 21 sites (8 open/active/not reported) are located within or near proposed Element 5
- 26 sites (13 open/active/not reported) are located within or adjacent to proposed Element 6
- 13 sites (9 active/not reported) are located within or adjacent to proposed Element 7
- 11 sites (5 open/active/not reported) are located within or adjacent to proposed Element 8
- 3 sites (3 active) are located within or adjacent to proposed Element 9
- 7 sites (2 not reported) are located within the Master Plan Area at a distance from the proposed Elements
- 6 sites (3 open/not reported) are located 500 feet to 0.2 mile from the Master Plan Area

TABLE 3.9-1
HAZARDOUS MATERIALS SITES WITHIN OR ADJACENT TO THE MASTER PLAN AREA

	Business Name	Street Address	Location Relative to Project Area	Listing(s) Summary	Property Status*
1	No Name	3776 S Vermont Ave	Within Master Plan Area Within or adjacent to Element 1	Facilities at this address were listed in Historical Underground Storage Tank (HIST UST)	Not reported
2	WILLIAMSON DONALD	3790 S Vermont Ave	Within Master Plan Area Within or adjacent to Element 1	Facilities at this address were listed in HIST AUTO Historic gas and oil services station	Not reported
3	UNIVERSITY AUTO SERVICE	3782 S Vermont Ave	Within Master Plan Area Within or adjacent to Element 1	Facilities at this address were listed in HIST AUTO	Inactive
4	No Name	3900 Menlo Ave	Within Master Plan Area Within or adjacent to Element 1	Facilities at this address were listed in CHMIRS, ERNS	Not reported
5	LOS ANGELES SWIM STADIUM	3966 Menlo Ave	Within Master Plan Area Within or adjacent to Element 1	Facilities at this address were listed in HAZNET	Inactive
6	NO NAME	931 W Martin Luther King Jr Blvd	Within Master Plan Area Within or adjacent to Element 1	Facilities at this address were listed in UST	Not reported
7	SMITTY'S AUTO STATION	931 W Martin Luther King Jr. Blvd	Within Master Plan Area Within or adjacent to Element 1	Facilities at this address were listed in SWEEPS UST, CA FID UST	Active
8	NO NAME	875 W Martin Luther King Jr Blvd	Within Master Plan Area Within or adjacent to Element 1	Facilities at this address were listed in UST	Not reported
9	UNIVERSITY OF SOUTHERN CALIFORNIA	3939 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in HAZNET	Inactive
10	LOS ANGELES MEMORIAL COLISEUM COMMISSION	3939 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in HAZNET	Inactive
11	REMOTE AREA MEDICAL	3939 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in HAZNET	Inactive
12	1X LA MEMORIAL COLISEUM & SPORTS ARENA	3939 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in HAZNET	Inactive
13	STADIUMCO LLC	3939 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in FINDS	Not reported
14	STADIUMCO LLC	3939 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in ECHO, RCRA NONGEN / NLR	Inactive
15	AT&T - G4192	3939 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in HAZNET, HAZMAT, CERS	Active
16	LAFC STADIUMCO, LLC	3939 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in HAZNET	Inactive
17	LOS ANGELES MEMORIAL COLISEUM	3911 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in FTTS, HIST FTTS, FINDS	Not reported
18	AT&T MOBILITY-LA0744-01 LA COLISEUM	3911 S Figueroa St Att-M	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in FINDS	Not reported
19	USC LOS ANGELES COLISEUM	3911 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in RCRA NONGEN / NLR, FINDS, ECHO	Active
20	CITY OF LOS ANGELES GENERAL SERVICES	3911 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in HAZNET	Inactive
21	VERIZON WIRELESS: COLISEUM	3911 S. Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in CERS, FINDS	Not reported
22	LA EXPOSITION PARK	3911 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in RCRA-SQG, FINDS, ECHO	Inactive
23	1X LOS ANGELES MEMORIAL COLISEUM	3911 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in HAZNET	Inactive
24	UNIVERSITY OF SOUTHERN CALIFORNIA	3911 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in HAZNET	Inactive

TABLE 3.9-1
HAZARDOUS MATERIALS SITES WITHIN OR ADJACENT TO THE MASTER PLAN AREA

	Business Name	Street Address	Location Relative to Project Area	Listing(s) Summary	Property Status*
25	LOS ANGELES MEMORIAL COLISEUM	3911 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2	Facilities at this address were listed in NPDES, HAZMAT, CIWQS, CERS	Active
26	LAFC	3939 S Figueroa Street	Within Master Plan Area Within or adjacent to Element 1, 2, 4	Facilities at this address were listed in NPDES, CIWQS	Terminated
27	ESPN	3939 S Figueroa St	Within Master Plan Area Within or adjacent to Element 1, 2, 4	Facilities at this address were listed in HAZNET	Inactive
28	1X LA SWIM STADIUM	3980 S Menlo Ave	Within Master Plan Area Within or adjacent to Element 1, 4, 5	Facilities at this address were listed in HAZNET	Inactive
29	1X EXPOSITION RECREATION CENTER	3990 S Menlo Ave	Within Master Plan Area Within or adjacent to Element 1, 5	Facilities at this address were listed in HAZNET	Inactive
30	FRASEUR EARL	970 Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5	Facilities at this address were listed in EDR HIST AUTO	Not reported
31	No Name	933 W Martin Luther King Jr Blvd	Within Master Plan Area Within or adjacent to Element 1, 5	Facilities at this address were listed in UST	Historical
32	LA COUNTY - MUSEUM OF NATURAL HISTO	900 W Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in FINDS	Not reported
33	CALIFORNIA AFRICAN AMERICAN MUSEUM	600 State Dr	Within Master Plan Area Within or adjacent to Element 1, 6, 7	Facilities at this address were listed in HAZNET	Inactive
34	CAL STATE AFRO-AMERICAN MUSEUM	600 State Dr	Within Master Plan Area Within or adjacent to Element 1, 6, 7	Facilities at this address were listed in EMI	Active
35	KARCHER ENVIRONMENTAL, INC.	600 State Dr	Within Master Plan Area Within or adjacent to Element 1, 6, 7	Facilities at this address were listed in FTTS, HIST FTTS, FINDS Child Occupied Facility	Not reported
36	LA COUNTY - MUSEUM OF NATURAL HISTO	900 W Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in UST	Inactive
37	LA COUNTY - MUSEUM OF NATURAL HISTO	900 W Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in FINDS	Not reported
38	LA CO., MUSEUM OF NATURAL HIST	900 West Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in EMI	Inactive
39	LA CO ISD MUSEUM OF NAT HIST	900 W Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in CERS HAZ WASTE, LOS ANGELES CO. HMS, HAZMAT, CERS	Open
40	NATURAL HISTORY MUSEUM FOUNDATION OF LOS ANGELES C	900 Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in CIWQS	Terminated
41	RDC CONSTRUCTION INC	900 Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in HAZNET	Inactive
42	NATURAL HISTORY MUSEUM	900 Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in HIST UST, CIWQS	Terminated
43	NATURAL HISTORY MUSEUM LA CO	900 Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in RCRA-LQG, FINDS, ECHO, HAZNET	Active
44	COUNTY OF LOS ANGELES ISD	900 Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in HAZNET	Inactive
45	MUSEUM OF NATURAL HISTORY	900 Exposition Blvd	Within Master Plan Area Within or adjacent to Element 1, 5, 6, 8	Facilities at this address were listed in SWEEPS UST, CA FID UST, PEST LIC	Active
46	CALIFORNIA SCIENCE CENTER FOUNDATION	700 Exposition Park Dr	Within Master Plan Area Within or adjacent to Element 3, 9	Facilities at this address were listed in HAZNET, NPDES, CIWQS, CERS. No releases or violations were reported.	Active
47	CALIFORNIA SCIENCE CENTER FOUNDATION	700 Exposition Park Dr	Within Master Plan Area Within or adjacent to Element 3, 9	Facilities at this address were listed in RCRA NONGEN / NLR	Active
48	CALIFORNIA SCIENCE CENTER FOUNDATION	700 Exposition Park Dr	Within Master Plan Area Within or adjacent to Element 3, 9	Facilities at this address were listed in FINDS, ECHO reporting databases: FINDS Quarterly Reporting 05/03/2019 ECHO Quarterly Reporting: 07/06/2019	Active

TABLE 3.9-1
HAZARDOUS MATERIALS SITES WITHIN OR ADJACENT TO THE MASTER PLAN AREA

	Business Name	Street Address	Location Relative to Project Area	Listing(s) Summary	Property Status*
49	NO NAME	555 W Martin Luther King Jr Blvd	Within Master Plan Area Within or adjacent to Element 4	Facilities at this address were listed in UST	Historical
50	JOHN C. ARGUE SWIM STADIUM	3980 Menlo Ave	Within Master Plan Area Within or adjacent to Element 4, 5	Facilities at this address were listed in HAZNET, CERS	Inactive
51	EXPOSITION PARK INTERGENERATIO	3938 Menlo Ave # 3990	Within Master Plan Area Within or adjacent to Element 4, 5	Facilities at this address were listed in CIWQS	Terminated
52	1X CITY OF LOS ANGELES/PARKS & REC	3980 S Menlo Ave	Within Master Plan Within or adjacent to Element 4, 5	Facilities at this address were listed in HAZNET	Inactive
53	1X ULLMAN, RICK	3987 South Menlo Ave	Within Master Plan Area Within or adjacent to Element 5	Facilities at this address were listed in HAZNET	Active
54	No Name	3966 S Vermont Ave	Within Master Plan Area Near Element 5	Facilities at this address were listed in HISTORICAL UST, 01/01/1990	Historical
55	LUCAS MUSEUM OF NARRATIVE ART	3800 S Vermont Avenue	Within Master Plan Area Near Element 5	Facilities at this address were listed in NPDES, CIWQS, CERS	Active
56	LAUSD--MANUAL ARTS NEW ES #1	700 State Dr	Within Master Plan Area Within or adjacent to Element 6	Facilities at this address were listed in FINDS, ECHO	No further action
57	LAUSD--MANUAL ARTS NEW ES #1	700 State Dr	Within Master Plan Area Within or adjacent to Element 6	Facilities at this address were listed in RCRA-SQG	Active
58	ARMORY BLDG	700 State Dr	Within Master Plan Area Within or adjacent to Element 6, 7	Facilities at this address were listed in RCRA-SQG, FINDS, ECHO	Active
59	1X CA MUSEUM OF SCIENCE & INDUSTRY	700 State Dr	Within Master Plan Area Within or adjacent to Element 6, 7	Facilities at this address were listed in HAZNET	Inactive
60	CALIFORNIA MUSEUM OF SCIENCE & INDUSTRY	700 State Dr	Within Master Plan Area Within or adjacent to Element 6, 7	Facilities at this address were listed in HAZNET	Not reported
61	SCIENCE CTR SCH & SCIENCE EDUCATION RESOURCE CTR	700 State Dr	Within Master Plan Area Within or adjacent to Element 6, 7	Facilities at this address were listed in CIWQS	Not reported
62	CALIFORNIA SCIENCE CENTER	700 State Dr	Within Master Plan Area Within or adjacent to Element 6, 7	Facilities at this address were listed in CERS TANKS, HAZMAT, CERS, UST, CIWQS	Active
63	CALIFORNIA MUSEUM OF SCIENCE AND	700 State Dr	Within Master Plan Area Within or adjacent to Element 6, 7	Facilities at this address were listed in HIST UST, CA FID UST	Active
64	CALIFORNIA	700 State Dr	Within Master Plan Area Within or adjacent to Element 6, 7	Facilities at this address were listed in FTTS, HIST FTTS	Not reported
65	CALIFORNIA MUSEUM OF SCIENCE &	700 State Dr	Within Master Plan Area Within or adjacent to Element 6, 7	Facilities at this address were listed in (HIST UST) Historical Underground Storage Tank	Not reported
66	CALIFORNIA SCIENCE CENTER	706 State Dr	Within Master Plan Area Within or adjacent to Element 6, 7	Facilities at this address were listed in HAZMAT Facility is listed as a science center and science education resource center.	Inactive
67	CALIFORNIA SCIENCE CENTER	706 State Dr	Within Master Plan Area Within or adjacent to Element 6, 7	Facilities at this address were listed in UST	Inactive
68	FONG TOM	3902 S Vermont Ave	Within Master Plan Area	Listed in the EDR historical cleaners (HIST Cleaners) database as Laundries Oriental 1942	Historical
69	SHON SAML	3912 S Vermont Ave	Within Master Plan Area	Listed in the EDR historical cleaners (HIST Cleaners) database as Laundries Oriental Clothes Presses and Cleaners 1929, 1933, 1937, 1942	Historical
70	MAINS C L	3966 S Vermont Ave	Within Master Plan Area	Listed in the EDR historical cleaners (HIST Cleaners) database as Clothes Presses and Cleaners 1937	Historical
71	FRY BROS	3972 S Vermont Ave	Within Master Plan Area	Historical Automobile Repairing (HOST AUTO) 1937	Historical

TABLE 3.9-1
HAZARDOUS MATERIALS SITES WITHIN OR ADJACENT TO THE MASTER PLAN AREA

	Business Name	Street Address	Location Relative to Project Area	Listing(s) Summary	Property Status*
72	VARTAMAN GEO	3980 S Vermont Ave	Within Master Plan Area	Listed in the EDR historical cleaners (HIST Cleaners) database as Clothes Presses and Cleaners 1929, 1933, 1937	Historical
73	BURGHART ARNOLD	3886 S Vermont Ave	Within Master Plan Area	Facilities at this address were listed in (HIST AUTO) 1937 Historical Automobile Repairing and Service Station	Not reported
74	BURGHART ARNOLD	3836 S Vermont Ave	Within Master Plan Area	Facilities at this address were listed in HIST AUTO Historical gas and oil services station	Not reported
75	No Name	3724 Vermont Ave	500 feet north of the northwestern corner of Master Plan Area	Facilities at this address were listed in (HIST UST) 01/01/1900 Historical Underground Storage Tank	Historical
76	SMITHS SHELL SERVICE	3724 S Vermont	500 feet north of the northwestern corner of Master Plan Area	Facilities at this address were listed in HIST AUTO Historical gas and oil services station	Inactive
77	CLINE HANSON	3720 S Vermont Ave	500 feet north of the northwestern corner of Master Plan Area	Facilities at this address were listed in (HIST AUTO) 1924 Historical gas and oil services station	Not reported
78	SMITH R E	3742 S Vermont Ave	500 feet north of the northwestern corner of Master Plan Area	Facilities at this address were listed in HIST AUTO Historical Automobile Repairing and Service Station	Not reported
79	STOLEN BASE CLEANERS	1015 W Martin Luther King Blvd	0.1 mile southwest of the Master Plan Area	Facilities at this address were listed in RCRA-SQG, LUST, CPSSLIC, FINDS, ECHO, HIST CORTESE, CERS, DRYCLEANERS, HAZNET	Completed-Case Closed
80	FORMER BETHUNE LIBRA	3665 Vermont Ave S	0.2 mile northwest of the Master Plan Area	Facilities at this address were listed in US BROWNFIELDS This is an open-active LUST (leaking Underground Storage Tanks)	Inactive – Action Required Open – Site Assessment

NOTE: HAZNET: Facility and Manifest Data (HAZNET) database; FINDS: Facility Index System/Facility Registry System; ECHO: Enforcement & Compliance History Information.
SOURCE: * California Department of Toxic Substances Control (DTSC). Accessed December 3, 2019. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/map/?global_id=CAD028409019
*California State Water Resources Control Board. Accessed December 3, 2019. Geotracker. https://geotracker.waterboards.ca.gov/map/?global_id=SL603798682

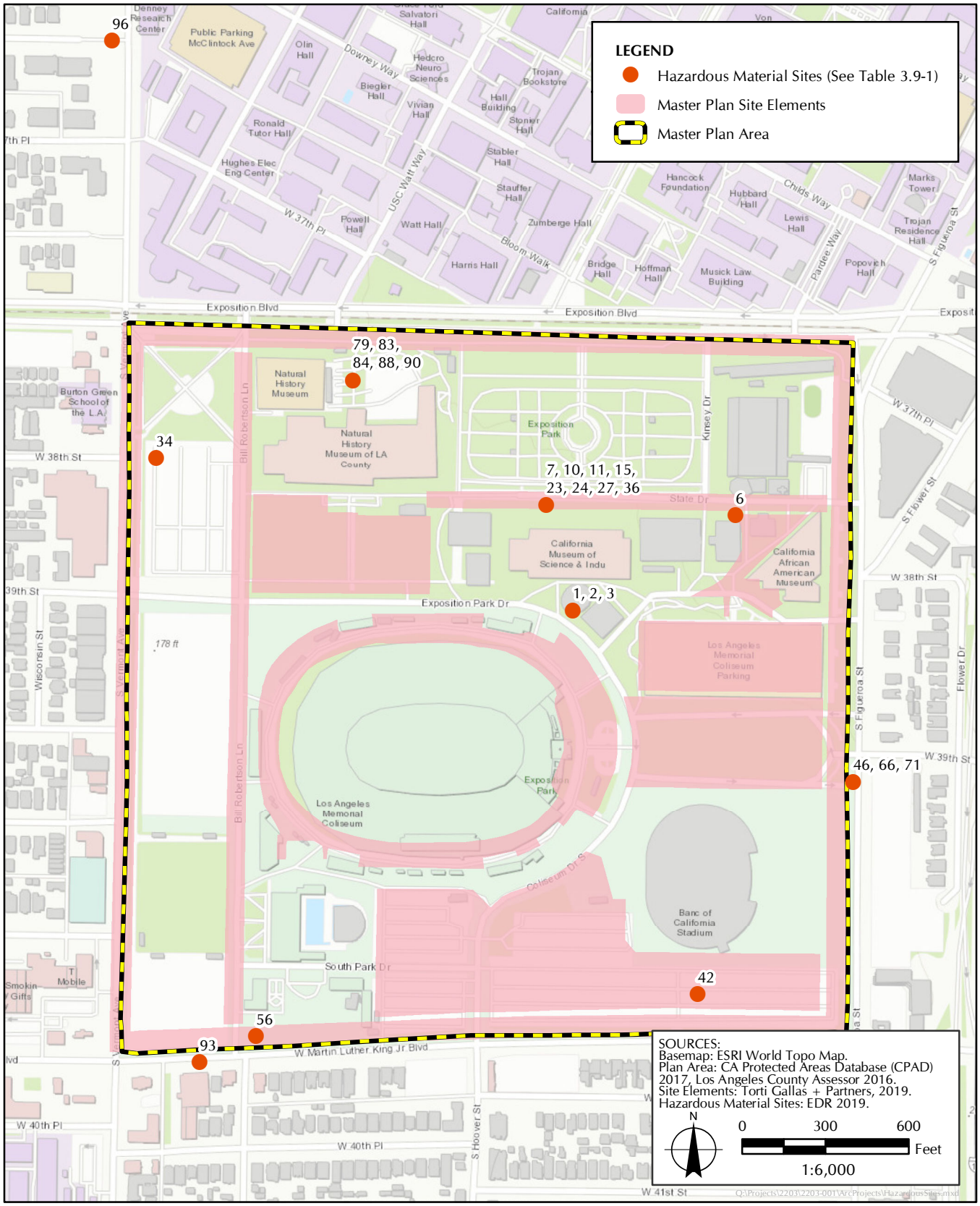

FIGURE 3.9-1

Active Hazardous Material Sites within or Adjacent to Master Plan Area

The historic land uses in and adjacent to the Master Plan Area are also known sources of hazardous materials, including vehicular use of roadways, fuels station, adjacent rail and bus uses, and industrial land uses. The potential presence of hydrocarbons, metals, and persistent pesticides in soil along roads or adjacent to the Master Plan Area represent a potential environmental concern. Elevated concentrations of lead (from use of leaded gasoline) and other metals are sometimes associated with older roadways. Based on a review of historical sources, roadways surrounding the Master Plan Area including Exposition Blvd., Figueroa St., Martin Luther King, Jr. Blvd., and Vermont Ave., and, traversing the Master Plan Area, Bill Robertson Lane, have been present since at least 1923. The historic use of yellow traffic markings (thermoplastic and paint) used to demarcate lanes in the street may also potentially contain hazardous levels of lead chromate. There is the potential of naturally occurring oil seeps within the Master Plan Area. The potential to encounter contaminated soils during demolition construction and expose workers and the surrounding general public and land uses to such substances constitutes a potentially significant impact requiring the consideration of mitigation measures. Mitigation Measure HAZ-1 would require soil sampling for locations of improvements within Elements 4 and 5. In addition, handling of hazardous materials in relation to construction of the proposed project would be in accordance with the Toxic Substance Control Act, Hazardous Material Transportation Act, Resource Conservation Act, Certified Unified Program Agency, and Californian Accidental Release Prevention Program. With implementation of Mitigation Measure HAZ-1, potential impacts to hazards and hazardous materials during construction in relation to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be reduced to below the level of significance.

Mitigation Measure HAZ-1: If soil in the vicinity of the Bill Robertson Lane (Element 5) and Festival Park and Community Promenade (Element 4) of the Master Plan is planned for excavation and off-site disposal as part of the proposed Master Plan improvements, soil shall be sampled and analyzed for the potential presence of petroleum hydrocarbons, metals and persistent pesticides. The samples should be analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), California Code of Regulations Title 22 Metals, and organochlorine pesticides (OCPs) using United States EPA Methods 8015B(M), 8260B, 6010B/7471A, and 8081, respectively. This methodology shall be documented in a Soil Management Plan prior to construction. During construction, soil excavations conducted on-site shall be monitored for visible soil staining and odor. Impacted soils shall be disposed of off-site in accordance with federal, state, and local regulatory guidelines.

Operations

The proposed project is limited to landscape improvements and the creation of public open space, along with parking and pedestrian and cycling improvements. As in the existing condition, the improved parkland would require incidental use of cleaning supplies, fuels, herbicides, and pesticides. The transport, use, and storage of hazardous materials are governed by a range of federal, state, and local statutes and regulations. Since the OEPM is a public agency, the use and storage of these materials are already regulated by a Business Plan. The application of herbicides and pesticides must be performed under the supervision of a licensed applicator, consistent with the specifications in the Materials Data Safety Sheet. Handling of hazardous materials in relation to operation of the proposed Master Plan would be in accordance with the Toxic Substance Control Act, Hazardous Material Transportation Act, Resource Conservation Act, Certified Unified Program Agency, and Californian Accidental Release Prevention Program. Therefore, impacts during operations would be less than significant.

(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The proposed project would result in potentially significant impacts to hazards and hazardous resources during construction in relation to emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Incorporation of mitigation measures would reduce impacts to below the level of significance.

There are five schools located within one-quarter mile of the Master Plan Area. The nearest schools are Ralph M. Parsons Pre-School and Dr. Theodore T. Alexander Science Center School, both of which are located in the Master Plan Area. The next nearest schools are USC Hybrid High School, Manual Arts High School, and Menlo Avenue Elementary School (see Table 3.9-2, *Schools within One-Quarter Mile of the Master Plan Area*).

TABLE 3.9-1
SCHOOLS WITHIN ONE-QUARTER MILE OF THE MASTER PLAN AREA

District	Name of School	Distance (miles)
LAUSD (Affiliated Independent Charter)	Alexander Science Center School	Within the Master Plan Area (northeast corner)
Private (Pre-School)	Ralph M. Parsons Pre-School	Within the Master Plan Area (southwest corner)
Private	USC Hybrid High School	0.02 (91 feet) west
LAUSD	Manual Arts High School	0.07 (345 feet) southwest
LAUSD	Menlo Avenue Elementary School	0.2 mile south

Construction

Based on a review of the EDR report, a total of 80 unique hazardous materials sites are located at 35 addresses in or adjacent to the Master Plan Area (see Table 3.9-1). The historic land uses in and adjacent to the proposed Master Plan Area are also known sources of hazardous materials, including vehicular use of roadways, fuels station, adjacent rail and bus uses, and industrial land uses. The potential presence of hydrocarbons, metals, and persistent pesticides in soil within or adjacent to the Master Plan Area represent a potential environmental concern. Elevated concentrations of lead (from use of leaded gasoline) and other metals are sometimes associated with older roadways also represent a potential environmental concern. Based on a review of historical sources, roadways surrounding the Master Plan Area including Exposition Blvd., Figueroa St., Martin Luther King, Jr. Blvd., and Vermont Ave., and, traversing the Master Plan Area, Bill Robertson Lane, have been present since at least 1923. The historic use of yellow traffic markings (thermoplastic and paint) used to demarcate lanes in the street may also potentially contain hazardous levels of lead chromate. There is the potential for naturally occurring oil seeps within the Master Plan Area. The potential to encounter contaminated soils during demolition construction and the potential exposure of workers and the surrounding general public and land uses to such substances constitutes a potentially significant impact requiring the consideration of mitigation measures. Mitigation Measure HAZ-1 would require soil sampling for locations of improvements within Elements 4 and 5. With incorporation of Mitigation Measure HAZ-1, potential impacts to hazards and hazardous materials during construction in relation to existing or proposed schools within one-quarter mile would be reduced to below the level of significance.

Operations

The proposed project is limited to landscape improvements and the creation of public open space, along with parking and pedestrian and cycling improvements. These improvements would require incidental use of cleaning supplies, fuels, herbicides, and pesticides. The transport, use, and storage of hazardous materials are governed by a range of federal, state, and local statutes and regulations. Since the OEPM is a public agency, the use and storage of these materials is regulated by a Business Plan. The application of herbicides and pesticides must be performed under the supervision of a licensed applicator, consistent with the specifications in the Materials Data Safety Sheet. Therefore, impacts during operations would be less than significant.

(d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to the Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

The proposed project would result in no impacts to hazards and hazardous materials in relation to location on a site that is include on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 which would create a significant hazard to the public or the environment. The review of the DTSC environmental regulatory database compilation does not indicate that the Master Plan Area is included on a list of hazardous materials sites compiled pursuant to the Government Code Section 65962.5.[8] Therefore, there would be no impact. No mitigation or further analysis is warranted.

(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The proposed project would result in no impacts to hazards and hazardous materials in relation to resulting in a safety hazard or excessive noise for people residing or working in the project area due to its location within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public use airport. The Master Plan Area is not located within 2 miles of a public airport or a public use airport or within an airport land use plan. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed project would result in no impacts to hazards and hazardous resources in relation to impairing implementation of or physically interfering with an adopted emergency response and/or emergency evacuation. Regarding wildfire hazards, the Master Plan Area is not located within or near a State Responsibility Area (SRA) or Very High Fire Hazard Severity Zone (VHFHSZ) (see Section 3.20, *Wildfire*).[9] As such, the wildfire emergency response and/or evacuation plans would not be adversely affected as a result of the proposed project. Regarding local emergency

[8] Department of Toxic Substance Control (DTSC), Accessed December 20, 2019. Envirostor Database. https://www.envirostor.dtsc.ca.gov/public/map/?global_id=38330005

[9] California Department of Forestry and Fire Prevention (CAL FIRE) Office of the State Fire Marshall. Accessed November 20, 2019. Fire Hazard Severity Zones Maps. https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/

evacuation routes, the Master Plan Area is within the City of Los Angeles Central Area under the Los Angeles County Operational Area for disaster routes. Disaster routes mapped for the City of Los Angeles – Central Area relevant to the Master Plan Area consists of the I-110 Freeway (Harbor Freeway), north and south directions; North Figueroa Street, north and south directions; Martin Luther King, Jr. Blvd., east and west directions; West Jefferson Blvd. from South Figueroa Street to South Hoover Street; and South Hoover Street starting at West Jefferson Boulevard and continuing north.[10] During construction, the proposed improvements would be contained on-site of the Master Plan Area property and would not interfere with these adjacent streets. There would be temporary additional trips associated with construction haul trucks, delivery trucks, and workers; however, road closures or the reengineering of the evacuation route roads surrounding the Master Plan Area would not be expected. Furthermore, the proposed improvements would be expected to reduce traffic congestion on the Martin Luther King, Jr. Blvd. evacuation route (see Section 3.17, *Transportation*). Additionally, the Master Plan Area itself is not included as part of a disaster route or evacuation center in any emergency response plan or any emergency evacuation plan (see Section 3.20). Therefore, there would be no impact. No mitigation or further analysis is warranted.

(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The proposed project would result in less than significant impacts to hazards and hazardous materials in relation to exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. The Master Plan Area is not located within or near an SRA or VHFHSZ (see Section 3.20, *Wildfire*). According to the California Department of Forestry and Fire Prevention (CAL FIRE),[11] the Fire Hazard Severity Zone Maps for both local and state responsibility areas (LRAs and SRAs) indicate that the Master Plan Area is located 2.78 miles away from the nearest LRA VHFHSZ (Baldwin Hills to the west) and approximately 14 miles away from the nearest SRA VHFHSZ (Whittier to the east). Furthermore, the proposed project is limited to landscape improvements and the creation of public open space along with parking and pedestrian and cycling improvements. Use of the proposed project would be similar to the existing condition. In the case of a fire hazard, the Master Plan Area has adequate access for and is adequately served by fire protection services (see Section 3.15, *Public Services*). The Master Plan Area would include a fire lane in Element 6 – Museum Walk; and Element 7 – California African American Museum Sculpture Garden would have a fire access road as well. Additionally, the Master Plan Area is a low-elevation, flat site that is in the immediate vicinity of large urban streets and local emergency evacuation routes. The fire protection response times from Los Angeles Fire Department Station 15 and 46 are 1 mile (6 minutes) and 0.5 mile (2 minutes), respectively. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

[10] County of Los Angeles Department of Public Works. Accessed November 27, 2019. City of Los Angeles Central Area Disaster Routes Map. https://dpw.lacounty.gov/dsg/DisasterRoutes/

[11] California Department of Forestry and Fire Prevention (CAL FIRE) Office of the State Fire Marshall. Accessed November 20, 2019. Fire Hazard Severity Zones Maps. https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/

3.10 HYDROLOGY AND WATER QUALITY

This analysis is undertaken to determine if the proposed project may have a significant impact to hydrology and water quality, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Hydrology and water quality at the Master Plan Area were evaluated with regard to the City of Los Angeles General Plan Safety Element,[1] the South Los Angeles Community Plan,[2] ZIMAS website,[3] the USGS 7.5-Minute Series Hollywood Topographic Quadrangle,[4] and a hydrology and water quality impact analysis for the proposed project (see Appendix A, *Exposition Park Master Plan Hydrology and Water Quality Impact Analysis*).

The State CEQA Guidelines recommend the consideration of five questions when addressing the potential for significant impact to hydrology and water quality. Would the project:

(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The proposed project would result in less than significant impacts to hydrology and water quality in relation to violating water quality standards or waste discharge requirements or otherwise substantially degrading surface or groundwater quality. Water quality would be protected by the implementation of a project-specific Stormwater Pollution Prevention Plan (SWPPP) as required by the Construction General Permit (CGP). Best management practices (BMPs) would be utilized according to the SWPPP plan. A hydrology and water quality impact analysis for the proposed project has been prepared (see Appendix A). Structural, nonstructural, and Low Impact Development (LID) BMPs would be used in the Master Plan Area (see Appendix A). Some of these include (but are not limited to) Rain Gardens, Biofilters, Dry Creeks, Drywells, and Capture and Use devices (see Figure 14 in Appendix A). Approximately 95 percent of the Master Plan Area drains to Ballona Creek Reach 1, and the remaining 5 percent flows to Los Angeles River Reach 2. Both watersheds have total maximum daily load (TMDL) requirements as described in the Clean Water Act (CWA) Section 303(d). The TMDLs for Ballona Creek Reach 1 are Trash, Bacteria, and Metals. The TMDLs for Los Angeles River Reach 2 are Trash, Nitrogen Compounds, and Bacteria. A SWPPP would be prepared for the construction and operation phase of each element of the Master Plan specifying the City's LID ordinance. BMPS would be utilized to avoid contributing to exceedances of TMDLs for Trash, Nitrogen Compounds, and Bacteria (see Table 1.12-1, *Best Management Practices* and Appendix A). BMPs would be utilized to prevent these constituents from discharging to Ballona Creek Reach 1 and Los Angeles River Reach 2 (see Table 1.12-1).

Average annual groundwater depth for the proposed project area is roughly 172 feet below ground surface (bgs).[5] Borings conducted in 2007 showed that groundwater was not detected in depths from 40 to 100 feet bgs.[6] The proposed project is not expected to encounter groundwater, and

[1] City of Los Angeles Department of City Planning. Adopted November 26, 1996. Safety Element of the Los Angeles City General Plan, City Plan Case No. 95-0371. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf

[2] City of Los Angeles Department of City Planning. Adopted November 22, 2017. South Los Angeles Community Plan.

[3] City of Los Angeles. Accessed November 27, 2019. ZIMAS. http://zimas.lacity.org/

[4] U.S. Geological Survey. Accessed December 3, 2019. USGS Topographic Maps. Current and Historical Topo Maps of the US. https://viewer.nationalmap.gov/basic/?basemap=b1&category=histtopo,ustopo&title=Map%20View

[5] Appendix A, p. 10.

[6] Appendix A, p. 10.

therefore it would not have the potential to degrade ground water quality. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The proposed project would result in no impacts to hydrology and water quality in relation to decreasing groundwater supplies or interference with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The existing impervious surface area of the nine project elements totals approximately 30.2 acres (1,317,540 square feet). The proposed project would reduce total impervious surface of the approximately 41.6-acre (1,810,786 square feet) development area to 21.6 acres, for a net decrease of 8.6 acres (Table 3.10-1, *Change in Imperviousness*; see Appendix A).

TABLE 3.10-1
CHANGE IN IMPERVIOUSNESS

Project Element	Approximate Development Area (square feet)	Existing Imperviousness (square feet) (%)	Proposed Imperviousness (square feet) (%)	Change in Imperviousness (square feet) (%)
1. Threshold and Gateway	80,100	62,381 (78%)	48,195 (60%)	–14,186 (–18%)
2. Expo Festival Plaza	227,826	112,965 (50%)	103,091 (45%)	–9,874 (–4%)
3. Solar Garden	173,967	154,946 (89%)	154,946 (89%)	0 (0%)
4. Festival Park and Community Promenade	615,819	570,065 (93%)	265,407 (43%)	–304,658 (–49%)
5. Bill Robertson Lane	123,787	120,364 (97%)	116,794 (94%)	–3,570 (–3%)
6. Museum Walk	98,171	72,353 (74%)	41,352 (42%)	–31,001 (–32%)
7. CAAM Sculpture	44,048	25,118 (57%)	44,048 (100%)	18,930 (43%)
8. Zanja Madre	203,132	6,971 (3%)	2,031 (1%)	–4,940 (2%)
9. Olympic Ring Walk	243,936	192,377 (79%)	168,554 (69%)	–23,823 (–10%)
Project Total	**1,810,786**	**1,317,540 (74%)**	**942,387 (56%)**	**–375,153 (–18%)**

Furthermore, there are no groundwater wells within 5 miles of the Master Plan Area. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?

The Master Plan would include stormwater management measures to reduce surface runoff and therefore reduce the potential for erosion, flooding, or polluted runoff (see Table 1.12.1-1, *Best Management Practices*, and Appendix A). These stormwater management measures include a proposed storm easement, a proposed utility easement, one proposed dry creek in the Zanja Madre and Museum Walk Zone, three proposed capture and use systems (one in the Expo Park Festival Plaza Zone and two in the Festival Lawn and Community Park and Promenade Zone), and seven proposed drywells (two in the Museum Walk and California African American Sculpture Garden Zone, four in the Olympic Ring Walk Zone, and one in the Community Park Zone). These stormwater management strategies for various areas of the park would reduce and control excess surface runoff through methods such as the drywell, which allows water to percolate into the soil zone and subsequently filter into groundwater, as opposed to staying on the surface as runoff. Therefore, the reduced impervious areas, the SWPPP and BMPs, and the numerous stormwater management measures would further reduce the volume of surface runoff such that it would not result in substantial soil erosion, flooding, an exceedance of the capacity of stormwater drainage systems, nor runoff. The combination of construction BMPs and current storm water capture devices at the Master Plan Area would not impede or redirect flood flows. Therefore, there would be no impact. No mitigation or further analysis is required.

(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The proposed project would result in no impacts to hydrology and water quality in relation to risking release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. The Master Plan Area is not located near any large water body, and as a result, it is not in a tsunami or seiche zone. Furthermore, it is located in a minimal flood hazard area (Zone X) according to the Federal Emergency Management Agency (see Appendix A).[7] The nearest tsunami zone is the Santa Monica/Venice Quadrangle located approximately 7.8 miles southwest of the Master Plan Area.[8] The nearest water body is the MacArthur Park reservoir located roughly 2.8 miles north of the Master Plan Area. Therefore, there would be no impact. No mitigation or further analysis is required.

(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The proposed project would result in no impacts to hydrology and water quality in relation to conflicting with or obstructing the implementation of a water quality control plan or sustainable groundwater management plan. The current project would comply with the objectives described in

[7] City of Los Angeles. Accessed November 27, 2019. ZIMAS. http://zimas.lacity.org/ZIMAS. http://zimas.lacity.org/.

[8] California Department of Conservation. Accessed December 3, 2019. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/Los-Angeles

the Los Angeles Basin Plan (LABP).[9] According to the LABP, the project would stay consistent with the maximum benefit to the people of the state, it must not unreasonably affect present and anticipated beneficial uses of such water, and it must not result in water quality less than that prescribed in water quality plans and policies. The beneficial uses of Los Angeles River Reach 2 include Municipal and Domestic Supply, Industrial Service Supply, Ground Water Recharge, Warm Freshwater Habitat, and Wildlife Habitat. Furthermore, any actions that can adversely affect surface waters are also subject to the federal Antidegradation Policy, developed under the CWA. Furthermore, the project is not anticipated to obstruct the Los Angeles River or Ballona Creek Enhanced Watershed Management Plan/Watershed Management Plan. Therefore, there would be no impact. No mitigation or further analysis is required.

[9] Los Angeles Regional Water Quality Control Board. Accessed November 27, 2019. LARWQCB Basin Plan. https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/

3.11 LAND USE AND PLANNING

This analysis is undertaken to determine if the proposed project may have a significant impact to land use and planning, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Land use and planning at the Master Plan Area was evaluated in regard to the City of Los Angeles General Plan Land Use Element,[1] South Los Angeles Community Plan,[2] Coliseum Specific Plan,[3] and City of Los Angeles Zoning Code.[4,5] These plans were evaluated with regard to regulations as they apply to land use and planning.

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impact to land use and planning. Would the project:

(a) Physically divide an established community?

The proposed project would result in no impacts to land use and planning in relation to the physical division of an established community. Exposition Park is located on lands administered by the OEPM and located in the corporate boundary of the City of Los Angeles. The City of Los Angeles is geographically divided into 35 Community Plan Areas and two Special Purpose Districts, the Port of Los Angeles and Los Angeles World Airports. Each of these community plans describe allowable land uses and zoning for each parcel in the City. The proposed project is located in the northeast portion of the South Los Angeles Community Plan Area bordering the western boundary of the Southeast Los Angeles Community Plan Area.[6] The South Los Angeles Community Plan Area is approximately 7,415 acres or roughly 15.4 square miles of land area, and it is located less than 2 miles southwest of Downtown Los Angeles. The Plan Area is generally 1.5 miles from west to east (between Arlington Avenue and Figueroa Street) and 8.5 miles from north to south (between Pico Boulevard and Century Boulevard), making it relatively long and narrow.[7] The South Los Angeles Community Plan Area is roughly bounded by W. Pico Boulevard to the north, the I-110 to the east, W. 120th Street to the south, and S. Van Ness Avenue to the west. The Master Plan Area was established in 1872 as a 160-acre agricultural fairground. The property was

[1] Los Angeles Department of City Planning. Accessed December 3, 2019. City of Los Angeles General Plan. https://planning.lacity.org/plans-policies/general-plan-overview

[2] Los Angeles Department of City Planning. Adopted November 22, 2017. South Los Angeles Community Plan. https://planning.lacity.org/plans-policies/community-plan-area/south-los-angeles

[3] Los Angeles Department of City Planning. June 30, 2017. Coliseum Specific Plan.

[4] City of Los Angeles. October 3, 1990. Municipal Code Section 12.04.05 "OS" Open Space Zone. http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120405osopenspacezone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.04.05.

[5] City of Los Angeles. June 30, 1991. Municipal Code Section 12.04.09 "PF" Public Facilities Zone. http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpublicfacilitieszone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.04.09.

[6] City of Los Angeles Department of City Planning. December 2019. Our LA2040. https://www.ourla2040.org/community-plans

[7] City of Los Angeles Department of City Planning. Adopted November 22, 2017. South Los Angeles Community Plan. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

jointly purchased in 1889 (called Agricultural Park at the time) by the State of California and the County and City of Los Angeles for development of a cultural center, and the park was renamed Exposition Park in 1910 when the State of California agreed to build an exposition building and armory if the County of Los Angeles would construct a history and art museum with the City of Los Angeles maintaining the grounds (see Figure 1.4-7, *Property Owners and Operators at Exposition Park*, in Section 1, *Project Description*).

Land uses adjacent to the Master Plan Area include the USC campus to the north and northeast; mixed-use residential and commercial land uses to the east; commercial and multiple dwelling residential land uses to the south; commercial land uses to the southwest; and commercial, mixed-use residential, and medical land uses to the west. The Metro Expo Line is located immediately north of the Master Plan Area, including the Expo Park/USC Station (see Figure 1.4-2, *Local Vicinity Map*, in Section 1, *Project Description*).

The nine elements comprising the proposed project would not be expected to divide the community, since there would not be new development of highways, commercial centers, or walled projects within the project site or surrounding area:

1. Threshold and Gateway. Conversion of a bike lane to a protected cycle track and improved signage would not divide the community of South Los Angeles as the nature of these improvements would not result in the closure of major County arterials that provide north-south or east-west connections between important areas of the community.

2. Expo Festival Plaza. The proposed promenades consisting of zero curb street/sidewalks lined with bollards, truncated domes, wayfinding banners and shade trees would not divide the community of South Los Angeles as the nature of these improvements would not result in the closure of major County arterials that provide north-south or east-west connections between important areas of the community.

3. Solar Garden. The new photovoltaic shade array system or Solar Garden including the installation of solar panel poles to the existing parking structure along with electrical connections would not divide the community of South Los Angeles as the nature of these improvements would not result in the closure of major County arterials that provide north-south or east-west connections between important areas of the community.

4. Festival Park and Community Promenade. The relocation of surface parking underground, and provision of open space and public spaces above ground, operations center/restrooms/bus parking, and community promenade would not divide the community of South Los Angeles as the nature of these improvements would not result in the closure of major County arterials that provide north-south or east-west connections between important areas of the community.

5. Bill Robertson Lane. The proposed street improvements along Bill Robertson Lane including a continuous left turn lane along the center of the street with demarcations of left turn; bus drop-off and loading areas; a zero curb with bollards and truncated domes; and pervious and impervious surfacing, bollards, vehicular and pedestrian wayfinding elements and canopy trees in vegetated planters would not divide the community of South Los Angeles as the nature of these improvements would not result in the closure of major County arterials that provide north-south or east-west connections between important areas of the community.

6. Museum Walk. The reconfiguration of State Drive and its approximately 100 existing surface parking spaces for pedestrian use with a museum walk or promenade flanked by canopy shade trees and two seating and amenities zones; pedestrian oriented improvements; repaving of the street with concrete pavers; pervious surfacing; shade trees; understory planting; seating; and other site amenities such as trash and recycling receptacles, picnic tables, and wayfinding element would not divide the community of South Los Angeles as the nature of these improvements would not result in the closure of major County arterials that provide north-south or east-west connections between important areas of the community.

7. California African American Museum Sculpture Garden. The proposed CAAM Sculpture Garden, which would include a plaza, dining area, garden, and an enhanced entry along Figueroa St. where the proposed enhanced entry improvements are planned to be located, and the provision of a fire access road that serves as a promenade, pervious surfacing, varied seating options, shade trees, planter areas, artwork and stormwater components, would not divide the community of South Los Angeles as the nature of these improvements would not result in the closure of major County arterials that provide north-south or east-west connections between important areas of the community.

8. Zanja Madre. The proposed Zanja Madre would include a main or central plaza-like gathering space, two sunken lawn areas, a school bus drop-off/pick-up area, a prominent iconic boulder, a Victory Walk, as well as the extension of the proposed Museum Walk would not divide the community of South Los Angeles as the nature of these improvements would not result in the closure of major County arterials that provide north-south or east-west connections between important areas of the community.

9. Olympic Ring Walk. The Olympic Walk, which would provide a reconfigured path around the Coliseum that would provide proposed concessions and amenities integrated within the Coliseum berm and native landscaping, would not divide the community of South Los Angeles as the nature of these improvements would not result in the closure of major County arterials that provide north-south or east-west connections between important areas of the community.

The proposed project's recommended improvements and modifications to the existing site would be compatible with the existing community and would not cause a physical division within the community.

Additionally, the proposed project's recommended improvements would result in in an increase in the Master Plan Area's connectivity with the adjacent community, and within the Master Plan Area itself. The proposed project would guide the development of Exposition Park during a 25-year period to link Exposition Park to the City of Los Angeles around it; connect the park's segments to one another; and encourage visitors and locals to linger with more plentiful pathways, plantings, and visitor amenities. The proposed project would connect the park's segments by improving pedestrian and recreational use of the spaces between its buildings and moving surface parking spaces underground. The Master Plan Area is served by public transit bus, light rail, pedestrian access, and bicycle paths. The proposed project would improve vehicular access for large groups with dedicated loading zones and bus drop-off areas. The improvements would be constructed consistent with the 2016-2040 RTP/SCS goals by promoting energy efficiency through design enhancements and providing opportunities for open space served by public transit in close proximity to transit stops. The proposed project would enhance pedestrian and bicyclist access to Exposition Park and within the community. New protected cycle tracks would be installed along

Exposition Blvd. and MLK Jr. Blvd. Pedestrian gathering spaces and access would be enhanced including extending the Expo Festival Plaza to include promenades and zero curb sidewalks.

Therefore, there would be no impact. No mitigation or further analysis is warranted.

(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The proposed project would result in no impacts to land use and planning in relation to conflict with any OEPM land use plan, policy, or regulation, or conflicts with the land use plans, policies or regulations of the adjacent City of Los Angeles adopted for the purpose of avoiding or mitigating an environmental effect. The State of California OEPM owns the majority of parcels on the project site with the exception of parcels owned by the City of Los Angeles near the edges of the Master Plan Area. The State manages these properties through master leases to public and private agencies (see Figure 1.4-7).

The Master Plan Area is bordered by USC and Exposition Blvd. to the north, Figueroa St. and the Harbor Freeway (I-110) to the east, MLK Jr. Blvd. to the south, and South Vermont Ave. to the west (see Figure 1.4-2). Although the State is not subject to city general plans, the City General Plan designations have been provided to inform OEPM's decision-making process, and guide portions of the proposed project located in areas owned and/or operated by the City of Los Angeles. The Master Plan Area is located within the South Los Angeles Community Plan Area.[8] The City of Los Angeles' General Plan land use designations for Exposition Park are Public Facilities – PF and Open Space – OS (Figure 3.11-1, *General Plan – South Los Angeles Community Plan*).[9]

The South Los Angeles Community Plan goals and policies related to the proposed project include the following:

Goal CF8: Existing recreation and park facilities that are conserved, maintained, and better utilized to promote the recreational needs of the community.

Policies

CF8.1 Maintain and Improve Existing Facilities. Preserve, maintain and enhance existing recreational facilities and park space.

CF8.2 High Level of Service Standards. Establish a high standard of service for parks in order to promote accessibility, cleanliness, and adequate lighting

[8] City of Los Angeles Department of City Planning. Adopted November 22, 2017. South Los Angeles Community Plan. https://planning.lacity.org/complan/pdf/sclcptxt.pdf

[9] City of Los Angeles Department of City Planning. Adopted November 22, 2017. South Los Angeles Community Plan. General Plan Land Use Map. https://planning.lacity.org/complan/central/PDF/slaplanmap.pdf

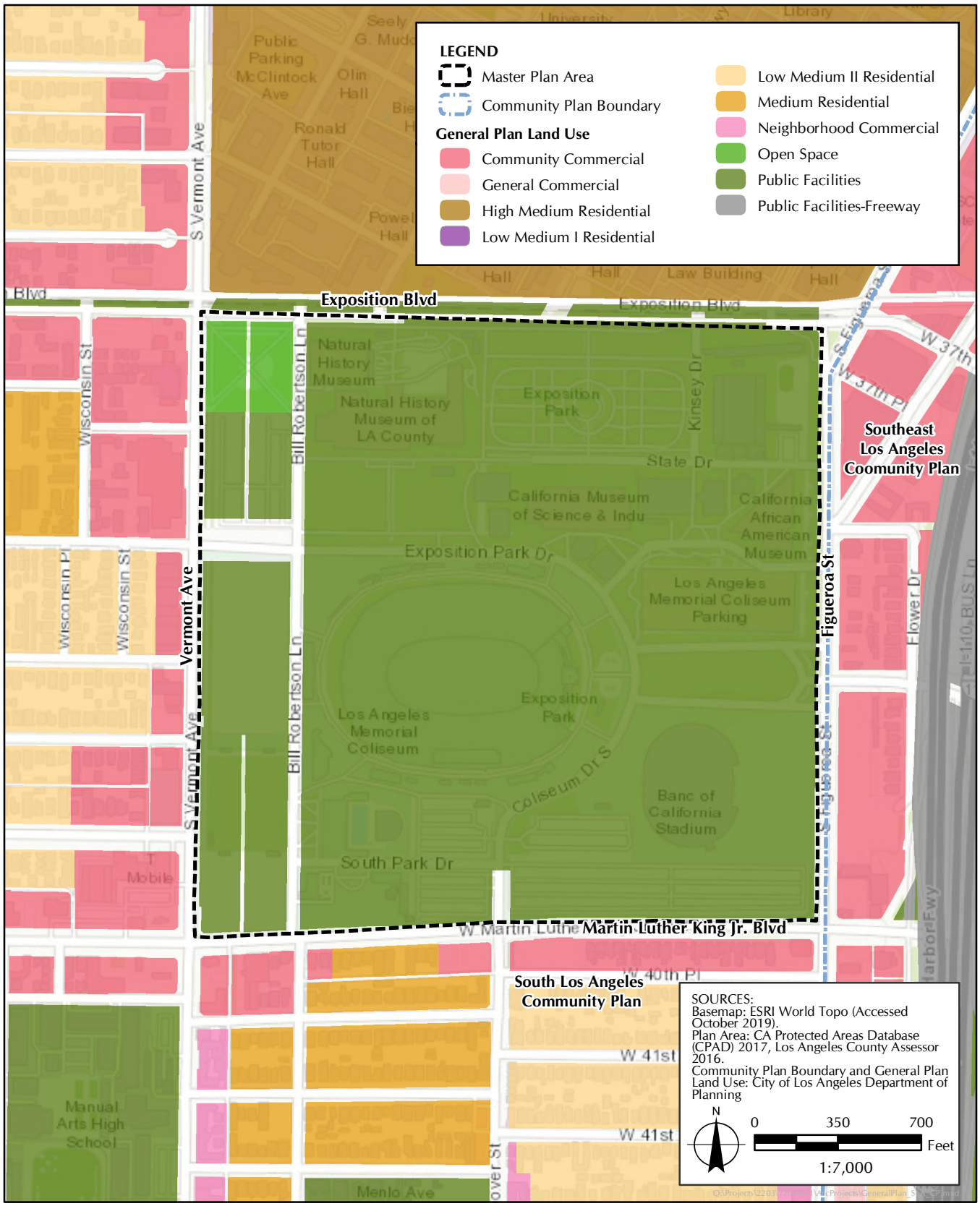

FIGURE 3.11-1

General Plan – South Los Angeles Community Plan

Goal CF9: Neighborhoods that are safe and attractive places for recreational exercise.

Policies

CF9.1 Parks in Low-Income Communities First. Prioritize new parks in underserved or low-income communities.

CF9.2 Prioritize Park Opportunity Areas. Target park and recreation projects in areas with the greatest opportunities.

CF9.3 Accommodate Greenways. Identify opportunities to increase acreage of total recreational areas, such as converting outdated railroad rights-of-way and select alleyways to accommodate greenways, pedestrian paths and bicycle trails.

CF9.4 Walkability Standard. Set a walkability standard (e.g., a quarter- or half-mile) for residents' access to recreational facilities.

CF9.5 Joint-Use of Schools. Pursue joint-use agreements to share facilities with schools and universities, especially in neighborhoods that suffer a disproportionate lack of recreational facilities.

CF9.6 High Level of Service Standards. Support efforts to fund a high level of service standards for parks in order to promote cleanliness and adequate lighting.

CF9.7 Minimize Displacement. Plan and design the expansion of existing facilities and the acquisition of new sites in a manner that minimizes the displacement of housing and the relocation of residents.

Goal CF10: Greater open space, parkland and recreational facility opportunities that result from increased cooperation with a broad range of partners.

Policies

CF10.1 Minimize Land Acquisition through Joint-Use. In order to minimize the amount of land acquisition required for the establishment of new parks, encourage joint-use agreements between the Los Angeles Unified School District and the Department of Recreation and Parks to make facilities available to residents after school and on weekends.

Goal CF11: Open space, parkland and recreational facilities that are safe and inviting for the enjoyment of all.

Policies

CF11.1 Adequate Illumination and Security. Parks should be adequately illuminated and secured for safe use in the evening.

Goal CF12: Existing open space resources that are preserved and, where possible, new open space that is developed.

Policies

CF12.1 Retain Passive Open Space. Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.

CF12.2 Accommodate Active Park Uses. Accommodate active parklands and other open space uses.

CF12.4 Utilize Public Lands for Recreational Needs. Encourage coordination with City departments, neighboring cities, and County, State and Federal agencies to utilize existing public lands such as flood control channels, utility easements and Department of Water and Power properties to provide for such recreational needs as hiking and biking.[10]

A State zoning designation has not been assigned to Exposition Park due to its location within an incorporated city. Although the State is not subject to city zoning, the City's zoning designations have been provided to inform OEPM's decision-making process and because portions of the Master Plan Area are owned or operated by the City of Los Angeles. There are three City zoning designations for the Master Plan Area: PF-1, PF-1-SN, and OS-1XL (Figure 3.11-2, *Zoning*).[11] Allowable uses within the "PF" Public Facilities Zone include any joint public and private development uses permitted in the most restrictive adjoining zones if approved by the Director utilizing the procedures described in Section 16.05 to H of the City of Los Angeles Municipal Code.[12] Allowable uses within the "OS" Open Space Zone include parks and recreation facilities, including bicycle trails, equestrian trails, walking trails, nature trails, parkland/lawn areas, children's play areas, child care facilities, picnic facilities, and athletic fields (not to exceed 200 seats in park) used for park and recreation purposes.[13]

[10] City of Los Angeles Department of City Planning. Adopted November 22, 2017. South Los Angeles Community Plan. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[11] City of Los Angeles Department of City Planning. Accessed September 5, 2019. ZIMAS. http://zimas.lacity.org/

[12] City of Los Angeles. Accessed September 5, 2019. Official City of Los Angeles Municipal Code – Chapter I, Planning & Zoning. Section 12.04.09 "PF" Public Facilities Zone. http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpublicfacilitieszone?f=templates$fn=altmain-nf.htm$q=[field%20folio-destination-name:%2712.04.09.%27]$x=Advanced#JD_12.04.09.

[13] City of Los Angeles. Accessed September 5, 2019. Official City of Los Angeles Municipal Code – Chapter I, Planning & Zoning. Section 12.04.05 "OS" Open Space Zone. http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120405osopenspacezone?f=templates$fn=altmain-nf.htm$q=[field%20folio-destination-name:%2712.04.05.%27]$x=Advanced#JD_12.04.05.

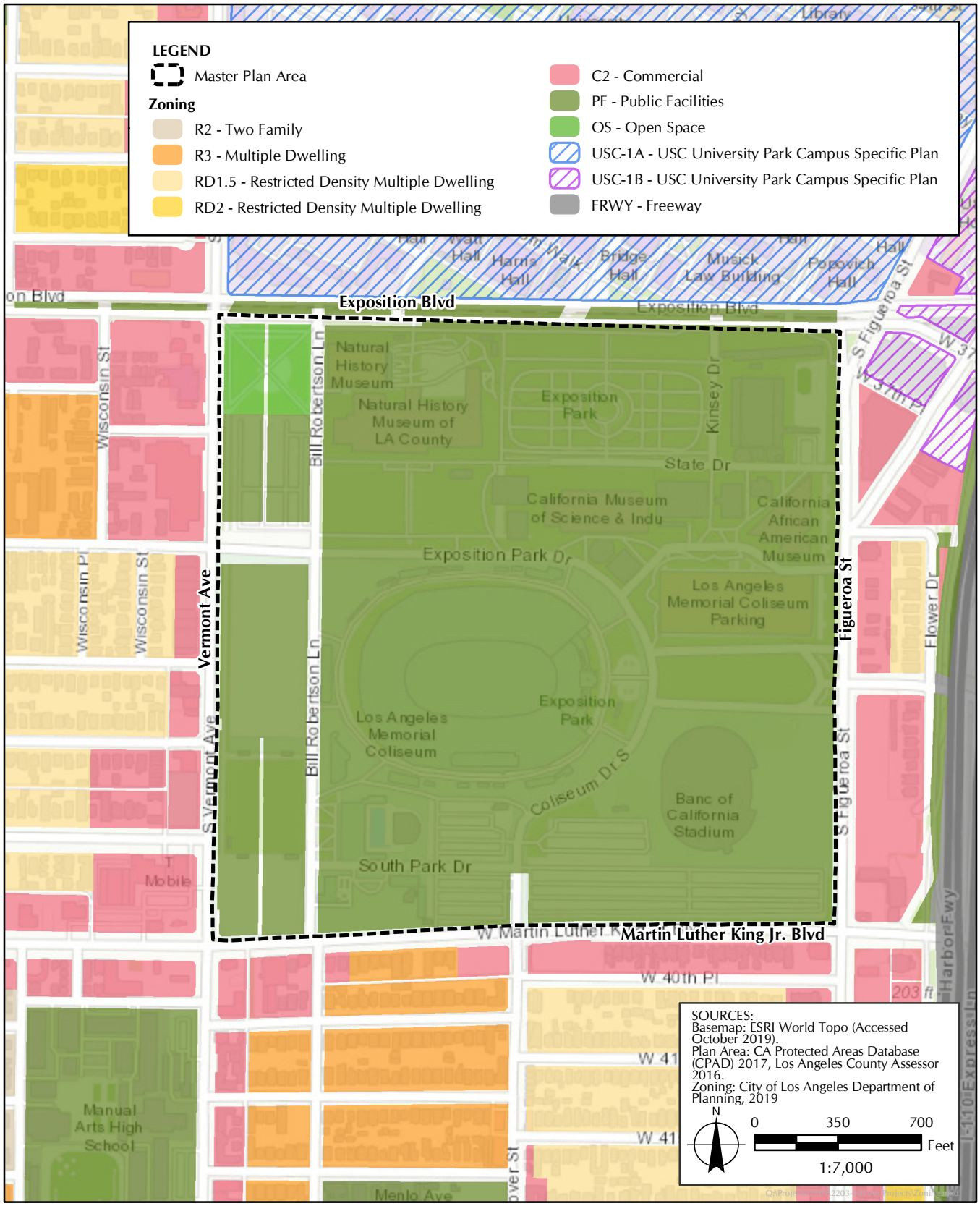

FIGURE 3.11-2

Zoning

The southwestern and southern portions of Exposition Park are located within the Coliseum District Specific Plan (Figure 3.11-3, *Coliseum Specific Plan*).[14] However, the Coliseum District Specific Plan Area does not include the EXPO Center. The Coliseum District Specific Plan is intended to provide regulatory controls and incentives; ensure orderly development by establishing general procedures for development within the Specific Plan Area; provide for the preservation and upgrade of the historic Los Angeles Memorial Coliseum stadium and associated development and enhancements to the site in conformance with the goals and objectives of local and regional plans and policies; and provide for the development of the approximately 15-acre Los Angeles Memorial Sports Arena site (Banc of California Stadium) with a state-of-the-art professional soccer stadium and ancillary uses.

The proposed project would be consistent with the Public Facilities – PF and Open Space – OS land use designations of the South Los Angeles Community Plan, the goals and policies of the South Los Angeles Community plan, and the City zoning designations of designations for the Master Plan Area of PF-1, PF-1-SN, and OS-1XL.

The nine elements consisting of the proposed project would not be expected to result in impacts to land use and planning related to a conflict with adopted or proposed land use plans, policies, or regulations:

1. Threshold and Gateway. Conversion of a bike lane to a protected cycle track and improved signage. The proposed project would be consistent in relation to the above South Los Angeles Community Plan goals policies. The nature of the proposed improvements of Element 1 would not alter the current use of the Master Plan Area as a Regional Park and National Register Historic District as designated in the South Los Angeles Community Plan.

2. Expo Festival Plaza. Promenades consisting of zero curb street/sidewalks lined with bollards, truncated domes, wayfinding banners and shade trees: The proposed project would be consistent in relation to the above South Los Angeles Community Plan goals policies. The nature of the proposed improvements of Element 2 would not alter the current use of the Master Plan Area as a Regional Park and National Register Historic District as designated in the South Los Angeles Community Plan.

3. Solar Garden. New photovoltaic shade array system or Solar Garden including the installation of solar panel poles to the existing parking structure along with electrical connections: The proposed project would be consistent in relation to the above South Los Angeles Community Plan goals policies. The nature of the proposed improvements of Element 3 would not alter the current use of the Master Plan Area as a Regional Park and National Register Historic District as designated in the South Los Angeles Community Plan.

4. Festival Park and Community Promenade. Relocation of surface parking underground, and provision of open space and public spaces above ground, operations center/restrooms/bus parking, and community promenade: The proposed project would be consistent in relation to the above South Los Angeles Community Plan goals policies. The nature of the proposed improvements of Element 4 would not alter the current use of the Master Plan Area as a Regional Park and National Register Historic District as designated in the South Los Angeles Community Plan.

[14] City of Los Angeles Department of City Planning. Accessed October 15, 2019. Coliseum District Specific Plan. Ordinance No. 195042. https://planning.lacity.org/plans-policies/overlays/coliseum-district

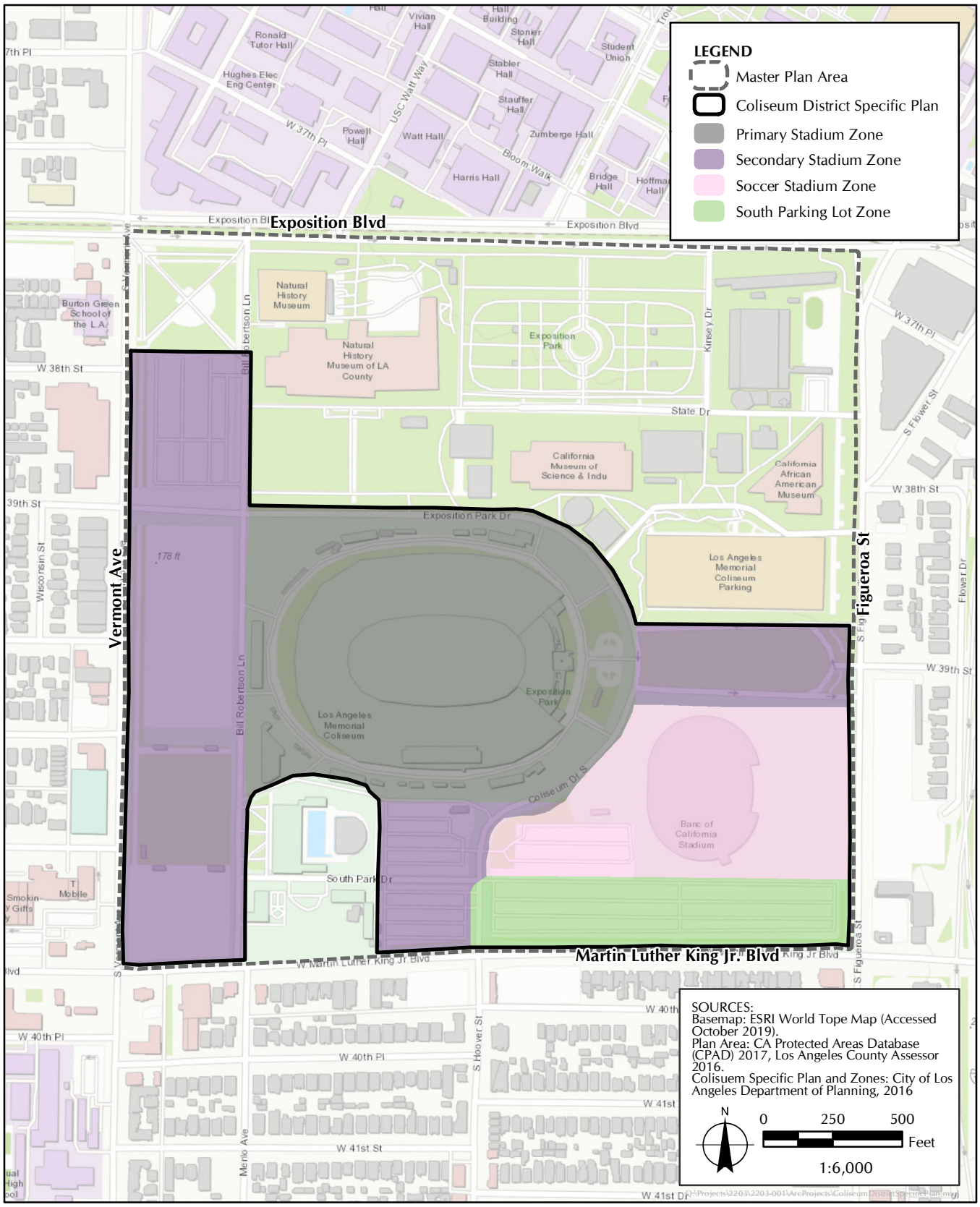

FIGURE 3.11-3

Coliseum Specific Plan

5. Bill Robertson Lane. Proposed street improvements along Bill Robertson Lane including a continuous left turn lane along the center of the street with demarcations of left turn, bus drop off, and loading areas, and a zero curb with bollards and truncated domes, and pervious and impervious surfacing, bollards, vehicular and pedestrian wayfinding elements and canopy trees in vegetated planters: The proposed project would be consistent in relation to the above South Los Angeles Community Plan goals policies. The nature of the proposed improvements of Element 5 would not alter the current use of the Master Plan Area as a Regional Park and National Register Historic District as designated in the South Los Angeles Community Plan.

6. Museum Walk. Reconfiguration of State Drive and its approximately 100 existing surface parking spaces for pedestrian use with a museum walk or promenade flanked by canopy shade trees and two seating and amenities zones, pedestrian oriented improvements, re-paving of the street with concrete pavers, pervious surfacing, shade trees, understory planting, seating and other site amenities such as trash and recycling receptacles, picnic tables, and wayfinding element: The proposed project would be consistent in relation to the above South Los Angeles Community Plan goals policies. The nature of the proposed improvements of Element 6 would not alter the current use of the Master Plan Area as a Regional Park and National Register Historic District as designated in the South Los Angeles Community Plan.

7. California African American Museum Sculpture Garden. Proposed CAAM Sculpture Garden which would include a plaza, dining area, garden, and an enhanced entry along Figueroa St. where the proposed enhanced entry improvements are planned to be located, and the provision of a fire access road that serves as a promenade, pervious surfacing, varied seating options, shade trees, planter areas, artwork and stormwater components: The proposed project would be consistent in relation to the above South Los Angeles Community Plan goals policies. The nature of the proposed improvements of Element 7 would not alter the current use of the Master Plan Area as a Regional Park and National Register Historic District as designated in the South Los Angeles Community Plan.

8. Zanja Madre. Proposed Zanja Madre including a main or central plaza-like gathering space, two sunken lawn areas, a school bus drop-off/pick-up area, a prominent iconic boulder, a Victory Walk, as well as the extension of the proposed Museum Walk: The proposed project would be consistent in relation to the above South Los Angeles Community Plan goals policies. The nature of the proposed improvements of Element 8 would not alter the current use of the Master Plan Area as a Regional Park and National Register Historic District as designated in the South Los Angeles Community Plan.

9. Olympic Ring Walk. Olympic Walk, providing a reconfigured path around the Coliseum that would provide proposed concessions and amenities integrated within the Coliseum berm and native landscaping: The proposed project would be consistent in relation to the above South Los Angeles Community Plan goals policies. The nature of the proposed improvements of Element 9 would not alter the current use of the Master Plan Area as a Regional Park and National Register Historic District as designated in the South Los Angeles Community Plan.

As described above, the nine elements of the proposed project would not be expected to result in impacts to land use and planning related to a conflict with adopted or proposed land use plans, policies, or regulations. No mitigation or further analysis is warranted.

3.12 MINERAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to mineral resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines.[1] Mineral resources at the Master Plan Area were evaluated with regard to California Geological Survey (CGS) publications (previously known as the Division of Mines and Geology);[2,3,4] California Division of Oil, Gas, and Geothermal Wells data;[5] the City of Los Angeles General Plan;[6] and the South Los Angeles Community Plan.[7]

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impact to mineral resources. Would the project:

(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The proposed project would result in less than significant impacts to mineral resources in relation to the loss of availability of a known mineral resource. Under the 1975 Surface Mining and Reclamation Act (SMARA, PRC 2710 et seq.), Mineral Land Classification (MLC) studies are conducted by the State Geologist through the CGS. MLC reports identify the areas with potentially important mineral resources that should be considered in local and regional planning, and then designate and map Mineral Resource Zones (MRZs) according to the existence or nonexistence of significant mineral resource deposits. A review of relevant CGS/Division of Mines and Geology publications shows that the Master Plan Area has been split into two different MRZs. The Master Plan Area is primarily designated MRZ-3 for aggregate resources (updated from a previous designation of MRZ-4), which is an area containing mineral deposits the significance of which cannot be evaluated from available data, and therefore has no known mineral resource of value to the region. However, the southeastern corner of the Master Plan Area is designated MRZ-2 for aggregate resources, or an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.[8,9]

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[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[2] California Department of Conservation, Division of Mines and Geology. 1994. Open-File Report 91-14: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part II – Los Angeles County.

[3] California Department of Conservation, Division of Mines and Geology. 1982. Special Report 143: Mineral Land Classification of the Greater Los Angeles Area, Part IV: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region.

[4] California Department of Conservation, Division of Mines and Geology. 2010. Special Report 209: Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California.

[5] California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). Accessed September 25, 2019. Well Finder DOGGR GIS. https://www.conservation.ca.gov/dog/Pages/WellFinder.aspx

[6] City of Los Angeles Planning Department. Adopted September 26, 2001. Conservation Element of the City of Los Angeles General Plan.

[7] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan.

[8] California Department of Conservation, Division of Mines and Geology. 1994. Open-File Report 91-14: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part II – Los Angeles County. Plate 1B: Generalized Mineral Land Classification Map of Los Angeles County – South Half.

The City General Plan conserves MRZ-2 sites that contain potentially significant sand and gravel deposits. The General Plan states that any proposed development plan must consider access to the deposits for purposes of extraction, but also recognizes that many of the areas within the MRZ-2s were developed with structures prior to classification and are therefore unavailable for extraction.[10] The proposed project would construct subterranean excavation for underground parking in the MRZ-2 within the Master Plan Area; however, no mineral extraction operations have occurred, currently occur, or are proposed to occur within the Master Plan Area of the MRZ-2. None of the drill holes in the MRZ-2 are within the Master Plan Area itself.[11] Furthermore, none of the active aggregate mine operations in the region are located within this MRZ-2.[12] Additionally, there are no oil or gas fields, facilities, or wells within the Master Plan Area.[13] Notwithstanding its location within an MRZ, no mineral extraction operations occur in the Master Plan Area. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

The proposed project would result in no impacts to mineral resources regarding the loss of availability of a known mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Based on a review of the City General Plan and South Los Angeles Community Plan, the Master Plan Area is zoned for land use as primarily Public Facilities, with a small park in the northwest corner as Open Space.[14] The City General Plan follows the California Surface Mining and Reclamation Act (SMARA, PRC 2710 et seq.) and conserves MRZ-2 sites that contain potentially significant sand and gravel deposits. The General Plan identifies the southeast corner of the Master Plan Area as an MRZ-2, but it does not discuss any form of a mineral resource recovery site within the Master Plan Area.[15] The City South Los Angeles Community Plan discusses oil and gas fields within the community; however, there are none within the Master Plan Area itself.[16] The City Community Plan does not discuss any other mineral resource recovery sites,[17] and a review of California Division of Mines and Geology publications and Division of Oil, Gas, and

[9] California Department of Conservation, Division of Mines and Geology. 1982. Special Report 143: Mineral Land Classification of the Greater Los Angeles Area, Part IV: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region. Plate 4.9: Mineral Land Classification Map – Hollywood Quadrangle.

[10] City of Los Angeles Planning Department. Adopted September 26, 2001. City of Los Angeles General Plan. Conservation Element.

[11] California Department of Conservation, Division of Mines and Geology. 1982. Special Report 143: Mineral Land Classification of the Greater Los Angeles Area, Part IV: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region. Plate 4.9: Mineral Land Classification Map – Hollywood Quadrangle.

[12] California Department of Conservation, Division of Mines and Geology. 2010. Special Report 209: Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California. San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations.

[13] California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). Accessed September 25, 2019. Well Finder DOGGR GIS. https://www.conservation.ca.gov/dog/Pages/WellFinder.aspx

[14] City of Los Angeles Planning Department. April 2018. South Los Angeles Community Plan. Figure 3-1: General Plan Land Use South Los Angeles.

[15] City of Los Angeles Planning Department. Adopted September 26, 2001. City of Los Angeles General Plan. Conservation Element.

[16] City of Los Angeles Planning Department. April 2018. South Los Angeles Community Plan. Figure 3-8: Oil Drilling Districts South Los Angeles.

[17] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan.

Geothermal Resources data indicates that there are no mineral extraction operations within the Master Plan Area.[18,19,20] Therefore, there are no known mineral resource recovery sites of local importance located within the Master Plan Area. Therefore, there would be no impact. No mitigation or further analysis is warranted.

[18] California Department of Conservation, Division of Mines and Geology. 1994. Open-File Report 91-14: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part II – Los Angeles County. Plate 1B: Generalized Mineral Land Classification Map of Los Angeles County – South Half.

[19] California Department of Conservation, Division of Mines and Geology. 2010. Special Report 209: Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California. San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations.

[20] California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). Accessed September 25, 2019. Well Finder DOGGR GIS. https://www.conservation.ca.gov/dog/Pages/WellFinder.aspx

3.13 NOISE

This analysis is undertaken to determine if the proposed project may result in significant impacts to noise in accordance with Section 15063 of the State CEQA Guidelines, thus requiring the consideration of mitigation measures or alternatives. The potential for impacts to noise were evaluated with regard to the noise standards in the California Land Use Compatibility, County of Los Angeles General Plan 2035, County Noise Ordinance, City of Los Angeles General Plan Noise Element, and City Noise Ordinance. Veneklasen Associates prepared an Environmental Noise and Vibration Analysis for the proposed project (Appendix E).

The State CEQA Guidelines recommend the consideration of three questions when addressing the potential for significant impacts to noise. Would the project result in:

(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

The proposed project would result in less than significant impacts to noise in relation to generating a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

The State of California Governor's Office of Planning and Research (OPR) is statutorily required by Government Code Section 65040.2 to adopt and periodically revise the State General Plan Guidelines (GPG) for the preparation and content of general plans for all cities and counties in California.[1] In 1976, the Department of Health Services Office of Noise Control issued the first Noise Element Guidelines pursuant to Health and Safety Code section 46050.1, followed by a model noise ordinance. Per Figure 2 in Appendix D (Noise Element Guidelines) of the 2017 update to the GPG, acceptable community noise exposure levels vary by existing land use type (Table 3.13-1, *Noise Element Guidelines – Community Noise Exposure by Land Use Category*).[2,3] As stated in Section 3.11, *Land Use*, across the 55- to 105-foot-wide streets surrounding Exposition Park, the Master Plan Area is surrounded by the USC campus (Category 4) to the north and northeast; mixed-use residential (Categories 2 and 9) and commercial (Category 9) land uses to the east; commercial (Category 9) and multiple dwelling residential (Category 2) land uses to the south; commercial (Category 9) land uses to the southwest; and commercial (Category 9), mixed-use residential (Categories 2 and 9), and medical (Category 4) land uses to the west. Based on these guidelines, normally acceptable community noise exposure levels for these land uses are up to 70 decibels (dB) to the north, northeast, and southwest; and up to 65 to 70 dB to the east, south, and west. Community Noise Equivalent Level (CNEL) is the 24-hour equivalent (average) sound pressure level in which the evening (7 pm–10 pm) and nighttime (10 pm–7 am) noise is weighted by adding 5 and 10 dB, respectively, to the hourly level.

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[1] State of California Governor's Office of Planning and Research. Updated September 1, 2019. General Plan Guidelines: 2017 Update. http://opr.ca.gov/planning/general-plan/guidelines.html

[2] **dB:** Decibels are a unit of measurement describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals (20 micronewtons per square meter). See State of California Governor's Office of Planning and Research. Updated 2017. General Plan Guidelines – Chapter 4. http://opr.ca.gov/docs/OPR_C4_final.pdf

[3] State of California Governor's Office of Planning and Research. Updated September 1, 2019. General Plan Guidelines: 2017 Update. Appendix D: Noise Element Guidelines. http://opr.ca.gov/docs/OPR_Appendix_D_final.pdf

TABLE 3.13-1
NOISE ELEMENT GUIDELINES – COMMUNITY NOISE EXPOSURE BY LAND USE CATEGORY

Land Use Category	Community Noise Exposure L_{dn} or CNEL, dB						
	Below 55	55-60	60-65	65-70	70-75	75-80	80+
1. Residential – Low Density Single Family, Duplex, Mobile Homes	Normally Acceptable						
		Conditionally Acceptable					
					Normally Unacceptable		
						Clearly Unacceptable	
2. Residential – Multifamily							
3. Transient Lodging – Motels, Hotels							
4. Schools, Libraries, Churches, Hospitals, Nursing Homes							
5. Auditoriums, Concert Halls, Amphitheaters							
6. Sports Arena, Outdoor Spectator Sports							
7. Playgrounds, Neighborhood Parks							
8. Golf Courses, Riding Stables, Water Recreation, Cemeteries							
9. Office Buildings, Business Commercial and Professional							
10. Industrial, Manufacturing, Utilities, Agriculture							

Normally Acceptable: Specified land use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
Clearly Unacceptable: New construction or development should generally not be undertaken.
SOURCE: California Governor's Office of Planning and Research. Updated September 1, 2019. General Plan Guidelines: 2017 Update. Appendix D: Noise Element Guidelines. http://opr.ca.gov/docs/OPR_Appendix_D_final.pdf

The State GPG establishes corrections for the acceptable community noise levels described above to account for seasons, outdoor residual noise level, previous exposure and community attitudes, and pure tone or impulse. For instance, in a noisy urban residential community (near relatively busy roads or industrial areas), 5 dB should be subtracted from the measured CNEL; in a very noisy urban residential community, 10 dB should be subtracted from the measured CNEL. As discussed below, the City of Los Angeles' Noise Regulation sets a maximum noise level from construction equipment operating in a residential zone of the City or within 500 feet thereof, of 75 A-weighted decibels (dBA; the relative loudness of sounds in air as perceived by the human ear).

Noise measurements surrounding the Master Plan Area were conducted on Wednesday, October 16, 2019, to establish the existing ambient noise levels (see Appendix E). Noise levels were measured across the street from Exposition Park using a Bruel and Kjaer 2270 sound level meter over a 15-minute period (Table 3.13-2, *Measured Ambient Noise Levels Surrounding Exhibition Park*; see Figure 3 in Appendix E). There were no major functions occurring at Exhibition Park during the measurements, and the major noise source was traffic noise.

TABLE 3.13-2
MEASURED AMBIENT NOISE LEVELS SURROUNDING EXHIBITION PARK

Location No.*	Location Description and Nearby Proposed Elements	15-Minute Measured Ambient Noise Level
1	North side of Exposition Blvd. at Bill Robertson Lane (sidewalk adjacent to USC campus, near LA Metro Expo Line station) 105+ feet north of proposed Elements 1 and 5	70 dBA
2	North side of Exposition Blvd. north of Rose Garden (sidewalk adjacent to USC campus, near LA Metro Expo Line station) 105+ feet north of proposed Element 1	76 dBA
3	East side of S. Figueroa St. east of State Drive 65+ feet east of proposed Elements 1, 6, and 7	68 dBA
4	East side of S. Figueroa St. east of Visitor Parking Structure 75+ feet east of proposed Elements 1 and 3	67 dBA
5	East side of S. Figueroa St. east of Christmas Tree Lane 75+ feet east of proposed Elements 1 and 2	68 dBA
6	East side of S. Figueroa St. north of intersection with MLK Jr. Blvd. 70+ feet south of proposed Elements 1 and 4	68 dBA
7	South side of MLK Jr. Blvd. south of Parking Lot 6 70+ feet south of proposed Elements 1 and 4	72 dBA
8	South side of MLK Jr. Blvd. south of Parking Lot 6 near Hoover Ave. 70+ feet south of proposed Elements 1 and 4	73 dBA
9	South side of MLK Jr. Blvd. south of Parking Lot 5 near Hoover Ave. 70+ feet south of proposed Elements 1 and 4	72 dBA
10	South side of MLK Jr. Blvd at Bill Robertson Lane 70+ feet south of proposed Elements 1 and 5	70 dBA
11	West side of Vermont Ave. near Leighton Ave. / LMNA construction site Approximately 450 feet west of Element 5	79 dBA
12	West side of Vermont Ave. near 39th Street / LMNA construction site Approximately 450 feet west of Element 5	70 dBA

NOTE: *Please see Figure 2 in Appendix E.
dBA: A-weighted decibels, or the relative loudness of sounds in air as perceived by the human ear. In the A-weighted system, the decibel values of sounds at low frequencies are reduced, compared with unweighted decibels, in which no correction is made for audio frequency. The sound level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the response of the human ear and gives good correlation with subjective reactions to noise.

Construction

Construction of the proposed project would generally be centered well inside the park, approximately 300 feet or more from the nearest sensitive receptors. However, a portion of the project construction for Elements 1, 4, and 5 would be located within 75 feet of the nearest receptors (to the east and south of Exposition Park). Construction noise impacts are expected to range between 73 and 85 dBA at the nearest receptors. In order to comply with the City of Los Angeles Municipal Codes, noise barriers or other mitigation methods would be required to ensure that the construction does not increase the existing CNEL by 5 dB or more.

According to Chapter XI of the City of Los Angeles Municipal Code (LAMC), Noise Regulation, established acceptable ambient noise levels to regulate intrusive noises within specific land use zones and provides procedures and criteria for the measurement of the sound level of "offending" noise sources. Section 112.05 of the City's Noise Regulation sets a maximum noise level from construction equipment operating between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, of 75 dBA, measured at a distance of 50 feet from the source, unless compliance with this limitation is shown to not be technically feasible. Section 41.40 of the LAMC prohibits construction noise between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. and after 6:00 p.m. on Saturday, and at any time on Sunday. Construction activities are not expected to occur outside of this time frame. In general, the City of Los Angeles Department of Building and Safety enforces noise ordinance provisions relative to noise generated by operation of equipment and the Los Angeles Police Department enforces provisions relative to noise generated by people.

Maximum noise levels during construction would occur when equipment is operating under full power conditions (i.e., with the equipment engine at maximum speed). However, equipment on construction sites often operates under less than full power conditions (Table 3.13-3, *Noise Levels for Typical Construction Equipment*).

TABLE 3.13-3
NOISE LEVELS FOR TYPICAL CONSTRUCTION EQUIPMENT

Equipment	Estimated Usage Factor* (%)	Typical Noise Level at 50 feet from Source (dBA)
Air compressors	5	80
Cement and mortar mixer	50	80
Concrete saw	20	90
Crane	16	81
Dozer	20	82
Forklift	10	75
Grader	40	85
Dump / haul truck (light)	40	76
Excavator	40	81
Roller	20	80
Rubber tired loader	40	79
Tractor / loader / backhoe	40	80
Welders	10	73

NOTE: * Usage factor represents the percentage of time the equipment would be operating at full speed.
SOURCE: Federal Highway Administration. January 2006. FHWA Roadway Construction Noise Model User's Guide. Prepared by U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center Acoustics Facility.
U.S. Environmental Protection Agency. October 1974. Background Document for Interstate Motor Carrier Noise Emission Regulations.

General construction noise ranges between 73 and 90 dBA at 50 feet (see Table 3.13-1). A portion of the project construction would be located within 75 feet within the closest sensitive receptors, and noise impacts would be expected to range between 73 and 85 dBA at the closest receptors. Construction of the proposed project would result in temporary noise increase. However, as discussed in Section 1, *Project Description*, during construction activities within a 50-foot radius of sensitive receptors, sound walls shall be installed by the contractor during the construction phase for the demolition of the two buildings and construction projects on the northeast edge of the Master Plan Area along the property boundary facing the existing residents to reduce the noise levels. Mufflers, blankets, and baffles shall also be implemented to ensure the reduction of noise levels. The noise barriers shall provide noise level reductions ranging from approximately 5 dBA to 20 dBA depending of the placement and structure of the sound wall to limit the temporary noise increase below the threshold of significance as outlined in the City of Los Angeles Municipal Code. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted..

Operation

The proposed project consists mainly of upgrading aesthetics and the functionality of existing spaces and their associated uses. The use of additional/reconfigured bike lanes (Element 1) and installed solar panels over the existing Visitor Parking Structure (Element 3) are not expected to increase noise levels during operation. The locations for proposed Elements 2, 3, and 9 would retain the same function as the existing condition and are not expected to increase noise levels during operation. Elements 5 and 8 would be located more than 450 feet from the nearest sensitive receptors to the west. Bill Robertson Lane (Element 5) would continue to serve as a road within Exposition Park; the replacement of street parking spaces with bus drop-off and group unloading areas would not increase noise levels at the nearest receptors. The locations of proposed Elements 6 and 8 would have lower noise levels than the existing condition on Game Day for events at the Coliseum because they would

no longer be utilized as VIP parking. However, Elements 4 and 7 have the potential to increase operational noise levels at the Master Plan Area.

As outlined in Appendix E, the proposed project includes a new underground parking structure (Element 4), which would replace 1,600 surface-level parking spots and an additional 500 temporary parking spaces available only during Coliseum events on the South Lawn and State Drive with 2,000 underground vehicle spaces. The potential increase of vehicles on event days is predicted to result in an increase of 1 dBA above existing conditions, which would be a less than significant impact. Element 4 also includes a children's playground and a skate park, which would be located 400 feet from the closest sensitive receptor. Veneklasen performed a literature search to determine typical noise levels from a children's playground at 50 feet and performed skate park measurements at The Cove skate park at 1401 Olympic Boulevard in Santa Monica (see Appendix E). Noise from the children's playground at 50 feet is predicted to range between 57 dBA and 65 dBA. Skate park noise measurements ranged between 59 dBA and 66 dBA at 50 feet. The noise levels from these uses are substantially less than the existing measured ambient level, which ranges between 70 and 72 dBA (Appendix E). The noise level would be expected to be 55 dBA at the closest sensitive receptor 400 feet away, which is 15 to 17 dBA less than the existing measured ambient noise level (Appendix E). Therefore, impacts would be less than significant, and no mitigation would be required.

Element 7 consists of the addition of a dining area to the California African American Museum Sculpture Garden. The dining area would be located 350 feet from the nearest sensitive receptor. The noise produced in this area would be blocked by the museum building, and impacts would be greatest at receptors with a direct line of sight to the dining area. Noise levels are predicted to be 39 dBA, which is 29 dBA less than the measured ambient noise level of 68 dBA. Therefore, the proposed project would not involve substantial permanent increases in sound, and operational impacts would be less than significant. No mitigation or further analysis is required.

(b) Generation of excessive groundborne vibration or groundborne noise levels?

The proposed project would result in less than significant impacts to noise regarding generation of excessive groundborne vibration or groundborne noise levels. Ground-borne vibration in the project study area is limited to minor traffic-induced vibrations from nearby streets, highways, and freeway vehicular traffic. There are no current construction projects, oil fields, mining operations, blasting, or other activities resulting in ground-borne vibrations in the Master Plan Area. Construction, operation, and maintenance of the proposed project would not require blasting, drilling, or other activities that would result in excessive ground-borne vibrations. The construction equipment and associated industrial machinery would produce operational vibration. Vibration would be perceptible to people on the project site but would attenuate with distance within 1,000 feet such that vibration would not be perceptible at the residents that are surrounding the proposed project site. According to the Environmental Noise and Vibration Analysis (Appendix E), the maximum vibration level at 25 feet from typical constriction is 87 vibration velocity (VdB) re: 1μin/sec. Vibration levels would be lower than the building damage criteria at 25 feet and calculates to 72.7 VdB at the closest receiving location, which is below the threshold of significance (Appendix E). Therefore, impacts would be less than significant. No mitigation or further analysis is required.

(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed project expose people residing or working in the proposed project area to excessive noise levels?

The proposed project would result in no impacts to noise in relation to being located within an airport land use plan or located within two miles of a public airport or public use airport. There are no public airports within two miles of the proposed Master Plan Area. The nearest public airport, Santa Monica Airport, is located 9 miles west of the Master Plan Area. Therefore, there would be no impact. No mitigation or further analysis is warranted.

3.14 POPULATION AND HOUSING

This analysis is undertaken to determine if the proposed project may have a significant impact to population and housing, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Population and housing at the Master Plan Area were evaluated with regard to federal, state, regional, and local data and forecasts for population and housing including U.S. Census Bureau and SCAG data,[1,2] State of California Economic Development Department Data,[3] the City of Los Angeles General Plan,[4] City Zoning Code,[5] and the South Los Angeles Community Plan.[6]

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impacts to population and housing. Would the project:

(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The proposed project would result in no impacts to population and housing in relation to inducing substantial direct or indirect population growth. Between 2000 and 2018, the County of Los Angeles had an estimated population growth rate of 8 percent and the City of Los Angeles had an estimated growth rate of 9.9 percent.[7] According to the City General Plan, the Master Plan Area is within the second-fastest growing Community Plan Area, South Los Angeles, at 5.1 percent population growth.[8] The population for South Los Angeles was at 270,354 in the 2010 Census and is projected to rise to 311,200 by 2035, which is within the Plan Capacity of 313,836 determined by the City General Plan. The number of dwelling units was at 82,186 in the 2010 Census and is projected to rise to 97,900 by 2035, which is approximately the same as the Plan Capacity of 97,897 under the City General Plan.[9] The proposed project would be not expected to contribute to

[1] U.S. Census Bureau. July 2018. Los Angeles City and Los Angeles County, California Population Estimates. QuickFacts. https://www.census.gov/quickfacts/fact/table/losangelescitycalifornia,losangelescountycalifornia,CA/PST045218

[2] Southern California Association of Governments. May 2019. Profile of the City of Los Angeles. https://www.scag.ca.gov/Documents/LosAngeles.pdf

[3] State of California, Employment Development Department. 2019. Labor Market Information for Los Angeles-Long Beach-Glendale Metropolitan District. https://www.labormarketinfo.edd.ca.gov/geography/md/los-angeles-long-beach-glendale.html

[4] Los Angeles Department of City Planning. Accessed December 3, 2019. City of Los Angeles General Plan. https://planning.lacity.org/plans-policies/general-plan-overview

[5] City of Los Angeles. 2019. Chapter 1: General Provisions and Zoning. In the Official City of Los Angeles Municipal Code. http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca

[6] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[7] Southern California Association of Governments. May 2019. Profile of the City of Los Angeles. https://www.scag.ca.gov/Documents/LosAngeles.pdf

[8] Los Angeles Department of City Planning. Adopted December 3, 2013. Housing Element Chapter 1: Housing Needs Assessment. In the City of Los Angeles General Plan 2035. https://planning.lacity.org/plans-policies/housing-element

[9] Los Angeles Department of City Planning. Adopted November 22, 2017. South Los Angeles Community Plan. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

the population or housing growth already projected by the City and SCAG, as the proposed project is intended to serve existing and anticipated residents, workers, visitors, and the transit population.

The proposed project would result in no direct impacts to population growth because it would not involve the construction of new housing units or businesses. The proposed project would result in no indirect impacts because it is fully supported by existing infrastructure, vehicular, bicycle, walking, bus, and light rail access as well as served by utilities. The project would not construct new roads or infrastructure; it is limited to pedestrian and vehicular access and gateway improvements, a solar garden, relocating above-surface parking underground, pervious and impervious surfacing, and trees and understory planting. There is an existing light rail transit network that provides significant transportation infrastructure to accommodate the Master Plan Area, include two Metro Expo Line light rail stations at the northern border of the Master Plan Area on Exposition Park Blvd.[10] There is also a station of the Silver Line (bus rapid transit [BRT] running in the high-occupancy vehicle [HOV] lanes of the I-110) within two-blocks of the park, and LA Metro is currently planning a new BRT line that will run along Vermont Avenue. In addition to being well-served by public transportation, the Master Plan Area is located in close proximity to dense urban area of Downtown Los Angeles which is well-served by existing infrastructure. The Master Plan Area is less than 0.01 mile west of I-110 and approximately 1.3 miles south of I-10, as well in close proximity to other major transit corridors such as State Route 101 and I-5 in Downtown Los Angeles that connects throughout the region. The Master Plan Area is adequately served by infrastructure and utilities and would not require extension of new roads or other infrastructure (see Section 3.19, *Utilities and Service Systems*).

The proposed project would not result in a substantial increase in population as a result of the proposed construction activities or operations. The construction and operations needs include construction labor for the duration of the project and operation of the new facilities, such as staffing and maintaining the proposed Visitors Center and green spaces. These changes would not increase staff such that it would induce substantial unplanned population growth. The Master Plan Area is located in the center of a dense urban area with a high population and readily available workforce, and labor needs would be met through the available labor in Los Angeles. The County of Los Angeles has a total population of 10,105,518[11] and South Los Angeles contains 270,354 residents.[12] In 2010, the City had a total population of 3,792,621.[13] According to the Housing Element of the City General Plan, the projected population for the City is expected to total approximately 3,965,433 residents by September 30, 2021. This represents a 4.6 percent population increase since 2010. The City General Plan anticipates that the population will reach 4,320,600 by 2035.[14]

[10] Los Angeles County Metropolitan Transportation Authority. August 24, 2019. Metro Expo Line Route Map. https://www.metro.net/riding/maps/

[11] U.S. Census Bureau. July 1, 2018. Los Angeles County, California Population Estimates. QuickFacts. https://www.census.gov/quickfacts/fact/table/losangelescountycalifornia,CA/PST045218

[12] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 2: Community Background. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[13] U.S. Census Bureau. July 1, 2018. Los Angeles City, California Population Estimates. QuickFacts. https://www.census.gov/quickfacts/fact/table/losangelescitycalifornia/PST045218

[14] City of Los Angeles Planning Department. Adopted December 3, 2013. City of Los Angeles General Plan. Chapter 1: Housing Needs Assessment. Available at: https://planning.lacity.org/odocument/899d18c9-eb79-4540-b3eb-1d42615394ee/ch1.pdf

The labor force as of October 2019 of the City is 5,161,500 with an unemployment rate of 4.5 percent.[15] October 2019 construction industry data in the Los Angeles-Long Beach-Glendale District starts at 160,300 employed, up from 144,800 at the beginning of 2019.[16] Therefore, there is sufficient labor supply within the City to support construction, operation, and maintenance of the facilities and programs contemplated by the proposed project. Local contractors and employees would be available and would not require labor forces to move to or near the Master Plan Area as a direct result of the proposed project. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The proposed project would result in no impacts to population and housing in relation to the displacement of substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere. There is adequate existing housing in the surrounding community considering that the Master Plan Area is surrounded by zoning including High Medium Residential, Medium Residential, Low Medium II Residential, and Community Commercial.[17,18] The southern and western borders of the Master Plan Area are zoned Community Commercial. Their streets contain multi-family residential housing apartment complexes, behind which lie primarily Medium and Low Medium II Residential neighborhoods. The eastern border of the Master Plan Area is also zoned Community Commercial with multi-family residential housing apartment complexes, some of which host retail and food businesses on the ground floor. Along the northern border of the Master Plan Area is zoned High Medium Residential, and it is part of the University of Southern California (USC), including student housing. According to SCAG's 2035 population and housing forecasts, South Los Angeles' dwelling units are expected to increase from 82,186 in 2010 to 97,900 in 2035.[19] There are no existing housing units in the Master Plan Area. Nor is there any allocation for construction of future housing within the Master Plan Area. Therefore, there would be no impact. No mitigation or further analysis is warranted.

[15] State of California Employment Development Department. October 1, 2019. Unemployment Rates and Labor Force. Labor Market Information for Los Angeles-Long Beach-Glendale Metropolitan District. https://www.labormarketinfo.edd.ca.gov/geography/md/los-angeles-long-beach-glendale.html

[16] State of California Employment Development Department. 2019. Industry Employment Official Monthly Estimates (CES): Los Angeles-Long Beach-Glendale Metropolitan District Construction Industry Number of Employed Data. Labor Market Information Resources and Data. Accessed 20 November 2019. https://www.labormarketinfo.edd.ca.gov/cgi/dataanalysis/areaselection.asp?tablename=ces

[17] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 3: Land Use and Urban Design. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[18] City of Los Angeles Planning Department. Accessed November 22, 2019. Zone Information and Map Access System (ZIMAS). http://zimas.lacity.org/

[19] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 2: Community Background. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

3.15 PUBLIC SERVICES

This analysis is undertaken to determine if the proposed project may have a significant impact to public services, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Public services at the Master Plan Area were evaluated with regard to the City of Los Angeles General Plan,[1] the South Los Angeles Community Plan,[2] the Coliseum Specific Plan,[3] Los Angeles Police Department (LAPD) resources,[4] Los Angeles Fire Department (LAFD) resources,[5] and Los Angeles Unified School District resources.[6]

The State CEQA Guidelines recommend the consideration of the following question when addressing the potential for significant impact to public services. Would the project:

(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

1) Fire protection

The proposed project would result in no impacts to public services in relation to facilities to support fire protection and emergency response services. The Master Plan Area is a state park that is currently served by the Exposition Park Department of Public Safety and California Highway Patrol (CHP) along with the LAFD for fire protection services. The Department of Public Safety has a communications office (Dispatch) that is staffed by dispatchers (communications operators) 24 hours a day, 7 days a week, 365 days a year. Dispatchers are the main line of communications between officers, supervisors, allied emergency response personnel (including LAFD), and all entities within Exposition Park. Officers are dispatched to incidents and calls for service from the communications office.[7] There are six LAFD fire stations that serve the South Los Angeles community, two of which serve the areas encompassing the northern and southern portions of Exposition Park within the South Bureau (Table 3.15-1, *Fire Stations Serving the Master Plan Area*; Figure 3.15-1, *Public Services Map*).

[1] Los Angeles Department of City Planning. June 1973. City of Los Angeles General Plan. Available at https://planning.lacity.org/odocument/01ea5f66-3281-488a-930b-f523712fef07/Open_Space_Element.pdf

[2] Los Angeles Department of City Planning. November 2017. South Los Angeles Community Plan. Available at https://planning.lacity.org/plans-policies/community-plan-area/south-los-angeles

[3] Los Angeles Department of City Planning. June 30, 2017. Coliseum Specific Plan.

[4] Los Angeles Police Department. Accessed 26 November 2019. Our Communities. For 700 Exposition Park Drive. http://www.lapdonline.org/southwest_community_police_station.

[5] Los Angeles Fire Department. Accessed 26 November 2019. Find Your Station. https://www.lafd.org/fire-stations/station-results.

[6] Los Angeles Unified School District. July 2015. Local District Central Schools and Offices Map. https://achieve.lausd.net/domain/34.

[7] State of California Office of Exposition Park Management. Accessed 26 November 2019. Exposition Park Department of Public Safety. http://expositionpark.ca.gov/public-safety/.

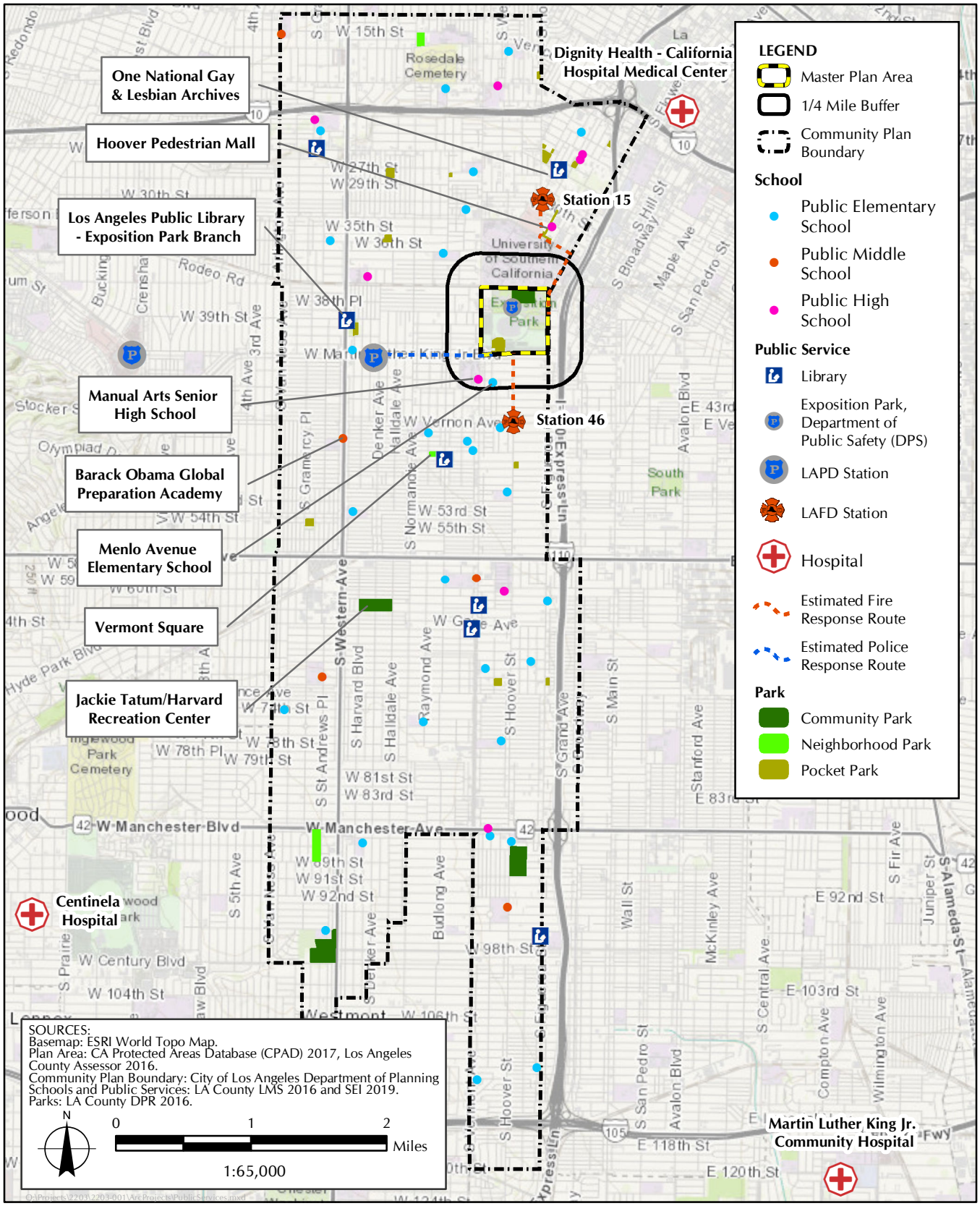

FIGURE 3.15-1

Public Services Map

TABLE 3.15-1
FIRE STATIONS SERVING THE MASTER PLAN AREA[8,9]

Station No.	Location	Personnel/Equipment	Linear Distance	Driving Distance[10]	Response Time[11]
46	4370 South Hoover St. Los Angeles, CA 90037	10 full-time members 4 apparatus: 1 engine, 1 EMT ambulance, 2 paramedic ambulances	0.5 mile	2 minutes	5 minutes, 17 seconds
15	915 West Jefferson Blvd. Los Angeles, CA 90007	14 full-time members; 16 Monday–Friday 6 apparatus: 1 truck, 2 engines, 2 ambulances, 1 alternative design unit (intoxicated/psych calls)	1.0 mile	6 minutes	5 minutes, 19 seconds

SOURCE: Los Angeles Fire Department. Accessed November 26, 2019. Find Your Station. https://www.lafd.org/fire-stations/station-results.
Male, Laura, Sapphos Environmental, Inc. December 2, 2019. Call with LAFD Station 15.
Male, Laura, Sapphos Environmental, Inc. December 3, 2019. Call with LAFD Station 46.

The proposed project is limited to landscape improvements, the improvement of existing public open space, parking, two 1-story structures, and pedestrian and cycling improvements. These improvements would be developed to serve the existing population and anticipated population growth as described under the City General Plan. According to the City General Plan, the Master Plan Area is contained within the second-fastest-growing Community Plan Area of South Los Angeles with 5.1 percent population growth.[12] The population for South Los Angeles is projected to rise to 311,200 by 2035,[13] which is within the Plan Capacity of 313,836 determined by the City General Plan.[14] In addition, the Master Plan Area is fully supported by existing infrastructure, vehicular, bicycle, walking, bus and light rail access as well as served by utilities. The proposed project would not construct new roads or infrastructure; thus, it would not result in direct or indirect population growth (see Section 3.14, *Population and Housing*). As such, the proposed project would not result in the need for the development of new fire stations or facilities or the improvement to existing fire stations. Therefore, there would be no impact. No mitigation or further analysis is required.

[8] Los Angeles Fire Department. Accessed 26 November 2019. Find Your Station. https://www.lafd.org/fire-stations/station-results.

[9] Google Earth Pro. Accessed 26 November 2019. Directions from Fire Stations 15 and 46 to Exposition Park.

[10] Google Earth Pro. Accessed 26 November 2019. Directions from Fire Stations 15 and 46 to Exposition Park.

[11] Los Angeles Fire Department. Accessed 26 November 2019. Response Times. https://www.lafd.org/fsla/stations-map

[12] Los Angeles Department of City Planning. Adopted 3 December 2013. Housing Element Chapter 1: Housing Needs Assessment. In the City of Los Angeles General Plan 2035. Available at https://planning.lacity.org/plans-policies/housing-element.

[13] Southern California Association of Governments. May 2019. Profile of the City of Los Angeles. Available at https://www.scag.ca.gov/Documents/LosAngeles.pdf.

[14] Los Angeles Department of City Planning. Adopted 22 November 2017. South Los Angeles Community Plan. Available at https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf.

2) Police protection

The proposed project would result in no impacts to public services in relation to facilities to support police protection and emergency response services. The Master Plan Area is a state park that is currently served by the Exposition Park Department of Public Safety along with the CHP and LAPD for police protection services. The Department of Public Safety has a communications office (Dispatch) that is staffed by dispatchers (communications operators) 24 hours a day, 7 days a week, 365 days a year.[15] Dispatchers are the main line of communications between officers, supervisors, allied emergency response personnel (including CHP and LAPD), and all entities within Exposition Park. Officers are dispatched to incidents and calls for service from the communications office. The Department of Public Safety reports incidents directly to the CHP before going to LAPD, as there is a CHP command station within Exposition Park and CHP is integrated into the Department of Public Safety. Within LAPD, the Southwest Community Police Station serves the Southwest Community, which includes Exposition Park.[16] It is located approximately 0.9 mile west of the Master Plan Area, or an approximately 3 minute drive away, at 1546 West Martin Luther King, Jr. Boulevard, Los Angeles, CA 90062[17] (see Figure 3.15-1). The Master Plan Area is also served by the South Traffic Division located at 4125 S. Crenshaw Boulevard, Los Angeles, CA 90008. The South Traffic Division is responsible for the investigation of traffic collisions and traffic related crimes for the South Bureau and the area encompassing the Master Plan Area, including south of the Santa Monica freeway to San Pedro and between Central Avenue and La Brea Avenue.[18]

The proposed project would be developed to serve the existing population and anticipated population growth as described under the City General Plan and is fully supported by existing infrastructure, vehicular, bicycle, walking, bus, and light rail access as well as served by utilities. The proposed project would not construct new roads or infrastructure; thus, it would not result in direct or indirect population growth (see Section 3.14). The proposed project is limited to landscape improvements, the creation of public open space, parking, and pedestrian and cycling improvements. As such, the proposed Master Plan would not result in the need for the development of new police stations or facilities or the improvement to existing police stations. Therefore, there would be no impact. No mitigation or further analysis is required.

3) Schools

The proposed project would result in no impacts to public services in relation to school facilities. The Master Plan Area is located in a dense urban area with a substantial number of schools for a range of student ages. There are six Los Angeles Unified School District (LAUSD) public schools located within one-half mile of the Master Plan Area covering elementary, middle, and high school, including one science charter school and one performing arts magnet school (Table 3.15-2, *LAUSD Schools within One-Half Mile of the Master Plan Area*; Figure 3.15-1).

The proposed project would be developed to serve the existing population and anticipated population growth as described under the City General Plan and is fully supported by existing

[15] Exposition Park, Department of Public Safety. Accessed 26 November 2019. http://expositionpark.ca.gov/public-safety/

[16] Los Angeles Police Department. Accessed 26 November 2019. Our Communities. For 700 Exposition Park Drive. http://www.lapdonline.org/southwest_community_police_station.

[17] Google Earth Pro. Accessed 26 November 2019. Directions from 1546 West Martin Luther King Junior Boulevard to Expo Park.

[18] Los Angeles Police Department. Accessed 26 November 2019. South Bureau. South Traffic Division. http://lapdonline.org/south_traffic

infrastructure, vehicular, bicycle, walking, bus, and light rail access as well as served by utilities. The proposed project would not construct new roads or infrastructure; thus, it would not result in direct or indirect population growth (see Section 3.14). The proposed project is limited to landscape improvements, the creation of public open space, two 1-story structures, parking, and pedestrian and cycling improvements. As such, the proposed project would not result in the need for the development of new schools or educational facilities or the improvement to existing schools. Moreover, while the existing schools on the Exposition Park campus (Alexander Science Center and Ralph M. Parsons Pre-School) are encompassed within the Master Plan Area, no physical alterations or development would be included in the proposed project. Therefore, there would be no impact. No mitigation or further analysis is required.

TABLE 3.15-3
LAUSD SCHOOLS WITHIN ONE-HALF MILE OF THE MASTER PLAN AREA[19]

District	Name of School	Approximate Distance
LAUSD (Affiliated Independent Charter)	Dr. Theodore T. Alexander Science Center School	Within the Master Plan Area (northeast corner)
LAUSD	Manual Arts Senior High School	0.07 mile southwest
LAUSD	Menlo Avenue Elementary School	0.20 mile south
LAUSD	Clinton Middle School	0.28 mile east
LAUSD	Lenicia B. Weemes Elementary School	0.28 mile northwest
LAUSD	32nd Street/USC Performing Arts Magnet	0.39 mile north

4) Parks

The proposed project would result in less than significant impacts to public services in relation to parks. The proposed project would primarily consist of landscape improvements and the creation of new recreational space for the community. The community surrounding the Master Plan Area is currently not adequately served by parks and is considered a park-poor community.[20,21] Little Green Acres Park-Community Gardens (~4.8 miles south of the Master Plan Area) is the only community park in South Los Angeles, and Exposition Park (the Master Plan Area) is the only regional park. The nearest neighborhood and pocket parks within one-half mile of the Master Plan Area are the Jesse Brewer Jr. Park (within the Master Plan Area) and Curtis Roland Park (~0.5 mile east) (see Figure 3.15-1). The Master Plan proposes to improve and expand recreation opportunities at Exposition Park, which is consistent with the City's General Plan goals and policies.[22] There is limited local recreation access, and the proposed project would help meet park needs through converting parking lot land to green space. In addition, the proposed project would be consistent with the SCAG 2016-2040 SCS for the provision of recreation resources for communities within

[19] Los Angeles Unified School District. July 2015. Local District Central Schools and Offices Map. https://achieve.lausd.net/domain/34.

[20] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 5: Community Faculties and Infrastructure.

[21] County of Los Angeles, Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment. https://lacountyparkneeds.org/wp-content/uploads/2016/06/FinalReport.pdf

[22] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 5: Community Faculties and Infrastructure.

one-half mile from major transit stops, high-quality transit corridors, and developed areas based on Senate Bill 375.[23]

The proposed project would not result in environmental degradation, as its purpose is to improve, not degrade the environment. While the proposed project would result in the construction of new governmental facilities in relation to parks, project design features have been integrated into the proposed project to avoid potential impacts (Section 1, *Project Description*). The new facilities would be maintained and upkept by the Exposition Park management. The proposed improvements have been designed to avoid or minimize adverse environmental effects. The new open space recreational facilities would be a part of Element 4 – Festival Park and Community Promenade, which would replace aboveground parking with 619,819 square feet of open space and public spaces. This square footage accounts for less than 10 percent of the total acreage, which is not a substantial increase. Furthermore, the expansion of recreational facilities would not have an adverse physical effect on the environment, as the Master Plan Area is not on land that is home to a listed species, does not involve a significant cultural resource, and does not affect any wetland areas (see Section 3.16, *Recreation*).

Additionally, the proposed project's recommended improvements would result in in an increase in the Master Plan Area's connectivity with the adjacent community, and within the Master Plan Area itself. The proposed project would guide the development of Exposition Park during a 25-year period to link Exposition Park to the City of Los Angeles around it; connect the park's segments to one another; and encourage visitors and locals to linger with more plentiful pathways, plantings, and visitor amenities. The proposed project would connect the park's segments by improving pedestrian and recreational use of the spaces between its buildings and moving surface parking spaces underground. The Master Plan Area is served by public transit bus, light rail, pedestrian access, and bicycle paths. The proposed project would improve vehicular access to the existing park for large groups with dedicated loading zones and bus drop-off areas. The improvements would be constructed consistent with the 2016-2040 RTP/SCS goals by promoting energy efficiency through design enhancements and providing opportunities for open space served by public transit in close proximity to transit stops. The proposed project would enhance pedestrian and bicyclist access to Exposition Park and within the community. New protected cycle tracks would be installed along Exposition Blvd. and MLK Jr. Blvd. Pedestrian gathering spaces and access would be enhanced including extending the Expo Festival Plaza to include promenades and zero curb sidewalks.

The proposed project would be developed to serve the existing population and anticipated population growth as described under the City General Plan and is fully supported by existing infrastructure, vehicular, bicycle, walking, bus, and light rail access as well as served by utilities. The proposed project would not construct new roads or infrastructure; thus, it would not result in direct or indirect population growth (see Section 3.14). Therefore, while the proposed project would result in new or physically altered governmental park facilities, the proposed project would not cause significant environmental impacts related to park performance objectives. No mitigation or further analysis is required.

[23] Southern California Association of Governments. 2019. High Quality Transit Areas (HQTA) 2045 – SCAG Region. http://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-118.328%2C34.008%2C-118.247%2C34.021

5) Other public facilities

The proposed project would result in no impacts to public services in relation to the construction of new or physically altered public facilities which would cause significant adverse environmental impacts. The Master Plan Area is served by two libraries located with 1 mile of the proposed Master Plan Area. The Los Angeles Public Library – Exposition Park Branch is located 0.9 mile to the west of the proposed Master Plan Area, and the One National Gay & Lesbian Archives are located 0.9 mile to the northeast of the Master Plan Area. The nearest hospital serving the Master Plan Area is Dignity Health – California Hospital Medical Center located 2.6 miles to the northeast of the Master Plan Area.

The proposed project would be developed to serve the existing population and anticipated population growth as described under the City General Plan and is fully supported by existing infrastructure, vehicular, bicycle, walking, bus and light rail access as well as served by utilities. The proposed project would not construct new roads or infrastructure; thus, it would not result in direct or indirect population growth (see Section 3.14). The proposed project would primarily consist of landscape improvements and the creation of new recreational space for the community and would not result in the need for new or physically altered governmental facilities related to other public facilities. Therefore, there would be no impact. No mitigation or further analysis is required.

3.16 RECREATION

This analysis is undertaken to determine if the proposed project may have a significant impact to recreation, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Recreation at the Master Plan Area was evaluated with regard to the City of Los Angeles General Plan,[1] Coliseum Specific Plan,[2] Resilient Los Angeles Report,[3] the South Los Angeles Community Plan,[4] the 2016 Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment,[5] the ZIMAS website, and data from the State of California.[6]

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impact to recreation:

(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The proposed project would result in less than significant impacts to recreation in relation to increased use of existing neighborhood and regional parks or other recreational facilities such that would contribute to their physical deterioration. The proposed project would guide the improvements of Exposition Park, an existing state park that receives approximately 4 million annual visitors by serving as a community park to half a million individuals who live within a 3-mile radius and a regional park that has been identified as one of the top five tourist and visitor destinations in Southern California.[7] South Los Angeles is a park-poor community in comparison to the rest of the City at 2 percent of Open Space use (161 acres) of the total land use distribution.[8] The Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment analyzed Los Angeles County by community-based study area and found that the park need in the South Los Angeles study area is very high. The County has an average of 3.3. acres of local parks and regional recreation parks per 1,000 people.[9] The City standard is 6 acres of land per 1,000 persons for regional parks,[10] 2 acres per 1,000 persons for community parks, and 1 acre per 1,000 persons for

[1] Los Angeles Department of City Planning. Accessed December 3, 2019. Open Space Plan. https://planning.lacity.org/odocument/01ea5f66-3281-488a-930b-f523712fef07/Open_Space_Element.pdf

[2] Los Angeles Department of City Planning. June 30, 2017. Coliseum Specific Plan.

[3] City of Los Angeles: Mayor's Office of Resilience. Accessed October 18, 2019. City of Los Angeles General Plan: Resilient Los Angeles. https://www.lamayor.org/Resilience

[4] Los Angeles Department of City Planning. November 2017. South Los Angeles Community Plan. https://planning.lacity.org/plans-policies/community-plan-area/south-los-angeles

[5] County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment. https://lacountyparkneeds.org/wp-content/uploads/2016/06/FinalReport.pdf.

[6] County of Los Angeles, Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment. https://lacountyparkneeds.org/wp-content/uploads/2016/06/FinalReport.pdf.

[7] Office of Exposition Park Management. Accessed November 20, 2019. Exposition Park, California: Park History. http://expositionpark.ca.gov/about-us/park-history/

[8] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 5: Community Faculties and Infrastructure.

[9] County of Los Angeles, Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment. https://lacountyparkneeds.org/wp-content/uploads/2016/06/FinalReport.pdf.

[10] City of Los Angeles Planning Department. Accessed December 3, 2019. Open Space Plan. https://planning.lacity.org/odocument/01ea5f66-3281-488a-930b-f523712fef07/Open_Space_Element.pdf

neighborhood parks.[11] In comparison, the 2010 Census estimated a population of 270,354 in South Los Angeles, with 246 acres of parks and/or recreational facilities, resulting in approximately 0.91 acre of parkland per 1,000 residents.[12] While Exposition Park is a major asset to the community that brings visitors from across the region and provides parks and recreation opportunities, it currently provides limited green space for recreation.[13]

The primary provider of parks and recreation services in South Los Angeles is the City's Recreation and Parks Department (RAP), which operates 33 parks and recreation facilities covering about 246 acres. There are four types of parks: mini, neighborhood, community, and regional. Mini ("pocket") parks provide small spaces for limited types of recreational activities to an immediate neighborhood, and neighborhood parks provide space and facilities for outdoor and indoor recreation activities to all residents in the immediate residential area. Community parks provide a broader range of services than neighborhood parks for the nearby community as well as other service areas, and regional parks provide specialized recreational facilities such as lakes, golf courses, campgrounds, wilderness areas and museums, which serve the Los Angeles area.

Little Green Acres Park-Community Gardens (~4.8 miles south of the Master Plan Area) is the only community park in South Los Angeles, and Exposition Park (the Master Plan Area) is the only regional park. The 31 remaining facilities are neighborhood and pocket parks. Based on the Parks and Open Space Map provided by the South Los Angeles Community Plan, the nearest neighborhood and pocket parks within 1/2-mile of the Master Plan Area are the Jesse Brewer Jr. Park (within the Master Plan Area) and Curtis Roland Park (~0.5 miles east). There are 12 existing parks within a 1-mile radius of the Master Plan Area (Table 3.16-1, *Existing Local Parks and Recreation Facilities within One Mile of the Master Plan Area*). Additionally, in the South Los Angeles Community Plan Area, the County owns and operates the Jesse Owens Community Regional Park (~4.4 miles southwest of the Master Plan Area).[14] The regional parks and recreation facilities in the adjacent City of Los Angeles Community Plan Areas are the Earvin "Magic" Johnson Recreation Area (~6.2 miles southeast) and Ted Watkins Memorial Park (~4.8 miles southeast) in Southeast Los Angeles,[15] Kenneth Hahn State Recreation Area (~3.8 miles west) in West Adams-Baldwin Hills-Leimert,[16] and Pan Pacific Regional Park in Wilshire (~5.4 miles northwest).[17] There is one 51-acre regional park in the adjacent City of Inglewood, Centinela Park (~3.7 miles southwest), and there are no regional parks in the adjacent unincorporated County.[18]

[11] City of Los Angeles Planning Department. Accessed December 3, 2019. Public Recreation Plan. https://planning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf

[12] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 5: Community Faculties and Infrastructure.

[13] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 5: Community Faculties and Infrastructure.

[14] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 5: Community Faculties and Infrastructure.

[15] City of Los Angeles Planning Department. Adopted November 22, 2017. Southeast Los Angeles Community Plan. Chapter 5: Community Faculties and Infrastructure.

[16] City of Los Angeles Planning Department. Adopted June 2016. West Adams-Baldwin Hills-Leimert Community Plan. Chapter 5: Community Faculties and Infrastructure.

[17] City of Los Angeles Planning Department. Adopted September 19, 2001. Wilshire Community Plan.

[18] City of Inglewood. December 1995. Inglewood General Plan Open Space Element. https://www.cityofinglewood.org/DocumentCenter/View/131/Open-Space-Element.

TABLE 3.16-1
EXISTING LOCAL PARKS AND RECREATION FACILITIES WITHIN ONE MILE OF THE MASTER PLAN AREA

Name of Park	Approximate Distance
Jesse Brewer Jr. Park	Within the Master Plan Area
Curtis Roland Park	0.5 mile east
Unnamed – Located within South Region Elementary School	0.6 mile south
Vermont Square Park	0.75 mile southwest
Denker Recreation Center	0.75 mile northwest
Julian C. Dixon park	0.8 mile south
Gilbert Lindsay Community Center	0.8 mile southeast
Martin Luther King Jr. Park	0.9 mile west
Richardson Family Park	0.9 mile northwest
Saint James Park	0.9 mile northeast
Hoover Recreation Center	0.9 mile north
Avalon-San Pedro Park	<1 mile east

SOURCE: City of Los Angeles South Los Angeles Community Plan[19] and Southeast Los Angeles Community Plan.[20]

The proposed project would be consistent with the City's park goals. Park development is based on a standard of population density to ensure that equal facilities and services to all residents. In 2011, RAP launched the 50 Parks Initiative to develop new pocket parks in South Los Angeles. The South Los Angeles Community Plan details the community's park goals and policies. This includes conserving, maintaining, and better utilizing existing recreation and park facilities for the community's recreational needs (Goal CF8) and targeting areas with the greatest opportunities (such as Exposition Park) for park and recreation projects (Policy CF9.2). Furthermore, the Community Plan calls for greater open space, parkland, and recreational facility opportunities that result from increased cooperation with a broad range of partners (Goal CF10), such as the colocation and integration of public facilities (such as Exposition Park) and open space (Policy CF10.3).[21] The proposed project would improve and expand recreation opportunities at Exposition Park, which is consistent with the City General Plan goals and policies. There is limited local recreation access, and the proposed project would help meet park needs through converting parking lot land to green space. The Master Plan is intended to accommodate existing and projected demand for open space and recreation by improving the capacity to absorb existing and projected population growth within the Service Area of Exposition Park, as well as improving the quality of the recreation experience for County and City residents and visitors.

There would not be a substantial increase in population as a result of the proposed project that would lead to degradation (see Section 3.14, *Population and Housing*). Improvements to the recreation facilities may result in increased visitation to Exposition Park, as it is a regional park, and there would be an increase in the number of designated parking spaces at Exposition Park by approximately 280 spaces (less than 5 percent). However, the proposed project would not contribute to the degradation of existing recreational facilities, as the Master Plan would provide recreational facilities where they do not currently exist. The Jesse Brewer Jr. Park is a City-owned

[19] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 5: Community Faculties and Infrastructure.

[20] City of Los Angeles Planning Department. Adopted November 22, 2017. Southeast Los Angeles Community Plan. Chapter 5: Community Faculties and Infrastructure.

[21] City of Los Angeles Planning Department. Adopted November 22, 2017. South Los Angeles Community Plan. Chapter 5: Community Faculties and Infrastructure.

and -operated neighborhood park that exists within the Master Plan Area. Increased visitation to Exposition Park as a result of the proposed project may lead to increased use of the Jesse Brewer Jr. Park facilities by bringing more people to the Master Plan Area and by making circulation improvements that make it easier to access different areas of Exposition Park. However, the Jesse Brewer Jr. Park would be maintained and upkept along with all other facilities in the Master Plan Area by Exposition Park staff. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The proposed project would result in less than significant impacts to recreation in relation to adverse physical effects on the environment as a result of existing recreational facilities or proposed construction or expansion of recreational facilities.

The proposed project would include the construction of new recreational facilities as a part of Element 4 – Festival Park and Community Promenade. Element 4 would increase the recreational facilities available by relocating surface parking underground and replacing the aboveground parking with 619,819 square feet of open space and public spaces. The proposed Festival Park and Community Promenade improvements would provide a Festival Lawn area of open space consisting mainly of turf, trees, paths, and parking structure daylighting or skylight features; recreational areas consisting of a children's playground, a plaza, and a skateboard park; as well as a Community Promenade. The remaining elements include the improvement, enhancement, and reconfiguration of the existing Exposition Park facilities for the purposes of pedestrian, cyclist, vehicle, and visitor experience and circulation, not for recreational facilities.

The recreational facilities improvements would not constitute a substantial increase. Exposition Park is a 152-acre site, or 6,621,120 square feet. Element 4 would replace an existing parking area with 619,819 square feet of open space and public recreation facilities, which is approximately 9.4 percent of the total acreage. Therefore, the proposed project would include the construction or expansion of recreational facilities that would increase the use of recreational facilities by less than 10 percent, which is not a significant increase.

Furthermore, the expansion of recreational facilities would not have an adverse physical effect on the environment, as the Master Plan Area is not on land that is home to a listed species, does not involve a significant cultural resource, and does not affect any wetland areas. While threatened or endangered species of plants and animals are known to occur with the vicinity of the Master Plan Area, none of these listed species were determined to be present within the Master Plan Area itself based on desktop analyses, absence of existing suitable habitat, surveys, and site visits (see Section 3.4, *Biological Resources*). There are also no federal jurisdictional wetlands within, or immediately adjacent to, the project site, so there would be no impacts to the environment in this way (see Section 3.4). The cultural resources evaluation found that there are eight known historical resources within the Master Plan Area; however, the only elements of the Master Plan that would be impacted by these cultural resources are Element 2 Expo Festival Plaza and Element 9 Olympic Ring Walk (see Section 3.5, *Cultural Resources*). Given that Element 4 is the only construction of a recreational facility, it would have no impacts on cultural resources. Therefore, the increase in recreational facilities by Element 4 would not have an adverse effect on the environment.

The proposed project would be developed to serve the existing population and anticipated population growth as described under the City General Plan and is fully supported by existing infrastructure, vehicular, bicycle, walking, bus and light rail access as well as served by utilities. The proposed Master Plan would not construct new roads or infrastructure; thus, the proposed Master Plan would not result in direct or indirect population growth (see Section 3.14). Therefore, despite the construction of new government park facilities, the proposed project would result in less than significant impacts regarding the construction of new or physically altered government park facilities which would cause significant adverse environmental impacts. No mitigation or further analysis is warranted.

3.17 TRANSPORTATION

This analysis is undertaken to determine if the Exposition Park Master Plan (proposed project) may have a significant impact to transportation, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the California Environmental Quality Act (CEQA).[1] Transportation facilities and circulation were evaluated at the proposed Master Plan Area with regard to Assembly Bill (AB) 1358 (the Complete Streets Act),[2,3] Senate Bill (SB) 743,[4] the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS),[5] Mobility Element of the Los Angeles County (County) General Plan 2035,[6] Mobility Plan 2035 of the Los Angeles City (City) General Plan,[1] the adopted Los Angeles County Congestion Management Program (CMP),[2] 2018 Los Angeles County Regional Transportation Improvement Program (RTIP),[7] two site visits conducted in October and November 2019, and review of Google Earth aerial imagery and street view.

The State CEQA Guidelines recommend the consideration of four questions when addressing the potential for significant impact to transportation:

Would the project:

(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The proposed project would result in less than significant impacts to transportation in relation to conflicting with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation systems. AB 1358, SB 743, the Mobility Element of the County General Plan 2035, Mobility Plan of the City General Plan, SCAG RTP, RTIP, and Congestion Management Program (CMP) were consulted to analyze impacts associated with traffic for the proposed project. The SCAG RTP's goals include providing adequate levels of accessibility and mobility for the efficient movement of people, goods, and services within the region. The SCAG RTP aims to improve transportation system safety through design, operations and maintenance, system improvements, support facilities, public information, and law enforcement efforts. The 2018 RTIP

[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[2] Government Code Sections 65040.2 and 65302.

[3] State of California. Approved September 30, 2008. Assembly Bill No. 1358: Chapter 657. http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=200720080AB1358

[4] State of California. Approved September 27, 2013. Senate Bill No. 743: Chapter 386. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743

[5] Southern California Association of Governments. Accessed December 3, 2019. 2016 RTP/SCS. http://scagrtpscs.net/Pages/default.aspx

[6] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 7: Mobility Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch7.pdf

[1] Los Angeles Department of City Planning. Adopted September 7, 2016. Mobility Plan 2035: An Element of the General Plan. https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

[2] Los Angeles County Metropolitan Transportation Authority. 2010. 2010 Congestion Management Program. http://media.metro.net/projects_studies/cmp/images/CMP_Final_2010.pdf

[7] Los Angeles County Metropolitan Transportation Authority. December 2017. 2018 Los Angeles County Regional Transportation Improvement Program. https://media.metro.net/projects_studies/funding/images/2018_LAC_rtip_submittal_2017-12.pdf

shows that there are no STIP projects within the City planned for construction concurrently during the construction of the proposed project.

The current roadway network in the vicinity of Exposition Park consists of a regional highway and an arterial and local residential-oriented road network. Interstate-110, a north-south direction freeway, is located approximately 0.1 mile east of the Master Plan Area, with freeway entrances and exits onto Martin Luther King Jr. Boulevard (MLK Jr. Blvd.) to the southeast of the Master Plan Area and West 37th Street to the east of the Master Plan Area, as well as a FastTrak entry/exit on 39th Street (see Figure 1.4-2, *Local Vicinity Map*). Existing visitor vehicular access to Exposition Park is currently provided from West Exposition Blvd. to the north of the Master Plan Area, South Figueroa Street to the east, MLK Jr. Blvd. to the south, and Vermont Avenue to the west.

As stated in the Project Description, the proposed project is located within a SCAG-mapped High Quality Transit Area (HQTA) in an urbanized location and is in close proximity to high-density urban development.[8] Exposition Park is well served by 13 bus lines operated by the Los Angeles County Metropolitan Transportation Authority (LA Metro) and the Los Angeles Department of Transportation (LADOT) Downtown Area Shuttle. There are 95 bus stops and 3 LA Metro Expo Line light rail stops within a half-mile radius of the Master Plan Area (see Figure 1.4-7, *Public Transit in Project Vicinity*). There are existing bike lanes on Figueroa Street along the eastern edge of the Master Plan Area as well as on Hoover Street south of MLK Jr. Blvd. Vermont Avenue is designated as a Tier 3 bicycle lane (sharrow) street between Exposition Blvd. and West 39th Street along the western border of the Master Plan Area as per the Los Angeles Mobility Plan 2035. The Mobility Plan also designates Exposition Blvd. for Tier 2 Bicycle Lanes and Figueroa St. and MLK Jr. Blvd. for Tier 1 Protected Bicycle Lanes. West of Vermont Avenue, Exposition Blvd. provides dedicated bicycle lanes.

The proposed project would be consistent with the intent of state, regional, and local goals addressing transit, bicycle, and pedestrian facilities in accordance with the 2008 requirement established by AB 1358 for "the legislative body of a city or county, upon any substantive revision of the circulation element of the general plan, modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. By requiring new duties of local officials, this bill would impose a state-mandated local program."[9]

The proposed project would provide additional parking spaces and a drop-off location to facilitate visitor arrival and departure and reduce traffic congestion. The new underground parking structure would increase parking spaces from 1,600 to 2,000 and would reduce the traffic congestion caused by street-level vehicles parking at the southeast area of the Master Plan Area and at surrounding streets.

During the project construction phase, there would be temporary additional trips associated with construction haul trucks, delivery trucks, and workers. However, the additional trips would be temporary and would not result in degradation of existing capacity of the roads surrounding the

[8] Southern California Association of Governments. Accessed December 3, 2019. High Quality Transit Areas (HQTA) 2045 – SCAG Region. http://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-118.328%2C34.008%2C-118.247%2C34.021

[9] State of California. Approved September 30, 2008. Assembly Bill No. 1358: Chapter 657. http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=200720080AB1358

Master Plan Area. The effects from construction would be temporary and contained on-site. Temporary road closures or the reengineering of public roads may occur surrounding the Master Plan Area due to the pick-up / drop-off lane on MLK Jr. Blvd., which would reconfigure the curb and the sidewalk. It is not anticipated that closures or the relocation of bus stops would occur (if moved, there would be no disruption of service). Improvements would be provided for the bike lanes, and all construction activities for the proposed project would be conducted within the Master Plan Area boundaries.

During operations, the proposed project is not anticipated to add additional traffic by motorized or nonmotorized transport to the existing circulation system. The new parking structure would reduce the demand for on-street parking. The proposed project includes a children's playground and a skate park, which would increase the existing uses of the park and would increase traffic to the Master Plan Area. However, the expansion of the parking structure and the available public transition in the vicinity would reduce traffic congestion in surrounding streets and leading to the Master Plan Area. The proposed project is served by public transit and provides accessibility to recreational opportunities for patrons visiting the park. Additionally, pedestrian accessibility improvements would be implemented to provide more accessibility to the Master Plan Area and would be consistent with the SCAG 2016 RTP/SCS. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

The proposed project would result in less than significant impacts to transportation in relation to conflicting or being inconsistent with CEQA Guidelines § 15064.3, subdivision (b). SB 743 was signed into law in September 2013, requiring the Office of Planning and Research (OPR) to[10]

> "prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the guidelines adopted pursuant to Section 21083 establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. In developing the criteria, the office shall recommend potential metrics to measure transportation impacts that may include, but are not limited to, vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. The office may also establish criteria for models used to analyze transportation impacts to ensure the models are accurate, reliable, and consistent with the intent of this section."

July 1, 2020, is the statewide implementation date for using vehicle miles traveled (VMT) as the CEQA transportation network for projects. Part 1 of Section 15064.3(b) of the CEQA Guidelines states that, generally, a land use project within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor (HQTC) should be presumed to cause a less than significant impact. As stated in the Project Description, the proposed project is located within a SCAG-mapped HQTA in an urbanized location and is in close proximity to high-density urban development and transit stops.[11] Exposition Park is well served by 13 bus lines operated by the LA

[10] State of California. Approved September 27, 2013. Senate Bill No. 743: Chapter 386. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743

[11] Southern California Association of Governments. Accessed December 3, 2019. High Quality Transit Areas (HQTA) 2045 – SCAG Region. http://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-118.328%2C34.008%2C-118.247%2C34.021

Metro and the LADOT Downtown Area Shuttle. There are 95 bus stops and 3 LA Metro Expo Line light rail stops within a half-mile radius of the Master Plan Area (see Figure 1.4-7). According to the SCAG 2016 RTP/SCS factsheet for the County,[12] the current daily VMT per capita is 22.1 miles. According to the American Community Survey data for 2017, approximately 2.15 percent of the people who live within 60 miles of the Master Plan Area use public transit to commute to work every day. The proposed project would therefore be consistent with SCAG RTP/SCS goals to provide opportunities of recreational and open spaces accessible through public transit.

The proposed project includes the provision of subterranean parking to reduce the street- and surface-level parking of the Master Plan Area. The new parking structure would provide 400 additional designated spaces that would be available more frequently than the 500 VIP Game Day parking spaces at the South Lawn and along State Drive that would be removed for development of Elements 6 and 8, which would help to reduce demand for street parking and may help reduce traffic congestion surrounding the Master Plan Area. The proposed project may result in an increase in vehicles and an increase in traffic due to the parking expansion and park improvements that could attract additional visitors. While the proposed project adds recreational opportunities that may increase traffic, accessibility to the Master Plan Area is served by public transit, and thus VMT would not be increased due to the proposed project. The existing traffic at surrounding intersections would continue to operate at or near current levels during peak hours from weekday AM and PM during construction and operation of the proposed project. Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project has the potential to result in significant impacts to transportation in relation to substantially increasing hazards due to a design feature or incompatible use, which warrants further analysis. There are currently four main entryways that provide vehicular access to the Master Plan Area: from Exposition Park Drive at Bill Robertson Lane, Figueroa St. at 39th, MLK Jr. Blvd. at Hoover Ave., and MLK Jr. Blvd. at Bill Robertson Lane. There would be no compatibility issues with proposed updates to the existing park and parking structure that would require traffic engineering design features or incompatible uses. The proposed project would not change the current land use at or surrounding the Master Plan Area. The proposed project would provide new access to the proposed parking structure off MLK Jr. Blvd. along with a pick-up/drop-off area in the same general location. The proposed project mainly consists of aesthetic upgrades and improvements to existing spaces as well as the construction of a subterranean parking structure, a dining area and plaza, a children's playground, open spaces, pedestrian paths, solar panels, and a skate park. The design components have been reviewed and coordinated with the LADOT. No dangerous curves or intersections are included in the design for the proposed project. Construction work would occur within the existing facility (see Figure 1.1-2, *Project Location Map*). There would be no changes to the existing roadway system.

However, there is a potential for conflicts between proposed bike lanes within the southern edge of Exposition Park along MLK Jr. Blvd. and the project's pick-up/drop-off area, which has the potential to increase hazards due to a design feature. The City of Los Angeles has adopted the Vision Zero initiative towards reducing severe injuries and deaths in roadway collisions.[13] South Figueroa St.,

[12] Southern California Association of Governments. 2016. 2016 RTP/SCS Factsheet Booklet Los Angeles County. http://scagrtpscs.net/Documents/FSB0516_LosAngeles.pdf

[13] City of Los Angeles. Accessed December 20, 2019. Los Angeles Vision Zero. http://visionzero.geohub.lacity.org/

MLK Jr. Blvd., and Vermont Ave., which surround Exposition Park to the east, south, and west, are mapped on the City's High Injury Network, which spotlights streets with a high concentration of traffic collisions that result in severe injuries and deaths. Therefore, the proposed project has the potential to result in significant impacts to transportation in relation to substantially increasing hazards due to a geometric design feature or incompatible uses. Further analysis is warranted.

(d) Result in inadequate emergency access?

The proposed project would result in no impact to transportation in relation to inadequate emergency access. Four main entry driveways provide access to the Master Plan Area: from Exposition Park Drive at Bill Robertson Lane, Figueroa St. at 39th, MLK Jr. Blvd. at Hoover, and MLK Jr. Blvd. at Bill Robertson Lane. The OEPM Public Safety Strategic Operating Procedures include emergency evacuation plans for individual parts of Exposition Park and overall strategic operating procedures (SOPs) that would be updated following completion of each Master Plan Element. The California Highway Patrol (CHP) patrols Exposition Park and buildings within the Park. The CHP provides timely and appropriate responses to safety problems outlined in the Public Safety Strategic Operating Procedures. The Park Policies and Enforcement Section of the Public Safety Strategic Operating Procedures includes traffic control, which is enforced by the Department of Public Safety (DPS); parking violations; and unlawful camping. Emergency and nonemergency protocols are outlined in detail in the Public Safety Strategic Operating Procedures. There would be no change to capacity and service related to the public transit routes and capacity as a result of the proposed project. Therefore, there would be no impact. No mitigation or further analysis is warranted.

3.18 TRIBAL CULTURAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to tribal cultural resources (TCRs), thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. TCRs at the Master Plan Area were evaluated with regard to a query of the South Central Coastal Information Center (SCCIC) and the Native American Heritage Commission (NAHC) for the USGS 7.5-minute series, Hollywood, topographic quadrangle in which the proposed project is located.

Letters from the NAHC dated November 5, 2019, were received by OEPM and indicated that the Sacred Land Files check was negative for the proposed project.[1] However, recent findings in nearby construction have revealed a significant cultural resource that may have been significant to a California Native American Tribe. Consultation between OEPM and tribal groups identified by the NAHC is ongoing. Six letters were transmitted by OEPM on December 6, 2019, indicating a formal notification to undertake a project and notification of consultation opportunity. As of December 20, 2019, no response has been received.[2] In accordance with Assembly Bill (AB) 52, the tribal groups contacted on December 6, 2019, have 30 days (i.e., until January 5, 2020) to request consultation with OEPM.

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impact to TCRs:

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

The proposed project would result in potentially significant impacts to TCRs in relation to causing a substantial adverse change in the significance of a TCR, defined in Public Resources Code § 21074 regarding being listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). Incorporation of mitigation measures would reduce impacts to below the level of significance.

A historical resource as defined in Public Resources Code Section 5020.1(k) refers to cultural and tribal cultural resources eligible for the California Register of Historical Resources. As stated in Section 3.5, *Cultural Resources*, archaeological resources at the proposed project site were evaluated with regard to a query of the SCCIC[3] and the NAHC. Historic quadrangle maps were reviewed during the supplemental research and included the following USGS maps:

[1] Native American Heritage Commission. November 5, 2019. Letter to Office of Exposition Park Management.

[2] Office of Exposition Park Management. December 6, 2019. AB 52 Letter.

[3] The SCCIC record search was completed on October 30, 2019.

- 7.5-minute series, Hollywood topographic quadrangle, 1953, 1966, 1981
- 62,500:1 Los Angeles topographic quadrangle, 1894, 1900, 1928
- 62,500:1 Santa Monica topographic quadrangle, 1896, 1898, 1902, 1921

The Master Plan Area is within a highly urbanized section of the City and County of Los Angeles. The Master Plan Area is surrounded entirely by well-developed areas consisting of streets, sidewalks, parking lots, and existing buildings. Due to the urbanization of the area, very little of the original (i.e., unpaved) ground surface has been adequately surveyed for TCRs, and as a result archaeological resources may be present beneath the surface. Potential impacts to TCRs are dependent on whether the proposed project will involve ground disturbance and whether that ground disturbance will penetrate native (undisturbed) soils. If the depth of ground disturbance is less than the verifiable depth of previous ground disturbance, then there would be no impact to TCRs.

Element 4 – Festival Park and Community Promenade. Among other proposed improvements for this element, Element 4 proposes construction of a subterranean three-level parking structure located at the current locations of parking lots 4, 5, and 6. The proposed parking structure would accommodate 2,000 vehicular parking spaces and incorporate vehicular ramped ingress and egress access. The construction of this subterranean parking structure and associated ramps would likely extend below any previous ground disturbance in this area, thus requiring the consideration of mitigation to avoid, reduce, or compensate for the impacts of this construction.

Element 8 – Zanja Madre. The proposed central plaza-like gathering space would include improvements such as planters, concrete seat walls, boulder seating, pervious and impervious surfacing, trees, and understory planting. The proposed west sunken lawn area would contain a large specimen tree; and the north, south, and west boundaries would be lined with two or more rows of trees. The proposed Victory Walk improvements would consist of an allée and the planter on the east side of the allée would encompass a grove of trees with improved surfacing materials. Other proposed improvements include stormwater components such as a dry creek. The construction of these elements could extend below any previous ground disturbance in these areas, thus requiring the consideration of mitigation to avoid, reduce, or compensate for the impacts of this construction.

Due to very shallow excavations into previously disturbed soils, or due to no excavation at all, it is not anticipated that the proposed project would result in impacts to archaeological resources from Elements 1, 2, 3, 5, 6, 7, or 9 of the Master Plan. If more details emerge during the ongoing design of the project that illustrate an element's construction activities involving excavation into native (undisturbed) soils, that element would require the incorporation of mitigation measures to avoid, reduce, or compensate for the impacts of this construction.

Potential impacts to TCRs related to a substantial adverse change in the significance of a TCR from Elements 4 and 8 of the proposed Master Plan would be reduced to below the level of significance with the incorporation of Mitigation Measures TRIBAL-1 and TRIBAL-2. (Mitigation Measures TRIBAL-1 and TRIBAL-2 are preliminary and subject to change after Native American consultation is completed pursuant to AB 52).

Mitigation Measure TRIBAL-1: *Tribal Resources – Avoidance and Monitoring.* Prior to the initiation of ground-disturbing activities in Element 4 and Element 8, OEPM shall review the construction plans to ensure that any known TCRs that are required to be avoided have been marked as "off-limits" areas for construction and construction staging. OEPM shall require monitoring of all ground-disturbing activities by a Native American monitor within 60 feet of a known TCR. In addition, consultation shall be undertaken with the Native American local Tribal contacts designated by the

NAHC and the Tribe to determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for TCRs.

In the event that previously unknown TCRs are encountered during construction, the resources shall either be left *in situ* and avoided through redesign, or the resources shall be salvaged, recorded, and reposited at the NHM or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan. OEPM has the delegated authority to deed archaeological or historical resources found during construction to the NHM. The cultural resource management plan will include further consultation with the Tribe. Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate adverse effects to cultural resources eligible or listed under CRHR Criterion 4, as it preserves important information that will otherwise be lost.

Mitigation Measure TRIBAL-2: *Pre-Construction Surveys*. At the time that any construction activity is proposed for development that would require ground-disturbing activities in soils that have been predominantly *in situ* during the past 50 years, records and archival information shall be reviewed to determine if there are any recorded TCRs as defined by AB 52 in the project footprint. At a minimum, the records and archival review shall include a search of the SCCIC if more than five years have passed since the previous records search, a request for Sacred Lands File from the NAHC, and a request for information regarding TCRs from the Native American local Tribal contacts designated by NAHC and the Tribe. The appropriate course of action shall be undertaken in light of the results of the records search:

(A) Where the project study area has been subject to a Phase I Walkover Survey within two years of the proposed activity and no TCRs are known within the project footprint, work shall proceed per the provision of Mitigation Measure TRIBAL-1.

(B) Where all or a portion of the project footprint has not been surveyed for cultural resources within two years of a proposed ground-disturbing activity, a qualified archaeologist who meets the Secretary of the Interior's *Professional Qualification Standards* for Archaeology and shall conduct a Phase I Walkover Survey to ascertain the presence or absence of TCRs, as defined in Section 15064.5(a) of the CEQA Guidelines.

a. If the survey and record searches determine no potential TCRs, then the work shall proceed consistent with the provisions of Mitigation Measure TRIBAL-1.

b. If the survey determines potential TCRs, then one of two courses of action shall be employed:

i. Where avoidance is feasible, the construction shall avoid the potentially significant TCRs, and the work shall then proceed consistent with the provisions of Mitigation Measure TRIBAL-1. The project area shall be surveyed by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior. DPR shall require monitoring of all ground-disturbing activities by a Native American monitor within 60 feet of a known TCR. In addition, consultation shall be undertaken with the Native American local Tribal contacts designated by the Native American

Heritage Commission and the Tribe to determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for TCRs.

ii. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible TCR within the area proposed for ground-disturbing work, the County shall in consultation with the Tribe, determine whether to avoid the resource through redesign or to proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of Mitigation Measure TRIBAL-1.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

The proposed project would result in potentially significant impacts to TCRs in relation to causing a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 regarding a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. Incorporation of mitigation measures would reduce impacts to below the level of significance.

There is a moderate to high sensitivity to encounter TCRs when excavating into native soil. As noted above, Elements 4 and 8 of the Master Plan would include ground-disturbing activities into native soil. Due to very shallow excavations into previously disturbed soils, or due to no excavation at all, it is not anticipated that the proposed project would result in impacts to archaeological resources from Elements 1, 2, 3, 5, 6, 7, or 9 of the Master Plan. If more details emerge during the ongoing design of the project that illustrate an element's construction activities involving excavation into native (undisturbed) soils, that element would require the incorporation of mitigation measures to avoid, reduce, or compensate for the impacts of this construction.

Potential impacts to TCRs related to a substantial adverse change in the significance of a TCR from Elements 4 and 8 of the proposed Master Plan would be reduced to below the level of significance with the incorporation of Mitigation Measures TRIBAL-1 and TRIBAL-2.

3.19 UTILITIES AND SERVICE SYSTEMS

This analysis is undertaken to determine if the proposed project may have a significant impact to utilities and service systems, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines.[1] Utilities and service systems at the Master Plan Ara were evaluated with regard to California Green Building Code (CALGreen),[2] Los Angeles Green Building Code,[3] the South Los Angeles Community Plan,[4] the Coliseum Specific Plan,[5] and other substantial evidence.

The State CEQA Guidelines recommend the consideration of five questions when addressing the potential for significant impact to utilities and service systems. Would the project:

(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The proposed project would result in less than significant impacts to utilities and service systems in relation to relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.

New or Expanded Water

Water supply at Exposition Park is primarily served by the Los Angeles Department of Water and Power (LADWP). Based on a review of the South Los Angeles Community Plan, LADWP ensures that water demands and water quality standards in the City are met through four main sources: the Los Angeles Aqueduct, groundwater, the Metropolitan Water District of Southern California (MWD), and treated and recycled wastewater.[6] During the operation of the proposed project, potable and non-potable water will be attained through a combination of extracted groundwater from City-owned wells, recycled water, and imported water from State Water Project, Los Angeles Aqueduct, and Colorado River Aqueduct. Due to the limitations in water rights, LADWP cannot meet the increase in water demand through an increase in water extraction. The increase in water demand would be met through a combination of conservation of local surface water, additional imported water, and water purchased from MWD. Furthermore, the proposed project would include a stormwater capture

[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[2] State of California. August 2019. Chapter 5 Nonresidential Mandatory Measures, Division 5.3 Water Efficiency and Conservation. In the 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11. https://codes.iccsafe.org/content/CGBC2019P2/chapter-5-nonresidential-mandatory-measures#CGBC2019P2_Ch05_SubCh5.3

[3] City of Los Angeles. January 3, 2014. Official City of Los Angeles Municipal Code, Chapter IX Building Regulations, Article 9 Green Building Code, Division 5 Nonresidential Mandatory Measures. http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chapterixbuildingregulations/article9greenbuildingcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD

[4] City of Los Angeles. November 2017. South Los Angeles Community Plan. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[5] City of Los Angeles Department of City Planning. June 30, 2017. Coliseum Specific Plan.

[6] City of Los Angeles. November 2017. South Los Angeles Community Plan. Chapter 5: Community Services and Infrastructure. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

and use system to partially offset irrigation water demand, and proposes to include drywells to augment the local groundwater source. The proposed project would not be expected to result in a net increase in areas requiring irrigation.

Wastewater Treatment

Based on a review of the South Los Angeles Community Plan, the City of Los Angeles Department of Public Works Bureau of Sanitation (BOS) provides sewer conveyance infrastructure and wastewater treatment services to the Master Plan Area. The Master Plan Area is located within the Hyperion Service Area (HSA) and is serviced by the Hyperion Treatment Plant (HTP).[7] HTP has a capacity to treat 450 million gallons per day (mgd) of wastewater, and the City is planning for more adequate and reliable wastewater infrastructure that supports the predicted growth of the community, such as adding treatment capacity at the existing plants.[8] The proposed Master Plan would create one additional restroom as a part of Element 4 – Festival Park and Community Promenade. This one additional restroom would not result in the need for relocation or construction or any wastewater treatment facility. Furthermore, the construction of these restrooms would not create significant environmental impacts, as they would comply with City ordinance regarding the Los Angeles Green Building Code (LAGBC).[9]

Stormwater Drainage

The Master Plan Area has existing storm drains which convey stormwater runoff from Exposition Park downstream to the respective receiving water bodies (Appendix A, *Hydrology and Water Quality Impact Analysis*). The proposed project would include the construction of new stormwater drainage systems within Exposition Park:

- Element 1 (Threshold and Gateway) would plant buffers that would act as a method of stormwater capture.
- Element 2 (Expo Festival Plaza) proposes promenades that would consists of zero curb streets/sidewalks with possible opportunities for a stormwater capture and use system on-site.
- Element 3 (Solar Garden) utilizes the existing storm drainage system.
- Element 4 (Festival Park and Community Promenade) would include stormwater components, such as a drywell over the Recreational Areas and a capture and use system over the new parking structure.
- Elements 6, 7, and 8 (Museum Walk, California African American Museum Sculpture Garden, and Zanja Madre, respectively) would incorporate stormwater components such as dry creek and drywell applications. Stormwater runoff in the proposed conditions could contain pollutants commonly found in runoff from recreational and

[7] City of Los Angeles. November 2017. South Los Angeles Community Plan. Chapter 5: Community Services and Infrastructure. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[8] City of Los Angeles. November 2017. South Los Angeles Community Plan. Chapter 5: Community Services and Infrastructure. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[9] City of Los Angeles. January 3, 2014. Official City of Los Angeles Municipal Code, Chapter IX Building Regulations, Article 9 Green Building Code, Division 5 Nonresidential Mandatory Measures. http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chapterixbuildingregulations/article9greenbuildingcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD

commercial land uses; however, the construction of these stormwater systems would not cause significant environmental effects.

- Element 9 (Olympic Ring Walk) would utilize the existing storm drainage system as well as the addition of drywells.

The construction activities would follow the required regulations for permitting stormwater discharges through the Clean Water Act Section 402(p), NPDES Permit, Los Angeles County LID Ordinance, and Construction General Permit site-specific SWPPP and BMPs. For example, the Storm Drain Inlet Protection BMP would protect all storm drains in the Master Plan Area and offsite (where inlets can receive flow downstream of sediment tracked from the site) with appropriate storm drain inlet protection such as filter fabrics, blocks and gravel filters, gravel and wire mesh filters, or gravel bag barriers (Appendix A). The proposed project would manage stormwater quality within the boundaries of the Master Plan Area and would not be expected to result in a net increase in stormwater quantity or impairment of stormwater quality that would require construction of new or expanded stormwater drainage or conveyance facilities external to Exposition Park.

Electric Power

Electrical Service to Exposition Park is provided by LADWP. The area is adequately served by public electric utilities, as LADWP provides a reliable supply of electric service to Exposition Park, which is distributed through an extensive network of receiving stations, distributing stations, overhead lines, and underground lines.[10] The proposed project would incorporate solar panels as appurtenant to other uses within Exposition Park to generate electricity. Element 3 is a Solar Garden that would shade visitors with artistically designed solar panels. This would involve the installation of solar panel poles to the existing parking structure along with electrical connections. This will not cause a significant adverse environmental effect given that the installation of solar panels would be an energy upgrade which would improve energy uses and increase energy efficiency, providing a benefit to the environment (see Section 3.6, *Energy*). The proposed project would not require construction of new or expanded electrical transmission or distribution lines outside the Master Plan Area.

Natural Gas

The Master Plan Area is currently served by the Southern California Gas Company (SoCalGas). The nearest high-pressure distribution gas line to the Master Plan Area ends near the corner of West Vernon Avenue and South Broadway, which is approximately 0.58 mile from the Master Plan Area. The nearest transmission gas line is located almost 2.6 miles away from the Master Plan Area.[11] The proposed project would include a minor increase in natural gas by means of hot water usage due to the construction of additional bathrooms on site. The anticipated energy use during operation would be minimal (see Section 3.6); therefore, the energy requirements of the proposed project on local supply is not expected to induce the need for additional generation capacity in the region. The proposed project would require the construction of new or expanded natural gas transmission or distribution lines outside the Master Plan Area.

[10] City of Los Angeles. November 2017. South Los Angeles Community Plan. Chapter 5: Community Services and Infrastructure. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[11] Southern California Gas Company. Accessed November 11, 2019. Gas Transmission Pipeline Interactive Map – Los Angeles. http://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335

Telecommunications Facilities

The Master Plan Area is adequately served by public telecommunications utilities such as TV and Internet, provided by Charter Communications and Spectrum.[12,13] The proposed project involves nine elements, none of which would require an increase or the relocation of telecommunication infrastructures. The proposed project would not require the construction of new or expanded telecommunication lines or towers outside the Master Plan Area.

Therefore, the proposed project would result in less than significant impacts associated with the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. No mitigation or further analysis is required.

(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The proposed project would result in less than significant impacts to utilities and service systems in relation to having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Based on a review of the South Los Angeles community plan, the LADWP ensures that water demands and water quality standards in the City are met through four main sources: the Los Angeles Aqueduct, groundwater, the MWD, and treated and recycled wastewater. Water supply in the Master Plan Area (the community of South Los Angeles) is primarily served by the MWD. LADWP and MWD maintain sufficient water supplies available to serve the project, and they continue to implement water conservation projects and emergency supplies.[14]

The Master Plan includes elements that would require increased water usage through planting buffers, planting shade and street trees, a new lawn, other landscaping elements, and the construction of a new restroom. However, the improved landscapes and the new restroom facility would not cause a significant adverse impact because they would comply with the 2019 California Green Building Standards Code (CALGreen) nonresidential mandatory measures in order to implement water efficiency and water conservation measures.[15] These measures regulate both indoor and outdoor water use and include the use of the Model Water Efficient Landscape Ordinance (MWELO) to increase water efficiency standards for new and retrofitted landscapes through encouraging the use of more efficient irrigation systems, graywater usage, and onsite storm water capture, and by limiting the portion of landscapes that can be covered in turf.[16] The proposed project would also

[12] MyUtilities. Accessed November 11, 2019. 700 Exposition Park Drive, Los Angeles, CA, 90037. https://myutilities.com/checkout/quote?hj=1&order_token=d7cf086d565ca3c7fb4925033ed218894bfc1725031e3df6

[13] UDR Allconnect. Accessed November 11, 2019. 700 Exposition Park Drive, 90037-1254. https://udr.allconnect.com/

[14] City of Los Angeles. November 2017. South Los Angeles Community Plan. Chapter 5: Community Services and Infrastructure. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[15] State of California. August 2019. Chapter 5 Nonresidential Mandatory Measures, Division 5.3 Water Efficiency and Conservation. In the 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11. https://codes.iccsafe.org/content/CGBC2019P2/chapter-5-nonresidential-mandatory-measures#CGBC2019P2_Ch05_SubCh5.3

[16] California Department of Water Resources. Accessed November 11, 2019. Model Water Efficient Landscape Ordinance. https://water.ca.gov/Programs/Water-Use-And-Efficiency/Urban-Water-Use-Efficiency/Model-Water-Efficient-Landscape-Ordinance

comply with Los Angeles Green Building Code (LAGBC)[17] and other water conservation ordinances in the City, such as the Water Conservation Ordinance (Ord. No. 184248)[18] and Existing Buildings Energy and Water Efficiency Program (Ord. No. 184674).[19] Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(c) Result in a determination by the waste water treatment provider, which serves or may serve the project that, it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The proposed project would result in less than significant impacts to utilities and service systems in relation to resulting in a determination by the wastewater treatment provider that it has adequate capacity to serve the project's demand in addition to the provider's existing commitments. Based on a review of the South Los Angeles Community Plan, the City BOS provides sewer conveyance infrastructure and wastewater treatment services to the Master Plan Area. The Master Plan Area is located within the HSA and is serviced by the HTP. The proposed project would create one additional restroom as a part of Element 4 – Festival Park and Community Promenade. HTP has a capacity to treat a maximum daily flow of 450 mgd of wastewater with a peak wet weather flow of 800 mgd. HTP has a daily flow of approximately 362 mgd,[20] which is at approximately 80 percent capacity with a remaining 88 mdg. This indicates that HTP has the adequate capacity to support the one additional proposed restroom and wastewater infrastructure that would be created by the proposed project. Furthermore, the City is planning for more adequate and reliable wastewater infrastructure that supports the predicted growth of the community, such as adding treatment capacity at the existing plants.[21] Therefore, impacts would be less than significant. No mitigation or further analysis is warranted.

(d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The proposed project would result in less than significant impacts to utilities and service systems in relation to generating solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Construction

The Construction & Demolition Waste Management program outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for

[17] City of Los Angeles. January 3, 2014. Official City of Los Angeles Municipal Code, Chapter IX Building Regulations, Article 9 Green Building Code, Division 5 Nonresidential Mandatory Measures. http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chapterixbuildingregulations/article9greenbuildingcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD

[18] City of Los Angeles. Accessed November 11, 2019. Ordinance No. 184248. http://clkrep.lacity.org/onlinedocs/2015/15-0458_ORD_184248_6-6-16.pdf

[19] City of Los Angeles. Accessed November 11, 2019. Ordinance No. 184874. https://www.ladbs.org/docs/default-source/forms/green-building-2017/ord_184674.pdf?sfvrsn=8

[20] City of Los Angeles Bureau of Sanitation. Accessed November 11, 2019. About Wastewater: Facts and Figures. https://planning.lacity.org/eir/8150Sunset/References/4.K.2.%20Wastewater/WW.06_Wastewater,%20About%20Wastewater,%20Facts%20and%20Figures_10.9.13.pdf

[21] City of Los Angeles. November 2017. South Los Angeles Community Plan. Chapter 5: Community Services and Infrastructure. https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

reusing, recycling, salvaging or disposal of nonhazardous waste materials generated during demolition and/or new construction to foster material recovery and reuse and to minimize disposal in landfills. Implementation of the proposed project would comply with all City, County, and State solid waste diversion, reduction, and recycling mandates, including compliance with the City of Los Angeles Annual Report, Countywide Integrated Waste Management Plan (CIWMP), and the City of Los Angeles Municipal Code. Furthermore, the County Class III landfills have a total remaining permitted capacity of about 167.60 million tons. Sunshine Canyon City/County Landfill, which accepts construction waste, has the largest remaining disposal capacity at approximately 68.0 million tons.[22,23] There is adequate capacity in existing landfills to support the solid waste that would be generated by the proposed construction of landscape and circulation improvements, a bookstore, café, and one new bathroom facility; and the demolition of a surface parking lot and auditorium bathroom building.

Operations

The proposed project would not increase population, thereby leading to an increase in solid waste, as it is limited to landscape improvements and the creation of public open space and pedestrian and cycling improvements. Consistent with the provisions of Assembly Bill (AB) 341, each element of the project would provide for trash and recycling bins for use by the public. Pedestrian-oriented improvements associated with the proposed project elements would include trash or recycling receptacles; however, capacity would not be increased substantially over the existing condition. Furthermore, how solid waste is currently disposed of or handled would not be changed.

There is adequate existing capacity to service the minimal solid waste generated by the construction and operation of the proposed project. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed project would result in no impacts to utilities and service systems in relation to compliance with federal, state, and local statutes and regulations related to solid waste. Solid waste management in the state is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. Additionally, in March 2006, the City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" and an overall diversion level of 90 percent. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. The proposed project would be consistent with the applicable regulations associated with solid waste. Specifically, the proposed project would provide

[22] Los Angeles County Department of Public Works. April 2019. Countywide Integrated Waste Management Plan: 2017 Annual Report. https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF

[23] Los Angeles County Department of Public Works. Accessed November 11, 2019. Fact Sheet: Sunshine Canyon City/County Landfill. https://dpw.lacounty.gov/epd/swims/site/factsheet-esri.aspx?id=1524&action=2

adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687). The proposed project would also promote compliance with AB 939 and City waste diversion goals by providing clearly marked, source-sorted receptacles to facilitate recycling. Therefore, there would be no impact. No mitigation or further analysis is required.

3.20 WILDFIRE

This analysis is undertaken to determine if the proposed project may have a significant impact to wildfires that would require the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines. Wildfire at the proposed project site was evaluated with regard to the City of Los Angeles General Plan (Safety Element[1] and Resilient Los Angeles[2]); South Los Angeles Community Plan;[3] California Department of Forestry and Fire Protection (CAL FIRE) Fire Resource and Assessment Program (FRAP) website;[4] City of Los Angeles ZIMAS website;[5] a review of conceptual sections, elevations, renderings and site plans; and site visits (October 30 and November 8, 2019).

The State CEQA Guidelines recommend the consideration of four questions when addressing the potential for significant impacts to wildfire. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

(a) Substantially impair an adopted emergency response plan or emergency plan?

The proposed project would result in no impacts to wildfire in relation to the impairment of adopted emergency response and/or emergency evacuation plans in or near state responsibility areas (SRA) or lands classified as very high fire hazard severity zone (VHFHSZ). The proposed project is not located within or near an SRA or VHFHSZ. According to the CAL FIRE's website,[6] the Fire Hazard Severity Zone Maps for both local and state responsibility areas (LRAs and SRAs) indicate that the Master Plan Area is located 2.78 miles away from the nearest LRA VHFHSZ (Baldwin Hills to the west) and approximately 14 miles away from the nearest SRA VHFHSZ (Whittier to the east). The emergency response and/or evacuation plans would not be adversely affected as a result of the proposed project.

The areas surrounding the Master Plan Area are within the City of Los Angeles Central Area under the Los Angeles County Operational Area for disaster routes. The County Department of Public Works maintains a list of disaster routes in the Los Angeles County Operational Area by city that have been preidentified for use during times of crisis.[7] Disaster routes mapped for the City of Los Angeles – Central Area relevant to the Master Plan Area consists of the I-110 (Harbor Freeway) north and south directions, N. Figueroa Street in north and south direction, Martin Luther King, Jr. Boulevard in east and west direction, W. Jefferson Boulevard from S. Figueroa St. to S. Hoover Street, and S. Hoover Street starting at W. Jefferson Boulevard and continuing north. The City of Los Angeles Fire Department

[1] City of Los Angeles Department of City Planning. Accessed December 3, 2019. City of Los Angeles General Plan. Safety Element. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf

[2] City of Los Angeles: Mayor's Office of Resilience. Accessed October 18, 2019. City of Los Angeles General Plan: Resilient Los Angeles. https://www.lamayor.org/Resilience

[3] City of Los Angeles Department of City Planning. November 2017. South Los Angeles Community Plan. https://planning.lacity.org/plans-policies/community-plan-area/south-los-angeles

[4] California Department of Forestry and Fire Protection (CAL FIRE). Accessed October 18, 2019. Fire and Resource Assessment Program (FRAP). https://frap.fire.ca.gov/

[5] City of Los Angeles Department of City Planning. Accessed October 21, 2019. ZIMAS. http://zimas.lacity.org/

[6] California Department of Forestry and Fire Protection (CAL FIRE) Office of the State Fire Marshall. Accessed November 20, 2019. Fire Hazard Severity Zones Maps. https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/

[7] County of Los Angeles Department of Public Works. Accessed November 6, 2019. Disaster Routes by City. https://dpw.lacounty.gov/dsg/DisasterRoutes/

(LAFD) includes evacuation information on their website that includes *the Ready, Set, Go Initiative*[8] and the City of Los Angeles Emergency Management Department (EMD) provides access to the *Ready Your LA Neighborhood* (RYLAN)[9] to help families and neighbors prepare for disasters. The Master Plan Area is not included as part of a disaster route or evacuation center in any emergency response plan or any emergency evacuation plan.[10] Furthermore,

> Los Angeles was the first city in the State to establish an "Emergency Operations Organization" (EOO). The City, through its EOO has developed integrated operational, contingency and long range plans to address all aspects of potential emergency and disaster situations. Therefore, Los Angeles already goes far beyond the intent of the State general plan law and Governor's guidelines relative to a comprehensive City safety element.[11]

The OEPM has an emergency evacuation plan that would be updated following completion of each proposed Master Plan Element. Emergency responses and procedures have been outlined for various scenarios within the OEPM Public Safety Strategic Operating Procedures. The Public Safety Strategic Operating Procedures includes protocols for fire events. In the event of a fire, the Exposition Park Dispatch should be contacted immediately, and notifications should include the exact location of the fire and important details that may be known so that the appropriate fire department and emergency response can be called. Occupants and endangered bystanders will be alerted using the telephone or internal notification systems with added sirens and a public-address system by law enforcement. Employees or officers familiar with the area may be able to assist fire personnel by locating additional water sources and alternate access routes.[12]

Moreover, regarding emergency response, there is one police station (Southwest Community Police Station)[13] and two fire stations (Station 15 and 46)[14] nearest to the Master Plan Area (Figure 3.15-1, *Public Services Map*). The response times from the police station to the Master Plan Area is 0.9 mile (3 minutes). The response times from Stations 15 and 46 are 1 mile (6 minutes) and 0.5 mile (2 minutes), respectively (see Figure 3.15-1). The proposed project would not hinder emergency response and emergency evacuation plans. Therefore, there would be no impact. No mitigation or further analysis is warranted.

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[8] City of Los Angeles Fire Department. Accessed November 20, 2019. Evacuation Information. https://www.lafd.org/safety/fire-safety/evacuation-information

[9] City of Los Angeles Emergency Management Department. Accessed November 20, 2019. Ready Your LA Neighborhood (RYLAN). https://emergency.lacity.org/rylan

[10] Los Angeles County. Accessed November 12, 2019. GIS Data Portal. https://egis3.lacounty.gov/dataportal/2016/01/19/disaster-routes/

[11] City of Los Angeles Department of City Planning. Adopted November 26, 1996. City General Plan: Safety Element. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf

[12] Office of Exposition Park Management. December 2018. Public Safety Strategic Operating Procedures. Procedures provided to Sapphos Environmental, Inc. by OEPM.

[13] City of Los Angeles Police Department. Accessed November 21, 2019. Police Station Locator: Southwest Community Police Station. http://lapdonline.org/southwest_community_police_station

[14] City of Los Angeles Fire Department. Accessed November 21, 2019. Fire Station Locator. https://www.lafd.org/fire-stations/station-results

(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The proposed project would result in no impacts to wildfire in relation to exacerbated wildfire risk due to slope, prevailing winds, and other factors and thereby expose proposed project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire in or near SRAs or lands classified as VHFHSZs. According to the CAL FIRE's website,[15] the Fire Hazard Severity Zone Maps for both local and state responsibility areas (LRAs and SRAs) indicate that the Master Plan Area is located 2.78 miles away from the nearest LRA VHFHSZ (Baldwin Hills to the west) and approximately 14 miles away from the nearest SRA VHFHSZ (Whittier to the east). In addition, the Master Plan Area is a developed state park located on relatively flat terrain in the urbanized Los Angeles Basin, approximately 10 miles northeast of the Pacific Ocean. Due to the low elevation of the relatively flat site (up to 222 feet above MSL at the berm of the Los Angeles Memorial Coliseum), the distance, intervening development, and ornamental landscaping, the Pacific Ocean is not visible from the Master Plan Area or immediate vicinity. In addition, per the City's Safety Element of the General Plan, most severe wind conditions are in autumn when the dry Santa Ana or "devil" winds contribute to wild land (brush fire) conditions or cause localized minor damage. These winds rarely reach a velocity of more than 75 miles per hour. There is no record of a hurricane having struck the City in modern times.[16] The proposed project would not exacerbate wildfire risk due to the flat site and distances away from LRA and SRA VHFHSZs. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The proposed project would result in no impacts to wildfire in relation to the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment in or near SRAs or lands classified as VHFHSZs. According to the CAL FIRE's website,[17] the Fire Hazard Severity Zone Maps for both local and state responsibility areas (LRAs and SRAs) indicate that the Master Plan Area is located 2.78 miles away from the nearest LRA VHFHSZ (Baldwin Hills to the west) and approximately 14 miles away from the nearest SRA VHFHSZ (Whittier to the east).

Electric Power Lines

Electrical power in the City of Los Angeles, including the Master Plan Area, is supplied by the LADWP. Electricity provided by the LADWP is generated from a diverse mix of power sources, including coal, natural gas, nuclear, and large hydropower, in addition to renewable sources such as wind, solar, small

[15] California Department of Forestry and Fire Protection (CAL FIRE) Office of the State Fire Marshall. Accessed November 20, 2019. Fire Hazard Severity Zones Maps. https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/

[16] City of Los Angeles Department of City Planning. Adopted November 26, 1996. City General Plan: Safety Element. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf

[17] California Department of Forestry and Fire Protection (CAL FIRE) Office of the State Fire Marshall. Accessed November 20, 2019. Fire Hazard Severity Zones Maps. https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/

hydroelectric, biomass & bio-waste, and geothermal. The 2016 Power Integrated Resources Plan (IRP) is a 20-year roadmap guiding LADWP's Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The IRP assumes that new construction and replacement construction would increase energy efficiency by 15 percent as part of the overall attainment strategy.[18] Furthermore, the LADWP indicated wildfire exposure measures within their Power Systems Update[19] from July 15–25, 2019, that includes the following:

- On September 5, 2018, in accordance with Senate Bill (SB) 1028, the Board determined that LADWP's overhead electrical lines and equipment do not pose a significant risk of causing a catastrophic wildfire.
- LADWP has an "urban footprint," with the majority of its facilities being outside of high fire hazard areas.
- On Red Flag Days, the City of Los Angeles enforces a Restricted Parking Program to remove illegally parked vehicles in very High Fire Hazard Severity Zones.
- LADWP has an active vegetation management program.
- LADWP's Transmission lines are spaced as part of its facility design planning to reduce the danger of lines touching each other.
- LADWP does not employ automatic re-closures that re-energize downed transmission lines and can create sparks that may cause wildfires.
- In addition to all-risk property insurance, LADWP's Risk Management program procures specific wildfire excess liability insurance.
- LADWP has had an active wildfire prevention plan since 2008 and is updating the plan to meet the wildfire mitigation plan requirements of SB 901.

While Element 3 of the proposed project (Solar Garden) would incorporate solar panel poles to the existing parking structure along with electrical connections, there would not be any vegetation or planting within the structure that would potentially contribute to wildfire risk.

Water Consumption

There are fire hydrants on-site capable of serving all areas of the proposed improvements, and LADWP has enough water supply to fight a fire at Exposition Park (Figure 3.20-1, *Fire Hydrants*). Water supply in the City of Los Angeles, including the proposed Master Plan Area, is supplied by LADWP. Substantial energy is required to pump and transport water into the Los Angeles Basin. Source water extraction, treatment and local distribution also require significant amounts of energy. The Los Angeles Aqueduct, local groundwater, and supplemental water purchased from the Metropolitan Water District of Southern California (MWD) are the primary sources of water for the city. LADWP has initiated a study to determine the nexus between water and energy consumption, and to evaluate the associated carbon footprint of its water supply sources. The water purchased from MWD is the most energy-intensive source of water for LADWP. This is followed by the production of recycled water and the treatment of groundwater.[20]

[18] Los Angeles Department of Water and Power. 2016. 2016 Power Integrated Resource Plan.

[19] Los Angeles Department of Water and Power. Accessed November 20, 2019. Customer First: Power Systems Updates – Investors Meetings July 15-25, 2019. https://www.ladwp.com/ladwp/faces/Search?_adf.ctrl-state=twu3js2ik_4&_afrLoop=112934263659980

[20] Los Angeles Department of Water and Power. December 2016. 2016 Power Integrated Resource Plan. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?_adf.ctrl-state=16pwdho46a_4&_afrLoop=601246270217941

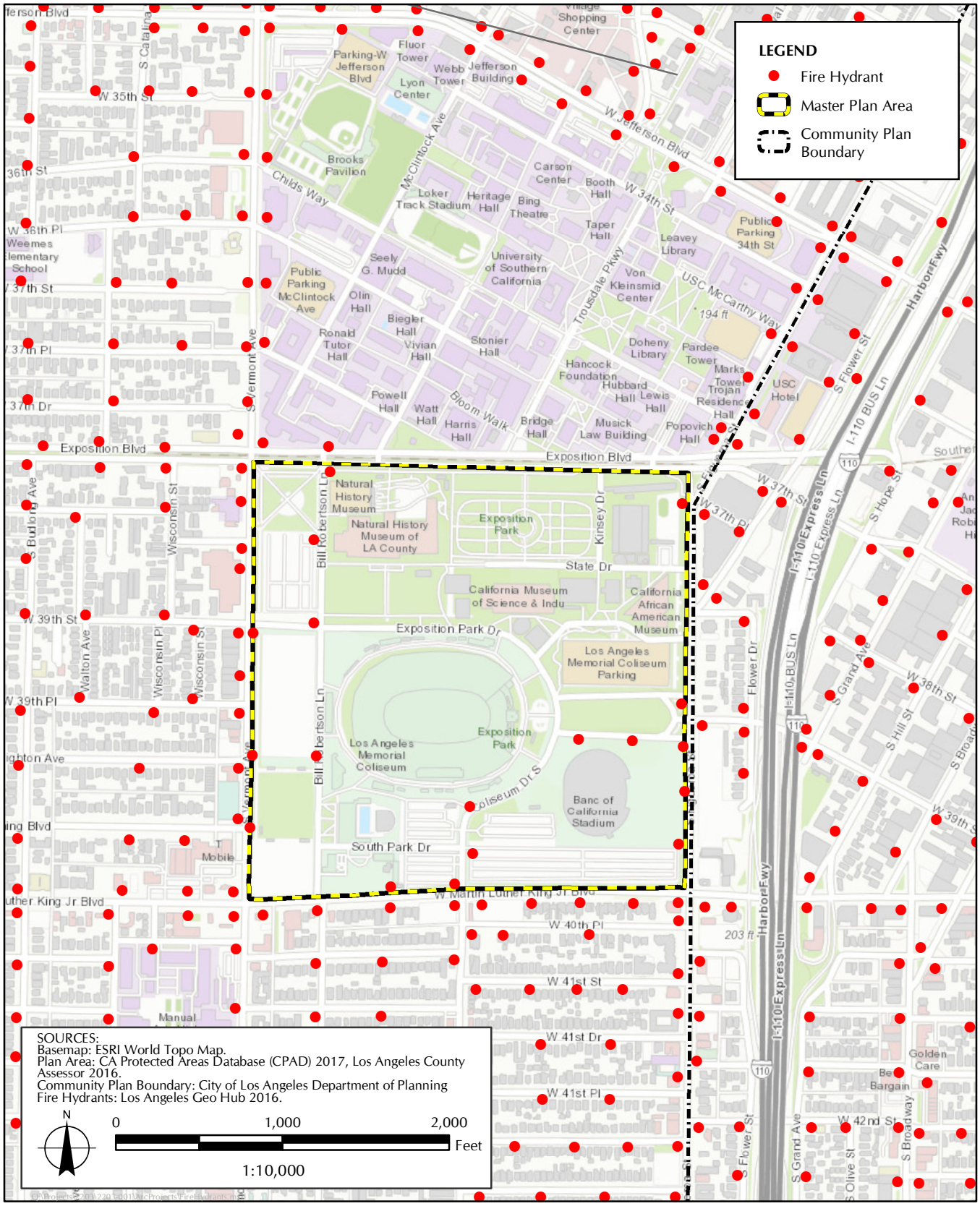

FIGURE 3.20-1

Fire Hydrants

Because water supplies are declining due to environmental degradation and impacts from climate change, the LADWP is implementing recycled water projects to fill a larger portion of the city's water supply portfolio. In addition, stormwater capture projects for groundwater recharge are also being developed.[21] The California Urban Water Management Planning Act (effective January 1, 1984) requires that every urban water supplier prepare and adopt an Urban Water Management Plan (UWMP) every 5 years. The LADWP's 2015 UWMP is the most recent plan available. It is the City's master plan for water supply and resources management and is consistent with the City's goals and policy objectives.[22] Total water demand varies from year-to-year and is influenced by population growth, weather, water conservation efforts, drought, and economic activity. From fiscal year (FY) 2012/13 through FY 2014/15, drought conditions triggered State and City mandatory conservation measures. This helped to reduce water use by 13 percent from FY 2013/14 to FY 2014/15. Since 1991, the City has recognized that water conservation is a foundation to improve water supply reliability. Water use must be characterized as either indoor or outdoor use in order to determine the potential for water use efficiency and target conservation programs. The City is currently aiming for a 25 percent per capita reduction in potable water by 2035, using FY 2013/14 as a baseline. The Master Plan Area is including dry wells, capture and use systems, and a dry creek. Proposed Master Plan Element 7, a portion of Element 4, and a portion of Element 6 would incorporate the dry wells; Element 2 and portions of Element 4 (at the location of the underground parking structure) would incorporate capture and use systems. Element 8 and portions of Element 6 would incorporate a dry creek system (see Section 3.19, *Utilities and Service Systems*).

The proposed Master Plan Area would not exacerbate wildfire risk due to the flat site, the proposed inclusion of on-site water retention applications, lack of planting within the new solar garden, and the wildfire measures from LADWP for utilities plus the distance away from LRA and SRA VHFHSZs. Therefore, there would be no impact. No mitigation or further analysis is warranted.

(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The proposed project would result in no impacts to wildfires related to exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes in or near SRAs or lands classified as VHFHSZs in the Master Plan Area or vicinity. According to the CAL FIRE's website,[23] the Fire Hazard Severity Zone Maps for both local and state responsibility areas (LRAs and SRAs) indicate that the Master Plan Area is located 2.78 miles away from the nearest LRA VHFHSZ (Baldwin Hills to the west) and approximately 14 miles away from the nearest SRA VHFHSZ (Whittier to the east). The proposed Master Plan Area is a developed state park located on relatively flat terrain in the urbanized Los Angeles Basin, approximately 10 miles northeast of the Pacific Ocean. Due to the low elevation of the relatively flat site (up to 222 feet above MSL at the berm of the Los Angeles Memorial Coliseum), distance, intervening development, and ornamental landscaping, the Pacific Ocean is not visible from the Master Plan Area or immediate vicinity. According to the Safety Element of the City of Los Angeles

[21] Los Angeles Department of Water and Power. Accessed November 20, 2019. Sources of Supply. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply

[22] Los Angeles Department of Water and Power. Approved April 27, 2016. 2015 Urban Water Management Plan. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=16pwdho46a_4&_afrLoop=601303253779685

[23] California Department of Forestry and Fire Protection (CAL FIRE) Office of the State Fire Marshall. Accessed November 20, 2019. Fire Hazard Severity Zones Maps. https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/

General Plan, the proposed Master Plan Area is not located within a wildfire hazard zone or urban fire and secondary hazard zone.[24] While the proposed project would involve construction of a new parking structure in Element 4 – Festival Park and Community Promenade and other exterior features throughout the Master Plan Area, the Master Plan Area is not located within a wildfire hazard area, is on flat terrain, and is distant from LRA and SRA VHFHSZs that would not expose people or structures to significant wildfire risk. Therefore, there would be no impact. No mitigation or further analysis is warranted.

[24] City of Los Angeles Department of City Planning. Accessed December 3, 2019. City of Los Angeles General Plan. Safety Element. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

(a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The proposed project would result in less than significant impacts with mitigation incorporated because the Master Plan Area is an existing developed park located in a highly urbanized environment with minimal habitat and historical resources.

Nine historical resources have been recorded within the Master Plan Area, including the Los Angeles Memorial Coliseum; Los Angeles County Museum of History, Science, and Art (name changed to the Los Angeles County Natural History Museum in 1965); Wallis Annenberg Building; Exposition Park Rose Garden; Exposition Clubhouse; Los Angeles Swimming Stadium; Christmas Tree Lane; the California Air and Space Museum (designed by Frank Gehry in 1984 to coincide with the 1984 Olympic Games in Los Angeles); and the California State Museum of Science and Industry (name changed to the California Science Center in 1996) (see Table 3.5-1, *Historic Resources Located within the Exposition Park Master Plan Area*). The Exposition Park Historic District shares the same boundaries as the proposed project and is another eligible historic resource. No impacts to built historical resources are anticipated from Elements 1, 3, 4, 5, 6, 7, or 8 of the Master Plan. The proposed project would result in potential impacts to the setting of the Coliseum and Christmas Tree Lane. Impacts to character-defining features would be reduced to below the level of significance through adherence with *The Secretary of the Interior Standards for Rehabilitation* 36 CFR 67, which states, "the historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided."[1] Design review by an architectural historian who meets the professional qualifications of the *Secretary of the Interior Standards* would be required to determine the work follows the standards for Rehabilitation prior to the initiation of construction of Elements 2 and 9 of the Master Plan. Implementation of mitigation measure CULTURAL-1 would be required to reduce impacts to built historical resources from Elements 2 and 9 to a less than significant level. Elements 4 and 8 would involve ground-disturbing activities in native soils, and implementation of mitigation measure CULTURAL-2 would be required to reduce potential impacts to historical archaeological resources to a less than significant level.

Element 2 – Expo Festival Plaza would include modifications to Christmas Tree Lane, an eligible historical resource and character-defining feature of the National Register and National Historic Landmark designated Los Angeles Memorial Coliseum. The view provided from Figueroa Street to the Coliseum Plaza by Christmas Tree Lane is a significant character-defining feature of the Coliseum, specifically the plaza.[2] Significant elements of Christmas Tree Lane include the roadways, sidewalks, and low walls dating to 1925; the greenway between N. and S. Coliseum Dr.; the two rows of mature Deodar Cedars; the London Plane Trees; the three Art Moderne streetlights; and the mature palm

[1] National Park Service U.S. Department of the Interior, "Secretary's Standards for Rehabilitation 36 CFR 67," accessed November 2019, available at: https://www.nps.gov/tps/standards/rehabilitation.htm.
[2] Myra L. Frank & Associates, Inc., "Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure," March 2001.

tree and its associated marker.[3,4] These features and their contribution to the setting of the Coliseum are significant to its National Register and National Historic Landmark designation. The addition of vehicular circulation islands, walking paths, and a bike lane along Figueroa Street, overlapping from Element 1 - Threshold and Gateway, would impact the existing roadways and sidewalks which are character-defining resources of Christmas Tree Lane, thus requiring implementation of mitigation measure CULTURAL-1 to avoid, reduce, or compensate for the impacts of this alteration. Character-defining features of Christmas Tree Lane which would be impacts by these alterations include sidewalks and roadways; low walls dating to 1925; the greenway between N. and S. Coliseum Dr.; the two rows of mature Deodar Cedars; the London Plane Trees; the three Art Moderne streetlights; and the viewshed of the Los Angeles Coliseum from Figueroa Street down Christmas Tree Lane.

Due to the urbanization of the area, very little of the original (i.e., unpaved) ground surface has been adequately surveyed for archaeological resources, and as a result archaeological resources may be present beneath the surface. Potential impacts to archaeological resources are dependent on whether the proposed project will involve ground disturbance and whether that ground disturbance will penetrate native (undisturbed) soils. If the depth of ground disturbance is less than the verifiable depth of previous ground disturbance, then there would be no impact to archaeological resources. As Element 4 – Festival Park and Community Promenade and Element 8 – Zanja Madre would involve ground-disturbing activities that could extend below any previous ground disturbance in these areas, including a subterranean three-level parking structure for Element 4 and planters, concrete seat walls, boulder seating, pervious and impervious surfacing, trees, and understory planting for Element 8. Therefore, implementation of mitigation measure CULTURAL-2 is required to reduce potential impacts to archaeological resources to a less than significant level.

Under CEQA, impacts to paleontological resources would be considered significant if there is a high likelihood of encountering unique paleontological resources that could be damaged or destroyed as a result of excavation. Younger Quaternary alluvial deposits have a low potential to yield significant paleontological resources. However, Older Plio-Pleistocene marine and non-marine deposits have a high potential to yield significant paleontological resources based on existing known resources contained within these sediments. Potential impacts to unique paleontological resources contained within older marine and non-marine deposits would be mitigated to below the level of significance with implementation of Mitigation Measure PALEO-1.

There is a moderate to high sensitivity to encounter Tribal Cultural Resources when excavating into native soil. As noted above, Elements 4 and 8 of the Master Plan would include ground-disturbing activities into native soil. Therefore, implementation of mitigation measures TRIBAL-1 and TRIBAL-2 is required to reduce potential impacts to Tribal Cultural Resources to a less than significant level. Due to very shallow excavations into previously disturbed soils, or due to no excavation at all, it is not anticipated that the proposed project would result in impacts to archaeological resources from Elements 1, 2, 3, 5, 6, 7, or 9 of the Master Plan.

Therefore, impacts would be less than significant with mitigation incorporated.

[3] Ibid.

[4] Three Art Moderne Streetlights were documented in Myra L. Frank & Associates, Inc., "Historic Property Survey Report for the California Science Center/California African American Museum Parking Structure," March 2001; Streetlights not visible or locatable at indicated location on-site.

(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The proposed project would result in less than significant impacts that are individually limited but cumulatively considerable after incorporation of mitigation measures. The proposed project is master plan that would guide the development of Exposition Park during a 25-year period to link Exposition Park to the City of Los Angeles around it. The proposed project consists of nine elements:

1. Threshold and Gateway
2. Expo Festival Plaza
3. Solar Garden
4. Festival Park and Community Promenade
5. Bill Robertson Lane
6. Museum Walk
7. California African American Museum Sculpture Garden
8. Zanja Madre
9. Olympic Ring Walk

The development of these nine elements would occur over a 25-year period. As stated in in Section 3, the proposed project would result in no impacts to in relation to environmental issues areas including Agriculture and Forestry Resources, Energy, Land Use/Planning, Population/Housing, and Wildfire; less than significant impacts in relation to environmental issue areas including Air Quality, Biological Resources, Greenhouse Gas Emissions, Hydrology and Water Quality, Mineral Resources, Noise, Public Services, Recreation, and Utilities/Service Systems; and less than significant impacts after mitigation in relation to Aesthetics, Biological Resources, Cultural Resources, Geology/Soils, Hazards and Hazardous Materials, and Tribal Cultural Resources after implementation of mitigation measures BIO-1, CULTURAL-1, CULTURAL 2, HAZ-1, PALEO-1, and TRIBAL-1 and TRIBAL-2. The proposed project would result in potentially significant impacts to Transportation in relation to substantially increasing hazards due to a design feature or incompatible use, which warrants further analysis; however, this would not be a cumulative impact, as it is specific to the site. The proposed project would result in additional trips during the construction phase, but this would be temporary and would not result in degradation of existing capacity of the roads surrounding the Master Plan Area. Therefore, the proposed project would not contribute to a cumulatively considerable impact with the incorporation of mitigation measures.

(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

A total of 80 unique hazardous materials sites are located at 35 addresses in or adjacent to the Master Plan Area (see Table 3.9-1; Appendix D). The historic land uses in and adjacent to the proposed Master Plan Area are also known sources of hazardous materials, including vehicular use of roadways, fuels station, adjacent rail and bus uses, and industrial land uses. The potential presence of hydrocarbons, metals, and persistent pesticides in soil within or adjacent to the Master Plan Area represent a potential environmental concern. Elevated concentrations of lead (from use of leaded gasoline) and other metals are sometimes associated with older roadways also represent a potential environmental concern. Based on a review of historical sources, roadways surrounding the Master Plan Area including Exposition Blvd., Figueroa St., Martin Luther King, Jr. Blvd., and Vermont Ave., and, traversing the Master Plan Area, Bill Robertson Lane, have been present since at least 1923. The

historic use of yellow traffic markings (thermoplastic and paint) used to demarcate lanes in the street may also potentially contain hazardous levels of lead chromate. There is the potential for naturally occurring oil seeps within the Master Plan Area. The potential to encounter contaminated soils during demolition construction and the potential exposure of workers and the surrounding general public and land uses to such substances constitutes a potentially significant impact requiring the consideration of mitigation measures. In addition, five schools are located within a one-quarter mile radius of the Master Plan Area, and construction activities would have the potential to encounter hazardous materials. Mitigation Measure HAZ-1 would require soil sampling for locations of improvements within Elements 4 and 5. In addition, handling of hazardous materials in relation to construction of the proposed project would be in accordance with the Toxic Substance Control Act, Hazardous Material Transportation Act, Resource Conservation Act, Certified Unified Program Agency, and Californian Accidental Release Prevention Program. With implementation of Mitigation Measure HAZ-1, potential impacts to hazards and hazardous materials during construction in relation to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, or within one-quarter mile of an existing or proposed school, would be reduced to below the level of significance.

The proposed project has the potential to result in significant impacts to Transportation in relation to substantially increasing hazards due to a design feature or incompatible use, which warrants further analysis. There are currently four main entryways that provide vehicular access to the Master Plan Area: from Exposition Park Drive at Bill Robertson Lane, Figueroa St. at 39th, MLK Jr. Blvd. at Hoover Ave., and MLK Jr. Blvd. at Bill Robertson Lane. There would be no compatibility issues with proposed updates to the existing park and parking structure that would require traffic engineering design features or incompatible uses. However, there is a potential for conflicts between proposed bike lanes within the southern edge of Exposition Park along MLK Jr. Blvd. and the project's pick-up/drop-off area, which has the potential to increase hazards due to a design feature. Therefore, further analysis is required for Transportation in relation to substantially increasing hazards due to a design feature or incompatible use.

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