
V. ENVIRONMENTAL IMPACT ANALYSIS

E. LAND USE

ENVIRONMENTAL SETTING

Existing Land Uses

The Project Site is located within the South Los Angeles Community of the City of Los Angeles and consists of an oval-shaped, approximately 27.4-acre parcel of land within Exposition Park. The Project Site includes the Los Angeles Memorial Coliseum and the areas immediately surrounding the Coliseum structure and is situated within the southwest portion of the Park. Exposition Park is an approximately 160-acre reservation of public land established that was originally established in 1908. The Los Angeles Memorial Coliseum was constructed in 1932.

Exposition Park is bounded by Exposition Boulevard on the north, Figueroa Street on the east, Martin Luther King Jr. Boulevard on the south, and Vermont Avenue on the west. Streets accessing the internal portions of Exposition Park include State Drive, North Coliseum Drive, and South Coliseum Drive. Menlo Avenue, which parallels the western edge of Exposition Park (Vermont Avenue) between Exposition and Martin Luther King Jr. Boulevards, bisects the park from north to south.

Exposition Park, while also a landscaped setting for community public recreation, is primarily a site for cultural, entertainment, and sporting facilities that draw visitors from much greater distances. Major public facilities within the park include the Los Angeles Memorial Coliseum (the Project Site), the California Science Center, the Rose Garden, the County Museum of Natural History, the Los Angeles Memorial Sports Arena, the African-American Museum, the Center for Science Learning, the IMAX Theater, and the EPICC/Los Angeles Swimming Stadium. An aerial map of the Project Site and immediately surrounding area indicating the existing arrangement of facilities, access routes and land uses within and adjacent to Exposition Park is provided in Figure V.E-1.

Land Uses Surrounding Exposition Park

Land uses surrounding Exposition Park generally consist of commercial/retail uses, surface parking lots, and multi-family residential uses (see Figure V.E-1). The University of Southern California (USC), a private university, is located directly north of the park, across Exposition Boulevard. To the east of Exposition Park is surface parking, a USC school related use, multi-family residential uses, fast food restaurants, and a retail center. To the south of Exposition Park is a bank, multi-family residential uses, surface parking and a retail use. To the west of Exposition Park, on the west side of Vermont Avenue, is a fast food restaurant, retail uses, a family guidance center, a children's guidance center and a gas station.

Figure V.E-1

Relevant Land Use Policies

The Project Site and many of the other land uses within Exposition Park are owned or operated by the State of California. The land under which the Coliseum is developed is owned by the Sixth District Agricultural Association of the State of California, also known as the “California Museum of Science and Industry” (“CMSI”) or the “California Science Center.” It is in the State and Consumer Services Agency and is deemed to be a tax-exempt organization as an instrumentality of this State in accordance with Section 23706 of the Revenue and Taxation Code (See Food and Agricultural Code Section 4101-4108). The Coliseum and the Sports Arena are operated by the Los Angeles Memorial Coliseum Commission. As a State entity, the Coliseum Commission is not subject to local General Plan and Zoning Code requirements for new development or redevelopment.

On a regional level, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region’s federally-designated metropolitan planning organization that has prepared a Regional Comprehensive Plan and Guide (RCPG) to address the issue of regional growth. The Proposed Project is also located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Each of these plans is discussed in greater detail below in relation to the project.

On a local level, the Project Site is located within the South Los Angeles Community Planning Area of the City of Los Angeles. It is also within the Hoover Redevelopment Project area, which is administered by the Community Redevelopment Agency of Los Angeles (CRA).

CMSI/Exposition Park Master Plan

As noted above, the Project Site is owned and operated under the auspices of the State of California. The CMSI/Exposition Park Master Plan is the overriding land use planning document for State-owned property and uses within Exposition Park. In 1987, the California Legislature and the Governor approved the development of the CMSI/Exposition Park Master Plan (“Master Plan”). The Master Plan included goals and objectives oriented around developing, preserving and restoring the following areas within Exposition Park: (1) the California Museum of Science and Industry; (2) the Science Museum School; (3) the Science Educational Resource Center; (4) the California African-American Museum; (5) park landscaping and open space areas, (6) parking facilities and circulation; and (7) ancillary infrastructure improvements. Although the Master Plan did address ancillary issues such as infrastructure and landscaping improvements throughout Exposition Park, it did not address or left unchanged the following facilities: (1) the Rose Garden; (2) the Natural History Museum; (3) the Coliseum; and (4) the Sports Arena.

Southern California Association of Governments (SCAG)

In 1994, the member agencies of SCAG adopted the Regional Comprehensive Plan and Guide (RCPG) to set broad goals for the Southern California region and identify strategies for agencies at all levels of government to use in guiding their decision-making. It includes input from each of the 13 subregions that make up the Southern California region (comprised of Los Angeles, Orange, San Bernardino, Riverside, Imperial and Ventura Counties). The Project Site is located within the City of Los Angeles subregion, which encompasses the entire City of Los Angeles. The RCPG serves as a policy document that sets broad goals for the Southern California region and identifies strategies for agencies at all levels of government to use in guiding their decision-making with respect to the significant issues and changes, including growth management, that can be anticipated by the year 2015 and beyond.

In response to the NOP for the Proposed Project, SCAG has determined that the renovation of the Coliseum is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and the California Environmental Quality Act (CEQA), Section 15206. Therefore, no further analysis with respect to the project's consistency with SCAG policies is required.

South Coast Air Quality Management District

The Proposed Project is located within the South Coast Air Basin (SCAB) and therefore within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The Air Quality Management Plan (AQMP), adopted in 1997 by SCAQMD and SCAG to assist in fulfilling these responsibilities, is intended to establish a comprehensive regional air pollution control program leading to the attainment of state and federal air quality standards in the SCAB area. Air quality impacts of the Proposed Project and consistency of the project impacts with the AQMP is analyzed in greater detail in Section V.B, Air Quality.

Congestion Management Program

The Congestion Management Plan (CMP) for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation and air quality decisions. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements) cities, counties, and other eligible agencies must implement the requirements of the CMP. Within Los Angeles County, the Metropolitan Transportation Authority (LACMTA) is the designated congestion management agency responsible for coordinating the County's adopted CMP. The project's Traffic Impact Analysis, which is presented in greater detail in

Section V.I, Traffic Access and Parking, was prepared in accordance with the County of Los Angeles CMP Guidelines.

City of Los Angeles General Plan (Land Use Element)

The City of Los Angeles General Plan addresses community development goals and policies relative to the distribution of land use, both public and private. The General Plan integrates the citywide elements and community plans, and gives policy direction to the planning regulatory and implementation programs. The Land Use Element of the General Plan is divided into 35 Community Plans for the purpose of developing, maintaining and implementing the General Plan. These community plans collectively comprise the Land Use Element of the City of Los Angeles General Plan. Exposition Park, including the Project Site, is located within the South Los Angeles Community Plan area of the City of Los Angeles.

The South Los Angeles Community Plan (Community Plan) was adopted by the Los Angeles City Council on October 26, 1979, and was amended as recently as March 22, 2000. The Community Plan designates the entire Project Site, as well as the majority of Exposition Park, as "Open Space." The Open Space land use designation is reserved for public land and does not allow any residential or commercial development that is not associated with a public-oriented facility. The Community Plan designates the corresponding zoning associated with this designation as Open Space (OS) and Agricultural (A1). Figure V.E-2 shows the existing Community Plan designations for the Project Site and immediately surrounding areas.

As shown in Figure V.E-2, land use designations in the locale of the Project Site and Exposition Park along Vermont Avenue Martin Luther King Jr. Boulevard are predominately designated as "Community Commercial" uses with the exception of a "High-Medium Residential" land use classification on the south side of Martin Luther King Jr. Boulevard between Hoover Street and Menlo Avenue. The areas west of the commercial uses along Vermont Avenue and south of the commercial and high density residential uses along Martin Luther King Jr. Boulevard are designated as being within the "Low Density Residential" and "Low Medium II Residential" land use categories. These designations are consistent with the existing residential neighborhoods located south of Martin Luther King Jr. Boulevard and west of Vermont Avenue.

Areas to the east of Figueroa Street (the eastern boundary of Exposition Park) are located in the Southeast Los Angeles Community Plan area and are designated with respect to land use by the Southeast Los Angeles Community Plan. Properties along the east side of Figueroa Street, between Exposition and Martin Luther King Jr. Boulevards, are designated for Community Commercial uses and are developed with low-rise (one-to three-story) retail uses, multi-family residential uses, office uses and surface parking lots. The land strip containing the Harbor Freeway (Interstate 110) is located immediately to the east of these properties and is designated as Public Facility. Areas east of the Harbor Freeway are generally designated for Limited Manufacturing uses (with corresponding zoning

Figure V.E-2

of M1, MR1, and P). These areas are densely developed with uses generally conforming to their corresponding Community Plan designations.

Other prominent land use designations in the area include the University of Southern California (USC) campus, located north of Exposition Boulevard, which is designated as High Medium Residential and Manual Arts High School, located on the west side of Vermont Avenue south of Martin Luther King Jr. Boulevard, which is designated as Public Facilities. The location of the USC Campus, an educational institution adjacent to Exposition Park containing recreational and cultural facilities, has effectively created a large public and quasi-public land reservation that dominates the vicinity and is surrounded by the non-related residential and commercial land uses comprising the basic fabric of the community.

As identified by the Community Plan, Exposition Park is defined as a “major opportunity site.” A major opportunity site is an area that has the potential to generate significant impacts within the surrounding neighborhoods. According to the Community Plan, the Exposition Park Master Plan shall provide the following guiding principles in the development of this area and the facilities it holds:

- The need for community empowerment regarding future development;
- The opportunity for a variety of jobs and job training for community residents;
- Development reflective of community needs;
- The need for appropriate development plans to prevent incongruent, incremental development.

Hoover Redevelopment Plan

The Project Site is located within the City of Los Angeles Community Redevelopment Agency’s (CRA) Hoover Redevelopment Project (Redevelopment Plan). The Hoover Redevelopment Project Area (HRPA) was established by the Los Angeles City Council on January 27, 1966, and was expanded on May 9, 1989. The HRPA consists of a 574-acre portion of the City generally bounded by Adams Boulevard on the north, Flower Street on the east, 41st Street on the south, and Walton Avenue and Catalina Street on the west. The boundaries of the HRPA are depicted in Figure V.E-3. As depicted in Figure V.E-3, the HRPA excludes the USC Campus. The project area includes all of Exposition Park.

The Redevelopment Plan is divided into four subareas, including the Exposition Sub Area, in which the Project Site is located (see Figure V.E-4). The Redevelopment Plan governs development within the project area and is administered by the CRA. The Redevelopment Plan was designed to promote revitalization and development within the Hoover Project area. The Redevelopment Plan designates the Project Site for Public Use. According to the Redevelopment Plan, permitted uses of Public- and Quasi-Public-designated property include the establishment, maintenance, or enlargement of public uses including, but not limited to, park and recreational facilities, libraries, educational or fraternal facilities,

Figure V.E-3.

Figure V.E-4

parking and parking structures, housing, philanthropic and charitable or other institutions, and facilities of other similar associations or organizations.¹

It should be noted that real property which is owned or controlled by either the State of California or the Los Angeles Memorial Coliseum Commission, including the Project Site, is not subject to requirements and policies of the Hoover Redevelopment Plan, nor is it subject to review and/or approval by the CRA. Even so, current uses on the Project Site are consistent with the Redevelopment Plan's Public Use designation for the property.²

City of Los Angeles Planning and Zoning Code

Development Guidelines for properties within the City of Los Angeles are established by the City of Los Angeles Municipal Code (LAMC) Planning and Zoning Code (July 2000 Edition, Published by the City of Los Angeles).

The Project Site is in the OS-1XL (Open Space) Zoning District, as is the majority of Exposition Park. The OS-1XL designation refers to a zoning designation of Open Space with a corresponding Height District designation of No. 1, Extra Limited Height District (XL). The OS zone permits a limited amount of designated of uses under the City's Planning and Zoning Code (L.A.M.C. Section 12.04.05), including parks and recreation facilities (i.e. bicycle trails, equestrian trails, walking trails, nature trails, park land/lawn areas, children's play areas, picnic facilities, and athletic fields), natural resource preserves, marine and ecological preserves, sanitary landfill sites, and water conservation areas. Height District No. 1 limits development to a Floor Area Ratio (FAR) of 3:1. The XL allows a building height of two-stories, which shall not exceed a height of 30 feet. Like a number of other older buildings which pre-date the Planning and Zoning Code, the Coliseum is "grandfathered" into the zoning code because of its long term prior use.

Properties surrounding the Project Site are located within Exposition Park and are currently designated for High Density Housing and zoned RD1.5-1. The remainder of the parcels, located at the southern most end (fronting Martin Luther King Jr. Boulevard) are designated for Community Commercial use and zoned C2-1L and [Q]C2-1. This area is developed with park facilities, park/green space areas and surface parking facilities, utilized for Coliseum and Sports Arena events.

¹ "Redevelopment Plan for the Expanded Project Area of the Hoover Redevelopment Project as amended by the Fifth Amendment to the Redevelopment Plan for the Hoover Redevelopment Project", adopted May 17, 1989.

² Exposition Park was added to the HRP in 1983, and in 1984 the CRA prepared a Master Plan for the park. However, the Master Plan was contested and was never formally adopted. In 1985, the CRA and the State of California reached a settlement agreement that voided CRA consultation, review, or control over State of California or Los Angeles Memorial Coliseum Commission properties within Exposition Park. (EPICCA EIR, Community Redevelopment Agency of the City of Los Angeles, 1999)

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with the State CEQA Guidelines a project may result in a significant impact if it is found to be in conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project including, but not limited to the General Plan, Specific Plan, local coastal program or zoning ordinance. A significant impact related to land use consistency would result if a project were found to be in substantial conflict with the applicable goals, policies or objectives contained within the *City of Los Angeles General Plan*, the *South Los Angeles Community Plan*, the *Exposition Park Master Plan*, the *Hoover Redevelopment Plan*, or the City of Los Angeles Planning and Zoning Code, and regional plans or other adopted City or CRA plans. The determination of compatibility is based upon a survey of land uses in the area, in combination with the analysis of the physical development, construction and operational characteristics of the project.

Project Impacts

Land Use Compatibility

Although the project would be considered compatible with the land use policies of the South Los Angeles Community Plan, the Coliseum's physical and functional compatibility as described strictly in relation to lighting, noise, and traffic/parking indicates that the Coliseum could currently be considered to be physically incompatible with its surrounding environs with respect to these areas of impact. Such impacts have the potential to adversely affect neighboring residential properties to the south and west of Exposition Park. However, the Coliseum was originally constructed in 1932 and has been a part of the community for over 80 years. The Proposed operations and intensity of use is consistent with the operations that have historically occurred on site, which includes having the NFL as a primary tenant along with the USC football team. As indicated in Section IV, Overview of Environmental Setting the Coliseum has hosted an NFL team during 45 of its 80 years, including the Los Angeles Rams from 1946 to 1979 and the Los Angeles Raiders from 1982 to 1994. As a publicly-oriented land use contained within a larger reservation of public land (i.e., Exposition Park), the Coliseum currently displays a high degree of physical compatibility with its surroundings, particularly when considering its proximity to other public recreational uses and major arterial roadways, its centralized location within the context of the Greater Los Angeles area, and its proximity to a major university (USC) which is also one of its primary tenants.

Development of the Proposed Project would modify various aspects of the Coliseum, but would continue the site's existing character of use. As a result, while the project itself is not anticipated to introduce physically incompatible features to the site in and of itself, the Project would facilitate the continuance of existing uses, which are considered to be physically incompatible with the surrounding environment with respect to traffic, access and parking, noise and demands on public services (i.e.,

Police and Fire). Please see the applicable sections of this report for a complete discussion of such impacts, as well as measures recommended to mitigate both the project's environmental effects and existing adverse impacts associated with operation of the Coliseum. Implementation of the project would maintain the existing physically compatible aspects of the Coliseum resulting from its location in Exposition Park.

Land Use Compatibility With Surrounding Uses (Functional)

Functional land use compatibility is defined herein as the capacity for adjacent, yet dissimilar land uses to maintain and provide established services, amenities, and/or environmental qualities associated with such uses. Adverse functional compatibility impacts are generated when a proposed development may result in the degradation of the ambient environmental character and/or hinders relationships associated with existing patterns of use both on-site and in the immediately surrounding community. Ingress and egress locations, pedestrian access and safety, and availability and access to amenities and services are all project features that may affect functional compatibility between existing and proposed land uses and the surrounding area. Other issues that can adversely impact functional compatibility include overall site configuration, building height and design, continuity of building architectural style and integrity, and landscaping.

The Proposed Project consists of the renovation of an existing facility with the objective of maintaining current levels and types of usage. The project would not alter the current land use of the site, nor would it alter the ambient environmental character associated with the site and the surrounding vicinity, as it would retain the Coliseum's existing character of use, with only minor modifications visible to off-site viewers. No existing land use relationships between the site and the surrounding portions of Exposition Park would be altered as a result of project implementation. In effect, the Coliseum would continue to serve its current function relative to the surrounding communities, both local and regional.

As the overall site configuration would remain similar to existing conditions, the Proposed Project would not be anticipated to alter the existing land use relationship between the Coliseum and adjacent land uses. The Proposed Project would take place within the frame of the existing stadium. Most of the existing landscaping on-site would be retained with project development, including the majority of the vegetation on the exposed outer portions of the earthen berm. Additional landscaping to be provided as part of the Proposed Project would be of a similar character to existing vegetation both on-site and within adjacent portions of Exposition Park, and would therefore not be expected to detract from the aesthetic compatibility of the site with surrounding areas. All of the existing mature, original landscaping outside of the perimeter fence on the site would be retained, extending to the edge of the site. In addition, the perimeter fence would be removed, thus promoting the open space park-like atmosphere of Exposition Park. In addition to the Coliseum, adjacent portions of Exposition Park contain a variety of other publicly-oriented sports and non-sports facilities including the Sports Arena, the Los Angeles Swim Stadium, and the museums, all of which reinforce the Park's function as a public

gathering place where a variety of cultural and entertainment events may be enjoyed. No other modifications to existing landscaping in the vicinity would result from project implementation.

It is anticipated that the Proposed Project would secure the continued long-term utilization of the Coliseum, and thus would preserve the present functional relationship between the Coliseum and the surrounding areas discussed above. Accordingly, the Proposed Project would facilitate the land use objectives of the Exposition Park Master Plan, the South Los Angeles Community Plan, and the Hoover Redevelopment Plan with respect to promoting revitalization of the Park and preserving cultural monuments. Therefore, land use compatibility impacts would be less than significant.

Consistency of Land Use Policy and Regulations

This Section analyzes the consistency of the Proposed Project with the provisions and requirements of the applicable regional and local plans that currently govern development of the Project Site and surrounding areas. In general, land use impacts associated with implementation of the Proposed Project would be limited in scope, as the project would not induce any change to the existing use of the site. Existing impacts associated with the current and future land use of the site as a sports venue primarily include traffic congestion, increased noise levels, and increased demands for security and other public services on event days in areas surrounding the site. Such effects, however, only occur on days or evenings when major events are held at the Coliseum and have been occurring on site since the construction of the Coliseum in 1932. The Proposed Project would continue the existing use at generally the same level of intensity as the current operations, but with an additional 12 scheduled professional football games each year. This represents an approximate 35% increase in the annual number of events. Therefore, since the project would not change the current use of the Coliseum, no adverse land use impacts would result from development of the Proposed Project.

Exposition Park Master Plan

As stated previously, the CMSI/Exposition Park Master Plan (1993) did not include any specific alterations or renovation for the Coliseum. At the time the Master Plan was being prepared the Coliseum was the home field of the Los Angeles Raiders. The Coliseum was also undergoing a minor renovation project at the time which included lowering the field, expanding the locker rooms, building a press box, and upgrading and constructing new concession outbuildings surrounding the Coliseum. The Master Plan briefly discussed the current renovation activities underway at the time, but made no specific reference with respect to goals or objectives for the long-term use of the Coliseum. Nevertheless, the following general six objectives of the Master Plan are relevant to development within Exposition Park and are described and evaluated with respect to the Proposed Project as follows:

- *Objective 1: Provide a vision and depict the limits for the future development of the institutional uses of the park while reinforcing its dual role as a regional and community resource.*

Consistent. The Proposed Project will reinforce Exposition Park's role as a major regional community resource in the southern California region. The Coliseum is currently in a form of disrepair and has lost its ability to retain an NFL franchise as a primary tenant. Without the Proposed Project, the Coliseum will continue to deteriorate and will be unable to compete with other modern sports and entertainment venues in the southern California region as well as the nation.

- *Objective 2: Enhance the park's character and landscape features by increasing the area available for passive and recreational uses, defining entrances to the park and facilities, providing a clearly delineated system of pedestrian walkways and minimizing vehicular uses.*

Consistent. The Proposed Project will predominately take place within the walls of the existing Coliseum. The Proposed Project will include excavating the earth berm beneath the interior Upper Concourse level to provide locker rooms, a commissary, and a lower Concourse level within the interior of the Coliseum. The proposed design will substantially limit the amount of land area needed to provide upgraded and modern amenities and concession areas to support the future use of the Coliseum. In addition to the design of the Coliseum itself, the Proposed Project will include demolishing many of the existing outbuildings and steel bar and chain link fence that surrounds the Coliseum. These modifications will increase the open space and pedestrian areas for passive recreational use year round. On any given day Exposition Park visitors will be able to walk up to the walls of the Peristyle and Coliseum structure. This design feature will greatly enhance the park's character and landscape features by increasing accessibility to passive recreation areas.

The Proposed Project will also include creating two new structures outside the Coliseum - an approximate 20,000 square-foot retail use and the other an approximate 20,000 square-foot sports and Coliseum athletic history museum. Both uses will be ancillary uses to the Coliseum, but will be operational on a day-to-day basis throughout the year. These uses would be complementary to the existing uses within Exposition Park and would be designed and placed in a manner that is compatible with the surrounding structures.

- *Objective 3: Integrate the park with adjacent neighborhoods by providing convenient pedestrian transit linkages, minimizing traffic and parking impacts and developing employment, recreational, educational, and cultural opportunities within the park jointly with area residents.*

Consistent. While this objective is not specifically oriented towards the Coliseum's operations, the Coliseum will coordinate with other park stakeholders and implement a traffic management plan to minimize traffic and parking impacts on days when major events and football games are scheduled. The traffic management plan will include but not be limited to the following measures: implementing ride share incentives for ticket holders, provide a shuttle system to facilitate and promote the use of satellite parking lots, provide assignable parking lots for ticket holders, and manage parking and traffic patterns and conditions on the surrounding roadways.

(See Section V.I.1 for additional details on the traffic and parking management mitigation measures). With implementation of these measures, the Proposed Project will be consistent with this objective.

- *Objective 4: Preserve and interpret the historical legacy of the Park allowing the memories of the Park to be relived through appreciation of the historical significance of features such as the Rose Garden, the Coliseum, and other sites.*

Consistent. The Proposed Project would renovate the Coliseum in a manner that preserves the historic integrity of the structure to the maximum extent feasible. While some of the historic fabric of the Coliseum would be compromised by the proposed design (i.e., the geometry of the seating bowl), many of the major elements of the Coliseum structure would be retained and restored to reflect the historic significance of the Coliseum (i.e., the Peristyle, the exterior wall, the stairway and tunnel entrances). While the Secretary of Interior Standard's will not be met with respect to retaining the original geometry of the bowl, significant efforts have been made to retain as much of the oval bowl shape as possible. In addition, much of the existing bowl will still be visible behind the new seating areas and within the Concourse level. As such, the historic legacy of the Coliseum would be preserved (See Section V.C, Cultural and Historical Resources for a detailed discussion of this issue).

- *Objective 5: Establish a framework of consistent and compatible design standards for future facilities in the park, including criteria for siting, massing, circulation, landscape and orientation elements of the plan.*

Partially Consistent. This objective is not directly applicable to the Proposed Project as the project includes renovating the Coliseum structure which is in a fixed location. The Proposed Project will include the demolition and removal of the existing non-historic outbuildings and concession stands surrounding the Coliseum, and will construct two new structures for ancillary retail and museum uses. No specific framework or design standards for these future facilities have been developed. However, due to the nature of the project and the limited land area that is available to the Coliseum Commission, the location and massing of the proposed structures would be limited to the areas located southeast of the Coliseum Peristyle and northwest or west of the Sports Arena. This area is visually shielded from the majority of uses in Exposition Park by the Coliseum structure itself. Therefore, the development of these structures would not conflict with the scale and massing of other elements of the plan.

- *Objective 6: Strengthen and centralize park management to encourage cooperation among institutional users and the effective management of park resources such as circulation, parking, transit access, programming, security, maintenance and marketing.*

Consistent. The Proposed Project of the Coliseum will strengthen and centralize park management and encourage cooperation among park stakeholders as the Project will provide a new life to the Coliseum. It is anticipated that while the maximum seating capacity will be

reduced for any one event, the Project will increase the utilization of the Coliseum and help re-establish Exposition Park as a lively regional recreational center. Such activity will promote and encourage cooperation in management as each park stakeholder will need to coordinate major event operations.

Regional Comprehensive Plan and Guide

The Regional Comprehensive Plan and Guide (RCPG) includes several policies which are generally applicable to the Proposed Project. According to SCAG guidelines, the Proposed Project is determined to not be regionally significant per SCAG Intergovernmental Review (IGR) Criteria and the California Environmental Quality Act (CEQA), Section 15206. As such, no further analysis is warranted.

City of Los Angeles General Plan

As stated previously, the City of Los Angeles General Plan designation for the Project Site is OS, Open Space. This designation permits parks and community centers under the ownership and operation of a public agency. The South Los Angeles Community Plan sets forth numerous policy guidelines that are designed to govern land use decisions made within the South Los Angeles Community Plan area. Those Community Plan policies which are generally relevant to the Project Site are described and evaluated with respect to the Proposed Project as follows:

- *Policy 4-1.1: Preserve the existing recreational facilities and park space.*

Consistent. The Proposed Project of the Coliseum would continue to provide passive recreational uses for the local and regional community in the form of events held at the Coliseum. The adjacent areas within Exposition Park would continue to provide public recreation opportunities to the community and would not be adversely impacted by the Proposed Project. Therefore, the project would be considered to be consistent with this policy.

- *Policy 19-1.2: Identify all designated City of Los Angeles Historic and Cultural Monuments in order to foster public appreciation of the City of Los Angeles' valuable historic resources and to promote education of the public by preserving Los Angeles' historic past and to promote that any other appropriate landmarks of unique architectural and historical significance continue to be identified for the purpose of inclusion in the list.*

Partially Consistent. While this policy is directed at the City in identifying historic cultural monuments, the Proposed Project of the Coliseum recognizes the historical designation of the Coliseum as a National Historic Landmark. The proposed use and design is consistent with the intent of this policy as the proposed improvements would retain the exterior wall and as much of the original historic fabric of the inner bowl shape as possible. As concluded in Section V.C, Cultural and Historic Resources, while the Proposed Project would not achieve rehabilitation in conformance with the Secretary of Interior's Standards in all respects, the

project would not jeopardize the Coliseum's listing on the National Register of Historic Landmarks. Therefore the project would be partially consistent with this policy.

- *Policy 19-2.1: Encourage the preservation, maintenance, enhancement and adaptive reuse of existing buildings in commercial areas through the restoration of original facades and the design of new construction which complements old in a harmonious fashion, enhancing the historic pattern.*

Consistent. The Proposed Project would renovate the Coliseum, which is a designated National Historic Landmark, State Historic Landmark, and is listed on the National Register of Historic Places. As stated above, the proposed use and design is consistent with the intent of this policy as the proposed improvements would retain the exterior wall and as much of the original historic fabric of the inner bowl shape as possible. While the Proposed Project would not achieve rehabilitation in conformance with the Secretary of Interior's Standards in all respects, the project would not jeopardize the Coliseum's listing on the National Register of Historic Landmarks.

Hoover Redevelopment Plan

The Project Site is designated for Public Uses by the Hoover Redevelopment Plan, consistent with the current and historic use of the site. The Proposed Project would effectively perpetuate the existing use on the Project Site through the provision of a modern, state-of-the-art, multi-purpose sports and assembly facility. As a result, no adverse impacts to the Hoover Redevelopment Plan are anticipated to result from the implementation of the Proposed Coliseum renovation. The Hoover Redevelopment Plan contains several goals which are generally applicable to the Project or project vicinity. These goals are described and evaluated with respect to the Proposed Project as follows:

- *Goal: To eliminate and prevent the spread of blight and deterioration through the conservation, rehabilitation, and redevelopment of the area.*

Consistent. The Proposed Project would preserve and rehabilitate the Coliseum facility, while at the same time transform it into a modern, state-of-the-art, multi-purpose stadium able to continue to fulfill a wide variety of publicly-oriented purposes. Currently the Coliseum is in a form of disrepair and is underutilized as a major regional sports and entertainment venue. In its report to the Ad Hoc Sports Franchise Assessment Committee to the City of Los Angeles City Council, the City of Los Angeles CRA acknowledged that the public sector has the responsibility to protect and maintain the Coliseum. The development of another venue that would compete for events with the Coliseum could further diminish revenues necessary to maintain and operate the Coliseum. To the extent that the project would halt the current deterioration of the Coliseum facility, it would be consistent with this goal.

- *Goal: The provision of well-planned community uses, facilities, pedestrian and vehicular circulation, and adequate parking, particularly as these relate to Exposition Park.*

Consistent. The Proposed Project would redesign pedestrian access and circulation within the site and Coliseum itself in order to create a more well-designed and orderly pattern, and would reposition the existing entry gates to the Coliseum grounds in a specifically planned manner (see Section III.C, Project Characteristics). The Coliseum will continue to be served by existing parking facilities in and around Exposition Park, including approximately 20,000 parking spaces within Exposition Park, USC parking lots to the north and other private lots in the project vicinity. In addition, parking improvements are currently underway in Exposition Park to provide a 2,210-space subterranean parking lot adjacent to the California African-American Museum. This structure, which will likely be completed prior to the commencement of the Coliseum's renovation, will provide additional parking for Coliseum patrons. Therefore, the Proposed Project would be consistent with this goal.

- *Goal: To provide a basis for the location and programming of public service facilities, parks, and recreation facilities.*

Consistent. The Proposed Project would facilitate a continuance of the existing publicly-oriented use of the site and would therefore be consistent with the general aim of this goal.

- *Goal: To encourage the cooperation and participation of residents, property owners, business persons, public agencies, and community organizations in the revitalization of the area.*

Consistent. Implementation of the Proposed Project would be administered through private financial commitment by private businesses and individuals. The Proposed Project would not be dependent on Public Funds. Both the Coliseum Commission and the stadium's private operator, which has yet to be selected, would be expected to continue their current efforts to involve community organizations, residents, and property owners in the planning for on-going activities at the Coliseum. Coordination with the operators of the other facilities within Exposition Park would similarly be expected to continue. Therefore, the project would be considered to be consistent with this goal.

- *Goal: To promote coordinated management of Exposition Park with specific attention given to facility use, development, parking, circulation, security, and maintenance.*

Consistent. The Proposed Project would not change the existing management and operation arrangement currently in place at the Coliseum with respect to the other facilities within Exposition Park. Improvements to existing security and maintenance arrangements affecting the Project Site would be expected to result from the project, as would parking and traffic circulation measures designed to mitigate existing conditions. Therefore, the project would be considered to be generally consistent with this goal.

- *Goal: To encourage the preservation of historic monuments, landmarks, and buildings, particularly those affected by new development which is subject to an owner participation or disposition and development agreement.*

Consistent. The Proposed Project would renovate the Coliseum, which is a National Historic Landmark, State Historic Landmark, and is listed on the National Register of Historic Places. The proposed use and design is consistent with the intent of this policy as the proposed improvements would retain the exterior wall and as much of the original historic fabric of the inner bowl shape as possible. As concluded in Section V.C, Cultural and Historic Resources, while the Proposed Project would not achieve rehabilitation in conformance with the Secretary of Interior's Standards in all respects, the project would not jeopardize the Coliseum's listing on the National Register of Historic Landmarks. As a result, the Proposed Project would be consistent with this goal.

The Proposed Project would be generally consistent with the relevant goals of the Hoover Redevelopment Plan with the exception of the recommended provision of additional parking for patrons attending Coliseum events and/or other functions in Exposition Park, which is not contemplated by the Proposed Project (for more detail, see Section V.I, Traffic, Access, and Parking). However, the Proposed Project will benefit from the new parking structure that is currently under construction. Upon its completion, and prior to the estimated completion date of the Proposed Project, approximately 2,210 new parking spaces will become available in Exposition Park (see Related Project No. 32 in Section IV, Cumulative Related Projects). The availability of 2,210 new parking spaces in Exposition Park, and the reduction in the maximum seating capacity from 92,500 seats to 78,000 seats would improve parking conditions for future Coliseum events.

City of Los Angeles Planning and Zoning Code

The Project Site is zoned OS-1XL (Open Space), as is the majority of Exposition Park. The OS zone permits a limited amount of designated uses under the City of Los Angeles Planning and Zoning Code (Section 12.04.05), including parks and recreation facilities (i.e. bicycle trails, equestrian trails, walking trails, nature trails, park land/lawn areas, children's play areas, picnic facilities, and athletic fields), natural resource preserves, marine and ecological preserves, sanitary landfill sites, and water conservation areas. Outdoor stadium facilities seating over 200 persons are not permitted in any open space zones without a Conditional Use Permit. The existing inconsistency between the development on the Project Site and the site's zoning is explained by the fact that the City of Los Angeles did not incorporate a comprehensive zoning code and map system into its land use regulation process until after the Coliseum was built in 1923. In addition, the Proposed Project would not change the existing management and operation arrangement currently in place at the Coliseum with respect to the other facilities within Exposition Park. Therefore, the Proposed Project would be consistent with the Planning and Zoning Code.

CUMULATIVE IMPACTS

Identified related projects within the study area are located within either the South Los Angeles or Southeast Los Angeles Community Plan areas. Although the development of these related projects outside of Exposition Park could potentially require General Plan Amendments and/or Zone Changes in order to be effectuated, the cumulative implications of this growth, conformity with land use regulations, and compatibility with surrounding uses will be evaluated on a case-by-case basis by the City of Los Angeles. Given that the proposed Exposition Park Master Plan would govern land within the Park exclusively, future related projects located within Exposition Park would be subject to its requirements.

MITIGATION MEASURES

Implementation of the Proposed Project would not be expected to adversely impact the goals and policies of the South Los Angeles Community Plan, Exposition Park Master Plan and the Hoover Redevelopment Plan. As a result, no mitigation measures are recommended or required. Additional mitigation measures recommended and/or required (as appropriate) in relation to physical impacts such as noise, air quality, and traffic/parking are described in the respective sections of this report (Section V.B, Air Quality; Section V.C, Cultural and Historic Resources, Section V.F, Noise; and Section V.I, Traffic, Access, and Parking).