

CHAPTER 5

OTHER CEQA CONSIDERATIONS

Pursuant to Sections 15130 and 15126.2 of the State CEQA Guidelines, this chapter describes cumulative impacts, significant irreversible environmental changes, growth-inducing impacts, and significant environmental effects which cannot be avoided if the Proposed Project is implemented. In addition, Section 15128 of the State CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant. Effects determined to be less than significant for the Coastal Transportation Corridor Specific Plan (CTCSP) and West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP) Specific Plans Amendment Project are discussed in Section 5.5.

5.1 Cumulative Impacts

5.1.1 Introduction

Cumulative impacts are those environmental effects that, on their own, may not be considered adverse, but which, when combined with similar effects over time, result in substantial adverse effects. Cumulative effects are an important part of the environmental analysis because they allow decision makers to look not only at the impacts of an individual proposed project, but the overall impacts to a specific resource, ecosystem, or human community over time from many different projects.

The State CEQA Guidelines define cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." The analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to "be guided by the standards of practicality and reasonableness."

As the cumulative impacts are the anticipated impacts of the project along with reasonably foreseeable growth, State CEQA Guidelines Section 15130(b)(1) states that the identification of reasonably foreseeable growth may be based on either:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts; or
- A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions.

This chapter describes the cumulative impacts of the Proposed Project for each environmental resource analyzed in Chapter 4, *Environmental Impacts*. The basis of the cumulative impacts analysis, and the projects considered therein, are identified below.

As described in the introduction to Chapter 4, the EIR examines different scenarios to analyze environmental impacts of the Proposed Project. One of these, Future without Project (2035), includes currently funded projects that would be in place by 2035, and incorporates adopted growth projections that would occur in the Specific Plan areas as forecasted by the Southern California Association of Governments (SCAG) in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG, 2012). These projects and growth projections were included

as part of the transportation model for the Future without Project scenario. This Future without Project scenario represents the reasonably foreseeable conditions without the Proposed Project. The cumulative impacts analysis adds to this future condition additional projects that may occur but that are either currently not approved or not funded. For this analysis, those additional projects include the Mobility Plan 2035, the Exposition Corridor Transit Neighborhood Plan (ECTNP), and the LAX Landside Access Modernization Program.

Mobility Plan 2035

The Mobility Plan 2035, or MP 2035, was adopted by the Los Angeles City Council in November, 2015. The MP 2035 is the City's Transportation Element of the General Plan and provides a transportation blueprint for the City through the foreseeable future (at least 2035)(City of Los Angeles, 2015a). MP 2035 was prepared in compliance with the 2008 Complete Streets Act, which mandates that the circulation element of a city's general plan be modified 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. MP 2035 includes a number of changes to the City's circulation system, including policies, an Enhanced Complete Street System, an Action Plan, a Complete Streets Design Guide, and a revised Bicycle Plan, all of which will influence the network conditions in the study area and adjacent areas in the City of Los Angeles.

MP 2035 provides the framework for future planning documents, such as the proposed amendments to the CTCSP and WLA TIMP, which take a closer look at the transportation system in specific areas of the City and recommend more detailed implementation strategies to realize MP 2035. The proposed updates to the CTCSP and WLA TIMP project lists reflect the vision of MP 2035, however, they do not reflect full buildout of MP 2035. Rather, many of the projects contained in the updated project lists provide a first-step in implementing MP 2035. For example, Pico Boulevard is designated as part of the Moderate Plus Transit Enhanced Network (TEN) in MP 2035. For the purposes of analyzing the MP 2035 TEN, the Moderate Plus treatments were assumed to result in the conversion of one vehicular travel lane per direction to a bus only lane during peak periods. As part of the WLA TIMP proposed project list, transit would be prioritized on Pico Boulevard through the implementation of rapid bus service improvements with increased frequencies, stop improvements, and construction of a new rapid stop in Century City without the removal of vehicular capacity during the peak travel hours. As another example, Venice Boulevard is designated as part of both the TEN and Bicycle Enhanced Network (BEN) in MP 2035. While the Proposed Project does not reflect the ultimate improvements that could eventually occur as part of the TEN and BEN designations, such as dedicated transit lanes on Venice Boulevard, the proposed project lists reflect the following first-step improvements that would be consistent with the vision of providing enhanced transit and bicycle facilities along Venice Boulevard: 1) Cycle track throughout the project area, 2) Rapid bus improvements throughout the project area with increases in service frequency and stop improvements, and 3) Streetscape improvements between Lincoln Boulevard and Inglewood Boulevard.

Buildout of MP 2035 was not included in the Future without Project or Future with Project scenarios used in the analysis of the Proposed Project because, although MP 2035 has been adopted, the timing of implementation and funding sources have not yet been identified, and project design at the intersection level of detail has not been developed. However, the cumulative impacts analysis evaluates the impacts of the Proposed Project in conjunction with full build out of the MP 2035 multi-

modal improvements (including the Transit, Bicycle, Neighborhood, Pedestrian, and Vehicle Enhanced Networks) both within the Specific Plan areas and throughout the City.

Exposition Corridor Transit Neighborhood Plan

The ECTNP is a proposed Specific Plan that would guide future development within the Exposition Light Rail Corridor (City of Los Angeles, 2015b). The Specific Plan would include General Plan amendments and zone changes that would encourage infill development and a mix of uses within the identified areas to promote transit ridership, reduce automobile dependence, and create vibrant neighborhoods around the transit stations. The Project would (1) create four new zones and one new land use designation, and change zoning and land use designations within specified portions of the project area; (2) include public benefit requirements associated with tiered floor-to-area ratio (FAR) in the new zones; (3) create streetscape plans and modified street classifications for identified street segments in the project area; and (4) require design standards for new development within the project area (excluding R1 and R2 zones). The ECTNP would also include new open space regulations and parking regulations for select properties within the project area. Of the five new transit stations planned along this portion of the Exposition Corridor, four are located within the WLA TIMP Specific Plan area. The cumulative impacts analysis evaluates the impacts of the Proposed Project in conjunction with the land use changes associated with the ECTNP.

LAX Landside Access Modernization Program

The LAX Landside Access Modernization Program proposes a system of complementary ground transportation elements that will improve the circulation system in the immediate vicinity of the airport, and between the Central Terminal Area (CTA) and new remote parking facilities, a new consolidated rental car facility, and a multi-modal/transit facility planned by Metro as part of a light rail extension in the airport area. These new facilities, which would lie at the southern edge of the CTCSP, would be linked together and to the CTA through an Automated People Mover system that would provide fast, convenient, and reliable access to the CTA for passengers, employees, and other users of LAX (Los Angeles World Airports, 2015). On a regional level, the project is not expected to adversely alter travel patterns or the number of vehicle trips generated by the airport and the project-specific transportation improvements would not adversely affect the overall vehicle trips or vehicle miles traveled (VMT) reported for the Westside area.

Conditions Associated with Cumulative Development

The transportation planning efforts being undertaken in MP 2035, the ECTNP, and the LAX Landside Access Modernization Program would complement the transportation improvements that would be enabled by the CTCSP/WLA TIMP Specific Plans Amendment Project. The cumulative projects identified above would improve access to transit and concentrate growth in compact, mixed-use developments in close proximity to transit services. These projects are expected to result in shorter and fewer vehicle trips, and each additional resident and job is expected to contribute fewer VMT than current residents and employees, thereby decreasing the VMT per service population and increasing the number of people traveling by transit, biking, and walking.

Methodology for Cumulative Impact Analysis

In providing guidance pertaining to the analysis of cumulative impacts, Section 15064(h)(1) of the State CEQA Guidelines states: "...the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable." Therefore, the analysis of a project's contribution to a significant cumulative impact is a two-step process: first, a determination is made as to whether or not a cumulative impact would be significant. As per Section

15130(a)(2) of the State CEQA Guidelines, if it is determined that the cumulative impact is not significant, no further discussion needs to be provided in the EIR. However, if a cumulative impact is determined to be significant, then a determination must be made as to whether the project's contribution to the significant cumulative impact is cumulatively considerable. In making these determinations, the following definitions apply:

- A **cumulative impact** is the change in the environment which results from the incremental impact of the proposed project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant, projects taking place over a period of time (State CEQA Guidelines Section 15355).
- A **significant cumulative impact** occurs when the cumulative impact from several projects, in conjunction with the proposed project, would result in a substantial adverse change in the physical environment. Alternately, the combined cumulative impact associated with the project's incremental effect and the effects of other projects may be determined to be **less than significant**.
- A **cumulatively considerable impact** occurs when the incremental effects of an individual 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 (PRC Section 21083, State CEQA Guidelines Section 15064[h][1]). A project's contribution to a significant cumulative impact may be determined to be **less than cumulatively considerable** based on the nature or degree of the project's contribution. Additionally, a project's contribution to a significant cumulative impact may be rendered less than cumulatively considerable through project-specific mitigation measures, or compliance with the requirements in a previously approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located, including funding its fair share of a cumulative mitigation measure or program. A project's contribution to a significant cumulative impact that has been determined to be less than cumulatively considerable is not significant (State CEQA Guidelines Section 15130[a][3]).

In accordance with these provisions, the potential for the Proposed Project, in conjunction with cumulative development, to result in significant impacts is identified in the analyses below. Where cumulatively significant impacts would occur, the potential for the Proposed Project to make a cumulatively considerable contribution to these impacts is determined.

The proposed amendments to the CTCSP and WLA TIMP would not entitle the transportation improvements identified on the updated project lists. As the individual improvements are not proposed for construction at this time, schedules and phasing plans have not been determined for these improvements and design details have not been developed. Therefore, the cumulative impacts of the Proposed Project, in conjunction with cumulative development, are evaluated at a conceptual level of detail.

5.1.2 Cumulative Impacts

5.1.2.1 Air Quality

The South Coast Air Quality Management District's (SCAQMD) approach for assessing cumulative air quality impacts is based on the Air Quality Management Plan's forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state Clean Air Acts. The SCAQMD has set forth significance thresholds designed to assist in the attainment of ambient air quality standards. SCAQMD's thresholds are identified in Section 4.1, *Air Quality*. Specifically, mass daily pollutant emission thresholds for construction and operation are shown in Table 4.1-9, and localized significance thresholds are shown in Table 4.1-10. These significance thresholds are used to assess whether emissions from a proposed project, when added to other past, present, and reasonably foreseeable probable future projects, would be considered cumulatively significant. According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant.

Construction

Construction air quality impacts tend to be primarily local in nature (i.e., impacts such as fugitive dust and construction equipment emissions are mostly realized in the immediate area around a construction site), although construction-related air pollutant emissions also contribute incrementally to degradation of regional ambient air quality. Cumulative projects with the most notable potential to contribute to cumulative construction air quality impacts, adding to the construction-related impacts associated with the proposed CTCSP and WLA TIMP transportation improvements, would be those under construction at the same time and in the same general vicinity as the project-related improvements. As stated above, schedules and phasing plans have not been determined for the proposed transportation improvements. Therefore, evaluation of cumulative construction air quality impacts is provided at a conceptual level of detail. The basis used for determining significant air quality impacts, including both project-specific and cumulative impacts, is the thresholds established by the SCAQMD.

As described above in Section 5.1.1, cumulative actions include both funded projects that are included in the Future without Project scenario, as well as build-out of MP 2035, the ECTNP, and the LAX Landside Access Modernization Program.

As discussed in Section 4.1, *Air Quality*, the majority of the transportation improvements associated with the Proposed Project would result in a low level of construction activity. The regional emissions associated with the proposed transportation improvements would be at the low end of the intensity range of construction activities that occur in the region. Even considering the high construction intensity improvements, as shown in Table 4.1-13, project-related regional construction emissions of the nonattainment pollutants (inhalable particulate matter with diameter of ten microns or less [PM₁₀], fine particulate matter with diameter of 2.5 microns or less [PM_{2.5}], ozone [O₃] precursors, nitrogen oxides [NO_x], and volatile organic compounds [VOC]) would not contribute to an existing or projected air quality violation and would not exceed SCAQMD emissions thresholds. Therefore, regional construction emissions related to the Proposed Project **would not be cumulatively considerable**.

Localized construction-related pollutant emissions would be emitted by cumulative construction activities occurring at the same time and in the same general location as construction of transportation improvements associated with the Proposed Project. As shown in Table 4.1-18, construction activities for the majority of the transportation improvements would not result in significant localized pollutant emissions; impacts of these projects would be less than significant. However, as shown in Tables 4.1-16 and 4.1-17, peak daily localized emissions of particulate matter would exceed SCAQMD thresholds for the Lincoln Boulevard and Sepulveda Boulevard Bus Rapid Transit (BRTs) and the I-10 Ramp Reconfiguration at Bundy Drive (PM10) and the Lincoln Boulevard Bridge Enhancement (PM10 and PM2.5). Therefore, localized construction emissions associated with these improvements would be ***cumulatively considerable***.

Operation

As noted in Section 5.1.1, the cumulative projects would improve access to transit and concentrate more growth in compact, mixed-use developments in close proximity to transit services. These projects are expected to result in shorter and fewer vehicle trips, and each additional resident and job is expected to contribute fewer VMT than current residents and employees, thereby decreasing the VMT per service population and increasing the number of people traveling by transit, biking and walking. Nevertheless, as identified in Table 4.6-24, total project-related VMT in the Specific Plan areas in the future would be greater than existing conditions due to background growth that will occur with or without the project. However, Future with Project VMT is expected to be 3.4 percent lower than Future without Project VMT. The cumulative projects identified in Section 5.1.1 would expand multi-modal facilities beyond those associated with the Proposed Project. As a result, it is expected that VMT would further decrease under cumulative conditions, although it is assumed that VMT may still be greater than existing conditions.

Although daily VMT in the study area may be higher in the future with cumulative development, emission rates per mile would be lower because of technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. As a result, maximum cumulative daily emissions of CO, VOC, NO_x, PM10, PM2.5, and SO_x are expected to be lower than existing conditions and, therefore, would not exceed regional operational thresholds of significance. Therefore, operation of the Proposed Project, in combination with operation of future mobile sources under the MP 2035, ECTNP, the LAX Landside Access Modernization Program, and other funded projects consistent with the anticipated growth and development in the 2012-2035 RTP/SCS, would not result in a cumulatively significant air quality impact in the region. Cumulative impacts from operation would be ***less than significant***.

5.1.2.2 Biological Resources

Construction

Implementation of the Lincoln Boulevard Bridge Enhancement as part of the Proposed Project has the potential to result in significant impacts to biological resources associated with the Ballona Wetlands Ecological Reserve (BWER). As described in Section 4.2, *Biological Resources*, mitigation measures and compliance with all required permits would reduce potential impacts on migratory birds, special status species and habitat areas, other sensitive natural communities, and wetland resources to a level that is less than significant.

The cumulative projects identified in Section 5.1.1 do not have the potential to result in impacts to the BWER. MP 2035 does not include projects that would affect the BWER beyond the Lincoln Boulevard Bridge Enhancement discussed above. The ECTNP improvements are located over 4 miles north of the

BWER and the LAX Landside Access Modernization Program improvements are located several miles south. With regards to past projects and previously-approved future development, the most notable project is the Playa Vista project. The Playa Vista Phase I EIR determined that impacts to upland vegetation, federally-designated wetlands, and other sensitive habitat would be less than significant following mitigation. The EIR found that the project, when combined with other cumulative development (most notably the development of the Playa Vista Master Plan in its entirety) would result in a locally significant cumulative impact due to the loss of natural areas and increased disturbance from a higher density of people in the area (City of Los Angeles, 1992, Section V.D). Following completion of the Phase I EIR, the full build-out of Playa Vista was substantially reduced, which would lessen these cumulative impacts. The majority of impacts to biological resources associated with the Village at Playa Vista project were determined to be less than significant after mitigation. The EIR for that project found that loss of undeveloped area would be an unavoidable impact on foraging raptors and nesting common migrant birds (City of Los Angeles, 2003, Section D).

The loss of natural area associated with the Proposed Project is expected to be very minor as disturbance would be limited to areas immediately abutting existing roadways. All impacts to biological resources associated with the Proposed Project would be mitigated to a level that is less than significant. As a result, the project's contribution to potentially significant cumulative impacts to biological resources would ***not be cumulatively considerable***.

Operation

During operation, the proposed transportation improvements would operate within existing roadways, sidewalks, and rights-of-ways and would not result in adverse effects on biological resources. In addition, the Proposed Project would not add any population to the study area that could contribute to disturbance to biological resources. Therefore, operation of the Proposed Project, in combination with the cumulative development projects, would not result in a significant cumulative impact. Cumulative operational impacts to biological resources would be ***less than significant***.

5.1.2.3 Greenhouse Gas Emissions

Construction

The 2012-2035 RTP/SCS estimated that construction emissions in Los Angeles County would be approximately 0.2 percent of countywide greenhouse gas (GHG) emissions in 2035 (SCAG, 2012). These emissions include construction emissions from all development activity, not just transportation improvements. Construction emissions from cumulative development would be associated with construction equipment, construction-related truck trips, and worker commute trips. Similar to the Proposed Project, the MP 2035 and ECTNP do not propose construction of specific improvements. GHG emissions associated with the LAX Landside Access Modernization Program have not yet been determined, as the EIR for that project is currently in preparation.

As described in Section 4.3, *Greenhouse Gas Emissions*, most of the transportation improvements under the Proposed Project would not involve substantial construction activity, and the higher intensity construction improvements would not require substantial grading or excavation, which are activities that require heavy equipment and often use such equipment for extended periods.

When considered in combination with GHG emissions from construction from all development activity, as estimated in the 2012-2035 RTP/SCS, construction-related emissions associated with cumulative projects in the region would be a small portion of total construction emissions in Los Angeles, which themselves would represent a small fraction (0.2 percent) of all countywide GHG

emissions in 2035 (SCAG, 2012). Moreover, the ongoing implementation of motor vehicle emission control and fuel mileage standards in new vehicles, along with the gradual transition to newer, cleaner, and more fuel efficient engines over time, would result in reduced GHG emissions per engine or vehicle by 2035. GHG construction emissions associated with cumulative development are considered in conjunction with cumulative operational emissions to evaluate significance. The combined emissions analysis is provided below.

Operation

As noted in Section 5.1.1, the cumulative projects would improve access to transit and concentrate more growth in compact, mixed-use developments in close proximity to transit services. These projects are expected to result in shorter and fewer vehicle trips, and each additional resident and job is expected to contribute fewer VMT than current residents and employees, thereby decreasing the VMT per service population and increase the number of people traveling by transit, biking and walking. Nevertheless, as identified in Table 4.6-24, total project-related VMT in the Specific Plan areas in the future would be greater than existing conditions due to background growth that will occur with or without the project. However, Future with Project VMT is expected to be 3.4 percent lower than Future without Project VMT. The cumulative projects identified in Section 5.1.1 would expand multi-modal facilities beyond those associated with the Proposed Project. As a result, it is expected that VMT would further decrease under cumulative conditions, although it is assumed that VMT would still be greater than existing conditions.

Combined Construction and Operation GHG Emissions

Although daily VMT in the study area may be higher in the future with cumulative development, emission rates per mile would be lower because of technological advances in vehicle emission control, turnover in the vehicle fleet, and new emission standards. Similar to the Proposed Project, construction-related GHG emissions associated with cumulative development would represent a small fraction of the operational emissions. Therefore, decreases in operational GHG emissions would outweigh increases in GHG emissions from construction activities. As a result, combined annual cumulative GHG emissions are expected to be lower than existing conditions. Therefore, operation of the Proposed Project, in combination with operation of future mobile sources under the MP 2035, ECTNP, the LAX Landside Access Modernization Program, and other funded projects consistent with the anticipated growth and development in the 2012-2035 RTP/SCS, is expected to reduce GHG emissions in the region as compared to existing conditions or future without cumulative development conditions. Cumulative GHG impacts from combined construction and operation would be ***less than significant***.

5.1.2.4 Land Use and Planning

Construction

Cumulative development would result in short-term construction impacts throughout the Westside. Construction-related land use impacts, such as construction staging and right-of-way encroachments, generally would not be considered significant due to their temporary nature and limited duration. Cumulative construction could also result in temporary access disruptions to adjacent land uses. This could include disruption to residences, businesses, and other retail uses that are located within the Specific Plan area. Impacts and disruptions to access during construction would be temporary and would cease once construction is completed. Due to the urbanized nature of the study area, construction of cumulative projects would not be expected to have adverse impacts on surrounding

land uses as construction activities would be consistent with the types of activities that commonly occur in an urban environment.

Construction resulting from the proposed transportation improvements associated with the Proposed Project would occur within or adjacent to existing transportation right-of-ways and would not isolate communities, or alter the existing land use conditions in the community. Generally, construction activities associated with the Proposed Project could result in similar construction impacts as other cumulative projects, including temporary land use impacts related to construction staging, temporary right-of-way encroachments, or temporary access disruptions to adjacent land uses. Given the temporary nature of construction activities, project-related impacts would be less than significant.

When considered in combination with construction related to MP 2035 transportation improvements, the ECTNP, the LAX Landside Access Modernization Program, and other funded projects that are consistent with regional growth and development forecasts in the RTP/SCS, cumulative construction-related impacts are not expected to isolate communities or alter the existing land use conditions in the community. Therefore, cumulative construction-related impacts to land use and planning would be ***less than significant***.

Operation

Projects considered in the cumulative land use and planning analysis, including MP 2035, the ECTNP, the LAX Landside Access Modernization Program, and previously-approved and funded regional development, would take place within an already urbanized context and would not result in land use changes that would create land use conflicts. Buildout of the MP 2035 and implementation of the LAX Landside Access Modernization Program would not result in any changes in land uses. The transportation improvements associated with MP 2035 would occur along existing transportation corridors and, therefore, would not physically divide or isolate an existing community. The LAX Landside Access Modernization Program would implement planned transportation improvements on parcels that are designated for such uses. The ECTNP proposes to modify land use designations along the Exposition Light Rail Corridor in order to guide future development within the corridor in a manner that encourages infill development and a mix of uses to promote transit ridership, reduce automobile dependence, and create vibrant neighborhoods around the transit stations (City of Los Angeles, 2015b). The types of land uses proposed by the ECTNP would not be out of character with the surrounding community, nor would the project disrupt, divide, or isolate any existing neighborhoods or communities. Projects included in the Future without Project scenario are currently approved and funded; these projects were determined to be consistent with their respective land use designations, or those land use designations were modified through the project approval process to ensure consistency.

As discussed in Section 4.4, *Land Use and Planning*, the proposed updates to the Transportation Impact Assessment (TIA) fees would not alter future land use patterns or result in any direct or indirect physical impacts associated with the alteration of land use development patterns that could result in significant impacts associated with land use and planning, including changes that would physically divide an established community. Moreover, the Proposed Project would not result in any changes in General Plan land use designations or zoning classifications. No new roadways or transportation corridors are proposed that would divide or isolate existing neighborhoods or communities. The proposed transportation improvements would not establish new land uses. Operation of the proposed transportation improvements would be compatible with surrounding land

uses and would improve safety, access, and alternative modes of transportation in the surrounding area.

Following implementation of the Proposed Project, operation of projects on the lists of transportation improvements could result in indirect impacts to land use. While there would be no change in land use or zoning, there could be removal of some on-street parking. Implementation of some of the transportation improvement projects, such as BRT and cycle tracks, could decrease the width or number of driving lanes. Off-street parking and street parking on adjacent streets would not be affected, and the proposed loss of on-street parking is not anticipated to permanently prevent or disrupt access to surrounding land uses.

Implementation of the Proposed Project, combined with transportation improvements associated with the MP 2035, the coordination of land use and transportation development in the ECTNP, and the airport access improvements planned as part of the LAX Landside Access Modernization Program, would provide enhanced accessibility for non-vehicular modes of transportation and would increase accessibility of residents to local goods and services. This would enhance community character and the cohesion of the community. Implementation of these projects and other funded projects would be consistent with the goals and growth assumptions included in the 2012-2035 RTP/SCS. Overall, cumulative impacts to land use and planning associated with the Proposed Project, in combination with cumulative development in the region, would be *less than significant*.

5.1.2.5 Noise and Vibration

Construction

Construction of the cumulative development projects would result in temporary increases in noise levels generated by construction equipment, construction-related truck trips, and worker commute trips. Noise levels would fluctuate depending on the construction activities, equipment type, duration of activity, distance between the noise source and receptor, and presence of barriers that attenuate noise. Cumulative projects with the potential to contribute to cumulative construction-related noise and vibration impacts would be those under construction at the same time and in the same general vicinity as the project-related improvements. As stated previously, schedules and phasing plans have not been determined for the transportation improvements identified as part of the Proposed Project. Therefore, evaluation of cumulative construction-related noise and vibration impacts is provided at a conceptual level of detail.

As discussed in Section 4.5, *Noise and Vibration*, even with mitigation, construction-related noise and vibration impacts from the transportation improvements associated with the Proposed Project would be significant and unavoidable. Construction activities related to the transportation improvements in MP 2035, the development proposed in the ECTNP, and anticipated growth and development in the RTP/SCS could occur concurrently with construction related to the Proposed Project within the project area. As the LAX Landside Access Modernization Program would occur on a corridor that would not require notable construction under the Proposed Project, no cumulative construction-related impacts would occur from this project.

In general, construction-related activities from the Proposed Project and from cumulative development could individually result in significant noise and vibration impacts. If projects located in proximity to the same sensitive receptors were to occur concurrently, cumulative noise and vibration impacts could result. Potential cumulative noise and vibration levels would be intermittent, temporary, and would comply with the time restrictions and other relevant provisions in the Los

Angeles Municipal Code. Moreover, each project that would result in high noise and/or vibration levels at nearby sensitive receptors would be required to comply with mitigation measures identified in their respective environmental documents. Even with these measures, concurrent construction activities from nearby related projects would generate noise and vibration at each site and cumulative construction activities may exceed thresholds of significance for noise and vibration at nearby sensitive land uses. While specific project timelines and implementation schedules are not known, for purposes of this EIR, it is assumed that construction-related noise and vibration levels could result in significant cumulative impacts and the Proposed Project's contribution to these significant cumulative impacts would be ***cumulatively considerable***.

Operation

Cumulative development in the region would generate operational noise and vibration that would contribute to cumulative operational noise and vibration impacts. Operational impacts associated with the MP 2035 and the LAX Landside Access Modernization Program would include the implementation of transportation improvements in addition to those associated with the Proposed Project. Introducing additional transit operations, particularly bus operations associated with the MP 2035, could result in noise impacts to sensitive uses that are located in close proximity to these operations. Under the ECTNP, land use designations would be changed to create mixed use areas and infill development around transit stations. The development of mixed land uses in proximity to one another could result in noise impacts to sensitive uses.

Operational changes associated with the Proposed Project that could increase noise levels in the Specific Plan area include higher vehicle speeds resulting from enhanced mobility and the operation of BRT. As discussed in Section 4.5, *Noise and Vibration*, curb-running BRT may increase noise levels at some sensitive land uses by more than 3 A-weighted decibels (dBA). This would be a significant impact that could not be mitigated.

It is not expected that improvements associated with the LAX Landside Access Modernization Program, combined with the Proposed Project, would result in cumulative impacts, as the LAX-related improvements would occur on a corridor that would not have any transit improvements under the Proposed Project. However, noise from BRT operations associated with the Proposed Project, combined with other local sources of noise from the MP 2035, could increase cumulative noise in certain areas. In addition, changes in land use designations under the ECTNP could place noise-sensitive land use in proximity to bus operations that would be implemented as part of the Proposed Project. While details about the projects associated with the MP 2035, or specific development that could occur with implementation of the ECTNP, are not known, for purposes of this EIR, it is assumed that noise levels related to operations could result in significant cumulative impacts and the Proposed Project's contribution to this significant cumulative impact would be ***cumulatively considerable***.

5.1.2.6 Transportation

Construction

Construction impacts related to implementation of the transportation improvements under the Proposed Project would be short-term and significant. Standard construction techniques (e.g., preparation of a traffic control plan, flagmen, etc.) would reduce construction-related impacts associated with the Proposed Project, however, even with implementation of mitigation, it is expected that project-related construction impacts to transportation would be significant and unavoidable. Concurrent construction activity from nearby projects related to the MP 2035, ECTNP, and other development projected in the RTP/SCS would result in cumulative traffic impacts. In general,

cumulative construction-related traffic impacts would be localized and short-term. Nevertheless, despite the short-term nature of cumulative construction-related traffic effects and the fact that each cumulative project in the area would be required to mitigate construction-related traffic and parking impacts, it is anticipated that cumulative construction impacts would be significant and the Proposed Project's contribution to this significant cumulative impact would be ***cumulatively considerable***.

Operation

Traffic Impacts

As described in Section 4.6, *Transportation*, potential impacts to the circulation system associated with the Proposed Project were analyzed for transportation improvements included in the updated project lists. Volume-to-capacity (V/C) ratios and level of service (LOS) calculations were prepared for Existing, Future without Project, and Future with Project conditions. The "volume-weighted" average of the V/C ratio under Future with Project conditions for all of the analyzed roadway segments would exceed that of existing conditions (0.80 to 0.85 during the AM peak hour and 0.86 to 0.93 during the PM peak hour) and Future without Project conditions (0.83 to 0.85 during the AM peak hour and 0.90 to 0.93 during the PM peak hour). The number of roadway links projected to operate at unsatisfactory levels of service (LOS E or F) under Future with Project conditions exceed the number for existing conditions (21 percent to 29 percent during the AM peak hour and 29 percent to 40 percent in the PM peak hour) and Future without Project conditions (24 percent to 29 percent during the AM peak hour and 34 percent to 40 percent in the PM peak hour).

With the implementation of MP 2035, many of the projects included in the Proposed Project's updated project lists would be extended outside of the Specific Plan boundaries, resulting in a more robust multi-modal network throughout the City of Los Angeles. Full buildout of MP 2035 would also likely require the conversion of additional vehicular travel lanes both within and outside of the Specific Plan boundaries into transit-only lanes or bicycle facilities. The additional growth that would potentially occur with implementation of the ECTNP may worsen congestion in portions of the Specific Plan boundaries beyond the levels identified in the Future with Project conditions. Under current CEQA guidelines and City thresholds, this is considered to be a significant impact. The contribution of the Proposed Project to this cumulative traffic impact would be ***cumulatively considerable***.

Diversion of Traffic

The EIR modeling analysis conducted for the Proposed Project accounts for potential redistribution of vehicular traffic from highly congested links to links that have more available capacity. Along roadways where the Proposed Project would cause significant traffic congestion, diversion of trips could occur onto adjacent parallel routes. It is anticipated that diversion would not occur on streets that operate at LOS D or better during peak periods because the average delay is not substantial. However, for the street segments where the LOS would degrade from D to E or F, some trips could divert to adjacent streets to avoid longer travel times through congested locations. While the Residential Neighborhood Traffic Management (NTM) plans required by LADOT can alleviate neighborhood traffic intrusion from individual developments within the Specific Plan areas, regional growth and associated increases in activity levels may still result in vehicles diverting to residential roadways. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without implementation of the Proposed Project and cumulative projects. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Project conditions, although, as stated, those increases will occur with or

without the project. It is possible that diversions evaluated under the Future with Project conditions could increase with implementation of the MP 2035, as full buildout of that program would remove additional travel lanes in the Specific Plan area. Therefore, the diversion of traffic associated with cumulative conditions would be a significant cumulative impact and the contribution of the Proposed Project to neighborhood intrusion impacts would be ***cumulatively considerable***.

Congestion Management Program

As defined by the Congestion Management Program (CMP), a significant impact would occur when a project would increase traffic demand on a CMP facility by 2 percent of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact would occur when a project would increase traffic demand on a CMP facility by 2 percent of capacity ($V/C \geq 0.02$). On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without implementation of the Proposed Project and cumulative projects. The background growth influences the transportation analysis by accounting for the increased activity levels under Future with Project conditions, although, as stated, those increases will occur with or without the project. Consequently, when comparing traffic operations on the freeway system under Future with Project conditions to existing conditions, peak period congestion would continue to increase as a result of background growth. As stated in Section 5.1.1, with the addition of the cumulative projects, future VMT in the region would be expected to decrease compared to Future without Project conditions. Nevertheless, total future VMT with background growth and cumulative projects would be greater than existing conditions. Therefore, cumulative contributions to CMP freeway segment impacts would be a significant cumulative impact and the Proposed Project's contribution would be ***cumulatively considerable***.

Fire Protection and Emergency Access

A project would normally have a significant impact on fire protection if it would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. It is not expected that cumulative development, including the Proposed Project, would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. Los Angeles Fire Department (LAFD) has a mandate to protect public safety and must respond to changing circumstances and therefore would act to maintain response times. Based on information provided in LAFD's Strategic Plan 2015-2017 (LAFD, 2015) and from meetings with LAFD staff, the ability to provide adequate fire protection services is dependent on numerous factors including staffing levels, mutual aid agreements, deployment strategies, and technological advances in equipment. Moreover, LAFD's primary determinant for assessing future service needs is based on their cumulative review and analysis of past incidents. Options available to LAFD include expanding the Fire Preemption System, increasing staffing levels, and adding new fire station(s) to underserved areas. The potential for new fire station construction is speculative at the present time and is therefore not analyzed in this document. Depending on the location of new fire protection facilities, if they are determined to be needed, operational impacts (primarily noise) could occur; however, such impacts are not foreseeable at this time. Therefore, cumulative impacts to fire protection and emergency access would be ***less than significant***.

5.2 Significant Irreversible Environmental Changes

An EIR must examine irreversible changes to the environment. More specifically, the State CEQA Guidelines require an EIR to consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely” (State CEQA Guidelines Section 15126.2(c)). A “nonrenewable resource” refers to the physical features of the natural environment, such as land, waterways, etc.

Additionally, per Section 15126.2(c), the analysis of significant irreversible environmental changes should consider primary or secondary impacts that commit future generations to similar uses.

Implementation of the Proposed Project would update the TIA fee program and the list of transportation improvements and mitigation measures to be funded, in part, by the impact fees collected from new development. In addition, the proposed amendments would result in administrative changes and minor revisions to the CTCSP and WLA TIMP consistent with local and regional transportation policies. The Proposed Project does not involve any construction and would not result in direct impacts to land use and planning. Implementation of the Proposed Project would indirectly lead to the construction and operation of transportation improvement projects within the project area. The purpose of the proposed updated lists of transportation improvements is to improve mobility in the CTCSP and WLA TIMP Specific Plan areas.

Construction

Implementation of the transportation improvements would involve the consumption of building materials during construction, such as aggregate (sand and gravel), metals (e.g., steel, copper, lead), and petrochemical construction materials (e.g., plastics). This would represent the loss of non-renewable resources, which are generally not retrievable. Aggregate resources are regionally available. Their use for construction of the proposed transportation improvements would not have an adverse effect upon the availability of these resources. Similarly, other building materials, such as metals, petrochemicals, and other construction materials, are market-driven commodities for which adequate supplies are anticipated in the long-term.

Construction of the improvements would also require energy resources such as electricity, natural gas, and various transportation-related fuels. This would represent the loss of non-renewable resources, which are generally not retrievable. These energy resources are not in short supply and their use for project-related construction would not have an adverse effect upon their availability.

Implementation of the Lincoln Boulevard Bridge Enhancement would place permanent structures in the Ballona Channel in order to support the bridge improvements. As identified in Section 4.2, *Biological Resources*, impacts to habitat or wetland resources would be mitigated to a level that is less than significant. Moreover, the presence of these structures would not alter the fundamental nature of the channel or result in a permanent change in biological resources that live in, or rely on, the channel. Nevertheless, if a loss of wetlands resources were to occur, this would be an irreversible environmental change.

Operation

Operation of the proposed transportation improvements would require relatively little use of resources. As described in the transportation analysis (Section 4.6), the multi-modal improvements on the updated lists of transportation improvements would result in higher VMT compared to existing conditions. The increase in VMT is associated with increased growth that will occur with or without the Proposed Project. The Future with Project scenario would result in lower VMT compared to the Future without Project scenario. Therefore, implementation of the Proposed Project would not result in project-related increase in the use of fossil fuels and would not cause significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources.

5.3 Growth-Inducing Impacts

Section 15126(d) of the State CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. This includes projects which would remove obstacles to population growth. Generally, a project is considered to result in growth inducing effects if it causes one of the following:

- The extension of infrastructure (sewer, water, etc.) to an area currently undeveloped and/or lacking adequate infrastructure; or
- The provision of housing or employment to an area currently undeveloped or lacking adequate housing or employment.

The project area is currently a fully developed, populated urban area. While the Proposed Project could lead to transportation improvements, such as enhanced transit and bicycle facilities, which would improve mobility, the Proposed Project would not extend infrastructure to undeveloped areas or areas currently lacking adequate infrastructure. Rather, the transportation projects that would be implemented as a result of the updated lists of transportation improvements in the CTCSP and WLA TIMP would enhance the existing transportation network in the project area. Growth is expected in the project area with or without the amendments to the Specific Plans and the Proposed Project would not change the amount or type of growth anticipated to occur. Implementation of the Proposed Project would facilitate movement within the CTCSP and WLA TIMP areas as growth continues. It would accommodate anticipated infill or density-related growth as envisioned in the Framework and Community Plans. Therefore, implementation of the transportation improvements associated with the Proposed Project would not directly or indirectly induce growth.

5.4 Significant Environmental Effects that Cannot be Avoided if the Proposed Project is Implemented

Chapter 4, *Environmental Impacts*, of this EIR provides a comprehensive identification of the environmental effects of the Proposed Project, including the level of significance both before and after mitigation.

Implementation of the Proposed Project *would not* result in significant and unavoidable impacts in the following resource areas:

- **Biological Resources:** There would be no significant and unavoidable impacts on biological resources, including migratory birds, special status species and habitat areas, other sensitive natural communities, and wetland resources, associated with the construction or operation of the Proposed Project.
- **Greenhouse Gas Emissions:** There would be no significant effects related to construction or operational GHG emissions as a result of the Proposed Project.
- **Land Use and Planning:** There would be no significant effects related to land use and planning as a result of construction or operation of the Proposed Project.

Implementation of the Proposed Project *would* result in the following significant and unavoidable impacts:

- **Air Quality:** Localized effects from daily emissions associated with construction of the Lincoln Boulevard Bridge Enhancement (PM10 and PM2.5), the Lincoln Boulevard and Sepulveda Boulevard BRTs (PM10), and the I-10 Ramp Reconfiguration at Bundy Drive (PM10) would be significant and unavoidable.

Localized construction-related pollutant emissions, in combination with construction of other cumulative development, could result in significant cumulative impacts.

- **Noise and Vibration:** Construction of the transportation improvements associated with the Proposed Project would result in localized and temporary significant and unavoidable noise and human annoyance-related vibration impacts. Operation of the Proposed Project would include a number of improvements to bus service. It is possible that curb-running BRT could increase noise levels at some sensitive land uses by more than 3 dBA. This would be a significant and unavoidable impact.

Construction-related noise and vibration levels associated with project-related construction, in combination with construction of other cumulative development, could result in significant cumulative impacts. Operation of the Proposed Project, in conjunction with other cumulative development, could result in significant cumulative noise impacts.

- **Transportation:** Even with implementation of standard construction techniques, project-related construction impacts to transportation would be significant and unavoidable. Under current CEQA guidelines and City thresholds, implementation of the proposed transportation improvements would result in significant and unavoidable impacts related to vehicular traffic. The Proposed Project would also result in significant and unavoidable impacts related to neighborhood traffic intrusion and CMP freeway segments.

Impacts related to construction, and operational impacts on vehicular traffic, neighborhood traffic intrusion, and CMP freeway segments associated with cumulative development would be cumulatively significant.

5.5 Effects Determined to be Less than Significant

Section 15128 of the State CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and, therefore, were not discussed in detail in the EIR. A Notice of Preparation (NOP) was prepared for the Proposed Project and is included in Appendix C, *Notice of Preparation/Scoping*, of this Draft EIR. The NOP provides a detailed discussion of potential environmental impact areas and identifies both the topics to be addressed in the EIR as well as those topics that were determined to not require analysis in the EIR, for the reasons explained therein. In the NOP, the City determined that impacts of the Proposed Project would be less than significant for following resource areas: aesthetics, agricultural and forestry resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, public services, recreation, and utilities and service system.

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