

## 3.0 CORRECTIONS AND ADDITIONS

As required by California Environmental Quality Act (CEQA) Guidelines Section 15088, this chapter provides corrections or clarifications of certain statements in the Draft Environmental Impact Report (Draft EIR or DEIR). None of the corrections and additions constitutes significant new information or substantial project changes, as defined by CEQA Guidelines Section 15088.5 nor would they result in new significant impacts or an increase in any impact already identified in the DEIR. New information is not significant unless the DEIR is changing in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. While changes have been made to the Proposed Project as a result of comments received regarding the DEIR and through the West Adams-Baldwin Hills-Leimert New Community Plan (Proposed Project) public hearing process, these changes do not constitute significant new information.

Additional context and supplemental information is provided in Section 3.1 entitled, “General Topics”, and Section 3.2 entitled, “Supplemental Draft EIR Impact Area Analysis Regarding Census 2010”. Corrections to existing DEIR text is provided in Section 3.4 entitled, “Corrections and Additions to the Draft EIR”.

### 3.1 GENERAL TOPICS

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#### CITYWIDE CONTEXT

This section is intended to provide a general overview of long-range planning in the City of Los Angeles as well as a brief discussion of recent population growth, trends, and projections and context for the NCP. Additional information (i.e., data sources and methodology) is provided in Final EIR Appendices.

#### REGIONAL PLANS

Southern California Association of Governments (SCAG) is designated as a Metropolitan Planning Organization (MPO) responsible for carrying out federal and state statutory duties within its region which encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles with over 18 million residents.

The California State Office of Planning and Research is authorized through Government Code Section 65040 to guide SCAG in the development of regional plans for transportation, growth management, hazardous waste management and air quality. SCAG is responsible for producing socio-economic estimates and projections at multiple geographic levels. The socio-economic estimates and projections are used for federal and state mandated long-range planning efforts such as the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the Air Quality Management Plan (AQMP), the Federal Transportation Improvement Program (FTIP), and the Regional Housing Needs Assessment (RHNA). Federal and state regulations require that local plans be consistent with the RTP; which requires Community Plans to utilize population forecasts provided by SCAG.

SCAG is required to develop, maintain, and update regional transportation plans on a four-year cycle. The following are the most recent adopted regional transportation plans: 2004 RTP: *Destination 2030*, 2008 RTP: *Making Connections*, and 2012–2035 RTP/SCS: *Towards a Sustainable Future*. Federal laws require that land use allocation in an RTP reflect development patterns most likely to be built in the region. The growth forecast at the regional and small geographic area level is the basis for developing the RTP. The development of the growth forecast is driven by collaboration between SCAG and local jurisdictions who are major contributors to the process. The integration of the regional and local forecasts is achieved through joint efforts and collaboration among the various contributors. For more information on SCAG’s forecasting

methodology and assumptions used to project household and population for the region for the year 2030 go to: [http://rtpscs.scag.ca.gov/Documents/2004/FINAL\\_2004\\_RTP.pdf](http://rtpscs.scag.ca.gov/Documents/2004/FINAL_2004_RTP.pdf).

Many government agencies, including public service providers and other city departments, rely on the same source, the most current SCAG RTP data, for purposes of planning, both for estimates of current population, housing, and employment as well as for projections of future population, housing, and employment. Use of such data is a consistent and best practice for local governments. It is also the Planning Department’s policy to use SCAG RTP data as a benchmark or as a reference point for estimates and projections locally.

**CITY OF LOS ANGELES GENERAL PLAN**

California State Law (Government Code Section 65300 *et seq.*) requires that cities prepare and adopt a comprehensive, integrated, long-term General Plan to direct future growth and development. As stated above, local and regional long-range plans must be consistent. The General Plan is a fundamental policy document. It defines how the city should use and manage its physical and economic resources over time. State Law requires seven General Plan Elements: land use, circulation, housing, conservation, open space, noise, and safety. The General Plan’s guiding document for the City of Los Angeles is the Framework Element, which provides a strategy for long-range growth and development focused around the following guiding principles: grow strategically, conserve existing residential neighborhoods, balance the distribution of land uses; enhance neighborhood character through better development standards; create more small parks, pedestrian districts, and public plazas; improve mobility and access; and identify a hierarchy of commercial districts and centers.<sup>3</sup> The Framework Element establishes the big-picture goals that are then further refined in other planning documents such as the community plans and the zoning code.

The Land Use Element of the General Plan for the City of Los Angeles is comprised of 35 community plans. The 35 community plans guide the physical development of neighborhoods by establishing goals and policies for land use. The community plans implement, at a community level, the citywide goals and policies established in the overarching Framework Element and all other elements of the General Plan.

**CITYWIDE POPULATION TRENDS, GROWTH, AND PROJECTIONS**

The City of Los Angeles has grown from its modest small-town size of 28 square miles with roughly 50,000 persons to over 469 square miles with approximately 3.8 million persons today. The population is anticipated to increase by 14.9 percent to approximately 4.3 million persons by the year 2030, according to the SCAG 2004 RTP (see **Table 3-1**).

<b>TABLE 3-1: PROJECTED POPULATION GROWTH FOR THE CITY</b>				
<b>Planning Subregion</b>	<b>2010 Population*</b>	<b>2030 Projected Population**</b>	<b>Projected Population Growth (2010–2030)**</b>	<b>% Change in Projected Population Growth (2010–2030)**</b>
City of Los Angeles	3,789,593	4,320,975	531,381	14.9%
South Valley	729,702	810,383	80,681	11.1%
South Los Angeles	723,748	793,688	69,940	9.7%
North Valley	695,790	760,004	64,214	9.2%
Central	647,211	823,228	176,017	27.2%
West Los Angeles	407,155	473,614	66,459	16.3%
East Los Angeles	391,963	448,913	56,950	14.5%
Harbor	194,024	211,144	17,120	8.8%

\* **SOURCE:** 2010 Decennial Census.  
 \*\* **SOURCE:** The 2030 projected population is based on SCAG’s 2004 Regional Transportation Plan (RTP). The Department of City Planning (DCP) adjusted the 2030 projected population within each geographic planning area in order to implement the Framework Element of the General Plan for the City of Los Angeles. The overall 2030 projected population for the city was slightly adjusted from SCAG. For more information on the methodology refer to Appendix M of the Final EIR.

<sup>3</sup>Executive Summary, General Plan Framework Element. <http://planning.lacity.org/Framework.html>, accessed April 13, 2015.

The City of Los Angeles has 35 community plan areas located within seven larger geographic planning areas, or subregions (see **Figure 3-1**). The West Adams-Baldwin Hills-Leimert Community Plan Area is located within the South Los Angeles Planning Subregion. The South Los Angeles Planning Subregion, which includes the community plan areas of Southeast Los Angeles, South Los Angeles and West Adams-Baldwin Hills-Leimert, had a population of approximately 723,748 in 2010 (see **Table 3-1**). Population in the Subregion is anticipated to increase by 9.7 percent to approximately 793,688 persons in the year 2030. South Los Angeles represents approximately 13 percent of the anticipated population growth for the entire city (69,940 out of the City’s 531,381 projected population growth).

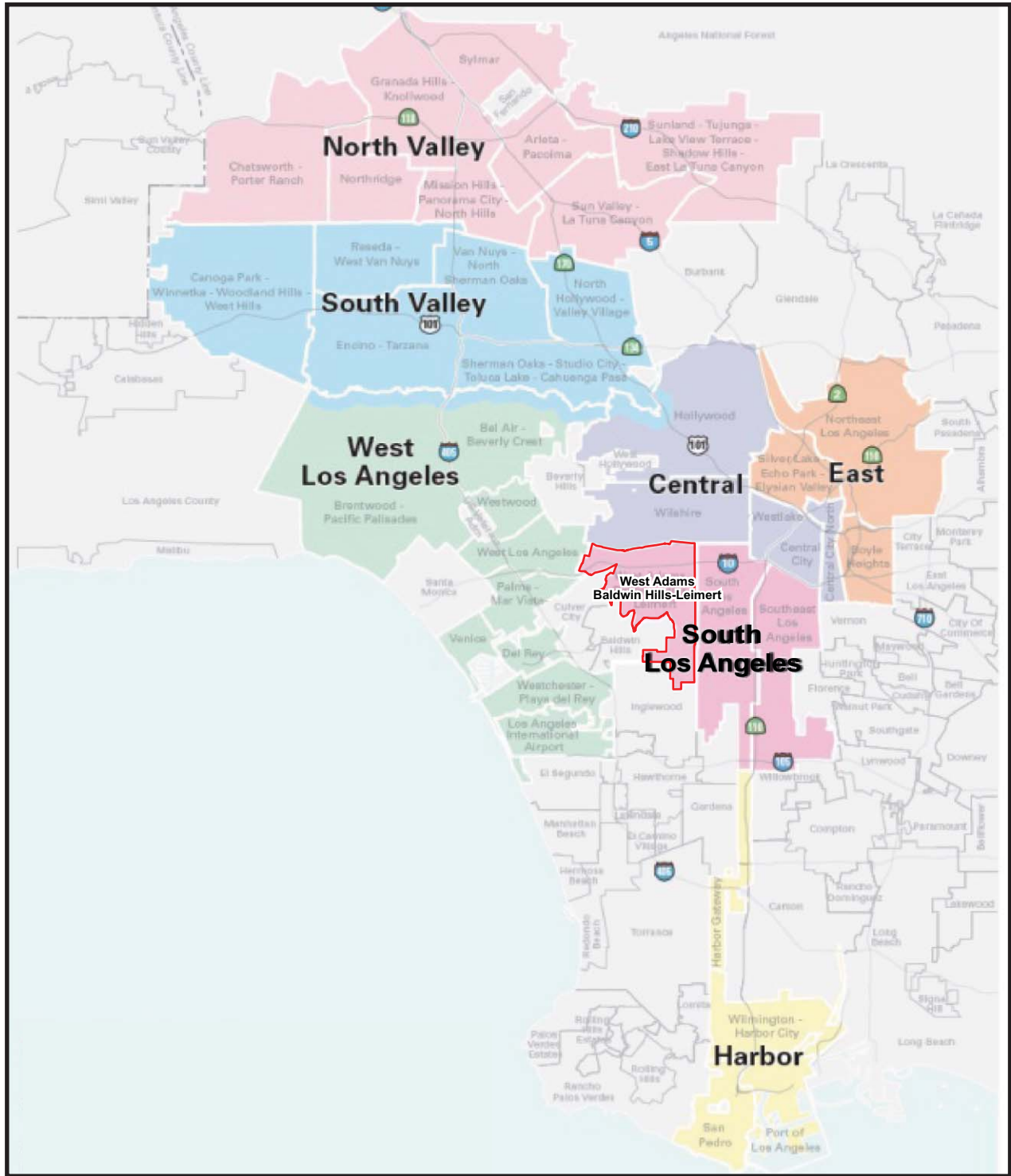
The purpose of projecting future population is to describe the likely future under current trends. In general, projections help city departments to understand where current policies might lead us and to determine whether they are leading us in the direction the city wants to go. They are also used by each city department in preparing long-range plans, such as community plan updates. Every four years, SCAG produces socioeconomic projections that are used by various city departments and agencies for their long-range planning efforts. The Department of City Planning uses SCAG RTP forecasts as a resource when analyzing population growth. In addition to other factors such as current and future land use patterns, the projections help to determine the level of development that could reasonably occur during the life of the plan, often described as the “plan capacity”. In this regard, the distribution or allocation of population growth within the city is based on several factors including: historical development trends, land values, and development costs; and adjustment of historical trends to reflect the attraction of development to areas in proximity to rail, major bus centers, corridors and mixed-use boulevards, community centers, regional centers, and the city center (downtown Los Angeles).

While population growth as determined through regional projections is a fundamental consideration in making long-range land use planning decisions, it is important to note that projections are targets and as with any data, projections have limitations. These figures are only best estimates derived from regional data which are then disaggregated to the city and then the community level. Furthermore, the projections are often based on recent or historical growth trends that may or may not continue as conditions change. That is why projections do not necessarily mirror plan capacity, which is primarily based on a potential build-out of current or proposed land use. The Department of City Planning adjusted the 2030 SCAG citywide projection for population in order to more accurately reflect the City’s overall growth strategy; the General Plan Framework Element, and further allocated community plan capacity, individually, through the New Community Plan (NCP) update process to more accurately address specific local context in implementing the Framework. For more information on the City’s methodology refer to Appendix M.

**POPULATION TRENDS, GROWTH, AND PROJECTIONS FOR THE WEST ADAMS CPA**

The West Adams CPA is a unique 13.5 square mile general urban to suburban community located at the northern face of the Baldwin Hills, approximately 7 miles southwest of downtown Los Angeles, and roughly at the center of the Los Angeles Basin. The community plan area is characterized by low-scale residential neighborhoods adjacent to “main street” commercial districts initially planned and developed as streetcar suburbs in the late nineteenth and early twentieth centuries. Today, the community plan area is distinguished by economically stable and racially diverse neighborhoods where close to 180,000 residents enjoy an environment of flatlands and hillsides, exceptional city views and wildlife preserves. **Table 3-2** shows the historical population trends for the West Adams CPA. For additional information on the history and context of the community plan area refer to the West Adams-Baldwin Hills-Leimert Community Plan text document (see Appendix H of the Final EIR).

<b>TABLE 3-2: POPULATION TREND FOR THE WEST ADAMS CPA</b>					
<b>Area</b>	<b>1970 Population</b>	<b>1980 Population</b>	<b>1990 Population</b>	<b>2000 Population</b>	<b>2010 Population</b>
West Adams CPA	159,090	151,528	169,395	172,913	175,057
<b>SOURCE:</b> Decennial Census data					



**LEGEND:**

- West Adams Baldwin Hills Leimert Community Plan

Approx. Scale



SOURCE: City of Los Angeles Planning Department, TAHA 2016.



**FIGURE 3-1**

**GEOGRAPHIC PLANNING AREAS**

Based on the SCAG 2004 RTP, population within the West Adams CPA is projected to increase by 14.9 percent to approximately 201,220 persons by the year 2030 (see **Table 3-3**). The West Adams CPA would represent approximately 5 percent of the total anticipated growth for the entire city (26,163 out of the 531,382 projected population growth). The overall allocation of the projected population for the West Adams-Baldwin Hills-Leimert CPA would remain relatively the same as in the year 2010, with approximately 5 percent of the city’s projected population residing in the West Adams CPA (see **Table 3-4**).

<b>TABLE 3-3: PROJECTED POPULATION GROWTH FOR THE WEST ADAMS CPA</b>						
<b>Area</b>	<b>2010 Population*</b>	<b>% of Citywide 2010 Population*</b>	<b>2030 Projected Population**</b>	<b>Projected Population Growth (2010–2030)**</b>	<b>% of Citywide 2030 Projected Population**</b>	<b>% Change in Projected Population Growth (2010*–2030**)</b>
City of Los Angeles	3,789,593	100%	4,320,975	531,382	100%	14%
South Los Angeles	723,748	19.1%	793,688	69,940	18.3%	9.7%
West Adams CPA	175,057	4.6%	201,220	26,163	4.6%	14.9%

\* SOURCE: 2010 Decennial Census.  
\*\* SOURCE: The 2030 projected population is based on SCAG’s 2004 Regional Transportation Plan (RTP).

<b>TABLE 3-4: PROPOSED POPULATION CAPACITY FOR THE WEST ADAMS CPA</b>						
<b>Area</b>	<b>2010 Population*</b>	<b>% of Citywide 2010 Population*</b>	<b>2030 Proposed Project Capacity Population**</b>	<b>Planned Population Growth (2010–2030)**</b>	<b>% of Citywide 2030 Projected Population**</b>	<b>% Change in Population (2010*–2030**)</b>
Proposed West Adams CPA	175,057	4.6%	218,741	43,684	5.1%	24.9%

\* SOURCE: 2010 Decennial Census.  
\*\* SOURCE: The 2030 population capacity is based on the land use recommendations of the Proposed Project.

The DCP planned and analyzed a population greater than the SCAG based population projections. The West Adams Proposed Project capacity of 218,741 is 17,521 persons greater than the SCAG projection and represents a 24.9 percent growth from Census 2010. This does not necessarily mean that the population of the CPA will increase by 43,684 persons by the year 2030 but rather that the City analyzed an amount of growth for the area in order to adequately assess the potential environmental impacts given the anticipated land use changes proposed for the area. In this regard, Proposed Project capacity or build-out can be imprecise similar to projections and depends on specific assumptions about future density of development and household size, which may be more, or less, than what actually occurs. Historical trends over the last two decades (see **Table 3-2**) indicate that the percent of change or growth rate for the CPA is about 1 to 2 percent or that roughly 2 to 3 thousand persons are added to the overall population per decade. This is well below the SCAG projected growth of 14.9 percent (see **Table 3-3**). Referring back further to the 1970 and 1980 Census figures, the percentage of change was as high as 11 percent from 1980 to 1990, and decreased to negative -5 percent between 1970 and 1980. The fluctuation in Census data is one reason why projections are more generous than the actual Census data would suggest and why the SCAG projections are utilized primarily as targets to assist in defining a reasonable Proposed Project capacity. For more information on the City’s methodology in determining plan capacity, refer to Appendix M.

## 3.2 SUPPLEMENTAL DRAFT EIR IMPACT AREA ANALYSIS REGARDING CENSUS 2010

The EIR noted that the Proposed Project has significant and unavoidable impacts to the environmental issue areas of aesthetics, air quality, greenhouse gas emissions, noise, public services, and traffic. While the analysis of impacts for most environmental issue areas is based on 2008 dwelling unit estimates, in certain instances the 2008 population and employment estimates were also utilized to establish a Base Year in which to compare existing conditions to the 2030 Proposed Project. In the discussion that follows, where the 2008 estimates were used as part of the analysis, consideration of the 2010 Census data would show 7,543 fewer persons in the West Adams Community Plan Area than were estimated in 2008 (an approximately four percent difference). The 2010 Census data also revealed that there were 158 more dwelling units than estimated in 2008 (an approximately 0.2 percent difference). Much of the analysis of environmental impacts is completed using dwelling unit capacity and, as shown in the following discussion, does not have an effect on the level of impacts analyzed in the Draft EIR. Population, housing and employment data for the West Adams CPA is presented in **Table 3-5**.

<b>TABLE 3-5: POPULATION, HOUSING AND EMPLOYMENT DATA FOR THE WEST ADAMS CPA</b>					
	<b>DCP 2008 Estimate</b>	<b>Census 2010 Data</b>	<b>SCAG 2030 Projection</b>	<b>Current Plan Capacity</b>	<b>Proposed Project Capacity</b>
Population	182,600	175,057	201,220	206,521	218,741
Dwelling Units	66,415	66,573	79,074	81,307	86,118
Employment	44,779	-	-	49,220	53,113
<b>SOURCE:</b> City of Los Angeles Planning, 2011; SCAG, RTP 2004; US Decennial Census, 2010.					

The following section presents a detailed discussion of the analyses and conclusions by issue area using 2010 Census data, as indicated in the Final EIR. It is presented as supplemental analysis, and does not replace the 2008 analysis included in the Draft EIR.

### AESTHETICS

- 2008 Base Year Analysis:** The Final EIR has noted that based on 2008 population, housing and employment estimates, implementation of the Proposed Project would accommodate a capacity increase of up to 19,703 dwelling units 36,151 residents, and 8,334 jobs. Impact analysis under aesthetics was not based on 2008 population, housing and employment data; instead the analysis includes a discussion of existing scenic resources within the CPA such as scenic vistas, scenic resources (i.e. rock outcroppings), existing visual character, and light and glare and shade/shadow conditions, and identifies plans and policies in the Proposed Project that would preserve these identified scenic vistas and resources as well as visual character components. This includes the proposed Community Plan Implementation Overlay (CPIO) Ordinance and amendments to the Crenshaw Corridor Specific Plan as well as policies for directing growth away from existing residential neighborhoods and hillside areas, and towards commercial corridors, nodes and TOD areas. Both the CPIO and Specific Plan Amendments provide regulations that call for commercial revitalization through new development that complements the existing character and scale of neighborhoods thereby conserving neighborhood form and visual character. Additionally, the Proposed Project’s implementing ordinances as analyzed through the Draft EIR delineate the geographic boundaries and parameters for potential maximum height and building intensity of new developments to a level of detail adequate to determine that the Aesthetic section impacts related to views and vistas, and scenic resources, would be less than significant. However, the Draft EIR noted that since specific development projects are unknown at this time and would be speculative to anticipate, the adoption and implementation of the Proposed Project and implementing ordinances could only reduce aesthetic impacts related to visual character, and light and glare to *less-than-significant with mitigation*. Shade and shadow could not be reduced to less-than-significant even

with the Proposed Project's overlay district and specific plan regulations as mitigation. Therefore, due in part to the City's adopted CEQA threshold regarding shade and shadow and uncertainty regarding the specific details of future development, the EIR noted that the Proposed Project would have a **significant and unavoidable** impact with regard to this particular topic area.

- **Census 2010 Analysis and Conclusion:** Based on the 2010 Census, the Proposed Project plans for a capacity increase up to 19,545 additional dwelling units and 43,684 residents between 2010 and 2030. However, the discussion above shows that the 2010 Census data was not used directly to analyze aesthetic impacts of the Proposed Project. The discussion and the analysis would remain the same even if the 2010 Census data were used. The EIR is therefore consistent with Section 15145 of the CEQA Statutes and Guidelines and the Lead Agency did not speculate on the possible project-level aesthetic impacts of future projects, but rather disclosed that, due to the uncertainty, impacts relative to visual character, and light and glare would be **significant without mitigation** and **less-than-significant with mitigation**, and, the impacts relative to shade and shadow would be **significant and unavoidable**.

#### AGRICULTURE AND FORESTRY RESOURCES

- **2008 Base Year Analysis:** The Draft EIR analysis of potential impacts to Agriculture and Forestry Services was not based on the 2008 population, housing and employment estimates. It was based on impacts associated with the conversion of existing farmland, forest land, and timberland, or conflicts associated with changes to the existing zoning of said lands. Therefore, impacts related to agriculture and forestry resources would be **less than significant**.
- **Census 2010 Analysis and Conclusion:** Using the 2010 Census data would not change the impacts or conclusions in the Draft EIR. The majority of land use changes proposed by the West Adams New Community Plan consist of General Plan amendments to create consistency with Framework Land Use designations. The West Adams CPA does not include or possess areas zoned for farmland, timberland or forest land. The Proposed Project includes zone changes primarily along commercial corridors and at centers, none of which are located in an area known for agriculture and forestry services and the Proposed Project does not propose land use or zone changes for properties designated for such resources. Therefore, impacts related to agriculture and forestry resources would remain **less than significant**.

#### AIR QUALITY

##### *Construction - Regional and Localized Emissions*

- **2008 Base Year Analysis:** This impact analysis was based on the Proposed Project's land uses, and specifically on whether or not new land uses would create construction emissions that would violate the South Coast Air Quality Management District's (SCAQMD) recommended thresholds for emissions. Since the Proposed Project directs population growth to the Metro Expo Line and Crenshaw/LAX LRT stations and commercial nodes at major intersections throughout the CPA, these areas will most likely account for increased emissions in the CPA. The West Adams Draft EIR does not have a construction schedule in place for development anticipated under the Proposed Project. Based on this unknown level of construction activity, the impact for construction activities was determined to be **significant and unavoidable** on a program level.
- **Census 2010 Analysis and Conclusion:** Since the analysis for this impact was based on the land uses of the Proposed Project and not on the 2008 population, housing and employment estimates, use of the 2010 Census data would not change the Draft EIR analysis or conclusion for this impact. The TDM strategies for reducing Vehicle Miles Traveled (VMT) included in the Proposed Project would still apply, but based on the land uses of the Proposed Project, emissions would still exceed SCAQMD's thresholds for pollutants. Therefore, this impact would still be **significant and unavoidable**.

### **Operations – Regional and Localized Emissions**

- **2008 Base Year Analysis:** Operational emissions are comprised of mobile source emissions (i.e., motor vehicle trips) and area source emissions (i.e., natural gas consumption for space and water heating), and were based on the average floor area ratio (FAR) for each land use type in the Proposed Project. The Draft EIR analysis at the regional level of future daily emissions under implementation of the proposed project are expected to decrease from existing emissions for all of the assessed pollutants except VOC. The increase in VOC emissions would be less than the SCAQMD daily significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to regional operational concentrations. The Draft EIR analysis of emissions at the localized level was based on the review of the two segments in the CPA with the largest traffic volumes and whether these segments exceeded State CO standards. Micro-scale dispersion modeling determined that the State’s standards would not be exceeded at any intersection within the West Adams CPA assuming implementation of the Proposed Project. Therefore, the Proposed Project would result in *less-than-significant* impacts related to local mobile source CO concentrations as well as regional operational concentrations.
- **Census 2010 Analysis and Conclusion:** The Draft EIR’s analysis of impacts associated with operational emissions is based on VMT generated by population growth of the Proposed Project. In considering 2010 Census data, Master Response 2 of Final EIR Section 2.2, clearly indicates that fluctuations in traffic counts for later years was marginal and therefore its correlative impact on VMT marginal as well. Therefore, use of the 2010 Census data would not change the EIR’s analysis or conclusion for this impact which would remain *less than significant*.

### **Toxic Air Contaminates**

- **2008 Base Year Analysis:** The impact analysis for the exposure of sensitive receptors (children and other vulnerable populations) to pollutant concentrations was based on several factors contained in the *Air Quality and Land Use Handbook: A Community Health Perspective*, published by CARB. This document provides recommendations that local governments should consider when siting new sensitive lands uses. Sources of particular concern include freeways and high-traffic roadways, distribution centers, rail yards, ports, refineries, chrome platers, dry cleaners, and gasoline dispensing facilities. The Proposed Project focuses future potential growth in higher-intensity commercial centers close to transportation and services, such as the Metro Expo Line and Crenshaw/LAX LRT stations and at major intersection commercial nodes located throughout the CPA. These TOD and commercial node areas are where new construction will likely occur, and many sites could be located near such sources. As described by Mitigation Measure AQ2 of the EIR, any *Active Change Area Project* that contains sensitive receptors will be required to implement the guidelines of the CARB Air Quality Handbook. Therefore, operational toxic air contaminant impacts related to the Proposed Project would be mitigated to *less than significant*.
- **Census 2010 Analysis and Conclusion:** As discussed in the Draft EIR, exceedance of SCAQMD significance thresholds regarding operational toxic air contaminants shall be determined at the project-specific level through adherence to Air Quality Handbook guidelines and the requirement of a Health Risk Assessment (HRA) for sensitive receptor projects within 500 feet of the I-10 Freeway. Therefore, use of the 2010 Census data would not change the EIR’s analysis or conclusion for this impact which would remain mitigated to *less than significant*. [Notwithstanding the above analysis, the holding in CBIA v. BAAQMD provides that impacts from the existing environment to a project is not a CEQA impact. Therefore, notwithstanding the analysis in the DEIR or this updated analysis for the 2010 Census, there are no significant impacts from the project related to Toxic Air Contaminants.]

### **Odors**

- **2008 Base Year Analysis:** This impact analysis was based on the Proposed Project’s land uses, and specifically whether or not new land uses would create objectionable construction and/or operational



odors. The Draft EIR discloses that construction projects within the CPA would be temporary in nature and the potential to omit odors would be contained to the site and regulated through the permitting process and construction site inspections. Operational odors associated with new land uses have the potential to emit odors, but most projects generally associated with objectionable odors would be limited by the Proposed Project's predominately neighborhood commercial and commercial manufacturing zoning. Additionally, siting requirements will be applied at the project level to ensure that odors are not objectionable/significant. The Proposed Project focuses future potential growth in higher-intensity commercial centers close to transportation and services, such as the Metro Expo Line and Crenshaw/LAX LRT stations and at commercial nodes throughout the CPA. These areas where future growth will be directed, include a mix of commercial, manufacturing and multi-family residential zoned properties. The Los Angeles Municipal Code currently has regulations related to trash enclosures that include a prohibition of open storage in commercial and multi-family residential zoned properties and regulation for the location and use of trash enclosures on site. Recycling buyback centers, landfills, wastewater treatments, and other typically odor generating uses would be required to obtain a separate discretionary approval (i.e., a Conditional Use Permit), which would require a separate environmental review and mitigation. Therefore, construction and operational impacts associated with Odors would be *less than significant*.

- **Census 2010 Analysis and Conclusion:** Since the impact analysis was based on the land uses in the Proposed Project and not the 2008 population estimates, use of the 2010 Census data would not change the Draft EIR analysis or conclusion for this impact. New development is required to comply with City regulations related to construction activities, location of trash enclosures and trash disposal, among other construction and operational requirements. Therefore, use of the 2010 Census data would not change the Proposed Project's impact on objectionable odors and the impact would remain *less than significant*.

#### ***Consistency with the Air Quality Management Plan***

- **2008 Base Year Analysis:** This impact analysis was based on the Proposed Project's land uses, and specifically whether or not new land uses would create construction and/or operational emissions, including criteria pollutants, which would violate the SCAQMD's recommended thresholds for emissions. It was not based on the 2008 population and employment figures. Since the Proposed Project directs population growth to higher-intensity commercial centers close to transportation and services, such as the Metro Expo Line and Crenshaw/LAX LRT stations and at commercial nodes throughout the CPA, these are areas that will most likely account for increased emissions in the CPA. The emission methodology used by SCAQMD to establish the AQMP emission inventories includes construction emissions based on anticipated regional development. The AQMP updates are generally developed every three to four years; thereby allowing for frequent improvements to the emission inventories. As analyzed in Section 4.13 Population, Housing and Employment, growth associated with the proposed project would not exceed that anticipated for the SCAG Los Angeles region. The construction emissions anticipated were included in the regional AQMP analysis. Consistency with the AQMP can be assessed by determining how a project accommodates increases in population or employment. Generally, a project that is planned in a way that minimizes VMT would also minimize air pollutant emissions. Since the Proposed Project directs growth to TODs and nodes throughout the CPA, thereby reducing VMT over time, this type of project would be consistent with the goals of the AQMP. Therefore, construction and operational impacts associated with the Proposed Project's consistency with the Air Quality Management Plan would be *less than significant*.
- **Census 2010 Analysis and Conclusion:** Since the analysis for this impact was based on the land uses of the Proposed Project and not on the 2008 estimates, use of the 2010 Census data would not change the Draft EIR analysis or conclusion for this impact. Furthermore, Master Response 2 of Final EIR Section 2.2 compared traffic data at several intersections for the years 2005, 2008, 2010 and 2012 which revealed negligible changes to traffic. Therefore, release of the 2010 Census data would not change the conclusions represented by considering 2008 Base Year data, and implementation of the Proposed

Project would not conflict with or obstruct implementation of the applicable air quality plan and the analysis and conclusions in the EIR would remain *less than significant*.

## BIOLOGICAL RESOURCES

- **2008 Base Year Analysis:** The impact analysis for biological resources was based on proposed land uses, the degree to which they would change, and their proximity to biological resources, not on 2008 population, housing and employment data. The Draft EIR analysis identified known special-status plant and wildlife species in the CPA, sensitive habitats, and properties designated as open spaces. The analysis in the Draft EIR also notes policies and implementation programs that would preserve these resources. Open space and significant ecological areas are located along the perimeter of the CPA (e.g. Ballona Creek, Kenneth Hahn SRA). The Proposed Project focuses growth along the commercial and mixed-use corridors near the Metro Expo Line and Crenshaw/LAX LRT stations, which are areas that do not overlap with open space areas or with significant ecological areas. Since no major changes in land use patterns would occur on lands within the open space and significant ecological areas, and any future development would still have to comply with applicable regulations that would protect unknown or previously unidentified biological resources, impacts on biological resources would be *less than significant* except as they apply to migratory birds which would be *less than significant with mitigation*.
- **Census 2010 Analysis and Conclusion:** Using the 2010 Census data would not change the impacts or conclusions presented in the Draft EIR. The majority of land use changes proposed by the West Adams New Community Plan consist of General Plan amendments to create consistency with Framework land use designations, and zone changes primarily along commercial corridors, major intersection nodes and TODs, none of which are located in an area known for candidate, sensitive special-status species, riparian habitats or wetlands. Additionally, the Proposed Project does not propose land use or zone changes for properties that are designated as open spaces, however, migratory bird species do exist, and trees within the West Adams CPA could potentially support migratory birds. The potential impact is not based on the number of new people introduced by this NCP but as a result of new construction activities which could impact migratory bird populations, regardless of existing population levels. Therefore, impacts on biological resources would remain *less than significant* except as they apply to migratory birds which would remain less than significant with mitigation.

## CULTURAL RESOURCES

### *Archeological and Paleontological Resources, and Human Remains*

- **2008 Year Analysis:** The impact analysis for cultural resources was based on proposed land uses and their proximity to known cultural resources in the CPA, and not on 2008 population, housing and employment estimates; therefore, using data from the 2010 Census data would not change the analysis. Given the well-documented occupation by indigenous tribes both prehistorically and historically, there is reasonable potential that development would be located on a site with previously unknown archeological resources. However, the Draft EIR stated that the CPA is considered highly disturbed and any archeological or paleontological resources that may have existed at the surface have likely been disturbed by past development. Since new development would primarily occur in a previously developed urban area, and future projects will have to comply with applicable regulations that would protect unknown and previously unidentified resources, impacts on cultural resources would be less than significant. Any potential change in the base year estimates would not change this conclusion, since the land uses of the proposed NCP, on which this analysis is based, remain the same. Therefore, impacts related to Archeological and Paleontological Resources, and Human Remains were determined to be *less than significant with mitigation*.
- **Census 2010 Analysis and Conclusion:** Using data from the 2010 Census would not change the analysis or conclusions included in the EIR. Any future projects will still have to comply with applicable regulations that would protect unknown and previously unidentified human remains, archaeological

resources and paleontological resources or unique geologic features. Therefore, impacts related to archeological and paleontological resources, and human remains were determined to remain *less-than-significant with mitigation*.

### **Historical Resources**

- **2008 Base Year Analysis:** The impact analysis for historic resources was based on proposed land uses and their proximity to known historic resources in the CPA, and was not based on 2008 population, housing or employment estimates. The EIR identified numerous eligible and designated individual historical resource sites within the CPA as well as the existing La Fayette Square, West Adams Terrace and Jefferson Park Historic Preservation Overlay Zones (HPOZs). The Proposed Project includes policies to protect significant historic resources. These policies and design standards, afford protection and preservation of the existing character of neighborhoods with regards to building orientation, scale, and heights, and do not propose changes to designated historic resources. While a future development project could result in the demolition, alteration, or removal of a designated site, any discretionary project would be subject to environmental review and compliance with existing regulations. Within the West Adams NCP this also includes properties located within the boundaries of the CPIO District subareas that have been identified as eligible for designation through SurveyLA. Therefore, implementation of the Proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Compliance with applicable regulations would ensure this impact is *less than significant with mitigation*.
- **Census 2010 Analysis and Conclusion:** Using data from the 2010 Census would not change the analysis or conclusions included in the EIR because the analysis regarding historic resource impacts was based on the form, scale and location of new development expected in the Proposed Project, as well as the location of existing historic resources. Any potential change in the base year estimates would not change this conclusion. Any future projects will comply with applicable regulations that would protect historic resources. Therefore, the impact on historic resources remains *less than significant with mitigation*.

### **GEOLOGY AND SOILS**

- **2008 Base Year Analysis:** The impact analysis for geology was based on proposed land uses and the proximity of geologic conditions and hazards in the CPA, not on 2008 population, housing and employment data. The EIR analysis used published geologic maps and reports and the City's hazard mitigation plans to establish a Base Year when identifying geologic conditions, mineral resources, and geologic hazards in the CPA. The EIR states that the Proposed Project's geological impact would be *less than significant* because all future development in the CPA will be required to comply with the California Building Code and City of Los Angeles Building Code regulations. Additionally, the Proposed Project includes land use changes that will conserve hillsides, historic resources, and single-family residential uses; future development on hillsides would be minimal because the areas that are not designated Open Space would require extensive land alteration.
- **Census 2010 Analysis and Conclusion:** Using data from the 2010 Census would not change the analysis or conclusions included in the Draft EIR. This is because analysis of geologic impacts depends on the form, scale and location of development expected in the proposed NCP, as well as the location of geologic conditions and hazards in the CPA. The number of dwelling units, residents, and employees at a prior time does not change the location of geologic conditions and hazards, nor does it change the land uses in the Proposed Project. Any future projects will still have to comply with applicable regulations that would not disturb geological areas, mineral resources, and will not create geologic hazards; therefore, the impact on geologic resources remains *less than significant*.

## GREENHOUSE GAS EMISSIONS (GHG)

- **2008 Base Year Analysis:** The greenhouse gas emissions analysis is based on the construction of new residential, commercial, and industrial uses. Greenhouse gas emissions from development under the Proposed Project would arise from project construction and from sources associated with project operation, including direct sources of motor vehicles, natural gas consumption, solid waste, and indirect sources such as electricity generation. Under the Proposed Project, daily vehicle miles traveled (VMT) will increase from approximately 3,559,800 in 2008 to 4,111,500 in 2030 as a result of population growth. The Proposed Project would result in an increase of approximately 205,417 metric tons of CO<sub>2</sub>e per year from existing conditions. Approximately 108,750 metric tons of this increase can be attributed to growth in VMT. As stated earlier, the EIR uses CalEEMod software to quantify the greenhouse gases generated through construction and operation of new residential, commercial, and industrial uses in 2030 compared to 2008 (Base Year) conditions. Implementation of the Proposed Project would result in development that could contribute substantial operational emissions of greenhouse gases and would conflict with the implementation of AB 32. Implementation of feasible mitigation measure GHG1 would reduce this impact, but not to less-than-significant. Therefore, this impact is *significant and unavoidable*.
- **Census 2010 Analysis and Conclusion:** The greenhouse gas emissions impact analysis is based on the construction of new residential, commercial, and industrial uses through implementation of the Proposed Project. The use of the 2010 Census data would result in less impact on greenhouse gas emissions than what was analyzed in the Draft EIR due to a smaller increase in the number of housing units from 2010 to 2030 under the Proposed Project, when compared to the increase from 2008 to 2030 under the Proposed Project. The conclusion and impacts noted in the Draft EIR would not change since project-level specifics that would quantify the amount of greenhouse gas emissions related to project construction and operations is unknown and the marginal change in housing units would not be enough to change the conclusions using the 2008 Base Year data. Therefore, the Proposed Project's impact on greenhouse gas would remain *significant and unavoidable*.

## HAZARDS AND HAZARDOUS MATERIALS

- **2008 Base Year Analysis:** The EIR analyzed the exposure of hazardous materials resulting from the implementation of the Proposed Project, and identification of existing hazardous material sites in the CPA. Under the Proposed Project, industrial land use acreage would decrease from approximately 322 acres to 221 acres. The analysis was not based on the 2008 population, housing, or employment estimates but on existing land uses in 2008 which remain unaffected by Census 2010. The Draft EIR analyzed the exposure of hazardous materials resulting from implementation of the Proposed Project, and identified existing hazardous material sites in the CPA. This included the use, disposal, transport, or management of hazardous materials (i.e., from refineries or dry cleaners), leaking underground storage tanks, wildland fire hazards, and emergency response measures. It also identified implementation programs and policies in the Proposed Project that would lessen safety impacts. Through implementation of the CPIO, the Proposed Project further restricts detrimental uses, incentivizes development in targeted areas, and provides development standards to ensure that new construction is consistent with neighborhood character, as well as corrects minor errors within the existing West Adams Community Plan.

Impacts to hazards and hazardous materials would be primarily limited to the commercial, commercial manufacturing and industrial corridors located throughout the CPA, and the transit-oriented districts near the Expo Phase I and Crenshaw/LAX LRT stations, which are areas that include proposed up-zones where population density increases may occur. Construction activities associated with new development could involve the transport or release of hazardous materials (i.e., lead or asbestos), and certain land uses may involve the use of hazardous materials (i.e., refrigerants or cleaners). Construction activities could expose a greater number of people to safety hazards since a greater density of residents and employees is planned for the commercial nodes and transit-oriented districts. Some schools near these districts may also be exposed to safety hazards from adjacent construction, haul routes, and land uses involving

hazardous materials. Additionally, impacts to emergency response plans could occur as a result of construction activity at these locations. However, all new development will be required to comply with applicable federal, state and local regulations, such as the California Building Code, that would ensure that new structures and activities do not expose people to injury as a result of hazardous materials or conditions. Additionally, areas that are prone to wildfire hazards are located in areas where the Proposed Project limits growth by preserving large residential lots, open space, and hillside areas. Therefore, hazards and hazardous materials impacts would be *less than significant* for all areas except for hazardous materials sites and *less than significant with mitigation for hazardous material sites*.

The DEIR also analyzed the cumulative impact of land uses that could involve the use of greater quantities and variety of hazardous products. The cumulative context included future development under the Proposed Project, the City's 34 other community plans, and the County of Los Angeles General Plan. Although new development in the County, CPA, and throughout the City could create new sources of hazardous materials, emissions, and/or waste due to construction, demolition, or operational activities, compliance with state, federal and local regulations (i.e., Cal OSHA, SCAQMD, Cal/EPA regulations) would ensure that the cumulative impact would be *less than significant*.

- **Census 2010 Analysis and Conclusion:** Using data from the 2010 Census would not change the analysis or conclusions included in the EIR. Any future projects will still have to comply with applicable regulations so as not to impact human health and the environment from exposure to hazardous materials. Therefore, using the 2010 Census population data would not change the conclusion that the Proposed Project's impacts on hazards and hazardous materials which would continue to be *less than significant* for all areas except for hazardous materials sites and *less than significant with mitigation for hazardous material sites*.

## HYDROLOGY AND WATER QUALITY

- **2008 Base Year Analysis:** The Draft EIR analyzed the potential impacts to water quality, including surface, groundwater, stormwater drainage, and flooding and inundation resulting from the implementation of the Proposed Project. The analysis was not based on the 2008 population, housing, or employment estimates. It was based on the existing development pattern of land uses in 2008, which did not change by 2010. For instance, existing conditions looked at 2008 existing build-out, number of vacant parcels that could contribute to decreased rates of runoff, land uses that allow drilling that create changes in groundwater conditions, among others. Therefore, the Proposed Project's impacts related to Hydrology and Water Quality would be *less than significant*.
- **Census 2010 Analysis and Conclusion:** Using data from the 2010 US Census would not change the analysis or conclusions included in the EIR which were based on the existing condition pattern of development which did not change from 2008 to 2010. While 2010 Census data may have shown lower population counts, the existing number of buildings remained relatively consistent. Furthermore, any future projects will still have to comply with applicable regulations so as not to impact human health and the environment. Therefore, the Proposed Project's impacts related to Hydrology and Water Quality would remain *less than significant*.

## LAND USE AND PLANNING

- **2008 Base Year Analysis:** The analysis in this section focuses on the compatibility of land uses identified in the Proposed Project with existing and planned land uses within the Community Plan Area, as well as consistency with any applicable land use plans, policies, or regulations. The analysis is not based on 2008 population, housing and employment estimates. For example, the Draft EIR analyzed whether the Proposed Project would substantially disrupt, divide or isolate existing neighborhoods, communities, or land uses, conflict with any applicable land use plan, or result in a substantial increased potential for land use conflicts and nuisance relationships between existing and future land uses. The land use analysis presented the Proposed Project's land use and zone changes, and the Proposed Project's

policies relevant to land use and discussed how they are consistent with a range of regional policy and land use plans, including but not limited to the following: SCAG Regional Transportation Plan, SCAG Compass Growth Vision, South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP) Metropolitan Transportation Authority (MTA) Congestion Management Program, and the City's General Plan. Further, the Proposed Project focuses new growth to commercial nodes and TODs, minimizing changes to stable neighborhoods and reducing potential land use conflicts. The Proposed Project's impact on land use would be *less than significant*.

- **Census 2010 Analysis and Conclusion:** As noted above, since the land use analysis was primarily based on the calculation of acreage per land use category, and location and intensity of potential development, use of the 2010 Census data as the base year for the analysis would not change the conclusion of this analysis and impacts identified in the Draft EIR. Therefore, the impacts regarding the Proposed Project's land use and other land use plans and policies would continue to be *less than significant*.

## MINERAL RESOURCES

- **2008 Base Year Analysis:** The impact analysis for Mineral Resources was based on proposed land uses and their proximity to mineral resource areas, not on 2008 population, housing and employment data. The Draft EIR considered development that includes placement of structures over mineral resource areas, or blocks access to a mineral resource area, or results in the loss of availability of resources. Impacts are determined based on whether the Proposed Project would result in a loss of, or loss of access to, identified mineral resources, and whether the loss of access would be permanent. The importance of the mineral resource on a State, regional and local level, in terms of economic value, remaining supply, and feasibility of recovering the resource is also taken into consideration. Therefore, the impacts on mineral resources remains *less than significant*.
- **Census 2010 Analysis and Conclusion:** Using data from the 2010 Census would not change the analysis or conclusions included in the Draft EIR. This is because analysis of mineral resource impacts depends on the form, scale and location of development expected in the Proposed Project, as well as the existing location of mineral resources in the CPA. The number of dwelling units, residents, and employees at a prior time does not change the location of mineral resources, nor does it change the land uses in the Proposed Project. Any future projects will still have to comply with applicable regulations that would not disturb mineral resources, and will not create geologic hazards; therefore, the impact on mineral resources remains *less than significant*.

## NOISE

- **2008 Base Year Analysis:** The noise impact analysis is based on measurements of actual noise, anticipated construction and the traffic analysis. As described in the Draft EIR, the primary source of noise in the West Adams CPA is from motor vehicles on roadways. Secondary noise sources include construction activities, freight and commuter rail services, industrial uses, and stationary sources such as heating and ventilation systems on large commercial and multi-family residential buildings. Existing daytime noise levels were monitored at eight locations in the CPA and the average noise levels and sources of noise measured at each location are identified in Table 4.12-4 of the Draft EIR. Existing roadway noise levels were also calculated for roadway segments in the CPA that are approximate to existing or future noise-sensitive uses, and are noted in Table 4.12-8 in the Draft EIR. This task was accomplished using the Federal Highway Administration Highway Noise Prediction Model and traffic volumes from the project traffic analysis. As described above, the noise analysis of the existing and future noise environment is based on noise-level monitoring, noise prediction modeling, and empirical observations. However, because specific development projects are unknown at this time, the adoption and implementation of the Proposed Project could have a *significant and unavoidable* impact on construction related noise levels.

- **Census 2010 Analysis and Conclusion:** As noted above, the noise analysis was not solely based on the 2008 population, housing and employment data, but rather was based on measurements of actual noise, anticipated construction, and the traffic analysis. Since the number of people in the CPA is less in the year 2010 than estimated for 2008 and the number of dwelling units is slightly greater in 2010 than 2008, it is assumed that there would be less primary and secondary noise sources in 2010. However, the release of the 2010 Census data would not change the 2030 population capacity projections and would not change the distribution of land uses under the Proposed Project.

Therefore, the overall analysis and conclusions would not change. Impacts identified as less-than-significant with and without mitigation measures would not change with the release of the 2010 Census data and neither would impacts identified as significant and unavoidable change through consideration of 2010 Census data. For instance, projects will still be required to comply with Los Angeles Municipal Code (LAMC) Sections 112.02 and 115.02, which regulate HVAC units and amplified sound, respectively. Nevertheless, impacts associated with construction related noise levels and development would remain *significant and unavoidable* since specific details of individual development projects are unknown.

## POPULATION, HOUSING, AND EMPLOYMENT

- **2008 Base Year Analysis:** The impact analysis regarding population, housing and employment was conducted by comparing growth in the CPA with SCAG's growth projections for the City, the South LA Planning Subregion and the West Adams CPA. The analysis looked at whether growth under the Proposed Project accommodates, or meets, local and regional forecasts, whether it is consistent with Framework principles of targeted growth, and/or whether it would result in the displacement of housing or people. In addition, the analysis considered whether population growth and increased development were previously assumed to occur in a particular area. The Proposed Project focuses future potential growth (in terms of infill projects) into higher-intensity transit-oriented districts in proximity to the Metro Expo Line and Crenshaw/LAX LRT stations and at commercial nodes located at the intersection of major arterial streets throughout the plan area. These areas where future growth will be encouraged, include a mix of commercial, light industrial and multi-family residential zoned properties.

As shown in the Draft EIR, the Proposed Project has a capacity of approximately 218,741 residents, 86,118 housing units, and 53,113 jobs. The Proposed Project capacity meets and exceeds SCAG projections as allocated for the West Adams CPA. As noted in Appendix M (Methodology), DCP's goal is to align community plan land use capacities with the overall SCAG projections for the City in order to be consistent with other departments and agencies who plan for and provide public services and infrastructure to the City. However, efforts to allocate growth at the planning subregion or CPA level cannot be static. Individual community plan updates and planning subregion capacities may differ from earlier DCP efforts to reallocate, or adjust the overall citywide SCAG allocation in order to better address areas, such as the West Adams CPA, where substantial light rail transit investment anticipates transit-oriented development (TOD). Because potential growth (which primarily will involve infill redevelopment) under the Proposed Project and throughout the rest of the City is evaluated at the city, planning subregion and CPA level, growth consistent with the citywide projected SCAG 2030 levels is ensured and adverse cumulative impacts to adopted City or regional housing plans would not result.

Furthermore, referring to **Table 3-6**, the land use recommendations of the Proposed Project increase capacity by 36,151 people and 19,703 housing units from the 2008 Base Year estimates. Because an EIR must include a description of the Base Year conditions against which project-related impacts are compared, in this instance, the "delta", or difference between the Base Year 2008 conditions and the future 2030 build-out conditions of the Proposed Project is presented primarily for informational purposes only. By and large, the "delta", in and of itself, is not used to determine whether the implementation of the West Adams NCP, which has a 20-year planning horizon, would result in significant environmental impacts.

<b>TABLE 3-6: POPULATION, HOUSING, AND EMPLOYMENT COMPARISONS FOR THE WEST ADAMS CPA</b>						
	<i>Existing (2008)</i>	<i>2010 Census</i>	<i>Current Plan Capacity</i>	<i>Proposed Project Capacity</i>	<i>Change from Existing (2008) to Proposed</i>	<i>Change from 2010 to Proposed</i>
Population	182,600	175,057	206,521	218,714	36,151	46,342
Housing	66,415	66,573	81,307	86,118	19,703	19,545
Employment	44,779	--	49,220	53,113	3,893	--
Resident-to Housing Ratio	0.67	--	0.60	0.61	--	--

**SOURCE:** City of Los Angeles Planning, 2011; SCAG, RTP 2004; US Decennial Census, 2010.

As discussed in Appendix M, Methodology, the Proposed Project capacity is intended to meet SCAG projections for the City and the CPA, and exceed those projections for where circumstances have changed due to factors such as market demand, trends, the introduction of transit or other infrastructure changes as is the case for the West Adams CPA. Exceedance of SCAG projections do not necessarily trigger the CEQA significance threshold, rather, the determination of significance of impacts is based primarily on the end-state condition, or in this case, whether future conditions under the Proposed Project’s 2030 capacity would exceed established thresholds of significance as listed on page 4.13-10 of the Draft EIR. Therefore, impacts with regard to population, housing and employment would be less than significant.

- Census 2010 Analysis and Conclusion:** The 2010 Census revealed that there were 7,543 fewer persons in the West Adams Community Plan Area in 2010 than were estimated in 2008 (an approximately four percent difference). The 2010 Census also revealed that there were 158 more dwelling units than estimated in 2008 (and approximately 0.2 percent difference). Employment data for the 2010 Census was not considered as part of this supplemental analysis. The 2010 Census did not include this data. As discussed through the Methodology Appendix and Master Response 1A, increases (or decreases) in population and housing growth can be attributable to several factors such as vacancy rates, possible undercounts and other demographic factors. However, these fluctuations do not change the conclusions presented in the Draft EIR about population and housing since the determination of significance of impacts is based primarily on the Proposed Project 2030 build-out condition and whether it triggers direct or indirect impacts as outlined on page 4.13-14 of the Draft EIR. As shown in the **Table 3-6**, using the 2010 Census data as the Proposed Project Base Year would result in a capacity “delta” of 46,342 people and 19,545 housing units between 2010 and 2030. Although the capacity “delta” differs from that described above using the 2008 Base Year, and the EIR disclosed a lower “delta” in population by using the 2008 estimate as the Base Year, as stated earlier, to include new analyses using 2010 census data would not yield new or more severe environmental impacts primarily because the “delta” would not influence the determination of significance of impacts and thresholds of significance. Additionally, it is important to note that since the Census 2010 dwelling unit data was slightly higher than the 2008 Base Year estimate, the EIR actually disclosed the greater housing “delta”. Regardless, the 2010 data would not change the conclusion of this analysis and impacts identified in the EIR and implementation of the Proposed Project would not adversely impact physical change in the environment nor be inconsistent with Framework or the Housing Element; therefore, the impacts related to population, housing and employment would remain *less than significant*.

**PUBLIC SERVICES**

*Fire Protection and Emergency Services*

- 2008 Base Year Analysis:** Impacts on fire protection services are considered significant if the implementation of the Proposed Project would result in an increase in population or would result in response times that would exceed that established goal of 5 minutes 90 percent of the time, which could



require the construction of new fire protection facilities or the expansion of existing fire protection facilities. Therefore, the impact analysis on fire also considered the proposed land uses and existing fire stations in the CPA. As discussed in the Draft EIR, changes to land uses under the Proposed Project would accommodate projected growth if it occurs. However, an increase in population and/or changes to land uses by itself would not increase demand for a new fire station. Factors such as emergency response times are used by the Los Angeles Fire Department (LAFD) to determine adequacy of service. On a yearly basis, LAFD assesses its resources and reallocates them based on demand and need citywide. For instance, in 2014, the average travel time (or response time for fire services) for Fire Station 34 serving the Crenshaw Community was about 4:28 minutes, which is below the City’s response time goal of 5 minutes, (see **Table 3-7**).

<b>TABLE 3-7: AVERAGE TRAVEL TIME FOR NON-EMERGENCY SERVICES AND EMERGENCY SERVICES - 2014</b>	
<b>Station Number</b>	<b>Average Travel Time (Non-EMS/EMS)</b>
26	3:35/3:49
66	4:14/4:18
34	4:28/4:16
43	4:07/3:38
58	4:21/4:20
68	4:29/4:07
94	3:59/4:07

**SOURCE:** City of Los Angeles Fire Department, *FireSatLA* Response Metrics, 2014.

Even though population and housing have increased within the CPA since 2010 (according to the Planning Department’s 2014 Growth & Infrastructure Report) response times have improved. As discussed in the Draft EIR, the provision of new fire stations varies more as a function of not only the geographic distribution of physical structures, but access to trucks, ambulances, and other equipment as well as the location of the CPA.

**Table 3-7** shows the average travel time for the year 2014 for non-emergency services (non-EMS) and emergency services (EMS) for the seven fire stations that serve the West Adams CPA. Additionally, the Proposed Project focuses future potential growth in higher-intensity commercial centers close to transportation and services, such as the Metro Expo Line and Crenshaw/LAX LRT stations and at commercial nodes throughout the CPA. These areas are served by Station Nos. 26, 66, 34, 43, 58, 68 and 94, and existing operational structures, policies and regulations (i.e., policies related to the emergency response systems in the Safety Element as well as the Fire Code) will ensure that the LAFD can adequately plan for and serve the new growth, which will be incremental and would take place over a period of at least 20 years. It is also expected that the LAFD will maintain acceptable emergency response times with the provision of additional personnel and equipment as needed for the duration of time that the West Adams New Community Plan is in place. Therefore, impacts related to fire protection and emergency services under the Proposed Project would remain *less than significant*.

- Census 2010 Analysis and Conclusion:** The release of the 2010 Census population number would not change the analysis since impacts from the construction of new or altered fire stations is based upon several factors including proposed land uses and growth and the Draft EIR concluded that implementation of the Proposed Project would not cause the construction of a new fire station. As indicated above, the provision of a new fire station varies more as a function of not only population but on the geographic distribution of physical structures, access to equipment, and the location of the CPA. Furthermore, new individual projects within the West Adams CPA would be required to submit development plans to the LAFD to ensure there would be adequate fire flow and proper hydrant siting, and that the overall site plan layout complies with the Fire Code. Since areas of growth proposed by the plan are currently served by seven stations in and around the CPA, and Fire Code and Safety Element policies ensure that the LAFD can adequately serve this new growth, this impact remains *less than significant*.

### ***Police Protection Services***

- **2008 Base Year Analysis:** This section analyzes the potential physical environmental effects related to police protection impacts created by construction of new or additional facilities associated with implementation of the Proposed Project. As discussed in the Draft EIR, the crime rate and type of crime, which represents the number of crimes reported, affects the “needs” projection for staff and equipment for the Los Angeles Police Department (LAPD). In addition to crime rates, the LAPD’s operational statistics are also analyzed in terms of response time. The provision of new police stations varies more as a function of the crime rate and response time than population increases. Further, unlike fire protection services, police units are often in a mobile state; hence actual distance between a headquarters facility and the project site is often of little relevance. Instead, the number of officers on the street is more directly related to the realized response time. With the increase in population, commercial and retail land uses, and dwelling units under the Proposed Project, there will likely be an increase in demand for police protection services. Since the Proposed Project concentrates development along established commercial thoroughfares such as Crenshaw Boulevard, and particularly, adjacent to the Metro Expo Line and Crenshaw/LAX LRT stations, implementation of the Proposed Project could foreseeably require the addition of a new police station or the expansion, consolidation or relocation of an existing facility to maintain service. However, demand could be met incrementally over time using a combination of operational factors applied to facilities within a service area geographically larger than the CPA. Construction impacts would not cause significant environmental impacts relative to maintaining acceptable police service ratios, response times, or other performance objectives and compliance with existing regulations would insure this impact remains less than significant. Nonetheless, new developments associated with the Proposed Project could result in the need for increased police protection services. Therefore, impacts related to police protection services under the Proposed Project would be *mitigated to less than significant*.
- **Census 2010 Analysis and Conclusion:** The Proposed Project which guides development through the year 2030, and provides capacity for a population increase of roughly 20 percent using the 2008 estimate and 25 percent considering Census 2010 data. Using the National Association of City Managers and Police Department standard of 4 police officers per 1,000 residents to determine the adequate level of deployment of police officers by 2030, the project’s increased 2030 capacity for a population growth of 36,141 persons using the 2008 estimate, or 46,342 persons using the 2010 Census data would require 39 additional officers; an increase from approximately 145 officers to 184 officers. Although the increase in population would result in an increase in demand for police protection services within the West Adams CPA, this change would be incremental and occur over an extended period of approximately 20 years. In accordance with the City of Los Angeles General Plan, the LAPD would be expected to monitor and forecast demand for existing and projected police services and maintain acceptable response times through the addition of new officers as projects are built. Therefore, using the 2010 Census data would not alter the analysis or conclusions in the DEIR with regard to the operations of police protection services which be *mitigated to less than significant*.

### ***Public Schools***

- **2008 Base Year Analysis:** The EIR evaluated the impacts based on enrollment data provided by LAUSD. Student generation is based on residential units and not population. **Table 3-8** shows anticipated student generation based on housing units for the 2008 Base Year and 2010 Census. Based on changes associated with the Proposed Project, student enrollment in elementary, middle, and high schools serving the West Adams CPA would be expected to increase by as much as 6,261 students by 2030. The increases in enrollment would exceed the current available capacity of existing schools. However, LAUSD’s New School Construction Program will relieve overcrowding and address facility needs through the construction of new classroom seats and the replacement and expansion of athletic and play space at school sites.

<b>TABLE 3-8: ANTICIPATED STUDENT GENERATION</b>					
Use	Dwelling Units (DU) or Buildable Square Feet			Student Generation Rate	Students Generated 2008/ 2010
	2008 / 2010	2030	Net		
<b>ELEMENTARY SCHOOL</b>					
Residential DU /a/	66,415 / 66,573	86,118	19,703 / 19,545	0.1496 per DU	2,947 / 2,924
Commercial /b/	12,754,739	16,623,423	3,868,684	0.0238 per 1,000 sq. ft.	92
Light Industrial /c/	7,573,013	4,335,062	(3,237,951)	0.0287 per 1,000 sq. ft.	(93)
<b>Total Elementary School Students Generated</b>					<b>2,946 / 2,923</b>
<b>MIDDLE SCHOOL</b>					
Residential DU	66,415 / 66,573	86,118	19,703 / 19,545	0.0763 per DU	1,503 / 1,491
Commercial	12,754,739	16,623,423	3,868,684	0.0123 per 1,000 sq. ft.	47
Light Industrial	7,573,013	4,335,062	(3,237,951)	0.0150 per 1,000 sq. ft.	(48)
<b>Total Middle School Students Generated</b>					<b>1,502 / 1,490</b>
<b>HIGH SCHOOL</b>					
Residential DU	66,415 / 66,573	86,118	19,703 / 19,545	0.0921 per DU	1,814 / 1,800
Commercial	12,754,739	16,623,423	3,868,684	0.0123 per 1,000 sq. ft.	47
Light Industrial	7,573,013	4,335,062	(3,237,951)	0.0148 per 1,000 sq. ft.	(48)
<b>Total High School Students Generated</b>					<b>1,813 / 1,799</b>
<b>Total Students Generated by Proposed Project</b>					<b>6,261 / 6,212</b>
<small>/a/ The student generation rate for multi-family units was used to determine the students generated by the residential component of the Proposed Project.                      /b/ The student generation rate for retail and services was utilized to determine the students generated by the commercial component of the Proposed Project. For purposes of this study, commercial land use is composed of regional commercial, neighborhood commercial, and community commercial.                      /c/ For purposes of this study, industrial land use is comprised of limited industrial and hybrid industrial.  <b>SOURCE:</b> Los Angeles Unified School District, Commercial/Industrial Development Fee Justification Study, 2008; Los Angeles Unified School District, School Facilities Analysis, 2009; and TAHA, 2011.</small>					

In the event that LAUSD constructs a new school or physically alters an existing facility, a project specific environmental analysis would be required and would address site-specific environmental concerns. Additionally, all future residential projects in the CPA will be required to pay school fees for the purpose of funding the construction or reconstruction of school facilities. SB 50 authorizes the LAUSD to collect such fees associated with increasing school capacity as a result of development, and the provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts. Therefore, implementation of the Proposed Project would result in less-than-significant impacts related schools.

- Census 2010 Analysis and Conclusion:** Referring again to the revised **Table 3-8**, above, using the 2010 Census data would result in a smaller increase in dwelling units from 2010 to 2030 under the Proposed Project when compared to the increase from 2008 to 2030 under the Proposed Project. A net increase of 19,545 additional housing units as opposed to 19,703 occurs utilizing the 2010 Census data. This would equate to a total decrease in student enrollment capacity of 6,212, or 49 fewer students. Regardless, the minor adjustment in enrollment would still exceed the current available capacity of existing schools, and using the 2010 Census data would not change the conclusions of the EIR, therefore, impacts related to schools would remain *less than significant* through compliance with State Code Section 65995 and SB 50.

**Libraries**

- 2008 Base Year Analysis:** Implementation of the Proposed Project would result in a projected increase in population and require the expansion of existing libraries and/or the development of a new library. The EIR impacts were evaluated based on LAPL Branch Facilities Plan standards that describe minimum size facilities for service area populations. As a general rule, the recommended sizes are 12,500 square foot facilities for communities with less than a 45,000 population and 14,500 square foot facilities for communities with more than 45,000. In addition, the LAPL plan also recommends that when a

community reaches a population of 90,000, an additional branch library should be considered for that area. As described in **Table 3-9**, below, most of the libraries within the CPA do not meet these facilities standards. In all, there is a total of 49,012 square feet of existing library space for a service area population of 238,544. Important to note is that Branch libraries serve more than one community plan area and it is speculative to assign a percentage or ratio of the total available library space that serves the residents of any given community plan area, particularly since the library services for the CPA can be enhanced when other nearby branch libraries are taken into consideration. Therefore, the Proposed Project would result in a *significant and unavoidable* impact related to public libraries.

Facility	Existing	Projected (2030)	Existing Library (Square Feet)	Consider Additional Branch
Angeles Mesa	31,974	33,678	5,243	
Baldwin Hills	74,420	78,389	12,000	x
Hyde Park	24,811	26,101	10,500	
Jefferson	48,910	51,557	9,000	
Washington Irving	58,429	62,036	12,269	

Note: Future library square feet is estimated by service area population growth.  
SOURCE: LAPL Branch Facilities Plan, 2007 and West Adams Community Plan EIR.

- Census 2010 Analysis and Conclusion:** Another approach is to apply the State Library standard of 0.5 square-foot per capita (as cited in the City’s General Plan Framework). **Table 3-10** shows population data from the 2008 Base Year, 2010 Census, and the comparative library capacity of the Proposed Project. Based on the 2010 population data, this standard generates a requirement of 87,582 square feet of library space, compared to a requirement for 91,300 square feet based on the 2008 population estimate. Using the 2010 Census data would potentially result in a greater impact due to the “delta” increase in the number of people from 2010 to 2030 under the Proposed Project when compared to 2008. However, this difference is less than 10% and the provision of adding or expanding library services is not solely determined by population. Standards of the Library Branch Facilities Plan, as well as online services that provide access to the library’s online catalog, information databases, and multi-media software are also considered in determining the provisions for adding and expanding library services and would not change the conclusions of the EIR. Nevertheless, the overall 2030 population number would not change, and the CPA remains deficient in library space with or without the Proposed Project, regardless of the 2010 Census population data. Therefore, impacts related to public libraries would remain *significant and unavoidable*.

	Existing Population (2008)	2010 Census	Current Plan Capacity	Proposed Project Capacity	Difference between Proposed Project Capacity and 2008	Difference between Proposed Project Capacity and 2010
Population	182,600	175,057	206,521	218,741	36,141	46,684
Library Space (based on standard)/a/	91,300 sf	87,582 sf	103,260	109,370	18,070 sf	21,788 sf

Note: sf = square feet  
/a/(X=0.5 square feet x population)  
SOURCE: State Library Standards.

**Public Parks**

- 2008 Base Year Analysis: This impact analysis considered the potential environmental effects related to the construction of new or physically altered park facilities. The impact analysis on parks was based on the population capacity and acres of parkland under the Proposed Project’s 2030 capacity. The analysis also included a discussion of existing and proposed regional facilities, local parks, and policies that preserve and enhance the availability of parks. A standard of 4 acres per 1,000 residents for combined neighborhood and community parks and six acres per 1,000 residents for regional parks is considered adequate for each CPA. The Final EIR revised and noted that the total parkland in the CPA is approximately 432 acres (Refer to Table 4.14-14 of the Final EIR Corrections Section 3.4 as well as Final EIR Master Response 5: Parks and Open Space).

**Table 3-11** shows population data for the 2030 Proposed Project, and includes the assumption that the total parkland in the CPA remains constant over the life of the Proposed Project. Based on the 2030 population capacity of 218,741 persons and 432 acres of parkland, the parkland ratio for the Proposed Project is calculated at 1.97 acres per 1,000 residents, which is below the combined neighborhood, community and regional standard of 10 acres per 1,000 residents. Since the CPA is parkland deficient and parkland designated (OS) by the Proposed Project is marginal (involving zone consistency updates for recent and existing pocket park facilities) this amount is used to determine the impact of the Proposed Project capacity (2030) on public parks. Therefore, implementation of the Proposed Project would result in a projected increase in population and require the expansion of existing park facilities and the development of new parks and results in a *significant and unavoidable* impact related to public parks.

<b>TABLE 3-11: FUTURE (2030) DEMAND FOR PARKS AND RECREATIONAL FACILITIES IN THE WEST ADAMS CPA</b>						
<b>Recreational Facility Type</b>	<b>Acres per 1,000 residents Standard/a/</b>	<b>Future Population (2030)/b/</b>	<b>Future Ratio (Acres per 1,000 residents)</b>	<b>Existing Acres/c/</b>	<b>Needed Acres /d/</b>	<b>Acre Deficit</b>
Neighborhood Parks	2	218,741	0.12	26.62	437.48	410.86
Community Parks	2		0.31	67.37	437.48	370.11
Regional Parks	6		1.54	338.00	1,312.45	974.45
<b>Total</b>	<b>10</b>		<b>1.97</b>	<b>431.99</b>	<b>2,187.41</b>	<b>1,755.42</b>
<small>/a/ Recommended standard per the City of Los Angeles Public Recreation Plan.                      /b/ Reasonable expected population based on capacity of the Proposed Project.                      /c/ Includes parks, open spaces and recreational centers located within 0.5 mile of the West Adams CPA.                      /d/ Acres needed to meet Public Recreation Plan standards.  <b>SOURCE:</b> SCAG, <i>Regional Transportation Plan</i>, 2008; 2000 U.S. Census; TAHA, 2013.</small>						

- **Census 2010 Analysis and Conclusion:** Using the 2010 Census data as the new Base Year would not change the conclusion of the analysis since the threshold for park impacts is only based on total future population and park acreage. Nonetheless, a comparison of the three scenarios (2008 Base Year, 2010 Census, and 2030 Proposed Project) indicates that the impact remains substantially the same. **Table 3-12** shows population data for these three scenarios and the calculated parkland ratios for each year. Based on the 2010 Census, parkland ratio is 2.46 acres per 1,000 residents, slightly more than compared to the 2008 Base Year parkland ratio of 2.36 acres per 1,000 residents. The overall 2030 population under the Proposed Project, which determines the amount of parkland needed to accommodate projected growth, would not change. These differences do not change the conclusion of the DEIR, as these ratios remain below the combined standard of 10 acres per 1,000. Therefore, the impact on parkland remains *significant and unavoidable* based on the 2010 Census population.

<b>TABLE 3-12: PARKLAND RATIO BASED UPON POPULATION</b>			
	<b>Existing (2008)</b>	<b>2010 Census</b>	<b>Proposed Project Capacity</b>
Population	182,600	175,057	218,741
Parkland Ratio	2.36 acres: 1,000	2.46 acres: 1,000	1.97 acres: 1,000
<b>SOURCE:</b> DCP Demographics Research Unit; SCAG, <i>Regional Transportation Plan</i> , 2008; 2010 U.S. Census, DCP.			

**TRANSPORTATION AND TRAFFIC**

*Circulation System*

- 2008 Base Year Analysis:** The evaluation of traffic impacts associated with implementation of the Proposed Project involved comparing 2008 Base Year traffic demand data with projections for 2030. As described more fully in the Draft EIR analysis of impacts, this traffic demand data, derived from population, housing and employment data for the CPA indicated an increase in traffic in 2030 above existing base year conditions. Therefore, in accordance with Appendix G of the State CEQA Guidelines, implementation of the Proposed Project would have *significant and unavoidable* impacts related to the circulation system.
- Census 2010 Analysis and Conclusion:** As described in detail through Master Responses 2 and 3 of Final EIR Section 2.2, use of the 2010 Census data would not change the EIR analysis or conclusion for this impact which would remain *significant and unavoidable*.

*Congestion Management Program (CMP)*

- 2008 Base Year Analysis:** For the purpose of a CMP Traffic Impact Analysis, a project impact is considered to be significant if the proposed project increases traffic demand, as determined by comparing 2008 Base Year data to projections for the Year 2030 Proposed Project. As discussed in the Draft EIR, impacts were evaluated based on the Congestion Management Plan (CMP) Highway System’s (HS) specific roadways, including State Highways and arterial monitoring locations/intersections. Implementation of the Proposed Project was determined to have *significant and unavoidable* impacts related to the CMP.
- Census 2010 Analysis and Conclusion:** Existing freeway mainline traffic volumes were obtained from the 2010 CMP for the selected freeway mainline locations. Traffic forecasts for build-out of the Proposed Project were developed by adding the difference between the forecasted traffic volume and the validated base year traffic volume which showed marginal change in subsequent years, as discussed through Master Response 2 of Final EIR Section 2.2. Therefore, use of the 2010 Census data would not change the EIR analysis or conclusion for this impact, which would remain *significant and unavoidable*.

*Emergency Access*

- 2008 Base Year Analysis:** The impact analysis of the Draft EIR states that existing emergency response routes would be maintained in their existing locations and all related development would be designed in accordance with City standards, which include provisions that address emergency access (e.g., minimum street widths, minimum turning radii, maximum lengths of cul-de-sacs, etc.). Compliance with these standards as well as those related to construction and operational activities within the CPA regarding emergency response or evacuation plans due to temporary construction barricades or other obstructions that could impede emergency access would all help to minimize potential emergency access impacts. Regardless, the 2008 population, housing and employment figures were not used to analyze the impact. Therefore, impacts associated with emergency access would be *less than significant* because existing emergency response routes would be maintained in their existing locations, and all related development

would be designed in accordance with City standards, which include provisions that address emergency access.

- **Census 2010 Analysis and Conclusion:** Since this analysis was not based on the 2008 population, housing and employment estimates, use of the 2010 Census data would not change the EIR analysis or conclusion for this impact which remains *less than significant*.

#### ***Public Transit, Bicycle, and Pedestrian Facilities***

- **2008 Base Year Analysis:** The impact analysis considers construction and operational activities within the CPA regarding multi-modal mobility. As discussed in the Draft EIR, the West Adams CPA is currently served by 33 Metro bus lines, six LADOT bus lines, and four Santa Monica bus lines in addition to the operating Metro Expo Line, and Crenshaw/LAX LRT Line, currently under construction. Construction impacts associated with these facilities required independent environmental clearance. Installation and environmental review of the Proposed Project's bike facilities is on-going as a phased program of the citywide adopted 2010 Bicycle Plan. Because the Proposed Project directs future population, housing and employment growth to urban infill TOD and commercial node sites adjacent to these public transit facilities, the increased ridership is beneficial to the overall function of public transit in the CPA. Therefore, the Proposed Project would result in *less-than-significant* impacts related to public transit, bicycle and pedestrian facilities since the operation these facilities would be improved through implementation of the Proposed Project.
- **Census 2010 Analysis and Conclusion:** Use of the 2010 Census data would not change the EIR analysis or conclusion for this impact. Consideration of the 2010 population data, which would describe a greater amount of change in population from 2010 to 2030 than that considered using a 2008 Base Year, would increase transit ridership and use of other modes of transportation. Therefore, impacts related to the public transit, bicycle and pedestrian facilities would remain *less than significant*.

### **UTILITIES AND SERVICE SYSTEMS**

#### ***Water Supply***

- **2008 Base Year Analysis:** The Draft EIR analyzed the current status of water supply services and the change in levels of water use as a result of the implementation of the Proposed Project. The impact analysis for water delivery and distribution to the population was based on 2008 dwelling unit and employment estimates. As described in column four of **Table 3-13**, the generation rates, or water usage factors, used for 2008 range in gallons per day (gpd) for dwelling units, and gallons per employee per day for employment. Referring to column four of **Table 3-14**, the range of generation rates used to calculate water demand for the 2030 Proposed Project was lower for dwelling units, and for employment. This difference in the generation rates, or water usage factors, is based on the new water generation rates that were required as part of the Water Conservation Act of 2009, as part of LADWP's 2010 Urban Water Management Plan. Refer to Draft EIR page 4.16-10 for a summary analysis of the City's water conservation programs and projections. The EIR analyzed the current status of water supply services and the change in levels of water use as a result of the implementation of the Proposed Project. Referring to **Table 3-14**, although the generation rate used to calculate water demand for the Proposed Project capacity is lower, the Proposed Project's estimated total water usage remains greater.

<b>TABLE 3-13: ESTIMATED EXISTING WATER USAGE WITHIN THE WEST ADAMS CPA</b>				
<b>Use</b>	<b>Quantity 2008/2010</b>	<b>Units</b>	<b>Water Usage Factor /a/ 2008/2010</b>	<b>Water Usage (gpd) 2008/2010</b>
Single-Family Residential	24,829 / 24,837	dwelling units	359	8,913,611 / 8,916,483
Multi-Family Residential	41,586 / 41,736	dwelling units	224	9,315,264 / 9,348,864
Commercial	34,014 / NA	employees	84	2,857,176
Industrial	10,097 / NA	employees	132	1,332,804
Open Space	179 / NA	employees	84	15,030
Public Facilities	490 / NA	employees	84	41,196
<b>Total Existing Water Usage</b>				<b>22,475,081 / 22,511,553</b>
/a/ Water usage factors were obtained from the LADWP 2010 Urban Water Management Plan, Exhibit 2H: Base Year Unit Water Use Rates (2005-2008).				
/b/ The estimation of employees is based on existing 2008 land use designations, which did not change in 2010.				
<b>SOURCE:</b> City of Los Angeles Department of City Planning, Demographics Unit, 2008.				

<b>TABLE 3-14: ESTIMATED WATER USAGE OF THE PROPOSED PROJECT</b>				
<b>Use</b>	<b>Quantity</b>	<b>Units</b>	<b>Water Usage Factor (2026-2030) /a/</b>	<b>Water Usage (gpd)</b>
Single-Family Residential /b/	30,903	dwelling units	333	10,290,699
Multi-Family Residential	55,215	dwelling units	211	11,650,365
Commercial	44,329	employees	77	3,413,333
Industrial	5,780	employees	121	699,390
Open Space	216	employees	77	16,632
Public Facilities	2,787	employees	77	214,599
<b>Estimated Total Water Usage of Proposed Project</b>				<b>26,285,018</b>
<b>Less Existing Water Usage (2008 / 2010)</b>				<b>22,475,081 / 22,511,553</b>
<b>Net Water Usage of Proposed Project (2008 / 2010)</b>				<b>3,809,937 / 3,773,465</b>
<b>Percent Increase through year 2030 from Existing Conditions in CPA (2008 / 2010)</b>				<b>14.5% / 14.3%</b>
/a/ Water usage factors were obtained from the LADWP 2010 Urban Water Management Plan, Exhibit 2I: Projected Unit Water Use.				
/b/ The total dwelling units for the Single-Family Residential category were determined by totaling dwelling units in the R-1 and R-1.5 zones.				
<b>SOURCE:</b> City of Los Angeles, Demographics Unit, 2008; TAHA, 2012.				

Nevertheless, impacts related to water supply as a result of the Proposed Project were found to be *less than significant* because the water usage increase within the West Adams CPA due to the Proposed Project would represent a small proportion (an additional 0.61 percent) of the total expected water supplies available to the City in year 2030, and the increase would occur incrementally over at least a 20 year period during which LADWP would continue to implement several planned and funded programs regarding water conservation and acquisition. Furthermore, the Proposed Project will direct future population growth to urban infill sites adjacent to Metro Expo Line and Crenshaw/LAX LRT station areas, as well as major intersection commercial nodes throughout the CPA. Development projects within these areas, that will most likely account for the increased water demand through the year 2030 within the CPA, will be required to adhere to development regulations that ensure that projects fit within their urban context and do not incorporate the yard setbacks and building footprints associated with low-density suburban development. Since 30 percent of the State’s water usage is attributable to non-agricultural uses and residential lawns consume far more water than urban water use, the compact, higher-intensity developments incentivized through the Proposed Project for commercial and industrial areas will assist in guiding growth in a manner consistent with State and local water conservation policies.

- Census 2010 Analysis and Conclusion:** Referring to column four of **Tables 3-13** and **3-14**, use of the 2010 Census data would show that the water usage increased by 36,472 gpd based on a 158 net increase in dwelling units from 2008 to 2010 despite a 7,543 person decrease in population between 2008 and 2010. Since the 2010 Census showed a higher use of water than in 2008, the EIR considered the greater



amount of consumption by using the 2008 estimates. Since the Proposed Project directs population growth to the Metro Expo Line and Crenshaw/LAX LRT station areas, as well as major intersection commercial nodes throughout the CPA, these are areas that will most likely account for the increased water demand through the year 2030 within the CPA; a 14.5 percent increase in water consumption in the CPA using the 2008 Base Year versus a 14.3 percent increase using 2010 Census data. Nevertheless, since the EIR's water supply analysis is based primarily on the 2030 Proposed Project "end state" condition using dwelling unit data, use of the 2010 Census dwelling unit data would not alter the conclusion in the EIR relative to water supply, which would remain *less than significant*.

#### ***Water Supply Treatment and Conveyance Infrastructure***

- **2008 Base Year Analysis:** Although the EIR's water supply analysis is based primarily on the 2030 Proposed Project "end state" condition using dwelling unit data, the 2008 dwelling unit data was considered in the analysis as well. As discussed on Draft EIR page 4.16-10, water usage increases resulting from the Proposed Project would occur incrementally through the year 2030. This is equally true for increases in water supply treatment provisions. The Los Angeles Aqueduct (LAA) was responsible for 23 percent of all water supplied by LADWP in 2008. Assuming sustained operations at maximum flow capacity for an entire year, LAA has the potential to deliver 561,074 acre-feet per year. This amount is over 87 percent of total water deliveries in year 2008 by LADWP to all of Los Angeles. Considering the potential delivery capacity of the LAA alone, the potential delivery capacity of the existing water conveyance infrastructure has the capacity to meet expected increases in demand. Therefore, the Proposed Project would result in *less-than-significant* impacts related to water supply treatment and conveyance.
- **Census 2010 Analysis and Conclusion:** Since the analysis of impacts was based on the calculated water demand of the Proposed Project 2030 "end-state" condition using dwelling unit data, use of the 2010 Census data would not alter the analysis or conclusion in the EIR, therefore impacts related water supply, treatment and conveyance would remain *less than significant*.

#### ***Wastewater***

- **2008 Base Year Analysis:** This impact analysis considered potential environmental effects related to the construction of new or physically altered wastewater facilities, should the Proposed Project exceed the capacity of wastewater treatment providers. The Draft EIR analyzed the change in levels of wastewater expected to be generated as a result of implementation of the Proposed Project. Referring to **Table 3-15**, similar to water consumption, wastewater generation was calculated using the 2030 Proposed Project dwelling units and employment. For conservative planning purposes, the analysis assumes up to 90 percent of domestic water use becomes wastewater in need of treatment. Based on this calculation, the existing wastewater generation rates included in **Table 3-16** have been supplemented to include data from the 2010 Census data for comparison purposes. Since 2010 Census data showed a higher number of dwelling units than 2008, this EIR considered the larger amount of change in terms of wastewater treatment by using the 2008 estimate. Since the Proposed Project directs population growth to the Metro Expo Line and Crenshaw/LAX LRT Station areas, as well as major intersection commercial nodes throughout the CPA, these are the areas that will most likely account for the increased wastewater generation within the CPA. The wastewater treatment plants that serve the City of Los Angeles have been sized to accommodate growth within build-out of the General Plan, including that of the West Adams CPA. Full implementation of the Proposed Project would cause wastewater generation to increase by approximately 5.5 mgd over existing wastewater generation within West Adams CPA. This amounts to an increase of less than one percent of the current maximum treatment capacity of all four treatment plants (580 mgd). Since there is remaining wastewater treatment capacity to accommodate additional wastewater flow, implementation of the Proposed Project would not require additional treatment facilities, and impacts related to wastewater treatment and wastewater conveyance would be *less than significant*.

<b>TABLE 3-15: ESTIMATED EXISTING WASTEWATER GENERATION WITHIN THE WEST ADAMS CPA</b>				
<b>Use</b>	<b>Quantity /a/ 2008/ 2010</b>	<b>Units</b>	<b>Wastewater Generation Factor (gpd/unit) /b/</b>	<b>Wastewater Generation 2008 / 2010 (gpd)</b>
Single-Family Residential	24,829 / 24,837	dwelling units	330	8,193,570 / 8,196,210
Multi-Family Residential	41,586 / 41,736	dwelling units	250	10,396,500 / 10,434,000
Commercial	34,014 / NA	employee	30	1,020,420
Industrial	7,573,013 / NA	square feet	0.1	757,301
Open Space	179 / NA	employee	30	5,368
Public Facilities	490 / NA	employee	30	14,713
<b>Total Existing Wastewater Generation (2008 / 2010)</b>				<b>20,387,872 / 20,428,012</b>
/a/ The estimation of employees is based on existing 2008 land use designations, which did not change in 2010.				
/b/ Wastewater generation factors were obtained from the City of Los Angeles Bureau of Engineering, <i>Sewer Design Manual, Part F 200: Projection of Flows and Hydraulics of Sewers, Table F-229</i> .				
<b>SOURCE:</b> City of Los Angeles, Demographics Unit, 2012-2014; TAHA, 2012.				

<b>TABLE 3-16: ESTIMATED WASTEWATER GENERATION OF THE PROPOSED PROJECT</b>				
<b>Use</b>	<b>Quantity</b>	<b>Units</b>	<b>Wastewater Generation Rate (gpd/unit) /a/</b>	<b>Wastewater Generation (gpd)</b>
Single-Family Residential /b/	30,903	dwelling units	330	10,197,990
Multi-Family Residential	55,215	dwelling units	250	13,803,750
Commercial	44,326	employee	30	1,329,780
Industrial	4,335,062	square feet	0.1	433,506
Open Space	216	employee	30	6,480
Public Facilities	2,787	employee	30	83,610
<b>Estimated Total Wastewater Usage of Proposed Project</b>				<b>25,855,116</b>
<b>Less Existing Wastewater Usage (2008 / 2010)</b>				<b>20,387,872 / 20,428,012</b>
<b>Net Wastewater Generation of Proposed Project (2008 / 2010)</b>				<b>5,467,244 / 5,427,104</b>
/a/ Wastewater generation factors were obtained from the City of Los Angeles Bureau of Engineering, <i>Sewer Design Manual, Part F 200: Projection of Flows and Hydraulics of Sewers, Table F-229</i>				
/b/ The total dwelling units for the Single-Family Residential category were determined by dwelling units in the R-1 and R-1.5 zones.				
<b>SOURCE:</b> City of Los Angeles, Demographics Unit; TAHA, 2012.				

- Census 2010 Analysis and Conclusion:** The calculated change in wastewater generation between existing use and expected 2030 Proposed Project levels using the 2010 Census data reflects a 5,427,104 gallons per day (gpd) increase. This rate is 40,140 gpd less than the rate using the 2008 data which reflects a 5,467,244 gpd increase. Therefore, the Draft EIR considered the greater amount of wastewater generation by using the 2008 estimates. Nevertheless, the analysis was based on the calculated wastewater generation rate of the Proposed Project and there is sufficient wastewater treatment capacity as stated in the DEIR. Therefore, use of the 2010 Census data instead of the 2008 estimates would not alter the analysis or conclusion in the Draft EIR, and impacts related to wastewater usage would remain *less than significant*.

**Solid Waste**

- 2008 Base Year Analysis:** This impact analysis considered potential environmental effects related to the addition of solid waste collection routes, recycling, or disposal facilities. The impact analysis regarding solid waste was based on the 2030 Proposed Project dwelling unit and employment numbers which were then used to calculate projected solid waste generation based on generation factors from the City’s CEQA Thresholds Guidelines. Base year solid waste generation was also calculated considering the dwelling unit and employment estimates for the 2008 Base Year. Since the Proposed Project directs population growth to the Metro Expo Line and Crenshaw/LAX LRT Station areas, as well as major intersection commercial nodes throughout the CPA, these are the areas that will most likely account for the increased solid waste generation rates within the CPA.

As shown in **Tables 3-17** and **3-18**, the amount of existing solid waste generated within the CPA was calculated to be 815,429 pounds-per-day using the 2008 estimates, and 1,017,718 pounds-per-day for the 2030 Proposed Project. Based on the projected capacity of area landfills and incorporation of the mitigation measures for waste reduction and recycling, the impacts of solid waste generated from implementation of the Proposed Project on solid waste collection and disposal facilities would be *less than significant*.

<b>TABLE 3-17: ESTIMATED EXISTING SOLID WASTE GENERATION WITHIN WEST ADAMS CPA</b>					
Use	Quantity/a/	Units	Solid Waste Generation Rate (pounds/unit) /b/	Solid Waste Generation (pounds/day)	Solid Waste Generation 2008 / 2010 (pounds/day)
Single-Family Residential	24,829	dwelling units	12.1	300,431	300,431 / 300,528
Multi-Family Residential	41,586	dwelling units	5.6	232,882	232,882 / 233,722
Commercial	34,014	employee	6.3	214,288	214,288
Industrial	10,097	employee	6.3	63,611	63,611
Open Space	179	employee	6.3	1,127	1,127
Public Facilities	490	employee	6.3	3,090	3,090
<b>Estimated Total Existing Solid Waste Generation 2008 / 2010</b>					<b>815,429 / 816,366</b>
<i>/a/ The estimation of employees is based on existing 2008 land use designations, which did not change in 2010.</i>					
<i>/b/ Solid waste generation rates were derived from the City of Los Angeles Bureau of Sanitation, City of Los Angeles Solid Waste Planning Background Studies Summary Report (2006), Section 3.1.2: Waste Disposal by Sector</i>					
<b>SOURCE:</b> City of Los Angeles, Demographics Unit; TAHA, 2012-2014.					

<b>TABLE 3-18: ESTIMATED SOLID WASTE GENERATION OF THE PROPOSED PROJECT</b>				
Use	Quantity	Units	Solid Waste Generation Rate (pounds/unit/day) /a/	Solid Waste Generation (pounds/day)
Single-Family Residential /b/	30,903	dwelling units	12.1	373,926
Multi-Family Residential	55,215	dwelling units	5.6	309,204
Commercial	44,326	employee	6.3	279,254
Industrial	5,780	employee	6.3	36,415
Open Space	216	employee	6.3	1,361
Public Facilities	2,787	employee	6.3	17,558
<b>Estimated Total Solid Waste Generation of Proposed Project</b>				<b>1,017,718</b>
<b>Estimated Total Existing Solid Waste Generation (2008 / 2010)</b>				<b>815,429 / 816,366</b>
<b>Net Solid Waste Generation of Proposed Project (2008 / 2010)</b>				<b>202,289 / 201,352</b>
<i>/a/ Solid waste generation rates were derived from the City of Los Angeles Bureau of Sanitation, City of Los Angeles Solid Waste Planning Background Studies Summary Report (2006), Section 3.1.2: Waste Disposal by Sector.</i>				
<i>/b/ The total dwelling units for the Single-Family Residential category were determined by dwelling units in the R-1 and R-1.5 zones.</i>				
<b>SOURCE:</b> City of Los Angeles, Demographics Unit; TAHA, 2012-2014.				

- Census 2010 Analysis and Conclusion:** Since the Base Year solid waste generation rates evaluated in the Draft EIR were based on 2008 estimates (dwelling units and employment), the solid waste generation **Tables 3-17** and **3-18**, which are included in the Draft EIR, have been updated to include data from the 2010 Census. The calculated change in solid waste generation between existing use and expected 2030 Proposed Project levels using the 2010 Census data reflects a 201,352 pounds/day increase. This rate is 937 pounds/day less than the rate using the 2008 data which reflects a 202,289 pounds/day increase. Therefore, the Draft EIR considered the greater amount of solid waste generation by using the 2008 estimates. Nevertheless, the analysis was based on the calculated solid waste generation rate of the Proposed Project and there is sufficient solid waste removal capacity as stated in the DEIR. Therefore, use of the 2010 Census data instead of the 2008 estimates would not alter the analysis or conclusion in the Draft EIR, and impacts related to solid waste collection and disposal facilities would remain *less than significant*.

**Energy Resources**

- 2008 Base Year Analysis:** This impact analysis considered the potential environmental effects related to the construction of new or physically altered energy-supply facilities and distribution infrastructure. The impact analysis for energy-supply facilities and distribution was based on the 2030 Proposed Project’s land uses. Residential energy consumption was based on residential dwelling units and commercial/industrial energy consumption was based on square feet. The Draft EIR determined that the Proposed Project would increase the use of electricity within the CPA due to future development based electricity and natural gas generation rates for residential units and square feet of commercial/industrial space. **Tables 3-19** and **3-20** show the total electricity and natural gas demand based on the 2030 Proposed Project and the 2008 Base Year. Since the Proposed Project directs population growth to the Metro Expo Line and Crenshaw/LAX LRT station areas, as well as major intersection commercial nodes throughout the CPA, these are the areas that will most likely account for the increased electricity usage within the CPA. Although implementation of the Proposed Project could require new energy-supply facilities and distribution infrastructure or capacity-enhancing alterations to existing facilities to accommodate energy demands, increasing energy conservation and incorporation of alternative renewable energy sources into project designs, along with State Energy Code standards and energy conservation requirements of the Building Code will ensure that implementation of the Proposed Project would result in *less-than-significant* impacts.

<b>TABLE 3-19: ESTIMATED EXISTING ELECTRICITY USAGE WITHIN THE WEST ADAMS CPA</b>				
<b>Use</b>	<b>Quantity 2008 / 2010</b>	<b>Units</b>	<b>Electricity Usage Rate (kwh/unit/year) /a/</b>	<b>Electricity Usage Generation 2008 / 2010 (kwh/year)</b>
Single-Family Residential /b/	24,829 / 24,837	dwelling units	6,406	159,054,574 / 159,105,822
Multi-Family Residential	41,586 / 41,736	dwelling units	6,406	266,399,916 / 267,360,816
Commercial	12,754,739	square feet	14.63	186,601,832
Industrial	7,573,013	square feet	15.77	119,426,415
Open Space	178,931 /c/	square feet	14.63	2,617,761
Public Facilities	490,429	square feet	14.63	7,174,976
<b>Total Existing Electricity Usage (2008 / 2010)</b>				<b>741,275,474 / 742,287,622</b>
<p><i>/a/</i> Electricity usage rates were derived from <i>California Energy Demand 2010-202 Adopted Forecast, Chapter 6: Los Angeles Department of Water and Power Planning Area, Form 1.1 – Electricity Consumption by Sector, page 209</i>. Form 1.1 provides total usage by sector (i.e. Residential, Commercial, and Industrial), which was divided by total units within that sector to arrive at the Electricity Usage Rates used for the calculations in this table.</p> <p><i>/b/</i> The total dwelling units for the Single-Family Residential category were determined by dwelling units in the R-1 and R-1.5 zones.</p> <p><i>/c/</i> The open space land use is represented by the total building square footage on land that is identified as open space.</p> <p><b>SOURCE:</b> City of Los Angeles, Demographics Unit; TAHA 2012.</p>				

<b>TABLE 3-20: ESTIMATED NATURAL GAS USAGE FROM EXISTING USES WITHIN THE WEST ADAMS CPA</b>				
<b>Use</b>	<b>Quantity 2008 / 2010</b>	<b>Units</b>	<b>Natural Gas Usage Rate (cubic feet/unit/month) /a,b,c/</b>	<b>Natural Gas Usage 2008 / 2010 (cubic feet/month)</b>
Single-Family Residential	24,829 / 24,837	dwelling units	3424.791667	85,034,152 / 85,061,550
Multi-Family Residential	41,586 / 41,736	dwelling units	1689.563889	70,262,204 / 70,515,638
Commercial	34,014	employee	3550.017088	120,750,281
Industrial	10,097	employee	3550.017088	35,844,523
Open Space /d/	179	employee	3550.017088	635,208
Public Facilities	490	employee	3550.017088	1,741,031
<b>Total Existing Natural Gas Usage (2008 / 2010)</b>				<b>314,267,399 / 314,548,231</b>
<p><i>/a/</i> The natural gas usage rate for Single-Family Residential use was obtained from <i>2009 California RASS, Volume 2</i>. The study lists usage rates in therms per year, which were converted to cubic feet by using a conversion rate of 1Therm = 96.7 cubic feet of gas.</p> <p><i>/b/</i> The <i>2009 California RASS</i> includes separate usage rates for townhomes, 2-4 unit apartment buildings, and 5+ unit apartment buildings, which were averaged to arrive at the usage rate used above for Multi-Family Residential use. The study lists usage rates in therms per year, which were converted to cubic feet by using a conversion rate of 1Therm = 96.7 cubic feet of gas.</p> <p><i>/c/</i> The usage rate for Commercial, Industrial, Open Space, and Public Facilities were derived by first obtaining the total gas consumption in LA County for Non-Residential uses from the <i>CA Energy Commission ECDMS</i> website. Then total employment in Los Angeles County was obtained from the <i>U.S. Census Bureau</i> website and used to divide total gas consumption for Non-Residential uses to arrive at a usage rate per employee.</p> <p><i>/d/</i> The open space land use is represented by the total building square footage on land that is identified as open space.</p> <p><b>SOURCE:</b> <i>2009 California Residential Appliance Saturation Study (RASS): Volume 2, Table 2-21: Gas UECs by Residence Type for All Households and for Households With Gas Account Data</i>, page 21; U.S Census Bureau, State and County QuickFacts, <a href="http://quickfacts.census.gov/qfd/states/06/06037.html">http://quickfacts.census.gov/qfd/states/06/06037.html</a>, accessed February 16, 2012; California Energy Commission, Energy Consumption Data Management System (ECDMS), <a href="http://www.ecdms.energy.ca.gov/">http://www.ecdms.energy.ca.gov/</a>, accessed February 16, 2012.</p>				

- Census 2010 Analysis and Conclusion:** Since this analysis was based on the 2030 Proposed Project’s land uses, 2010 Census data would not change the conclusion of the DEIR. Although energy demand would increase as a result of growth near the Metro Expo Line and Crenshaw/LAX LRT station areas, as well as major intersection commercial nodes throughout the CPA, increasing energy conservation and regulations pertaining to energy efficiency would ensure that the impact is *less than significant*.

While the impact remains less than significant, 2010 Census data was analyzed to determine how the impact changed over time. **Tables 3-21 and 3-22** include data from the 2010 Census to compare projected electricity and natural gas demand. The discussion in regards to the 2010 Census is limited to the projected electricity and natural gas demand for residential uses and capacity in terms of existing square footage for all other land use categories. Residential energy consumption is based on dwelling units.

<b>TABLE 3-21: ESTIMATED ELECTRICITY USAGE FROM THE PROPOSED PROJECT</b>				
Use	Quantity	Units	Electricity Usage Rate (kwh/unit/year) /a/	Electricity Usage Generation (kwh/year)
Single-Family Residential	30,903 /b/	dwelling units	6406	197,964,618
Multi-Family Residential	55,215	dwelling units	6406	353,707,290
Commercial	16,623,424	square feet	14.63	243,200,688
Industrial	4,335,062	square feet	15.77	68,363,928
Open Space	216,233 /c/	square feet	14.63	3,163,485
Public Facilities	2,787,074	square feet	14.63	40,774,889
<b>Total Proposed Electricity Usage</b>				<b>907,174,898</b>
<b>Existing Electricity Usage (2008 / 2010)</b>				<b>741,275,473 / 742,287,622</b>
<b>Net Electricity Usage of Proposed Project (2008 / 2010)</b>				<b>165,899,425 / 164,887,276</b>

/a/ Electricity usage rates were derived from *California Energy Demand 2010-2020 Adopted Forecast, Chapter 6: Los Angeles Department of Water and Power Planning Area, Form 1.1 – Electricity Consumption by Sector, page 209*. Form 1.1 provides total usage by sector (i.e. Residential, Commercial, and Industrial), which was divided by total units within that sector to arrive at the Electricity Usage Rates used for the calculations in this table.  
/b/ The total dwelling units for the Single-Family Residential category were determined by dwelling units in the R-1 and R-1.5 zones.  
**SOURCE:** TAHA, 2012.

<b>TABLE 3-22: ESTIMATED NATURAL GAS USAGE FROM THE PROPOSED PROJECT</b>				
Use	Quantity	Units	Natural Gas Usage Rate (cubic feet/unit/month) /a,b,c/	Natural Gas Usage (cubic feet/month)
Single-Family Residential	30,903	dwelling units	3424.791667	105,836,337
Multi-Family Residential	55,215	dwelling units	1689.563889	93,289,270
Commercial	44,329	employee	3550.017088	157,368,707
Industrial	5,780	employee	3550.017088	20,519,099
Open Space /d/	216	employee	3550.017088	766,804
Public Facilities	2,787	employee	3550.017088	9,893,898
<b>Total Proposed Natural Gas Usage</b>				<b>387,674,115</b>
<b>Total Existing Natural Gas Usage (2008 / 2010)</b>				<b>314,267,399 / 314,548,231</b>
<b>Net Natural Gas Usage of Proposed Project (2008 / 2010)</b>				<b>73,406,716 / 73,125,884</b>

/a/ The natural gas usage rate for Single-Family Residential use was obtained from *2009 California RASS, Volume 2*. The study lists usage rates in therms per year, which were converted to cubic feet by using a conversion rate of 1Therm = 96.7 cubic feet of gas.  
/b/ The *2009 California RASS* includes separate usage rates for townhomes, 2-4 unit apartment buildings, and 5+ unit apartment buildings, which were averaged to arrive at the usage rate used above for Multi-Family Residential use. The study lists usage rates in therms per year, which were converted to cubic feet by using a conversion rate of 1Therm = 96.7 cubic feet of gas.  
/c/ The usage rate for Commercial, Industrial, Open Space, and Public Facilities were derived by first obtaining the total gas consumption in LA County for Non-Residential uses from the *CA Energy Commission ECDMS* website. Then total employment in Los Angeles County was obtained from the *U.S. Census Bureau* website and used to divide total gas consumption for Non-Residential uses to arrive at a usage rate per employee.  
/d/ The open space land use is represented by the total building square footage on land that is identified as open space.  
**SOURCE:** *2009 California Residential Appliance Saturation Study (RASS): Volume 2, Table 2-21: Gas UECs by Residence Type for All Households and for Households With Gas Account Data*, page 21; U.S Census Bureau, State and County QuickFacts, <http://quickfacts.census.gov/qfd/states/06/06037.html>, accessed February 16, 2012; California Energy Commission, Energy Consumption Data Management System (ECDMS), <http://www.ecdms.energy.ca.gov/>, accessed February 16, 2012.

The calculated change in electricity demand between the 2008 Base Year and the 2030 Proposed Project is approximately 166 million kWh/year (kilowatt-hour); versus using the 2010 Census data which is approximately 165 million kWh/year (kilowatt-hour). Therefore, consideration of the 2010 Census data represents a 1 million kWh/year (kilowatt-hour) reduction in electricity usage than use of the 2008 data.

Similarly, the calculated change in natural gas demand between the 2008 Base Year and the 2030 Proposed Project is also greater than that using the 2010 Census data. Use of the 2010 Census data represents a 280,832 cubic-foot-per-month reduction in natural gas usage than use of the 2008 data. Hence, the Draft EIR considered a greater demand of electricity and natural gas in using the 2008 Base Year data instead of the 2010 Census data. Therefore, consideration of Census 2010 data would not alter the analysis or conclusion in the Draft EIR, and impacts related to electricity and natural gas demand would remain *less than significant*.

### 3.3 CHANGES TO THE PROPOSED PROJECT

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As a result of comments received on the EIR and through the Proposed Project's public hearing process, changes to the Proposed Project have been made. These changes have been incorporated into the Proposed Project, as recommended and/or approved by the City Planning Commission (CPC). See FEIR Appendices H and I for further detail. While these changes do not constitute significant new information per CEQA, their inclusion remains subject to final adoption by the City Council and Mayor, similar to the other elements of the Proposed Project. The CPC's and Department of City Planning's (DCP's) changes to the Proposed Project are summarized as follows:

- I. At its meeting on April 11, 2013, the City Planning Commission approved the following land use change area requests and other revisions:

#### Changes to the Proposed CPIO District

- a. Added portions of La Cienega Blvd. north of the I-10 Freeway to the Commercial Corridors CPIO Subarea.
- b. Reduced the scope of the CPIO Node located at the intersection of Arlington Ave. and Washington Blvd.
- c. Reduced the height district for a portion of Crenshaw Blvd. between Martin Luther King Jr. Blvd. and Stocker St.
- d. Revised Subarea 770 to exclude R-2 zoned lots along West View St. and restored the Low Medium I land use as required through Correction Ordinance 182619.

#### Changes to Both the Proposed CPIO District and the Crenshaw Corridor Specific Plan Amendments

- a. Eliminated any exemptions from the ½ mile distance separation requirement for new free-standing fast-food establishments.
- b. Added ordinance language clarifying that the 3:1 maximum FAR Affordable Housing Incentive listed in the LAMC regarding projects located in Height District 1 also applies to affordable housing projects in Height District 2.

#### Changes to the Proposed Plan Policy Document

- a. Formed an Affordable Housing Working Group to consider policy and program revisions that address displacement resulting from transit-oriented development (TOD).
- b. Added a program identifying joint-use open space opportunities involving agencies other than LAUSD (i.e. BOE, BSS).
- c. Added additional Policy Document language addressing industrial incompatibilities, and enforcement of "clean-up/ green-up".
- d. Further clarified in the TIMP document the north/ south corridors that are to remain vehicular priority and refined TDM policies to consider unique parking demands for certain uses.

Changes Requested by Council District 10

- a. Incorporated several requested changes enumerated through the April 5, 2013 CD 10 letter to the CPC as follows:
  - i. General Plan Text Changes
  - ii. General CPIO District Changes
  - iii. Commercial Corridors and Major Intersection Nodes CPIO Subarea Changes
  - iv. Transit-Oriented CPIO Subarea Changes
  - v. Crenshaw Corridor Specific Plan Amendment Changes
  - vi. General Plan Land Use, Zone and Height District Changes
  
- II. At its meeting on February 11, 2016, the City Planning Commission approved and reaffirmed the Commission's prior April 11, 2013 approval in its entirety including the following modifications initiated by City Council Motion (CF 15-0071), as well as additional Council Office requests and other revisions:
  - a. General Plan amendments, zone and height district changes to portions of the Jefferson Park, Arlington Heights and Mid-City residential neighborhoods. As part of the "west" Jefferson Park zone changes, a portion of one block face of R3 zoned properties are proposed for inclusion into the Crenshaw Corridor Specific Plan.
  - b. The expansion of two nodes within the proposed "Major Intersection Nodes CPIO Subarea" (see Final EIR Appendix H).
  - c. A 15-foot height increase to a portion of the "Crenshaw/ Expo TOD" of the proposed "Crenshaw Corridor Specific Plan" amendments" (see Final EIR Appendix H).
  - d. The addition of a Character Residential CPIO Subarea" for the Arlington Heights neighborhood (see Final EIR Appendix H).
    - i. General Plan land use amendment, zone and height district change to correct errors for the following addresses: 3564-66 and 3588 W. Florence Ave., 7214 S. Brynhurst Ave., 3520-20 ½ and 3512-16 W. Florence Ave.
    - ii. General Plan land use amendments and zone changes pursuant to Government Code section 65860 (d) for park and public facilities as indicated on the Change Area Matrix.
    - iii. Updates and technical corrections to the Community Plan text, ordinances and street classifications including the following:
    - iv. Changes to the Street Reclassification Matrix in order to address the recently adopted Mobility Element nomenclature and the CPC approved Crenshaw Corridor Streetscape Plan recommendations.
    - v. Updates to the Community Plan (Policy Document) to include CPC directed updates, including those recommended by the Affordable Housing Working Group formed through the CPC's 2013 Motion.
    - vi. Ordinance changes including both the CPC approved and requested CPIO District and Crenshaw Corridor Specific Plan regulation updates in order to incorporate the requests of CD 10.

With the exception of two new CPIO District "Nodes" and the increase of height associated with the amended Crenshaw Specific Plan "Crenshaw/Expo TOD", the revised or new land use changes recommended by the CPC generally reduce height, development density and intensity at several commercial nodes and within low medium residential areas, and create further consistency by zoning, General Plan land use designation and existing use of property. With the CPC recommended changes, the Proposed Project's capacity would be reduced by 1,861 dwelling units and 4,729 persons. Jobs would increase by 443. Because the dwelling unit and population changes result in a reduction to the overall capacity projections of the Proposed Project, these modifications do not influence the findings of the EIR. This includes the addition of the "Character Residential" CPIO subarea for the Arlington Heights neighborhood, which would refine setbacks and further limit height consistent with prevailing historic character. The changes described above reflect refinements to the Proposed Project addressing concerns expressed by the CPC and the community,

and would not generate substantial adverse environmental effects as the changes reduce the amount and type of development anticipated to occur in the CPA which was used as the basis of analysis in the EIR.

Lastly, following the April 11, 2013 and February 11, 2016 CPC recommendation to approve the Proposed Project, the DCP developed a CPIO template to guide consistent usage of this new land use tool citywide. This has necessitated replacement of the term “CPIO subdistrict” with “CPIO Subarea”, which shall be applied through this reference to all sections of the EIR.

## 3.4 CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

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Corrections or information has been added to the Draft EIR pursuant to CEQA Guidelines, Section 15132, as part of the preparation of the Final EIR. All additions to the text of the Draft EIR are shown by underline and all deletions to the text of the Draft EIR are shown by ~~striketrough~~. All of the corrections to the Chapters and Sections merely clarify or amplify or make minor modifications to the analysis herein and have not been found to affect the impact analysis or conclusions in the Sections. In general, additions address recent legislative updates that have occurred since the release of the Draft EIR. Section updates regarding Census 2010 data can be found in the preceding Section 3.2 supplemental analysis further supporting and validating the analysis and findings of the Draft EIR.

Finally, the following nomenclature updates shall be applied to all sections throughout the Draft EIR:

- All occurrences of the term “Program EIR” have been revised as follows: “~~Program~~-EIR”.
- All occurrences of the term “CPIO subdistrict” have been replaced by “CPIO subarea”.

### CHAPTER 1.0 – INTRODUCTION

- The last paragraph on page 1-1 of Section 1.1 has been updated to include the following citation:  
(14 Cal. Code of Regs. § 15151.)

- Paragraphs 3 through 5 on page 1-3 of Section 1.5 have been eliminated as follows:

~~Each project undertaken during the planning horizon of the West Adams New Community Plan must be approved individually by the City, in compliance with CEQA. Therefore, this proposed West Adams New Community Plan is a First Tier/Program EIR that evaluates the effects of the entire proposed project at a program level.~~

~~Section 15168(a) of the CEQA Guidelines defines a Program EIR as an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.~~

~~Section 15168(b) of the CEQA Guidelines indicates that use of a Program EIR can provide the following advantages. The Program EIR can:~~

- ~~○ Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action;~~
- ~~○ Ensure consideration of cumulative impacts that might be slighted in a case by case analysis;~~
- ~~○ Avoid duplicative reconsideration of basic policy considerations;~~
- ~~○ Allow the lead agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts; and~~
- ~~○ Allow reduction in paperwork.~~



## CHAPTER 2.0 – SUMMARY

- Pages 2-1 and 2-2 of Section 2.2 have been updated as follows:

The proposed West Adams-Baldwin Hills-Leimert New Community Plan (~~Proposed Project West Adams New Community Plan or proposed project~~) will provide a framework on a program level for future development and will specify the type of uses, densities, and intensities that would be permitted. The proposed West Adams New Community Plan objectives promote the internal relationship of mutually supportive uses, such as employment, housing, recreation, and community-serving facilities, etc., so as to decrease dependency on the automobile, encourage alternative transportation modes, make efficient use of land and infrastructure, reduce energy consumption, promote sustainability, and foster a strong sense of community. ~~The proposed project will include implementing ordinances that are intended to:~~ The Proposed Project includes the following components:

- West Adams-Baldwin Hills-Leimert Community Plan text (Policy Document).
- Updated General Plan land use designations and corresponding zones (also referred to as the “Plan Map”
- General Plan amendments
- Modifications to the street designations and amendments to the Transportation (Mobility) element.
- Amendments to the General Plan Framework Long Range Land Use Diagram
- Updated Community Plan map footnotes and symbol changes
- Zone and height district changes
- Amendments to the Crenshaw Corridor Specific Plan
- Establishment of the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay District (CPIO)
- CPIO and the Crenshaw Corridor Specific Plan project approvals, including those approved by administrative clearance.
- ~~Guide development through 2030;~~
- ~~Refine and amend the existing 1996 General Plan Framework Element;~~
- ~~Initiate General Plan Amendments and Zone Changes as necessary to implement the General Plan and accomplish the stated goals and policies of the New Community Plan program;~~
- ~~Amend and establish Overlay Districts, Specific Plans, and/or special districts to portions of the West Adams New Community Plan, as necessary to implement the General Plan Framework and community plan policies; and~~
- ~~Refine and amend any applicable Citywide Elements of the General Plan.~~

The West Adams-Baldwin Hills-Leimert Community Plan Area (West Adams CPA) is located approximately seven miles southwest of Downtown Los Angeles and contains approximately 8,710 acres (approximately 13.61 square miles) of land area. The West Adams CPA is bounded on the north by Pico and Venice Boulevards, on the west by Robertson Boulevard and the eastern limits of Culver City, on the south by the Baldwin Hills, City of Inglewood, and portions of unincorporated Los Angeles County, and to the east by Arlington and Van Ness Avenues.

- Bullet point 3 located on page 2-3 of Section 2.5 has been updated as follows:
  - Air Quality (construction impacts to odors and consistency with the Air Quality Management Plan; operational impacts to regional and localized emissions, ~~toxic air contaminants~~, odors, and consistency with the Air Quality Management Plan.)
- Table 2-2 beginning on page 2-5 of Section 2.6 has been updated as follows:

TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact Category	Significant Impact	Mitigation Measures <sup>4</sup>	Significance After Mitigation
<b>AESTHETICS - OPERATIONS</b>			
Visual Character	The proposed project would not substantially damage existing visual character, value, or quality of the community; however, in order to ensure that these aspects of neighborhood character are maintained, mitigation measures shall be implemented.	<p><b>AE1</b> As a condition of approval for any <u>Any approval of a Discretionary project or "Active Change Area Project", as defined in Section 3.4 of the Project Description, the City shall require with new construction located on commercial or industrially planned land in CPIO subdistricts subareas and/or the Crenshaw Corridor Specific Plan that directly abuts or is across an alley from residentially planned land to must transition in the following manner:</u></p> <ul style="list-style-type: none"> <li>• Where the rear or side property line is contiguous with that of a residential lot or separated by an alley property, the building structure shall be set back or "stepped back" one foot for every one foot in height as measured fifteen feet above grade at the shared/residential property line, or as specified through the individual CPIO subarea or Specific Plan ordinances when more restrictive.</li> <li>• Where the properties are separated by an alley, the structure shall be set back or "stepped back" one foot for every one foot in height as measured from grade at the residential property line.</li> <li>• New construction located opposite the front yard setback of residentially planned land along local streets shall not exceed 30 feet in height for the first 50 feet of lot depth as measured from the commercial or industrial property line opposite the residential lot.</li> <li>• Adjustments and Exceptions (permitted): The fifteen foot "step back" height limitation at the residential property line may be increased by not more than 20 percent or as specified through the CPIO or Specific Plan regulations when more restrictive through adjustment, otherwise, through the exception procedures pursuant to the Los Angeles Municipal Code.</li> </ul>	Less than significant.
Light and Glare	The proposed project could potentially increase the amount of glare in the CPA due to the intensification of residential and commercial development. Therefore, without mitigation, the proposed project would result in a significant impact related to light and glare.	<p><b>AE2</b> As a condition of approval for <u>aAny approval of a Discretionary project or "Active Change Area Project", as defined in Section 3.4 of the Project Description, the City shall require ensure that all lighting be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties.</u></p> <p><b>AE3</b> As a condition of approval for <u>aAny approval of a Discretionary project or "Active Change Area Project", as defined in Section 3.4 of the Project Description, the City shall require ensure that glare effects be limited by using non-reflective building and construction materials, such as concrete, wood, and stucco. This shall include, but not be limited to, art installations, fencing material, and recreational equipment.</u></p>	Less than significant.

<sup>4</sup>The phrase "Discretionary project or 'Active Change Area Project,'" wherever used in mitigation measures or other text in the Draft or Final EIR, shall mean a project subject to an entitlement process, whether by an administrative clearance or a discretionary review, in the amended Crenshaw Corridor Specific Plan or the proposed West Adams Community Plan Implementation Overlay District Ordinance (CPIO).

<b>TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES</b>			
<b>Impact Category</b>	<b>Significant Impact</b>	<b>Mitigation Measures<sup>4</sup></b>	<b>Significance After Mitigation</b>
Shade and Shadow	Due to the sun's angle in the northern hemisphere, shadows from buildings project to the north and move from the west to the east throughout daylight hours. In addition, a building that is 45 feet tall will cast a minimum shadow length of 71 feet during the winter solstice. The setback transitions within the CPIO subdistricts <u>subareas</u> and Specific Plan require a 45-foot tall building to be setback 45 feet from a residential property line. Because the minimum shadow length is 71 feet, a 45-foot building within a CPIO-subdistrict <u>subareas</u> or the Specific Plan area will cast shadows that encroach on adjacent land uses during the winter months. Therefore, without mitigation, the proposed project could result in a significant impact related to shade and shadows throughout portions of the West Adams CPA.	See Mitigation Measure <b>AE1</b> above.	Significant and unavoidable.
<b>AIR QUALITY – CONSTRUCTION</b>			
Regional	Average daily construction emissions would exceed the SCAQMD regional thresholds for VOC and NO <sub>x</sub> . Therefore, without mitigation, the proposed project would result in a significant impact related to regional construction emissions.	<p><b>AQ1</b> As a condition of approval for any <u>Any approval of a Discretionary project</u> or "<u>Active Change Area Project</u>", as defined in Section 3.4 of the Project Description, the City shall <u>ensure that</u> require all contractors to include the following best management practices in contract specifications:</p> <ul style="list-style-type: none"> <li>• Use properly tuned and maintained equipment.</li> <li>• Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations.</li> <li>• Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g. engine catalyts) to the extent they are readily available and feasible.</li> <li>• Use heavy duty diesel-fueled equipment that uses low NO<sub>x</sub> diesel fuel to the extent it is readily available and feasible.</li> <li>• Use construction equipment that uses low polluting fuels (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible.</li> <li>• Maintain construction equipment in good operating condition to minimize air pollutants.</li> <li>• All diesel-powered construction equipment shall meet US Environmental Protection Agency Tier 2 or higher emissions standards according to the following schedule: <ul style="list-style-type: none"> <li>— <b>January 1, 2012 to December 31, 2014:</b> All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by California Air</li> </ul> </li> </ul>	Significant and unavoidable.

TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact Category	Significant Impact	Mitigation Measures <sup>4</sup>	Significance After Mitigation
		<p><del>Resource Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</del></p> <ul style="list-style-type: none"> <li>- <del>Post-January 1, 2015:</del> All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with <u>Best Available Control Technologies</u> BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</li> <li>• Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible.</li> <li>• Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic.</li> <li>• Construction contractors shall utilize super-compliant architectural coatings as defined by the South Coast Air Quality Management District (VOC standard of less than ten grams per liter).</li> <li>• Construction contractors shall utilize materials that do not require painting, as feasible.</li> <li>• Construction contractors shall use pre-painted construction materials, as feasible.</li> <li>• <u>Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.</u></li> <li>• <u>Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site as feasible.</u></li> <li>• <u>Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas as feasible.</u></li> <li>• <u>Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM<sub>10</sub> generation.</u></li> </ul>	
Localized	Based on the SCAQMD LSTs for a one-acre project site and a 25-meter receptor distance, equipment emissions combined with fugitive dust emissions would likely exceed the localized significance thresholds for NO <sub>x</sub> , PM <sub>2.5</sub> , and PM <sub>10</sub> . Therefore, without mitigation, the proposed project would result in a significant impact related to localized construction emissions.	See Mitigation Measure <b>AQ1</b> above.	Significant and unavoidable.

TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact Category	Significant Impact	Mitigation Measures <sup>4</sup>	Significance After Mitigation
<b>AIR QUALITY - OPERATIONS</b>			
Toxic Air Contaminants	<p>New development could be located within the CARB minimum distances for various stationary source land uses, including distribution centers, chrome platers, dry cleaners, and gasoline dispensing facilities. Therefore, without mitigation, the proposed project would result in a significant impact related to operational toxic air contaminant emissions.</p> <p><u>In April 2015, the City Council amended the LAMC to require ASHRAE Standard 52.2 MERV 13 air filtration systems in new buildings located within 1,000 feet of a freeway. The MERV filtration is a legal regulatory requirement, and Mitigation Measure AQ2 is no longer needed to ensure implementation of air filters.</u></p>	<p><b>AQ2</b> — As a condition of approval for any Discretionary or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, that contains sensitive receptors, the City shall require the consideration of the guidelines in the California Air Resources Board’s <i>Air Quality and Land Use Handbook: A Community Health Perspective</i>. This includes projects constructing uses sensitive to air pollution (e.g., residences, schools, medical facilities, elderly housing, etc.) and projects that may expose existing sensitive receptors to new pollution (e.g., warehouses). For projects with sensitive receptors located within 500 feet of the Santa Monica Freeway, a health risk assessment shall be completed that demonstrates that indoor and outdoor sensitive receptors would not be exposed to significant levels of toxic air contaminants in accordance with South Coast Air Quality Management District (SCAQMD) guidelines. The health risk assessments shall be circulated to the SCAQMD for review and comment.</p> <p>In order to lessen the levels of indoor toxic air contaminants, the City of Los Angeles may condition approval of private projects located in the vicinity of major transportation corridors (within 500 feet of a freeway for commercial and industrial uses and residential uses that front on a Major Highway or are located adjacent to an active heavy rail line) to install and maintain an air filtration system having efficiency equal to or exceeding American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2 Minimum Efficiency Reporting Value (MERV-13) (excluding storage/warehouse areas or garages). In addition, windows facing freeways may be required to be inoperable and the property perimeter nearest the freeway may be required to be landscaped with a dense mixture of shrubs and trees to maximize passive filtration of particulate air contaminants.</p>	Less than significant.
<b>BIOLOGICAL RESOURCES - CONSTRUCTION</b>			
Migratory Birds	<p>Construction activities associated with the proposed project could impact protected native tree species, which are protected by the MBTA and CDFG Code, by removal or destruction of an active nest (defined as a nest with eggs or young being attended by one or more adults) or direct mortality or injury of individual birds. Therefore, without mitigation, the proposed project would result in a significant impact related to migratory birds.</p>	<p><b>BR1</b> As a condition of approval of any <u>Any approval of a Discretionary project</u> or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall <u>ensure</u> require that in order to prevent the disturbance of nesting native and/or migratory bird species, all clearing of a project site should take place between September 1 and February 14. If construction is scheduled or ongoing during bird nesting season (February 15 to August 31), qualified biologists shall survey the area within 200 feet (or up to 300 feet, depending on topography or other factors, and 500 feet for raptors) of the construction activity to determine if construction would disturb nesting birds. If nesting activity is being compromised, construction shall be suspended in the vicinity of the nest until fledging is complete. This mitigation measure shall be implemented by a qualified biologist under contract with the project applicant(s). The project biologist should prepare a report detailing the results of the construction monitoring efforts. The report should be submitted to the California Department of Fish and Game Wildlife (CDFW) within two months of the completion of the monitoring activities.</p>	Less than significant.

<b>TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES</b>			
<b>Impact Category</b>	<b>Significant Impact</b>	<b>Mitigation Measures<sup>4</sup></b>	<b>Significance After Mitigation</b>
Tree Preservation	Specific development and infrastructure projects have the potential to result in the loss of protected trees within the West Adams CPA. Therefore, without mitigation, the proposed project would result in a significant impact related to tree preservation.	<b>BR2</b> As a condition of approval of any <del>Any approval of a</del> Discretionary project or "Active Change Area Project", as defined in Section 3.4 of the Project Description, the City shall ensure require that during the final design phase of the proposed project, and prior to the start of the demolition/construction phase, the project applicant shall submit a final landscape plan to the City of Los Angeles for approval by the City's Chief Forester and the Director of the Bureau of Street Services. The final landscape plan shall include provisions to either protect in place the existing protected trees in or adjacent to the project site, per the requirements of the City of Los Angeles Tree Preservation Ordinance.	Less than significant.
<b>CULTURAL RESOURCES - CONSTRUCTION</b>			
Historical Resources	<p>Historical resources are protected by the provisions of the Cultural Heritage Ordinance; however, without mitigation, the proposed project would result in a significant impact related to historical resources.</p> <p><u>The City has completed subsequent phases of the SurveyLA Historic Resources Survey Report: West Adams-Baldwin Hills-Leimert Community Plan Area that include analysis of industrial and manufacturing land uses, and therefore, Mitigation Measure CR3 is no longer needed to ensure that implementation of Mitigation Measure CR4, which has been renumbered is applied to all projects including those within an industrial or manufacturing land use category involving existing structures.</u></p>	<p><b>CR1</b> As a condition of approval for any <del>Before approval of a</del> Discretionary project or "Active Change Area Project", as defined in Section 3.4 of the Project Description, involving properties designated as Historic-Cultural Monuments or listed in or determined eligible for the National Register or California Register, the City <del>project</del> shall require that the project be reviewed by the Department of City Planning Office of Historic Resources.</p> <p><b>CR2</b> As a condition of approval for any <del>Before approval of any building permits for a</del> Discretionary project or "Active Change Area Project", as defined in Section 3.4 of the Project Description, developed in a Historic Preservation Overlay Zones, the City shall require written approval from the Department of City Planning Office of Historic Resources <del>prior to the issuance of building permits.</del></p> <p><b>CR3</b> As a condition of approval for any Discretionary or "Active Change Area Project", as defined in Section 3.4 of the Project Description, and until subsequent phases of the SurveyLA Historic Resources Survey Report: West Adams-Baldwin Hills-Leimert Community Plan Area have been completed to include analysis of industrial and manufacturing land uses, the City shall require all projects within an industrial or manufacturing land use category involving existing structures to be evaluated by a qualified architectural historian for the purposes of determining if they are historically significant. If the structures are found to be historically significant the project shall comply with the recommendations of the qualified architectural historian and the architectural survey report written by the qualified architectural historian. The report shall be submitted to the City for documentation.</p> <p><b>CR34</b> As a condition of approval for any <del>Before approval of a</del> Discretionary project or "Active Change Area Project", as defined in Section 3.4 of the Project Description, the City shall <del>involving properties identified in the SurveyLA Historic Resources Survey Report: "West Adams - Baldwin Hills - Leimert Community Plan Area" as eligible for listing, the City of Los Angeles Office of Historic Resources (OHR) shall find that the project is consistent with the U.S. Secretary of the Interior's Standards for Rehabilitation or that upon further review or study, the property is not eligible for designation as a historic resource.</del></p>	Less than significant.

TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact Category	Significant Impact	Mitigation Measures <sup>4</sup>	Significance After Mitigation
		<ul style="list-style-type: none"> <li>Identify potential impacts to historical resources. The project applicant shall review the <i>SurveyLA Historic Resources Survey Report: West Adams-Baldwin Hills-Leimert Community Plan Area</i>, dated August 2011 (and subsequent phases of the report that will evaluate industrial/manufacturing land uses), to determine whether the project site has been previously surveyed and whether historical resources were identified.</li> <li>Ensure that designated historic buildings, are appropriately renovated and maintained, and that the preservation, rehabilitation, restoration, and reconstruction or adaptive reuse of a known historical resource shall meet the U.S. Secretary of the Interior's Standards for Rehabilitation (Secretary's Standards). Any proposal to preserve, rehabilitate, restore, reconstruct, or adaptively reuse a known historical resource in accordance with the Secretary's Standards shall be deemed to not be a significant impact under CEQA and, in such cases, no additional mitigation measures will be required if the project does not require discretionary action.</li> <li>Ensure that incentive areas where Floor Area Ratio (FAR) increases may be proposed are in compliance with the Secretary's Standards, and require that all projects within these areas that may potentially impact historic resources meet the Secretary's Standards. The project would also be subject to any other historic resources review process triggered by any other historic designation. This requirement would be reviewed for compliance by Office of Historic Resources staff.</li> <li>Require, where feasible, noise buffers/walls and/or visual buffers/landscaping or some other material to be constructed by the prime construction contractor to preserve the contextual setting of significant built resources.</li> </ul>	
Archaeological Resources	Given the well-documented occupation of the Los Angeles Basin by indigenous tribes both prehistorically and historically, there is a reasonable potential that the development that would occur under the proposed project would be located on a site with previously unknown archaeological resources. Therefore, without mitigation, the proposed project would result in a significant impact related to archeological resources.	<p><b>CR45</b> As a condition of approval for a <u>Any approval of a Discretionary project</u> or "<u>Active Change Area Project</u>", as defined in Section 3.4 of the <u>Project Description</u>, the City shall <u>require ensure</u> that prior to excavation and construction on a proposed project site, the project applicant shall perform a cultural resources literature and records search by an institution recognized and approved by the City of Los Angeles Planning Department to assess the potential for the proposed project site to contain sensitive protected cultural resources.</p> <p><b>CR56</b> As a condition of approval for a <u>Any approval of a Discretionary project</u> or "<u>Active Change Area Project</u>", as defined in Section 3.4 of the <u>Project Description</u>, the City shall <u>require ensure</u> that prior to excavation and construction on a proposed project site, the prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the proposed project site.</p>	Less than significant.

<b>TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES</b>			
<b>Impact Category</b>	<b>Significant Impact</b>	<b>Mitigation Measures<sup>4</sup></b>	<b>Significance After Mitigation</b>
		<p><b>CR67</b> As a condition of approval for a <u>Any approval of a Discretionary project</u> or "<u>Active Change Area Project</u>", as defined in Section 3.4 of the Project Description, the City shall <u>require ensure</u> that if during any phase of project construction any cultural materials are encountered, construction activities within a 50-meter radius shall be halted immediately, and the project applicant shall notify the City. A qualified prehistoric archaeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to conduct a more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the project site.</p> <p><b>CR78</b> As a condition of approval for a <u>Any approval of a Discretionary project</u> or "<u>Active Change Area Project</u>", as defined in Section 3.4 of the Project Description, the City shall <u>require ensure</u> that if any find were determined to be significant by the archaeologist, the City and the archaeologist would meet to determine the appropriate course of action.</p> <p><b>CR89</b> As a condition of approval for a <u>Any approval of a Discretionary project</u> or "<u>Active Change Area Project</u>", as defined in Section 3.4 of the Project Description, the City shall <u>require ensure</u> that all cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.</p>	
Paleontological Resources	Given the well-documented fossil richness of the Los Angeles Basin, there is a reasonable potential that the development that would occur under the proposed project would be located on a site with previously unknown paleontological resources. Therefore, without mitigation, the proposed project would result in a significant impact related to paleontological resources.	<p><b>CR940</b> As a condition of approval for a <u>Any approval of a Discretionary project</u> or "<u>Active Change Area Project</u>", as defined in Section 3.4 of the Project Description, the City shall <u>require ensure</u> that during excavation and grading, if paleontological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by a paleontologist and properly processed. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.</p>	Less than significant.
Human Remains	Although the potential to disturb any human remains interred outside of formal cemeteries within the West Adams CPA is considered low, given the level of past human activity, it is possible that unknown human remains could be located on sites that would be developed under the proposed project. Therefore, without mitigation, the proposed project would result in a significant impact related to human remains.	<p><b>CR1044</b> As a condition of approval for a <u>Any approval of a Discretionary project</u> or "<u>Active Change Area Project</u>", as defined in Section 3.4 of the Project Description, the City shall <u>require ensure</u> that if human remains are unearthed at a project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of Los Angeles Public Works Department and County coroner shall be immediately notified. No further disturbance shall occur until the Los Angeles County Coroner has made the necessary findings as to origin and disposition in accordance with California Health and Safety Code Section 7050.5. If the remains are determined to be those of a Native American, the Native American Heritage Commission (NAHC) in Sacramento shall be contacted before the remains are removed in accordance with Section 21083.2 of the California Public Resources Code.</p>	Less than significant.



<b>TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES</b>			
<b>Impact Category</b>	<b>Significant Impact</b>	<b>Mitigation Measures<sup>4</sup></b>	<b>Significance After Mitigation</b>
<b>GREENHOUSE GAS EMISSIONS - OPERATIONS</b>			
Greenhouse Gas Emissions	The increase in emissions from the proposed project would have the potential to interfere with implementation of the ClimateLA plan, and subsequently could interfere with the State's ability to meet its goals under AB 32. Therefore, without mitigation, the proposed project would result in a significant impact related to operational GHG emissions.	<p><b>GHG1</b> As a condition of approval for a <u>Any approval of a Discretionary project or "Active Change Area Project"</u>, as defined in Section 3.4 of the Project Description, the City shall require ensure that developers to implement the following greenhouse gas reduction measures are incorporated into the project design: applicable GHG reduction measures in project design and comply with regulatory targets. Sources of GHG reduction measures include the California Attorney General's Office <u>Addressing Climate Change at the Project Level</u> (January 6, 2010) document and the California Air Pollution Control Officers Association <u>Model Policies for Greenhouse Gases in General Plans</u> (June 2009) document.</p> <ul style="list-style-type: none"> <li>• <u>Install energy efficient lighting (e.g., light emitting diodes), heating and cooling systems, appliances, equipment, and control systems).</u></li> <li>• <u>Install light colored "cool" roofs and cool pavements.</u></li> <li>• <u>Create water-efficient landscapes.</u></li> <li>• <u>Install water-efficient fixtures and appliances.</u></li> </ul>	Significant and unavoidable.
Applicable Plans, Policies, or Regulations	The increase in emissions from the proposed project would have the potential to interfere with implementation of the ClimateLA plan, and subsequently could interfere with the State's ability to meet its goals under AB 32. Therefore, without mitigation, the proposed project would result in a significant operational impact related to GHG plans, policies, and regulations.	See Mitigation Measure <b>GHG1</b> above.	Significant and unavoidable.
<b>HAZARDS &amp; HAZARDOUS MATERIALS - OPERATIONS</b>			
Hazardous Materials Sites	Future development on a site previously occupied by a hazardous materials generating facility would have the potential to create a significant hazard to the public or the environment unless an environmental site assessment is conducted to determine potential risks and appropriate mitigation. Therefore, without mitigation, the proposed project would result in a significant impact related to hazardous materials sites.	<p><b>HM1</b> As a condition of approval for a <u>Any approval of a Discretionary project or "Active Change Area Project"</u>, as defined in Section 3.4 of the Project Description, the City <u>that involves new construction that will involve soil disturbance shall require ensure that</u> a Phase I Environmental Site Assessment (ESA) to be <u>is prepared to ensure that potential hazards are evaluated and mitigated.</u> The assessment shall be prepared by a Registered Environmental Assessor (REA) in accordance with State standards/guidelines to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, State, and federal regulations and policies. <u>Any further study found necessary by an REA or relevant federal, state or local agency shall be performed prior to project approval and any remediation found necessary by the REA or any relevant federal, state or local agency shall be performed prior to project approval or made a condition on the project if that is found to be adequate for remediation by an REA or the relevant federal, state or local agency.</u></p>	Less than significant.

TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact Category	Significant Impact	Mitigation Measures <sup>4</sup>	Significance After Mitigation
<b>NOISE AND VIBRATION - CONSTRUCTION</b>			
Noise	Under both monitored and presumed noise levels, construction noise would increase ambient noise levels by more than 10 dBA and would exceed the significance thresholds for construction activities lasting more than one day and construction activities lasting more than ten days in a three month period. Therefore, without mitigation, the proposed project would result in a significant impact related to construction noise.	<p><b>N1</b> As a condition of approval for a <del>Any approval of a Discretionary project or "Active Change Area Project"</del>, as defined in Section 3.4 of the Project Description, the City shall require <del>ensure</del> <u>that</u> all contractors to include the following best management practices in contract specifications:</p> <ul style="list-style-type: none"> <li>• Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences.</li> <li>• The construction contractor shall locate construction staging areas away from sensitive uses.</li> <li>• When construction activities are located in close proximity to noise-sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses.</li> <li>• Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving.</li> <li>• Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.</li> <li>• The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.</li> </ul>	Significant and unavoidable.
Ground Vibration	Vibration generated by pile drivers, clam shovels, and vibratory rollers would exceed the building damage standards depending on the distance from the source to the receptor. Therefore, without mitigation, the proposed project would result in a significant impact related to construction vibration.	<p>See Mitigation Measure <b>N1</b> above, as well as:</p> <p><b>N2</b> <del>As a condition of approval for</del> <u>Prior to any approval of a Discretionary project or "Active Change Area Project" that is adjacent to buildings listed or determined eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, designated as a Historic-Cultural Monument by the City of Los Angeles, or within a Historic Preservation Overlay Zone ("historic buildings"), as defined in Section 3.4 of the Project Description, the City shall require project proponents to consider potential vibration impacts to historic buildings. The project proponents shall coordinate with the City to identify historic buildings located within 20 feet of general construction activity or 76 feet of pile-driving activity. Projects with construction activity within these distances from historic buildings shall develop a Vibration Control Plan to mitigate potential impacts. The Vibration Control Plan shall be completed by a qualified structural engineer and include a pre-construction survey letter establishing baseline conditions at potentially affected buildings. The survey shall provide a shoring design to protect the identified land uses from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels such as sonic pile driving or caisson drilling instead of impact pile driving.</u> <del>the City shall ensure all of the following requirements are or will be met:</del></p>	Significant and unavoidable.

TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact Category	Significant Impact	Mitigation Measures <sup>4</sup>	Significance After Mitigation
		<ul style="list-style-type: none"> <li>Historic buildings adjacent to the project's construction zones are identified.</li> <li>A Vibration Control Plan is prepared and approved by the City.</li> <li>The Vibration Control Plan shall be completed by a qualified structural engineer.</li> <li>The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected buildings. The survey letter shall provide a shoring design to protect the identified land uses from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels such as sonic pile driving or caisson drilling instead of impact pile driving.</li> </ul> <p>At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-on letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).</p>	
<b>NOISE AND VIBRATION - OPERATIONS</b>			
Noise	<p>Based on guidance provided by the Federal Transit Administration, Light Rail Transit can generate impacts at land uses within 350 feet and with an unobstructed view of the rail line. Land uses within 175 feet and with an obstructed view of the rail line may also be impacted. Development would potentially be located within 350 feet of the Expo Light Rail Transit Line. Therefore, without mitigation, the proposed project would result in a significant impact related to transit noise exposure.</p> <p><u>Note: Mitigation Measure N4 is not necessary to mitigate a CEQA impact. Pursuant to the holding in <i>CBIA v. BAAQMD</i> (2015), impacts from the existing environment on the project or future users or residents of the project are not CEQA impacts.</u></p>	<p><b>N3</b> As a condition of approval for a <u>Any approval of a Discretionary project or "Active Change Area Project"</u>, as defined in Section 3.4 of the Project Description, the City shall require <u>that proposed includes industrial projects</u> uses located within 1,000 feet of a residential land use to <u>shall ensure that complete a noise study is completed that usesing the significance thresholds established in the City of Los Angeles CEQA Thresholds Guide (including as it may be amended in the future).</u> Identified impacts shall be mitigated per the City's Noise Ordinance <u>or through any measures identified in the noise study.</u></p> <p><b>N4</b> As a condition of approval for any project, as defined in Section 3.4 of the Project Description, the City shall require that proposed land uses within 175 feet with an obstructed view or 350 feet with an unobstructed view of the Exposition Light Rail Transit Line to complete a noise study using the significance thresholds established in the City of Los Angeles CEQA Thresholds Guide. Identified impacts shall be mitigated per the City's Noise Ordinance.</p>	Less than significant.

<b>TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES</b>			
<b>Impact Category</b>	<b>Significant Impact</b>	<b>Mitigation Measures<sup>4</sup></b>	<b>Significance After Mitigation</b>
<b>PUBLIC SERVICES - OPERATIONS</b>			
Police	New developments associated with the proposed project could result in the need for increased police protection services on site. Therefore, without mitigation, the proposed project would result in a significant impact related to police protection services.	<b>PS1</b> As a condition of approval for a Discretionary projects in the CPIO or the Crenshaw Corridor Specific Plan or "Active Change Area Project", as defined in Section 3.4 of the Project Description, the City shall require be reviewed at the discretion of the that each applicant provide project plans to the Los Angeles Police Department (LAPD). Per department standards, the LAPD will determine if any additional crime prevention and security features would be available that are consistent with the development standards as applied to the design of the project. Any additional design features identified by the LAPD shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.	Less than significant.
Public Parks	<u>The population increase, due to implementation of the Proposed Project, would cause significant impacts to public parks and recreational facilities. Although the City is currently seeking to update park fees associated with implementation of the State Quimby Act that would generate greater funding for parks as a result of new development, the existing deficits in park acreage cannot be improved or resolved by fees on new development alone. Although the following mitigation measures have been identified, no feasible mitigation measures were identified to reduce the significant impact related to public parks to less than significant. Therefore, without mitigation, the proposed project would result in a significant impact related to public parks.</u>	<b>PS2</b> <u>Subject to available resources and funding, the City shall prioritize the implementation of recreation and park projects in parts of the West Adams Community Plan Area with the greatest existing deficiencies.</u> <b>PS3</b> <u>Subject to available resources and funding, the City shall establish joint-use agreements with the Los Angeles Unified School District and other public and private entities which could contribute to the availability of recreational opportunities in the West Adams Community Plan Area.</u> <b>PS4</b> <u>Subject to available resources and funding, the City shall monitor appropriate recreation and park statistics and compare with population projections and demand to identify the existing and future recreation and park needs of the West Adams Community Plan Area.</u>	Significant and unavoidable.
Public Libraries	The majority of the projected increase in population would likely use the Washington Irving and Baldwin Hills Libraries and would likely require the expansion of existing libraries or the development of a new library. Therefore, without mitigation, the proposed project would result in a significant impact related to public libraries.	No feasible mitigation measures were identified to reduce the significant impact related to public libraries to less than significant.	Significant and unavoidable.

<b>TABLE 2-2: REVISED SUMMARY OF IMPACTS AND MITIGATION MEASURES</b>			
<b>Impact Category</b>	<b>Significant Impact</b>	<b>Mitigation Measures<sup>4</sup></b>	<b>Significance After Mitigation</b>
<b>TRANSPORTATION &amp; TRAFFIC - OPERATIONS</b>			
Circulation System	Reductions in roadway capacity along major corridors required to provide proposed bike lanes encourage vehicles passing through the West Adams CPA to reroute around the West Adams CPA. Therefore, the localized reductions in VMT would not necessarily result in a regional benefit as increases in VMT would likely be experienced around the West Adams CPA.	No feasible mitigation measures were identified to reduce the significant impact related to the circulation system to less than significant, because none of the three proposed TAMP scenarios would maintain the same number (or fewer) of segments at LOS E or F when compared to existing (Year 2008) conditions.	Significant and unavoidable.
Congestion Management Plan	Implementation of the proposed project regarding walking, bicycling, transit use, transit-oriented development, and TDM would serve to reduce vehicle trips and improve mobility within the West Adams CPA. However, since there is no feasible mitigation within the existing right-of-way, and taking additional right-of-way for vehicular traffic may conflict with a number of other pedestrian and transit-oriented policies, the proposed project would result in a significant and unavoidable impact related to the CMP.	No feasible mitigation measures were identified to reduce the significant impact related to the CMP to less than significant, because taking additional right-of-way for vehicular traffic would conflict with a number of other policies.	Significant and unavoidable.
<b>SOURCE:</b> TAHA/DCP, 2012, 2015.			

**CHAPTER 3.0 - PROJECT DESCRIPTION**

- Section 3.2 on page 3-2 has been updated as follows:

The ~~proposed~~ Proposed Project will provide a framework on a program level for future development and will specify the type of uses, densities, and intensities that would be permitted. The ~~proposed West Adams New Community Plan~~ Proposed Project objectives promote the internal relationship of mutually supportive uses, such as employment, housing, recreation, and community-serving facilities, etc., so as to decrease dependency on the automobile, encourage alternative transportation modes, make efficient use of land and infrastructure, reduce energy consumption, promote sustainability, and foster a strong sense of community. As part of the City’s New Community Plan Program, the Proposed Project will update the goals, policies and implementation programs of the existing Community Plan as well as establish a series of implementing actions, all of which are intended to fulfill the following NCP Program goals, objectives and features: The primary objectives of the proposed West Adams New Community Plan are as follows:

- Table 3-2A has been added following the introductory paragraph on page 3-2 of the “Project Objectives” subsection as follows:

<b>TABLE 3-2A: NCP PROGRAM LEVEL GOALS, OBJECTIVES AND FEATURES</b>	
<b>OVERARCHING PROGRAM GOAL: GUIDE LAND USE AND DEVELOPMENT FOR THE NEXT TWENTY YEARS.</b>	
<i>Objective (1) Accommodate citywide projected population, housing and employment growth.</i>	
<i>Objective (2) Implement “smart growth” goals and policies.</i>	
<i>Objective (3) Minimize lengthy discretionary approvals.</i>	
<i>Objective (4) Assess public infrastructure, service and facility needs.</i>	
<i>Program Features</i>	<i>Amend the goals, policies and programs of the Community Plan consistent with those of the General Plan Framework Element.</i>
	<i>Update the General Plan Framework Long Range Land Use Diagram as necessary to ensure that districts and centers are in accord with Community Plan recommendations.</i>
	<i>Initiate General Plan amendments and zone changes as necessary to implement the General Plan and accomplish the stated goals and policies of the Community Plan.</i>
	<i>Amend and establish overlay districts, specific plans, and/or special districts to portions of the Community Plan, as necessary.</i>
	<i>Refine and amend any applicable Citywide Elements of the General Plan.</i>
	<i>Prepare an EIR that adequately evaluates the project impacts with regard to infrastructure, service and facility needs, and establishes mitigation measures where appropriate.</i>

The following list of project goals and objectives was developed in direct response to community outreach conducted in order to define the scope of the Proposed Project. Table 3-2B further clarifies the priority of these goals and objectives and further clarifies how they are implemented through adoption of the various project features of the Proposed Project. The primary goals of the Proposed Project are to facilitate revitalization of the area’s commercial and industrial corridors while conserving the low scale character of adjacent residential neighborhoods. The goals reflect the community vision and seek to improve the quality of life for all who share the community plan area.

<b>TABLE 3-2B: PROJECT LEVEL GOALS, OBJECTIVES AND FEATURES</b>	
<b>PRIMARY GOAL: REVITALIZATION OF COMMERCIAL AND INDUSTRIAL AREAS</b>	
<i>Objective (1) Facilitate the revitalization of underutilized commercial and industrial areas through the strategic location of potential future new development along major east/west corridors and at specific activity centers and nodes.</i>	
<i>Objective (2) Develop effective land use strategies toward creating a sense of place around existing and future transit systems such as the Exposition Light Rail Transit (Expo LRT) Line by incentivizing mixed-use transit-oriented developments (TOD), while continuing to minimize adverse impacts to adjacent residential neighborhoods.</i>	
<i>Objective (3) Improve the function, design, and economic vitality of commercial areas toward preserving and enhancing the positive characteristics of existing land uses.</i>	
<i>Objective (4) Enhance opportunities for housing and jobs via TOD located near transit stations, while respecting surrounding residential communities by creating requirements for buffering and height transitions.</i>	
<i>Objective (5) Support Regional Center development so that existing, stable residential communities have local shopping access.</i>	
<i>Objective (6) Preserve and strengthen commercial areas to provide a diverse jobs-producing economic base and to enhance the appearance of existing centers and corridors.</i>	
<i>Project Features</i>	<b>General Plan Amendments.</b> <i>General Plan amendments are proposed to maintain consistent neighborhood character, retain existing uses, improve business and employment opportunities, and preserve existing retail and neighborhood services.</i>
	<b>Zone and Height District Changes.</b> <i>Refinements to zoning regulations are proposed to enable opportunities for increased employment and new housing, particularly along commercial corridors, TOD areas, and at commercial centers. Floor Area Ratio (FAR) and building height regulations in some planning subareas would be increased or decreased through changes to the height district. In addition, transitional buffers for building heights adjacent to residential uses, as well as the rezoning of some industrial areas to either commercial or less intense hybrid industrial (commercial/manufacturing) uses are proposed to permit ground floor commercial and further limit outdoor storage.</i>
	<b>Community Plan Implementation Overlay District (CPIO).</b> <i>The West Adams CPIO District and its corresponding subareas provide supplementary use (overlay) districts throughout the West Adams CPA that directly implement the goals, policies, and programs of the Community Plan. CPIO Subareas will be used in combination with proposed underlying zone and height district regulations to further tailor use and development standards, including use limitations. CPIO Subareas will involve review procedures that require sign-off (ministerial approval) for projects that comply with the standards:</i>
	<ul style="list-style-type: none"> <li>• <i>Commercial Corridors and Major Intersection Nodes Subareas.</i> <i>These CPIO Subareas identify specific commercial corridors and nodes, and include use limitations and development standards for new construction.</i></li> <li>• <i>Hyde Park Boulevard Industrial Subarea.</i> <i>This CPIO Subarea has specific use limitations, development standards and streetscape concepts for new industrial construction along a segment of Hyde Park Boulevard from West Boulevard to Van Ness Avenue.</i></li> <li>• <i>La Brea/Farmdale Avenues TOD Subarea.</i> <i>This CPIO Subarea has specific use limitations, development standards and streetscape concepts for new construction in the blocks surrounding the proposed La Brea and Farmdale Avenues LRT stations. The subarea identifies parcels where more intense development would be permitted, including increased building intensity (FAR), height and reduced parking based on proximity to the LRT station.</i></li> <li>• <i>Jefferson/La Cienega Boulevards TOD Subarea.</i> <i>This CPIO Subarea has specific use limitations, development standards and streetscape concepts for new construction in the blocks surrounding the proposed La Cienega LRT station. The subarea identifies parcels where more intense development would be permitted, including increased building intensity (FAR), height and reduced parking requirements based on proximity to the LRT station.</i></li> <li>• <i>Venice/National Boulevards TOD Subarea.</i> <i>This CPIO Subarea has specific use limitations, development standards and streetscape concepts for new construction in the blocks surrounding the proposed Culver City LRT station. The subarea identifies parcels where more intense development would be permitted, including increased building intensity (FAR), height and reduced parking requirements based on proximity to the LRT station.</i></li> </ul>

<b>TABLE 3-2B: PROJECT LEVEL GOALS, OBJECTIVES AND FEATURES</b>	
	<p><b>Specific Plan Amendments.</b> <i>Specific Plan amendments are proposed for the Crenshaw Corridor Specific Plan. Amendments include height and FAR increases in certain areas, additional design guidelines and standards, identification of TOD areas, administrative clearance regulations, setback requirements, sign regulations and standards, and use limitations.</i></p> <p><i>These amendments to the existing Crenshaw Corridor Specific Plan refine design standards for development along the length of the corridor from the I-10 to Florence Avenue, and in particular at the Adams/Crenshaw Boulevards intersection and for new potential TODs in the blocks surrounding the following proposed Crenshaw/LAX Project LRT stations: Crenshaw/Exposition Boulevards, Crenshaw/Martin Luther King Jr. Boulevards, Crenshaw Boulevard/ Vernon Avenue, and Crenshaw Boulevard/ Slauson Avenue.</i></p>
<b>PRIMARY GOAL: NEIGHBORHOOD CONSERVATION</b>	
<i>Objective 1. Maintain and enhance the enduring and often historic character of the existing low-scale residential neighborhoods while providing a variety of housing opportunities.</i>	
<i>Objective 2. Include a comprehensive program of historic and cultural resource protection, enhancement, conservation, and re-use of existing buildings.</i>	
<i>Objective 3. Retain and enhance historic and cultural resources within the West Adams CPA, particularly those within the West Adams, Leimert Park, and Jefferson Park neighborhoods.</i>	
<u>Project Features</u>	<p><b>General Plan Amendments.</b> <i>General Plan amendments are proposed to maintain consistent neighborhood character, retain existing uses. Some General Plan amendments would also create consistency with future proposed land uses, restrict incompatible uses, apply updated Framework land use categories, or eliminate those categories that no longer exist, and correct minor errors. Some General Plan amendments would be accompanied by zone changes.</i></p>
	<p><b>Single-Family Residential.</b> <i>The existing Low Residential land use category would be divided into Low I, Low II and Low III Residential in order to limit the range of corresponding zones allowed within each land use designation as a method of retaining the existing character of the various neighborhoods. The existing zoning designations associated with single-family land use would be R1 for Low II Residential and RD5 to RD6 for Low III Residential.</i></p>
	<p><b>Zone and Height District Changes.</b> <i>The number of residential units (density) permitted and the bulk and massing (intensity) of new construction has been decreased through changes to the zone and height district in several residential neighborhoods in order to maintain the existing character of the various neighborhoods.</i></p>
	<p><b>Community Plan Implementation Overlay District (CPIO).</b> <i>The West Adams CPIO District and its corresponding subareas provide supplementary use (overlay) districts throughout the West Adams CPA that directly implement the goals, policies, and programs of the Community Plan. CPIOs in combination with the proposed underlying zone and height district regulations, as well as SurveyLA results to further tailor use and development standards such as transitional buffers for building heights adjacent to residential uses and reduced height in order to maintain neighborhood character.</i></p>
<b>PRIMARY GOAL: IMPROVED QUALITY OF LIFE</b>	
<i>Objective 1. Provide opportunities to improve public health by creating more pedestrian-friendly environments, improving access to public transit, and locating jobs and housing within walking or biking distance from one another.</i>	
<i>Objective 2. Establish use limitations for off-site alcohol sales, free-standing fast-food restaurants, automotive uses, swap meets, pawn shops, and gun shops.</i>	
<u>Project Features</u>	<p><b>Community Plan Implementation Overlay District (CPIO).</b> <i>The CPIO District and its corresponding subareas provide supplementary use (overlay) districts throughout the West Adams CPA that directly implement the goals, policies, and programs of the Community Plan as follows:</i></p> <ul style="list-style-type: none"> <li>• <i>The CPIO Subareas identify parcels where mixed-use development is encouraged, and require the ground floor of all new buildings to incorporate pedestrian-friendly design features.</i></li> <li>• <i>CPIO Subareas will be used in combination with the proposed underlying zone to prohibit or further limit certain uses through distance separation.</i></li> <li>• <i>Several TOD CPIO Subareas also incorporate streetscape concepts for new construction in the blocks surrounding the LRT stations.</i></li> </ul>



<b>TABLE 3-2B: PROJECT LEVEL GOALS, OBJECTIVES AND FEATURES</b>	
<b>SECONDARY GOAL: INCREASE MOBILITY</b>	
<i>Objective 1. Developing transportation alternatives</i>	
<i>Objective 2. Making streets more walkable</i>	
<i>Objective 3. Improving parking resources</i>	
<i>Project Features</i>	<b><i>Mobility Plan 2035.</i></b> <i>The Proposed Project is consistent with Mobility Plan 2035 (which replaced the City's 1999 Transportation Element) and identifies pedestrian, bicycle and transit priority streets.</i>
	<b><i>Community Plan Implementation Overlay District (CPIO).</i></b> <i>The Expo Line TOD and Hyde Park CPIO Subareas have streetscape concepts for the blocks surrounding the proposed LRT stations. The subareas reduce parking requirements based on proximity to the LRT station.</i>
	<b><i>Specific Plan Amendments.</i></b> <i>Amendments to the Crenshaw Corridor Specific Plan require all projects to comply with any adopted Streetscape Plan for Crenshaw Boulevard.</i>
<b>SECONDARY GOAL: PLAN FOR ADEQUATE PUBLIC INFRASTRUCTURE AND SERVICES.</b>	
<i>Objective 1. Provide for the development of civic, cultural, religious, educational, and other community uses such as libraries, fire stations, community centers, police facilities, parks, schools, etc.</i>	
<i>Project Features</i>	<b><i>Zone Consistency:</i></b> <i>The Proposed Project ensures that zoning and land use are consistent with new park and public facility uses.</i>
	<b><i>Community Plan Implementation Overlay District (CPIO).</i></b> <i>The CPIO District and its corresponding subareas provide supplementary use (overlay) districts throughout the West Adams CPA that directly implement the goals, policies, and programs of the Community Plan as follows:</i> <ul style="list-style-type: none"> <li>• <i>The Expo Line TOD and Hyde Park CPIO Subareas have development standards and streetscape concepts for the blocks surrounding the proposed LRT stations. These subareas require large TOD projects to incorporate open space that is accessible to the public.</i></li> <li>• <i>Development regulations are proposed to incentivize the establishment of community centers, particularly along commercial corridors, TOD areas, and commercial nodes.</i></li> </ul>
	<b><i>Specific Plan Amendments.</i></b> <i>Amendments to the Crenshaw Corridor Specific Plan require all projects to comply with any adopted Streetscape Plan for Crenshaw Boulevard and require large TOD projects to incorporate open space that is available to the public.</i>

The Proposed Project includes the following components:

- West Adams-Baldwin Hills-Leimert Community Plan text (Policy Document),
- Updated General Plan land use designations and corresponding zones (also referred to as the “Plan Map”)
- General Plan amendments
- Modifications to the street designations and amendments to the Transportation (Mobility) Element,
- Amendments to the General Plan Framework Long Range Land Use Diagram
- Updated Community Plan map footnotes and symbol changes
- Zone and height district changes
- Amendments to the Crenshaw Corridor Specific Plan
- Establishment of the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay District (CPIO)
- CPIO and the Crenshaw Corridor Specific Plan project approvals, including those approved by administrative clearance.
- ~~Revitalize underutilized commercial and industrial areas through the strategic location of potential future new development along major east/west corridors and at specific activity centers and nodes.~~
- ~~Develop rational land use strategies toward place making around existing and future transit systems such as the Exposition Light Rail Transit (Expo LRT) Line through the creation of transit-oriented developments (TOD), while continuing to minimize adverse impacts to adjacent residential neighborhoods.~~
- ~~Improve the function, design, and economic vitality of commercial areas toward preserving and enhancing the positive characteristics of existing land uses.~~

- ~~○ Enhance opportunities for housing and jobs via TODs located near transit stations, while respecting surrounding residential communities by creating requirements for buffering and height transitions.~~
  - ~~○ Support Regional Center development so that existing, stable residential communities have local shopping access.~~
  - ~~○ Preserve and strengthen commercial areas to provide a diverse jobs producing economic base and to enhance the appearance of existing centers and corridors.~~
  - ~~○ Maintain and enhance the enduring and often historic character of the existing low scale residential neighborhoods while providing a variety of housing opportunities.~~
  - ~~○ Include a comprehensive program of resource protection, enhancement, conservation, and re-use and provide mitigation of impacts of the project.~~
  - ~~○ Retain and enhance historic and cultural resources within the West Adams CPA, particularly those within the West Adams, Leimert Park, and Jefferson Park neighborhoods.~~
  - ~~○ Provide opportunities to improve public health by creating more pedestrian friendly environments, improving access to public transit, and locating jobs and housing within walking or biking distance from one another.~~
  - ~~○ Establish use limitations for such things as alcohol sales, free standing fast food restaurants, automotive uses, swap meets, pawn shops, and gun shops.~~
  - ~~○ Increase mobility through:
    - ~~▪ Developing transportation alternatives;~~
    - ~~▪ Making streets more walkable;~~
    - ~~▪ Improving parking resources; and~~
    - ~~▪ Planning for adequate public infrastructure and services.~~~~
  - ~~○ Provide for the development of civic, cultural, religious, educational, and other community uses such as libraries, fire stations, community centers, police facilities, parks, schools, etc.~~
  - ~~○ Initiate General Plan Amendments and Zone Changes as necessary to implement the General Plan and accomplish the stated goals and policies of the New Community Plan program;~~
  - ~~○ Amend and establish Overlay Districts, Specific Plans, and/or special districts to portions of the West Adams New Community Plan, as necessary to implement the General Plan Framework and community plan policies; and~~
  - ~~○ Refine and amend any applicable Citywide Elements of the General Plan.~~
- Paragraph 1 on page 3-8 of Section 3.4 has been updated as follows:

There are 200 acres of open space uses in the West Adams CPA. Residents of the West Adams CPA benefit from direct access to the Baldwin Hills and particularly, the Kenneth Hahn State Recreation Area, which comprises approximately 80 acres of Regional Open Space. An additional 120 acres of open space are dispersed throughout the West Adams CPA as Neighborhood and Community Parks.

There are 410 acres of public facilities uses in the West Adams CPA. Public Facilities include community serving uses such as public schools and libraries as well as infrastructure uses such as power-line, railroad and freeway right-of-ways.
  - Paragraph 1 on page 3-11 of Section 3.4 has been updated as follows:

The Proposed Project is a comprehensive revision of the adopted 1998 West Adams Community Plan. The proposed West Adams New Community Plan will include updates to the policies and programs of the existing Community Plan as well as establish a series of implementing ordinances, all which are intended to achieve the NCP Program and Proposed Project goals and policies enumerated in Tables 3-2A and 3-2B, above.

    - ~~○ Guide development through 2030;~~
    - ~~○ Refine and amend the existing 1996 General Plan Framework Element;~~
    - ~~○ Initiate General Plan Amendments and Zone Changes as necessary to implement the General Plan and accomplish the stated goals and policies of the New Community Plan program;~~

- ~~○ Amend and establish Overlay Districts, Specific Plans, and/or special districts to portions of the West Adams New Community Plan, as necessary to implement the General Plan Framework and community plan policies; and~~
- ~~○ Refine and amend any applicable Citywide Elements of the General Plan.~~
- Paragraph 3 on page 3-11 of Section 3.4 has been updated as follows:

The proposed West Adams New Community Plan includes new policies and programs, as well as zone changes, plan land use designation and district amendments, and establishes overlay zones, as appropriate. The zoning designations would serve to regulate development standards such as: heights of structures, setbacks, lot coverage, density and intensity, open space, use of land, parking, and design. Overlay zones, such as HPOZs and the CPIO District districts, and as well as other special plans such as the amendments to the Crenshaw Corridor Specific Plan would also be established to regulate development that is consistent with the General Plan, to enhance the unique character of neighborhoods, and to address growth within the West Adams CPA. While the policies and programs contained in the West Adams New Community Plan do apply throughout the Community Plan, it is important to note that zone changes being proposed by the project are targeted to specific geographic areas and do not affect every parcel in the West Adams CPA. The targeted areas of zoning changes can be seen in **Figure 3-5**. Development proposed outside these areas of zoning changes would be subject to existing City regulations and standards, as contained in its existing zoning, and would be guided by the policies and programs in the West Adams New Community Plan.
- Paragraph 6 on page 3-13 of Section 3.4 has been updated as follows:

A detailed list of the proposed land use and zone changes can also be found in Appendix B. These areas are primarily along the commercial corridors of Pico, Robertson, Venice, Washington, Adams, West, Jefferson, Martin Luther King Jr., La Cienega, and Crenshaw Boulevards, as well as Slauson and Florence Avenues, and 48<sup>th</sup> and 54<sup>th</sup> Streets. Changes to industrial uses are focused primarily around the Hyde Park Industrial Corridor Community Plan Implementation Overlay (CPIO) District (described below). The CPIO District also features a “Character Residential” Subarea applied to the Arlington Heights neighborhood.
- Paragraphs 3 and 5 on page 3-14 of Section 3.4 have been updated as follows:
  - **General Plan Amendments.** General Plan Amendments are proposed to maintain consistent neighborhood character, retain existing uses, improve business, employment, and housing opportunities, and preserve existing retail and neighborhood services. A limited amount of land classified for multi-family residential in predominately commercial or industrial areas, and a limited amount of land along corridor segments classified as commercial manufacturing would be reclassified to commercial or industrial land use designations to create consistency between land use designations and existing uses on the site and/or existing surrounding land uses. Some General Plan Amendments would also create consistency with future proposed land uses, restrict incompatible uses, apply updated Framework Land Use categories, revise General Plan Footnotes, and eliminate Framework Land Use categories that no longer exist, and as well as correct minor errors. Some General Plan Amendments would be accompanied by zone changes.
  - **Community Plan Implementation Overlay District (CPIO).** The West Adams CPIO District and its corresponding ~~Districts~~ subareas are a supplemental use (overlay) district over the West Adams CPA that directly implement the goals, policies, and programs of the Proposed Project. CPIO subareas will be used in combination with proposed underlying zone and height district regulations to further tailor use and development standards, including use limitations. The CPIO subarea will involve review procedures that require sign-off (ministerial approval) for projects that comply with the standards, while allowing for minor adjustment (discretionary approval) for projects pursuant to LAMC 13.14.

- Table 3-3 on page 3-15 of Section 3.4 has been updated following paragraph 2 as follows:

TABLE 3-3: MODIFIED LAND USE DESIGNATIONS UNDER THE PROPOSED PROJECT	
Existing Land Use Designation	Proposed Land Use Designation
Commercial Manufacturing	Hybrid Industrial
General Commercial	Neighborhood Commercial Community Commercial
Low Residential	Low II Residential Low III Residential
<b>SOURCE:</b> City of Los Angeles, 2011.	

- Section 3.4 on page 3-16 has been updated after paragraph 2 as follows:

**Commercial.** Existing commercial land uses include Neighborhood, General, Community and Regional. Commercial land use designations and are intended to foster economic revitalization that responds to neighborhood context. Under the Proposed Project, all of the existing Commercial land use designations would be retained, except General Commercial, which is to be transitioned to Neighborhood Commercial or Community Commercial depending on location and context (i.e. commercial corridors versus major intersection nodes, or TODs). Overall, commercial land uses will increase in acreage by approximately 13 percent.

- The last sentence of paragraph 6 on page 3-16 of Section 3.4 has been updated as follows:

There are ~~five~~ seven CPIO ~~districts~~ subareas and one Specific Plan amendment included in the proposed West Adams New Community Plan. The ~~five~~ seven CPIO ~~districts~~ subareas generally address the following:

- Section 3.4 on page 3-17 has been updated as follows:

**Commercial Corridors CPIO Subarea:** This CPIO District Subarea identifies specific commercial corridors ~~and major intersection nodes along major arterials~~, and includes use limitations, development standards and streetscape guidelines for new construction along these corridors ~~and at these nodes~~. In particular, current zoning along most commercial corridors does not clarify maximum height. The proposed plan calls for the establishment of maximum building height limits, as well as the establishment of development criteria toward reinforcing traditional prevailing neighborhood character along these corridor segments ~~and at major intersection nodes well served by public transportation~~.

~~and Major Intersection Nodes CPIO District Subarea.~~ This CPIO District Subarea identifies specific ~~commercial corridors and major intersection nodes along~~ throughout the West Adams CPA, and includes use limitations, development standards and streetscape guidelines for new construction ~~along these corridors and at these nodes~~. In particular, current zoning ~~along at most key commercial intersection sites~~ commercial corridors does not clarify maximum height. The proposed plan calls for the establishment of maximum building height limits, as well as the establishment of development criteria that incentivizes urban form toward reinforcing which reinforces traditional prevailing neighborhood character at major intersection nodes that are well served by public transportation.

**[UPDATE]Character Residential CPIO Subarea:** This CPIO subarea identifies specific residential neighborhood(s) throughout the West Adams Community Plan Area and provides development standards for new construction that seeks to reinforce prevailing neighborhood character and identity. This CPIO subarea identifies parcels where building height, bulk and setbacks have been tailored to complement the surrounding context.

- Paragraph 3 on page 3-23 of Section 3.4 has been updated as follows:

Many policies of the Proposed Project are implemented through the CPIO. Other policies could be implemented through future regulations adopted by the City based on the City's ability to protect the public health, safety, and welfare of its citizens. ~~City ordinances would also create~~ The CPIO creates a development review process that provides for City review of individual projects and authorizes the City to approve, deny, or condition projects based on their consistency with the proposed West Adams New Community Plan in accordance with Section 13.14 of the Los Angeles Municipal Code. Any environmental review required by CEQA for future discretionary projects in the CPIO subarea will remain applicable. ~~are ongoing and would continue to be used as a tool for land use decision making.~~ Other programs would be implemented at the time of adoption of the proposed West Adams New Community Plan, such as zone changes, supplemental use districts, and design overlays and Specific Plan Amendments.

- Paragraphs 2 and 3 on page 3-24 of Section 3.6 have been updated as follows:

~~Per CEQA Guidelines Section 15152, P~~project-specific environmental review would be able to "tier" from this Program EIR, potentially expediting the discretionary planning approval process through the incorporation of environmental analyses and mitigation measures contained within this program-level EIR and focusing the environmental review on the issues specific to the project.

~~This Program EIR identifies environmental impacts that could occur upon implementation of the Proposed Project proposed West Adams New Community Plan. It is important to note that the CPIO districts and amendments to the Crenshaw Corridor Specific Plan contain two types of development standards, administrative (by-right) and discretionary. If future projects will require discretionary review of their development standards or if the project meets or exceeds the thresholds for a major project involving 50 units or 50,000 square feet of floor area, as defined by the City's Site Plan Review process, the projects must be reviewed by the City on a case-by-case basis, and any applicable environmental clearance as is the current procedure when Site Plan Review is shall be required. In the event of a future project needing discretionary review or Site Plan Review, environmental review would occur on a case-by-case basis~~ Review under CEQA Guidelines Section 15125, for a tiering provides that when the initial study or other analysis finds that the project may cause significant effects on the environment that were not adequately addressed in the EIR per CEQA Guidelines Section 15152(d), a more focused environmental analysis would likely be required that would concentrate on the environmental effects that:

- Are capable of being further mitigated; or
- Were not analyzed as significant effects on the environment in this ~~Program~~ EIR.

Additionally, Public Resources Code Section 21166 provides that when an EIR has been adopted, no subsequent EIR or MND is required "unless one or more of the following events occurs:

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

A lead agency may prepare an addendum to the EIR if some changes or additions are necessary but none of the conditions described in PRC Section 21166 or CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR are prepared.

Nothing in the DEIR is intended to limit or change the requirements or authority provided in CEQA for environmental review of future projects in the West Adams-Baldwin Hills-Leimert Community Plan area. The City expressly reserves the ability to avail itself of any streamlining tools available under CEQA to review projects.

## SECTION 4.1 AESTHETICS

- The footnote associated with paragraph 2 on page 4.1-1 of Section 4.1 has been updated as follows:

As required under CEQA, the aesthetic analysis of a project must disclose the potential impacts the project would have on the existing visual character of the project area and surroundings. The concept of visual character, however, is not explicitly defined in the CEQA Guidelines or the City of Los Angeles CEQA Thresholds Guide.<sup>1</sup>

<sup>1</sup> City of Los Angeles, CEQA Thresholds Guide, 2006, available at [http://www.ci-la.ca.us/cad/programs/table\\_of\\_contents.htm](http://www.ci-la.ca.us/cad/programs/table_of_contents.htm)  
<http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>, accessed September 7, 2011-March 8, 2016.

- The first sentence of paragraph 3 on page 4.1-2 of Section 4.1 has been updated as follows:

The Citywide General Plan Framework (Framework), an element of the City of Los Angeles General Plan adopted in December 1996 and re-adopted in August 2001, is intended to guide the City's long-range growth and development through the year 2010.

- The source reference associated with Table 4.1-1 on page 4.1-4 of Section 4.1 has been updated as follows:

**SOURCE:** City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001; City of Los Angeles General Plan, *Conservation Element*, adopted 2001; City of Los Angeles General Plan, *Transportation Element*, adopted 1999. Note: Mobility Plan 2035 replaces the 1999 Transportation Element.

- Paragraph 1 on page 4.1-4 of Section 4.1 has been updated as follows:

**UPDATE: 2015 City of Los Angeles Mobility Plan (Mobility Plan 2035, MP 2035 or Mobility Element).** Mobility Plan 2035 (formerly the Transportation Element of the City of Los Angeles General Plan) is the transportation blueprint for the City of Los Angeles. This update adopted in November of 2015 is an update to the Transportation Element, last updated in 1999, and reflects the policies and programs that will give Angelenos a full range of options to meet their mobility needs, including bicycling, carpooling, driving, transit, and walking. Objectives, policies, and programs included in the Mobility Element ensure the protection of natural terrain and landforms, unique site features, scenic highways, and panoramic public views consistent with the goals, objectives, and policies stated in Table 4.1-1.

*Discussion Related to Corrections/Additions: Although the analysis in the DEIR did not rely on the MP 2035, a review of the policies, goals, objectives and programs of the Mobility Plan 2035, demonstrates that the proposed project is consistent with the policies, goals, objectives and programs of the Mobility Plan 2035. Additionally, the impact analysis in the DEIR has been reviewed in light of the MP 2035 and City Planning has determined that none of the impact analysis would change based on the adoption of the MP 2035.*

- The first sentence of paragraph 2 on page 4.1-4 of Section 4.1 has been updated as follows:

**City of Los Angeles Scenic Highways Plan.** The City of Los Angeles Scenic Highways Plan is a component of the Mobility Element (formerly the Transportation Element) of the City of Los Angeles General Plan.

- Section 4.1 on page 4.1-4 has been updated as follows:

**1998 West Adams-Baldwin Hills-Leimert Community Plan.** The existing West Adams Community Plan, also referred to as the "Current Plan", establishes land use designations, implementing measures, and land use policies for the West Adams Community Plan Area. The 1998 West Adams Community Plan encourages the preservation and enhancement of existing residential neighborhoods, while providing a variety of opportunities for compatible new housing. The Current Plan also incentivizes improvement to the function, design and economic vitality of commercial corridors, facilitates the enhancement of existing uses which provide community identity, and plans the remaining commercial and industrial development opportunity sites for needed job producing uses.

- Paragraph 1 on page 4.1-13 of Section 4.1 has been updated as follows:

The Kenneth Hahn SRA near La Brea Avenue and Stocker Street adjacent to the CPA, and the Baldwin Hills Scenic Overlook in Culver City are the nearest designated public vista points to the West Adams CPA. The Kenneth Hahn SRA vista point offers panoramic views of the West Adams CPA and of recognized scenic resources located outside of the boundaries of the West Adams CPA. The viewshed panorama from the Kenneth Hahn SRA extends from north to northeast. The east-facing vista points in the Kenneth Hahn SRA are approximately 500 feet above sea level and are about 250 feet higher in elevation than the CPA. Views looking toward the West Adams CPA from within Kenneth Hahn SRA are consistent with those from homes in the Baldwin Hills community, located adjacent to the recreation area. The background vista is visually dominated by the downtown Los Angeles skyline (particularly high rise towers on Bunker Hill), the Hollywood Hills, and the San Gabriel Mountains. Views of the CPA are limited to the northern portions of the plan area where the relative low heights of existing buildings and tree cover do not reveal any distinguishable visual elements of the West Adams CPA.

The Baldwin Hills Scenic Overlook is located approximately at the intersection of Jefferson Boulevard and Hetzler Road in Culver City, less than one mile from the West Adams CPA. The Baldwin Hills Scenic Overlook peak is 511 feet above sea level, which is higher in elevation than the West Adams CPA. Views of the CPA from the Baldwin Hills Scenic Overlook is visually dominated by the Hollywood Hills, and the Santa Monica and San Gabriel mountains.

- Paragraph 1 on page 4.1-14 of Section 4.1 has been updated as follows:

**Scenic Highways.** The 1999 Transportation Element (as replaced by the 2015 Mobility Element) of the City’s General Plan includes a Citywide list and map of roadways designated as “Scenic Highways.” These designations are included in the existing West Adams New Community Plan. The Transportation Mobility Element Scenic Highways Map identifies the following roadways within the West Adams CPA as scenic roadways (**Figure 4.1-5**):

- Figure 4.1-5, City Designated Scenic Roads, has been corrected as follows on the next page:

- Paragraph 2 on page 4.1-17 of Section 4.1 has been updated as follows:

The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project specific construction. Therefore, no further discussion of construction impacts is necessary. The West Adams New Community Plan does not include project-specific construction projects. Development occurring under the plan would likely have the visual impact of typical building construction projects: scaffolding, framing, earth moving, and construction vehicles and machinery on site. Construction would likely occur throughout the lifespan of the plan (through 2030) at no predetermined intervals. The visual impact of construction processes would be temporary, only lasting until the completion of construction. Furthermore, the analysis of aesthetics impacts for this community-plan level document is primarily concerned with the long-term implications of development once construction is completed. These concerns are related to whether or not public views of valued scenic resources would be diminished/destroyed by development within a change area, and if permanent buildings would shade sensitive uses/create glare or obstruct views of the nighttime sky.

- Paragraph 5 on page 4.1-17 of Section 4.1 has been updated as follows:

The Transit-Oriented District Subareas associated with the West Adams CPIO ~~The TOD CPIO subdistricts~~ proposed along the Expo LRT Line (Phase I) within the proposed West Adams New Community Plan are:

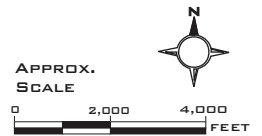
- Venice/National TOD CPIO Subarea ~~subdistrict~~
- Jefferson/La Cienega TOD CPIO Subarea ~~subdistrict~~
- La Brea/Farmdale TOD CPIO Subarea ~~subdistrict~~



LEGEND:

- West Adams CPA
- City Designated Scenic Roads

SOURCE: ESRI and TAHA, 2012.





- Table 4.1-4 beginning on page 4.1-18 of Section 4.1 has been updated as follows:

<b>TABLE 4.1-4: CPIO SUBDISTRICT SUBAREA AND SPECIFIC PLAN AMENDMENT STANDARDS AND GUIDELINES REGARDING AESTHETICS</b>					
<b>CPIO Subdistrict Subarea</b>	<b>Visual Character</b>	<b>Views and Vistas</b>	<b>Scenic Resources</b>	<b>Light and Glare</b>	<b>Shade and Shadows</b>
<b>COMMERCIAL CORRIDORS AND MAJOR INTERSECTION NODES CPIO SUBDISTRICT SUBAREAS</b>					
Corridors	1.5:1 Maximum FAR 30 Percent Minimum Lot Coverage Pedestrian Oriented Ground Floor /a/	45 foot Maximum Height Setback transition to Residential Neighborhoods	Façade Preservation /b/ Highway Dedication Waiver	No Relevant CPIO Guidelines, guided by the LAMC as well as adopted Citywide and Community Plan guidelines.	Setback transition to Residential Neighborhoods
Nodes	2:1 Baseline FAR 3:1 Maximum FAR 1:1 Minimum FAR 50 Percent Minimum Lot Coverage Pedestrian Oriented Ground Floor	55 foot Maximum Height Setback transition to Residential Neighborhoods	Façade Preservation Highway Dedication Waiver	No Relevant CPIO Guidelines, guided by the LAMC as well as adopted Citywide and Community Plan guidelines.	Setback transition to Residential Neighborhoods
Significant Impact	No, with required Mitigation Measures	No	No	No, with required Mitigation Measures	Yes, during December and January, otherwise, No, with required Mitigation Measures
<b>CRENSHAW CORRIDOR SPECIFIC PLAN AMENDMENTS</b>					
	1.5:1 Maximum FAR (portions of all subareas) 2:1 Maximum FAR (portions of all subareas, except G, E) 3:1 Maximum FAR (Mixed Use Projects in all subareas, except B, D and G) portions of Subarea A, B, C and F) Increased street frontage setbacks for projects with outdoor amenities (Subareas-D and G, E) Maximum FAR may be increased by up to 1.0 when allowed by height district, through introducing one square foot of floor area for each square foot of podium or surface parking area relocated to subterranean levels	48 foot Maximum Height (portions of Subareas B, D, E, F and H) 60 foot Maximum Height (portions of Subareas-A, B, C, E, F and H) 75 foot Maximum Height (Mixed Use Projects in portions of Subareas-A, B, C, E, F and H) Setback transition to Residential Neighborhoods	Discretionary projects involving an Eligible Historic Resource may require compliance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings as mitigation pursuant to CEQA.	Refer to Crenshaw Corridor Specific Plan Guidelines, the LAMC, as well as adopted Citywide and Community Plan guidelines.	Setback transition to Residential Neighborhoods
Significant Impact	No, with required Mitigation Measures	No	No	No, with required Mitigation Measures	Yes, during December and January, otherwise, No, with required Mitigation Measures
<b>HYDE PARK INDUSTRIAL CORRIDOR CPIO SUBDISTRICT SUBAREA</b>					
	1.5:1 Maximum FAR (Subareas Parcel groups A, C, D, F) 2:1 Maximum FAR (Subareas B, E) Pedestrian Oriented Ground Floor /c/ Bicycle, Vehicular, and Pedestrian Network Improvements Accessible Open Space and Greenway Linkage Improvements /d/	30 foot Maximum Height (Subareas Parcel groups D) 45 foot Maximum Height (Subarea F) 45 foot to 60 foot Maximum Height (Subareas Parcel groups A, C) 45 foot to 75 foot Maximum Height (Subareas Parcel groups B, E) Industrial setback transition to Residential Neighborhoods, Public Open Space, or School /e/	Façade Preservation /b/ Highway Dedication Waiver	No Relevant CPIO Guidelines, guided by the LAMC as well as adopted Citywide and Community Plan guidelines.	Industrial setback transition to Residential Neighborhoods, Public Open Space, or School /e/
Significant Impact	No, with required Mitigation Measures	No	No	No, with required Mitigation Measures	Yes, during December and January, otherwise, No, with required Mitigation Measures

<b>TABLE 4.1-4: CPIO SUBDISTRICT SUBAREA AND SPECIFIC PLAN AMENDMENT STANDARDS AND GUIDELINES REGARDING AESTHETICS</b>					
<b>CPIO Subdistrict Subarea</b>	<b>Visual Character</b>	<b>Views and Vistas</b>	<b>Scenic Resources</b>	<b>Light and Glare</b>	<b>Shade and Shadows</b>
<b>JEFFERSON/LA CIENEGA TOD CPIO-SUBDISTRICT-SUBAREA</b>					
	1.5:1 Maximum FAR (Subarea Parcel group A)2:1 Maximum FAR (Subarea Parcel group F) 3:1 Maximum FAR (Subareas Parcel groups B, C, D, E, G) 30 Percent Minimum Lot Coverage (Subareas Parcel groups A, B, D, E, F) 50 Percent Minimum Lot Coverage (Subareas Parcel groups C, G) Pedestrian Oriented Ground Floor Building Frontage Façade at Sidewalk Bicycle Parking On-street Carshare and Bicycleshare Parking Bicycle, Vehicular, and Pedestrian Network Improvements Open Space Improvements	45 foot Maximum Height (Subareas Parcel groups A, D) 55 foot Maximum Height (Subareas Parcel Groups C, G) 75 foot Maximum Height (Subareas Parcel Groups B, E, F) Setback transition to Residential Neighborhoods //	No Relevant Guidelines	No Relevant CPIO Guidelines, guided by the LAMC as well as adopted Citywide and Community Plan guidelines.	Setback to Residential Neighborhoods
Significant Impact	No, with required Mitigation Measures	No	No	No, with required Mitigation Measures	Yes, for December and January, otherwise, No, with required Mitigation Measures
<b>LA BREA/FARMDALE TOD CPIO SUBDISTRICT-SUBAREA</b>					
	1.5:1 Maximum FAR (Subarea Parcel group B) 2:1 Maximum FAR (Subarea Parcel group C) 3:1 Maximum FAR (Subareas Parcel groups A, C, D, F) 30 Percent Minimum Lot Coverage (Subareas Parcel Groups B, C, D, E) 50 Percent Minimum Lot Coverage (Subarea Parcel Group A) Pedestrian Oriented Ground Floor Building Frontage Façade at Sidewalk Bicycle, Vehicular, and Pedestrian Network Improvements Accessible Open Space and Greenway Linkage Improvements /g/	45 foot Maximum Height (Subareas Parcel groups B, C, E, F) 55 foot Maximum Height (Subareas Parcel groups A, D) 65 foot Maximum Height (Subarea Parcel Group A) Setback transition to Residential Neighborhoods	Façade Preservation Highway Dedication Wavier	No Relevant CPIO Guidelines, guided by the LAMC as well as adopted Citywide and Community Plan guidelines.	Setback to Residential Neighborhoods
Significant Impact	No, with required Mitigation Measures	No	No	No, with required Mitigation Measures	Yes, during December and January, otherwise, No, with required Mitigation Measures
<b>VENICE/NATIONAL TOD CPIO SUBDISTRICT-SUBAREA</b>					
	2:1 Maximum FAR (Subareas Parcel group B) 3:1 Maximum FAR (Subareas Parcel Groups A, C, D, E) Tower Footprint (Subarea Parcel Group A) Tower Separation (Subarea A) 30 Percent Minimum Lot Coverage (Subareas, Parcel Groups C, E) 50 Percent Minimum Lot Coverage (Subareas Parcel Groups A, B) Pedestrian Oriented Ground Floor Building Frontage Façade at Sidewalk On-street Carshare and Bicycleshare Parking Bicycle, Vehicular, and Pedestrian Network Improvements Accessible Open Space and Greenway Linkage Improvements /g/	45 foot Maximum Height (Subarea Parcel Groups D) 55 foot Maximum Height (Subareas Parcel Groups B, C, E) 65 foot to 150 foot Maximum Height (Subarea Parcel Group A) Setback transition to Residential Neighborhoods /h/	Façade Preservation Highway Dedication Wavier	No Relevant CPIO Guidelines, guided by the LAMC as well as adopted Citywide and Community Plan guidelines.	Transition to Residential Neighborhoods
Significant Impact	No, with required Mitigation Measures	No	No	No, with required Mitigation Measures	Yes, during December and January, otherwise, No, with required Mitigation Measures
<p>/a/ Recommended in all corridors, required on Washington and Robertson Boulevards for Administrative Clearance.                      /b/ Recommended for Administrative Clearance.                      /c/ Required in parcel groups C, D, and F for Administrative Clearance.                      /d/ Required in parcel groups A, B, C, and E for Administrative Clearance.                      /e/ Required in parcel groups A, B, and E for Administrative Clearance.                      // Required in parcel groups A, C, and D for Administrative Clearance.                      /g/ Required in parcel group A for Administrative Clearance.                      /h/ Required in parcel groups C and E for Administrative Clearance.</p> <p><b>SOURCE:</b> City of Los Angeles Department of City Planning, <i>West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay Districts and Crenshaw Corridor Specific Plan Amendments</i>, 2012. TAHA, 2012, 2015.</p>					

- Figure 4.1-9 – “Crenshaw Corridor Specific Plan TOD Heights” has been updated as follows on the next page:

- Paragraph 2 on page 4.1-26 of Section 4.1 has been updated as follows:

There are also several proposed HPOZs within the West Adams CPA. These include Leimert Park, Jefferson Park, Victoria Park, Arlington Heights, and Wellington Square. While height and FAR changes are proposed adjacent to some of these proposed HPOZs, no changes would take place within them, therefore, they would not alter the character of the proposed HPOZs. Height increases proposed for portions of the Crenshaw/ Expo TOD (Crenshaw Blvd. between Exposition Blvd. and Coliseum St.) adjacent to the Leimert Park neighborhood to the east range in height from 60 feet to 75 feet. These increases will not alter the character of a potential Leimert Park HPOZ provided transitional “stepping-down” of height adjacent to residential is required (see mitigation measure AE1, and Final EIR Appendix H, proposed Crenshaw Corridor Specific Plan Amendments).

- Additional text following paragraph 2 on page 4.1-28 of Section 4.1 has been updated to include the following:

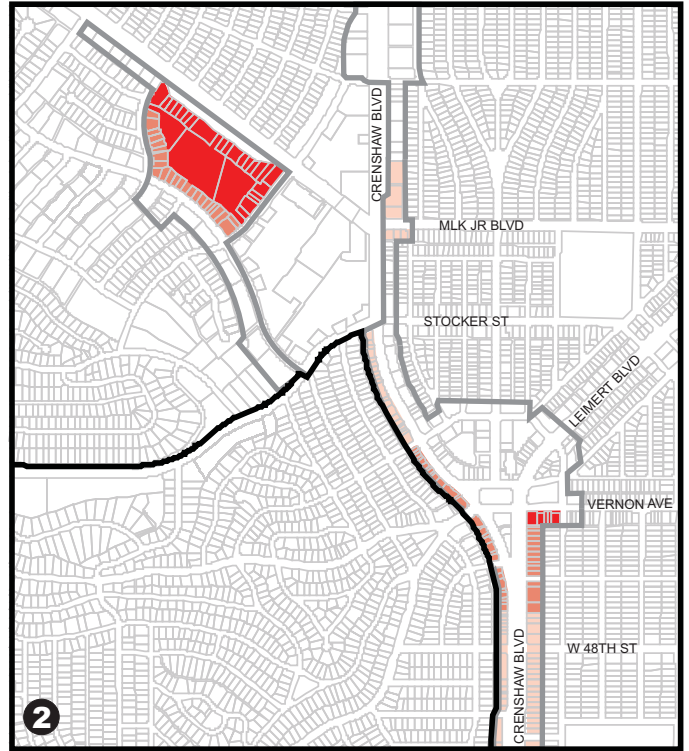
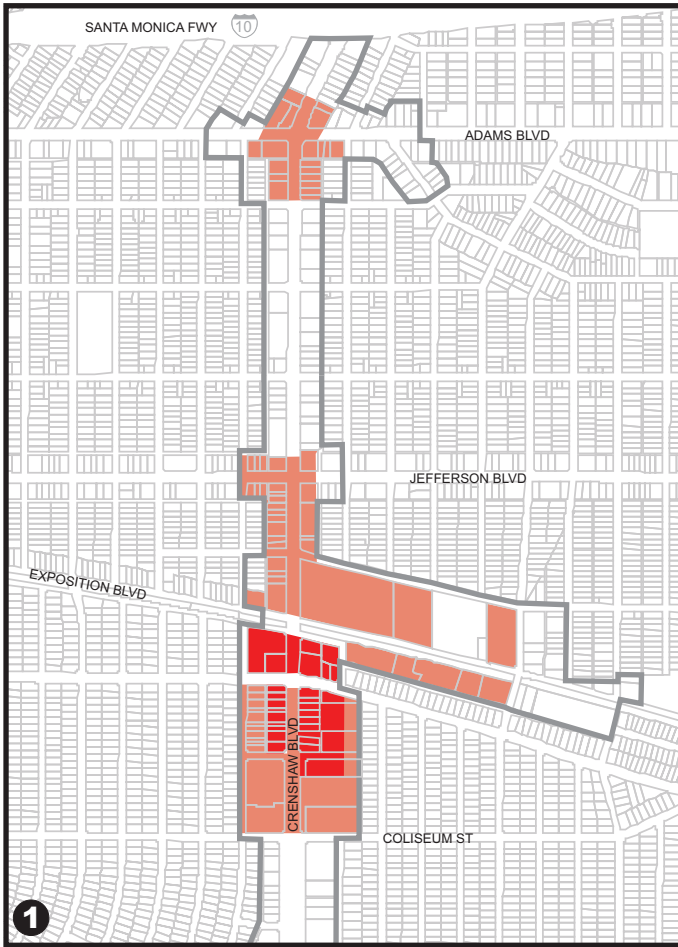
The Kenneth Hahn SRA and the Baldwin Hills Overlook are the nearest designated public vista points to the West Adams CPA. These vista points offer panorama views of the CPA and of recognized scenic resources located outside of the West Adams CPA. As previously described, views of recognized scenic resources outside of the West Adams CPA are available from the Kenneth Hahn SRA and from this vantage, onlookers are able to look beyond the West Adams CPA to scenic resources (such as to see the Pacific Ocean and the Getty Center). Currently, existing buildings and infrastructure in the West Adams CPA do not obstruct views of recognized scenic resources or mountains from either public vista point. While the proposed West Adams New Community Plan would allow increased building heights, it is unlikely that views of or beyond the West Adams CPA from Kenneth Hahn SRA or the Baldwin Hills Scenic Overlook would be obstructed by structures built to maximum permitted height under the Proposed Project within the CPA because the proposed height increases in the West Adams CPA are less than those currently existing in downtown Los Angeles, and would not obstruct views of the downtown Los Angeles skyline from the Kenneth Hahn SRA or Baldwin Hills Scenic Overlook, or views of the San Gabriel Mountains beyond the downtown skyline. Any development with increased building heights would be subject to transitional height requirements and massing restrictions provided in the CPIO that would limit impacts to viewsheds. Therefore, the proposed West Adams New Community Plan would not result in a substantial adverse effect to viewpoints of the CPA, or beyond the CPA, from the recognized viewshed panoramas of Kenneth Hahn SRA or the Baldwin Hills Scenic Overlook.

- Additional text following paragraph 2 on page 4.1-31 of Section 4.1 has been included as follows:

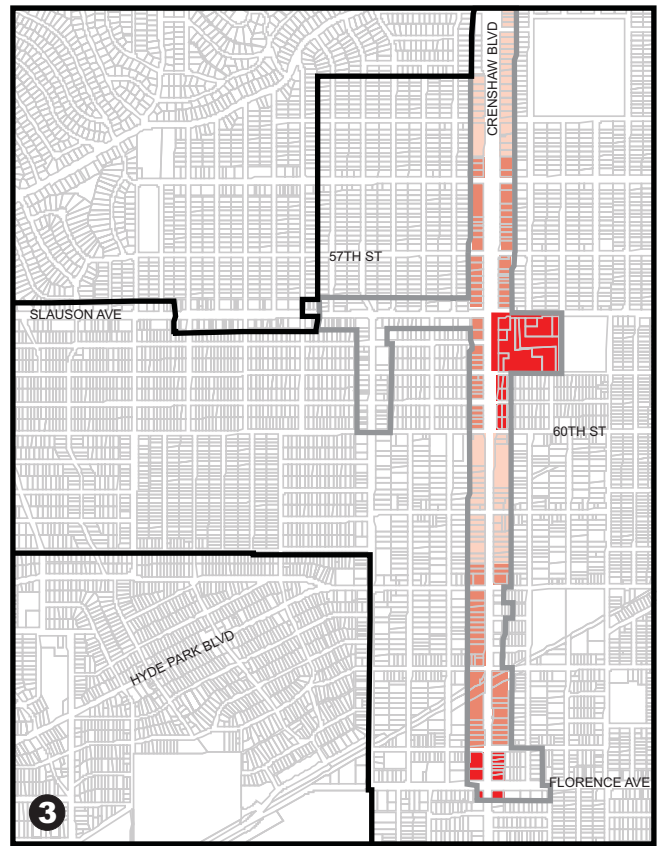
**UPDATE:** With the passage of Senate Bill 743 in September of 2013, the extent to which aesthetics and parking are defined as impacts under CEQA is limited. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project’s aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and
2. The project is located on an infill site within a transit priority area.

In compliance with Section 21099 (d)(1) of the PRC, the City of Los Angeles has instituted Transit Priority Areas (TPA). Refer to Department of City Planning Zoning Information Bulletin (ZI No. 2452) for further information.

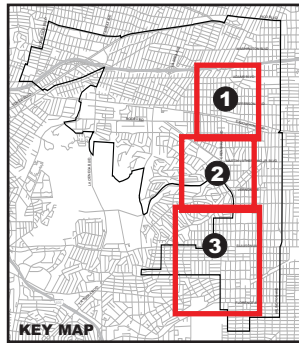


2



3

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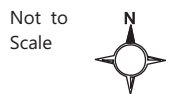
**LEGEND:**

- West Adams CPA Boundary
- Crenshaw Corridor Specific Plan Area

**Proposed Heights**

- 45 Feet
- 48 Feet
- 60 Feet
- 75 Feet

SOURCE: City of Los Angeles, ESRI, and TAHA, 2012.



- Mitigation Measure **AE1** on page 4.1-31 of Section 4.1 has been updated as follows:

~~As a condition of approval for any Any Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall require with new construction located on commercial or industrially planned land in CPIO subdistricts subareas and/or the Crenshaw Corridor Specific Plan that directly abuts or is across an alley from residentially planned land to~~must transition in the following manner:

- Where the rear or side property line is contiguous with that of a residential lot or separated by an alley property, the building structure shall be set back or “stepped back” one foot for every one foot in height as measured fifteen feet above grade at the shared/residential property line, or as specified through the individual CPIO subarea or Specific Plan ordinances when more restrictive.
  - ~~Where the properties are separated by an alley, the structure shall be set back or “stepped back” one foot for every one foot in height as measured from grade at the residential property line.~~
  - New construction located opposite the front yard setback of residentially planned land along local streets shall not exceed 30 feet in height for the first 50 feet of lot depth as measured from the commercial or industrial property line opposite the residential lot.
  - Adjustments and Exceptions (permitted): The fifteen foot “step back” height limitation at the residential property line may be increased by not more than 20 percent or as specified through the CPIO or Specific Plan regulations when more restrictive through adjustment, otherwise, through the exception procedures pursuant to the Los Angeles Municipal Code.
- Mitigation Measures **AE2 and AE3** on page 4.1-37 of Section 4.1 have been updated as follows:

**AE2** ~~As a condition of approval for a~~Any approval of a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall require ensure that all lighting be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties.

**AE3** ~~As a condition of approval for a~~Any approval of a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall require ensure that glare effects be limited by using non-reflective building and construction materials, such as concrete, wood, and stucco. This shall include, but not be limited to, art installations, fencing material, and recreational equipment.

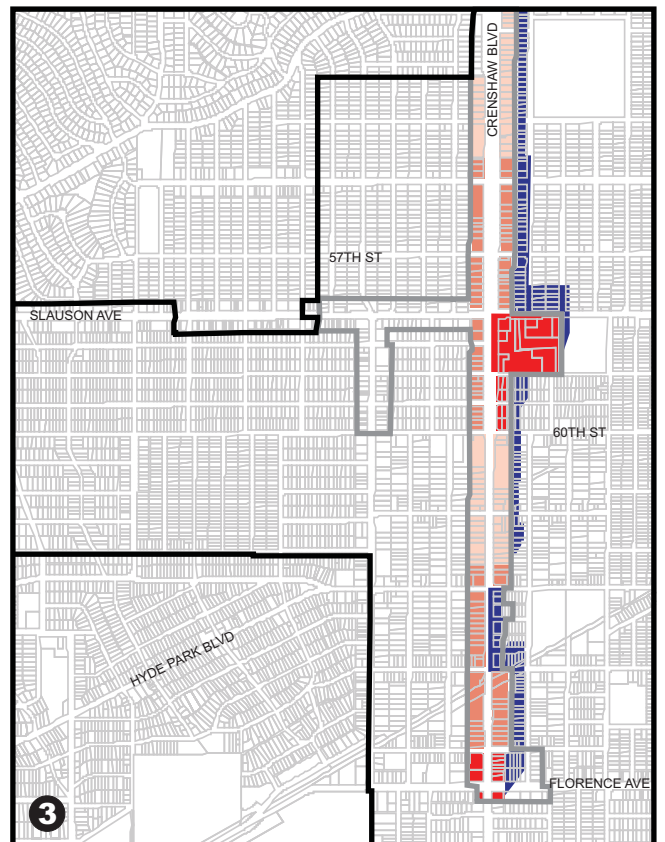
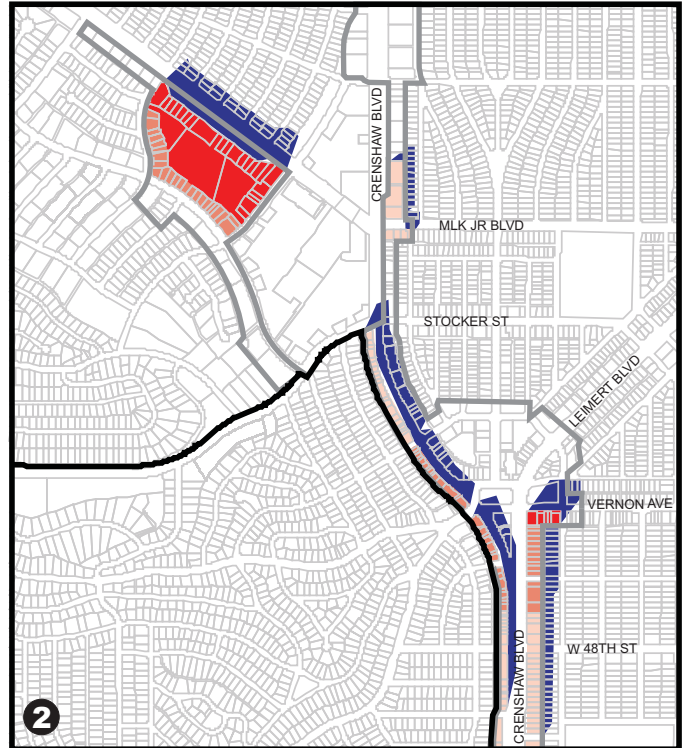
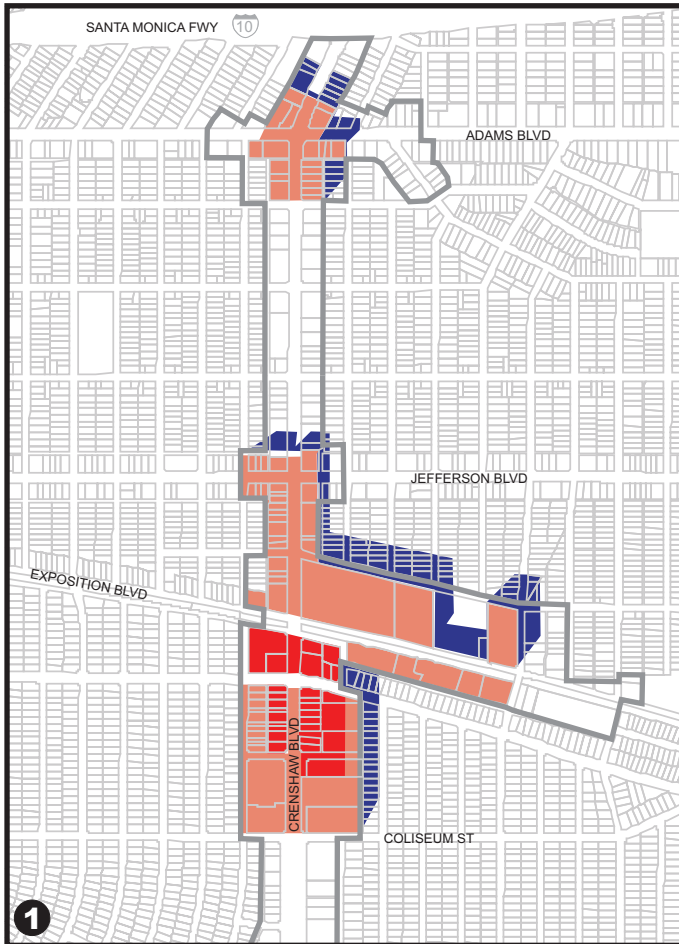
- Figure 4.1-13 – “Crenshaw Corridor Specific Plan Significant Shadow Zones” has been updated as follows on the next page:

## **SECTION 4.2 AGRICULTURE AND FORESTRY RESOURCES**

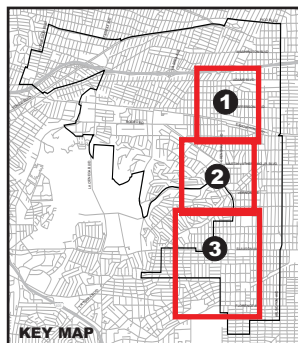
- Paragraphs following paragraph 4 on page 4.2-2 of Section 4.2 have been updated as follows:

### **FOREST AND TIMBERLAND**

As discussed above, the West Adams CPA is zoned for residential, commercial, industrial, open space, and public facilities uses. Vegetation within the West Adams CPA consists largely of non-native ornamental trees, grasses, and shrubs that are typical of urban landscaping. The West Adams CPA and surrounding area are fully developed and urbanized. A review of City land use and zoning maps shows there is no forest land, timberland, or timberland zoned Timberland Production.



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**LEGEND:**

- West Adams CPA Boundary
- Crenshaw Corridor Specific Plan Area

**Proposed Heights**

- 45 Feet
- 48 Feet
- 60 Feet
- 75 Feet
- Significant 3-hour Shadow Zones

SOURCE: City of Los Angeles, ESRI, and TAHA, 2012.



FIGURE 4.1-13

CRENSHAW CORRIDOR SPECIFIC PLAN  
SIGNIFICANT SHADOW ZONES

**FOREST LAND**

~~As discussed above, the West Adams CPA is zoned for residential, commercial, industrial, open space, and public facilities uses. Vegetation within the West Adams CPA consists largely of non-native ornamental trees, grasses, and shrubs that are typical of urban landscaping. The West Adams CPA and surrounding area are fully developed and urbanized and there are no forest lands in the project vicinity.~~

- The last sentence of paragraph 3 on page 4.2-3 of Section 4.2 has been updated as follows:

As there are no agriculture or forestry resources within the West Adams CPA, the proposed West Adams New Community Plan and its implementing ordinances do not contain any specific guidelines that would affect farmland, agricultural land, forest land, timberland, or ~~forest land~~timberland zoned Timberland Production.

- The last sentence of paragraph 1 on page 4.2-4 of Section 4.2 has been updated as follows:

Nevertheless, the West Adams CPA does not contain land uses that are considered prime, unique or important farmlands; therefore, no impacts related to farmland would occur.

- Paragraphs 3 and 4 on page 4.2-4 of Section 4.2 have been updated as follows:

**FOREST AND TIMBERLAND**

Many of the land use changes under the proposed West Adams Community Plan consist of General Plan Amendments to create consistency with Framework Land Use designations. As discussed above, the West Adams CPA is fully developed and urbanized and there ~~are no~~is no forest land, timberland or timberland zoned Timberland Production in the CPA. ~~s in the project vicinity.~~ Therefore, no impacts related to timberland would occur.

**FOREST LAND**

~~Many of the land use changes under the proposed West Adams Community Plan consist of General Plan Amendments to create consistency with Framework Land Use designations. As described above, the West Adams CPA and surrounding areas are fully developed and urbanized and there is no forest land in the West Adams CPA. Therefore, no impacts related to forest land would occur.~~

- The last sentence of paragraph 6 on page 4.2-4 of Section 4.2 has been updated as follows:

The West Adams New Community Plan describes the capacity for future development for a portion of the City. While the proposed project includes a series of implementing ordinances, it is not an implementation plan in and of itself, and its adoption does not constitute a commitment to any project-specific construction. ~~However, construction related to future capacity within the West Adams CPA would require the following mitigation measures.~~

- The following mitigation measures located on page 4.2-5 of Section 4.2 have been updated as follows:

**FOREST AND TIMBERLAND**

No impacts related to forest land, timberland, or timberland zoned Timberland Production would occur. No mitigation measures are required.

**FOREST LAND**

~~No impacts related to forest land would occur. No mitigation measures are required.~~

- The following statements of significance after mitigation located on page 4.2-5 of Section 4.2 have been updated as follows:

**FOREST AND TIMBERLAND**

No impacts related to forest land, timberland, or timberland zoned Timberland Production would occur.

**FOREST LAND**

No impacts related to forest land would occur.

**SECTION 4.3 AIR QUALITY**

- The last sentence of paragraph 7 continued from page 4.3-4 of Section 4.3 has been updated as follows:

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in **Table 4.3-1** and updated in **Table 4.3-1A**. The USEPA has classified the South Coast Air Basin (Basin) as maintenance for CO, PM<sub>10</sub>, and NO<sub>2</sub> and nonattainment for O<sub>3</sub>, PM<sub>2.5</sub>, and ~~Pb~~ PM<sub>10</sub>.

- A new Table 4.3-1A updating Table 4.3-1 on page 4.3-5 of Section 4.3 has been included:

<b>TABLE 4.3-1A: STATE AND NATIONAL AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUS FOR THE SOUTH COAST AIR BASIN</b>					
Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O <sub>3</sub> )	1-hour	0.09 ppm (180 µg/m <sup>3</sup> )	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m <sup>3</sup> )	n/a	0.075 ppm (147 µg/m <sup>3</sup> )	Nonattainment
Respirable Particulate Matter (PM <sub>10</sub> )	24-hour	50 µg/m <sup>3</sup>	Nonattainment	150 µg/m <sup>3</sup>	<del>Maintenance</del> Nonattainment
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	Nonattainment	--	--
Fine Particulate Matter (PM <sub>2.5</sub> )	24-hour	--	--	35 µg/m <sup>3</sup>	Nonattainment
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Nonattainment	<del>12.0</del> 15.0 µg/m <sup>3</sup>	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m <sup>3</sup> )	Attainment	9 ppm (10 mg/m <sup>3</sup> )	<del>Maintenance</del> Unclassified
	1-hour	20 ppm (23 mg/m <sup>3</sup> )	Attainment	35 ppm (40 mg/m <sup>3</sup> )	<del>Maintenance</del> Unclassified
Nitrogen Dioxide (NO <sub>2</sub> )	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )	Attainment	53 ppb (100 µg/m <sup>3</sup> )	<del>Maintenance</del> Unclassified
	1-hour	0.18 ppm (338 µg/m <sup>3</sup> )	Attainment	100 ppb (190 µg/m <sup>3</sup> )	<del>Maintenance</del> n/a
Sulfur Dioxide (SO <sub>2</sub> )	24-hour	0.04 ppm (105 µg/m <sup>3</sup> )	Attainment	--	--
	<del>3-hour</del>	--	--	--	--
	1-hour	0.25 ppm (655 µg/m <sup>3</sup> )	Attainment	75 ppb (196 µg/m <sup>3</sup> )	Attainment
Lead (Pb)	30-day average	1.5 µg/m <sup>3</sup>	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m <sup>3</sup>	<del>Nonattainment</del> Attainment

n/a = not available  
SOURCE: CARB, *Ambient Air Quality Standards and Attainment Status*, June 4, 2013 September 8, 2010.



- The last sentence of paragraph 2 on page 4.3-5 of Section 4.3 has been updated as follows:

The State standards are summarized in **Table 4.3-1** and updated through **Table 4.3-1A**, above.

- The subsection header located on page 4.3-6 of Section 4.3 has been corrected as follows:

**REGIONAL LOCAL**

- Additional text has been added after paragraph 1 of the Air Quality Management Plan (AQMP) subsection on page 4.3-8 of Section 4.3 as follows:

The SCAQMD is responsible for preparing the regional Air Quality Management Plan (AQMP). The AQMP is the SCAQMD plan for improving regional air quality. It addresses CAA and CCAA requirements and demonstrates attainment with State and federal ambient air quality standards. The AQMP is prepared by SCAQMD and the Southern California Association of Governments (SCAG). The AQMP provides policies and control measures that reduce emissions to attain both State and federal ambient air quality standards by their applicable deadlines.

- Additional footnoted text has been added after paragraph 2 on page 4.3-8 of Section 4.3 as follows:

The 2012 AQMP was adopted in December 2012 and continues the progression toward clean air and compliance with State and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources and area sources. The 2012 AQMP includes demonstration of attainment of the federal 24-hour PM<sub>2.5</sub> standard by 2014 in the Basin through adoption of all feasible measures while incorporating current scientific information and meteorological air quality models. It also updates the USEPA approved 8-hour O<sub>3</sub> control plan with new commitments for short-term NO<sub>x</sub> and VOC reductions. The 2012 AQMP also addresses several State and federal planning requirements. The 2012 AQMP builds upon the approach taken in the 2007 AQMP, for the attainment of federal PM and O<sub>3</sub> standards, and highlights the significant amount of reductions needed and the urgent need to engage in interagency coordinated planning to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under the CAA.

*Discussion Related to Corrections/Additions: The 2007 AQMP was the adopted and applicable AQMP when the NOP was published. The 2012 AQMP was adopted after the baseline conditions. For informational purposes and to further support the validity of the air quality analysis, supplemental analysis is provided based on the 2012 AQMP.*

- Additional text has been added after paragraph 3 on page 4.3-8 of Section 4.3 as follows:

SCAQMD conducted a follow-up MATES IV study (released May 2015) that monitored a network of sites, the locations generally the same as the MATES II and MATES III Studies. MATES IV found that the average cancer risk in the region is 418 persons in one million.

- A new subsection has been added after paragraph 3 on page 4.3-8 of Section 4.3 as follows:

**SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).** While Southern California is a leader in reducing emissions, and ambient levels of air pollutants are improving, the SCAG region continues to have the worst air quality in the nation. SCAG completed the 2012-2035 RTP/SCS, which includes a strong commitment to reduce emissions from transportation sources to comply with SB 375. Goals and policies included in the 2012-2035 RTP/SCS to reduce air pollution consist of adding density in proximity to transit stations, mixed-use development and encouraging active transportation (i.e., non-motorized transportation such as bicycling). SCAG promotes the following policies and actions related to active transportation to help the region confront congestion and mobility issues and consequently improve air quality:

- Implement Transportation Demand Management (TDM) strategies including integrating bicycling through folding bikes on buses programs, triple racks on buses, and dedicated racks on light and heavy rail vehicles;
  - Encourage and support local jurisdictions to develop "Active Transportation Plans" for their jurisdiction if they do not already have one;
  - Expand Compass Blueprint program to support member cities in the development of bicycle plans;
  - Expand the Toolbox Tuesday's program to encourage local jurisdictions to direct enforcement agencies to focus on bicycling and walking safety to reduce multimodal conflicts;
  - Support local advocacy groups and bicycle-related businesses to provide bicycle-safety curricula to the general public;
  - Encourage children, including those with disabilities, to walk and bicycle to school;
  - Encourage local jurisdictions to adopt and implement the proposed SCAG Regional Bikeway Network; and
  - Support local jurisdictions to connect all of the cities within the SCAG region via bicycle facilities.
- An additional subsection header has been added before paragraph 4 on page 4.3-8 of Section 4.3 as follows:

#### **LOCAL**

The "Regulatory Framework" subsection has been updated to include the following local "City of Los Angeles Municipal Code" building regulations on page 4.3-8 of Section 4.3 as follows:

**City of Los Angeles Municipal Code.** In April 2016, the City added Sections 95.314.3 and 99.04.504.6 to the LAMC and amended Section 99.05.504.5.3 to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns. Section 95.314.3 defines unacceptable locations for obtaining outside or return air for heating or cooling air systems (e.g., a closet, bathroom, toilet room, or kitchen). Section 99.04.504.6 states that, "In mechanically ventilated buildings within 1,000 feet of a freeway, provide regularly occupied areas of the building with air filtration media for outside and return air that provides a Minimum Efficiency Reporting Value (MERV) of 13. Filters shall be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual." An exception is provided for existing mechanical equipment. Section 99.05.504.5.3 requires MERV 8 filters for mechanically ventilated buildings located further than 1,000 feet from freeways. An exception is provided for existing mechanical equipment and for new ventilation units meeting certain 2013 California Energy Code requirements.

- Additional text has been added after paragraph 2 of the Air Monitoring Data subsection on page 4.3-11 of Section 4.3 as follows:

**Table 4.3-3a** also shows pollutant levels, the State standards, and the number of exceedances recorded at the Los Angeles – North Main Street Monitoring Stations. Criteria pollutants CO, NO<sub>2</sub> and SO<sub>2</sub> did not exceed the State standards reported in Table 4.3-3 during the 2008 to 2010 period. The one-hour State standard for O<sub>3</sub> was exceeded one time in 2010 while the eight-hour State standard for O<sub>3</sub> was exceeded one time in 2010 and two times in 2012. The 24-hour State standard for PM<sub>10</sub> was exceeded multiple times between 2011 and 2013. The annual State standard for PM<sub>2.5</sub> was also exceeded each year between 2010 and 2013.

- A new **Table 4.3-3A** updating Table 4.3-3 on page 4.3-11 of Section 4.3 has been included:

<b>TABLE 4.3-3A : AMBIENT AIR QUALITY DATA - DOWNTOWN LOS ANGELES</b>					
<b>Pollutant</b>	<b>Pollutant Concentration &amp; Standards</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
<u>Ozone</u> (O <sub>3</sub> )	<u>Maximum 1-hr Concentration (ppm)</u>	<u>0.098</u>	<u>0.087</u>	<u>0.093</u>	<u>0.081</u>
	<u>Days &gt; 0.09 ppm (State 1-hr standard)</u>	<u>1</u>	<u>0</u>	<u>0</u>	<u>0</u>
	<u>Maximum 8-hr Concentration (ppm)</u>	<u>0.080</u>	<u>0.065</u>	<u>0.077</u>	<u>0.07</u>
	<u>Days &gt; 0.070 ppm (State 8-hr standard)</u>	<u>1</u>	<u>0</u>	<u>2</u>	<u>0</u>
<u>Carbon Monoxide</u> (CO)	<u>Maximum 8-hr concentration (ppm)</u>	<u>2.32</u>	<u>2.40</u>	<u>1.91</u>	<u>-</u>
	<u>Days &gt; 9.0 ppm (State 8-hr standard)</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Nitrogen Dioxide</u> (NO <sub>2</sub> )	<u>Maximum 1-hr Concentration (ppm)</u>	<u>0.089</u>	<u>0.11</u>	<u>0.077</u>	<u>0.09</u>
	<u>Days &gt; 0.18 ppm (State 1-hr standard)</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Respirable Particulate Matter (PM<sub>10</sub>)</u>	<u>Maximum 24-hr concentration (µg/m<sup>3</sup>)</u>	<u>42</u>	<u>53</u>	<u>80</u>	<u>75</u>
	<u>Days &gt; 50 µg/m<sup>3</sup> (State 24-hr standard)</u>	<u>0</u>	<u>9</u>	<u>43</u>	<u>20</u>
<u>Fine Particulate Matter (PM<sub>2.5</sub>)</u>	<u>Maximum 24-hr concentration (µg/m<sup>3</sup>)</u>	<u>39.2</u>	<u>49.3</u>	<u>58.7</u>	<u>43</u>
	<u>Exceed State Standard (12 µg/m<sup>3</sup>)</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
<u>Sulfur Dioxide</u> (SO <sub>2</sub> )	<u>Maximum 24-hr Concentration (ppm)</u>	<u>0.010</u>	<u>0.020</u>	<u>0.005</u>	<u>0.002</u>
	<u>Days &gt; 0.04 ppm (State 24-hr standard)</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

**SOURCE:** CARB, Air Quality Data Statistics, *Top 4 Summary*, <http://www.arb.ca.gov/adam/topfour/topfour1.php>, accessed on January 13, 2014.

- Table 4.3-4 on page 4.3-13 of Section 4.3 has been corrected to reflect a clarification in the source document reference as follows:

**SOURCE:** SCAQMD, CEQA Air Quality Handbook, 1993; SCAQMD, Final Localized Significance Threshold Methodology, Revised July 2008 SCAQMD, 2011.

- Bullet 3 of paragraph 1 on page 4.3-14 of Section 4.3 has been updated to include the following:

The Proposed Project would generate significant emissions of TACs that exceed a Maximum Incremental Cancer Risk of 10 in a million, a Cancer Burden of 0.5 excess cancer cases, or a Chronic or Acute Hazard Index of 1.0;

- Table 4.3-5 on page 4.3-14 of Section 4.3 has been corrected to reflect a clarification in the source document reference as follows:

**SOURCE:** SCAQMD, CEQA Air Quality Handbook, 1993 SCAQMD, 2011.

- The “Consistency with the Air Quality Management Plan” subsection on page 4.3-16 of Section 4.3 has been updated to include the following clarifying text:

The AQMP focuses on long-term sources of emissions. The only control strategy for construction activity is related to modernizing the regional equipment fleet to reduce exhaust emissions. The AQMP states that equipment exhaust reduction will occur through compliance with USEPA exhaust standards and CARB emission reduction strategies. The proposed project would not interfere with implementation of these standards and strategies. Furthermore, the emission methodology used by SCAQMD to establish the AQMP emission inventories includes construction emissions based on anticipated regional development. There are many challenges with making accurate projections of future growth. However, forecasts are made with the best information available. The AQMP updates are generally developed every three to four years; thereby allowing for frequent improvements to the emission inventories. As analyzed in Section 4.13 Population, Housing and Employment, the population, housing, and employment associated with the proposed project would not exceed the growth anticipated for the SCAG Los Angeles region. The construction emissions anticipated were included in the regional AQMP analysis. Therefore, the proposed project would result in less-than-significant impacts related to consistency with the AQMP.

- The third sentence of last paragraph on page 4.3-16 of Section 4.3 has been updated to include the following clarification:

Future daily emissions under implementation of the proposed project are expected to decrease from existing emissions for all of the assessed pollutant except VOC. This is largely a result of reductions in vehicle emissions that are projected to occur between 2008 and 2030 due to stricter regulations and improved technology, as shown in EMFAC emission rates established by CARB. VOC emissions would increase as a result of architectural coating emissions associated with new residential land uses.

- Table 4.3-7 on page 4.3-17 of Section 4.3 has been corrected to reflect a clarification in the source document reference as follows:

**SOURCE:** DEIR Appendix C, West Adams NCP, TAHA, 2012.

- Paragraph 1 on page 4.3-17 of Section 4.3 has been clarified as follows:

Also, as discussed previously, the proposed project includes policies to help reduce VMT generated by projected growth. Such policies would further ensure that impacts from implementation of the proposed project would be less than significant, ~~although no emissions reduction was taken for these policies in the impact analysis.~~

- The localized operations impact analysis related to the “Toxic Air Contaminants” subsection on page 4.3-18 of Section 4.3 has been updated as follows:

~~In 2005, CARB published the *Air Quality and Land Use Handbook: A Community Health Perspective*. This document provides recommendations that local governments should consider when siting new sensitive lands uses to help keep children and other vulnerable populations out of harm’s way with respect to sources of air pollution and TACs. Sources of particular concern include freeways and high-traffic roadways, distribution centers, rail yards, ports, refineries, chrome platers, dry cleaners, and gasoline dispensing facilities.~~

The I-10 Freeway runs through the West Adams CPA; therefore, if receptors are sited within close proximity to the freeway, impacts would be potentially significant. ~~The~~ It is the practice of the City of Los Angeles recently amended the LAMC to condition approval of private projects located in the vicinity of major transportation corridors (within 500 feet of a freeway for commercial and industrial uses and residential uses that front on a Major Highway or are located adjacent to an active heavy rail line) to require that new residential and commercial building located within 1,000 feet of freeways install and maintain an air filtration system having efficiency equal to or exceeding American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 52.2 Minimum Efficiency Reporting Value (MERV 13) (excluding storage/warehouse areas or garages). The regulatory requirements also include recommendations for maintenance in the operation and maintenance manuals. Such filtration systems would reduce particulate levels by 75 percent or greater, thereby substantially reducing risk to employees and residents. Furthermore, the West Adams CPIO District includes environmental standards that would reduce TAC exposure, such as requiring air intakes to be located as far from the freeways as possible and windows facing freeways are generally not allowed to be operable ~~and~~ the property perimeter nearest the freeway is typically required to be landscaped with a dense mixture of shrubs and trees to maximize passive filtration of particulate air contaminants. Such requirements would reduce health risks from exposure to mobile source toxic air contaminants.

~~New development could still be located within the CARB minimum distances for various stationary source land uses, including distribution centers, chrome platers, dry cleaners, and gasoline dispensing facilities. Therefore, without mitigation, the proposed project would result in a less-than-significant impact related to operational toxic air contaminant emissions.~~

**Discussion Related to Corrections/Additions:** *The above amendments are made to recognize the California Supreme Court ruling in *CBIA v. BAAQMD*, (2015) 62 Cal.4th 369, which held that lead agencies do not need to assess impacts of the existing environment on a project or future residents or users of a project. As such, health impacts to residents or users by placing people near existing sources is not a CEQA impact, absent a finding that the project is exacerbating the environmental impacts such that the exacerbated conditions impact the residents or users. In this case, there is no evidence that siting new development within CARB minimum distances would exacerbate environmental impacts such that it would impact future residents or users of the new development.*

- Additional text has been added to the localized operations impact analysis related to the “Odors” subsection on page 4.3-18 of Section 4.3 as follows:

According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The West Adams CPA is not anticipated to be developed with land uses that are typically associated with odor complaints. The majority of development would be typical residential and commercial uses. On-site trash receptacles would have the potential to create adverse odors, but odors would not significantly differ from existing odors in the West Adams CPA. Compliance with the LAMC would ensure that trash ~~Trash~~ receptacles are ~~would be~~ located and maintained in a manner that promotes odor control and ~~no adverse odor impacts are anticipated from these types of land uses.~~ For example, LA Sanitation services four automated containers: black (for household refuse), blue (for recyclables), green (for yard trimmings) and brown (for horse manure) containers. Refuse is collected once every week in the City of Los Angeles. Regular pick up and proper segregation of trash would help to control odors. Therefore, the proposed project would result in a less-than-significant impact related to operational odors.

- Additional text has been added to the first paragraph of the “Consistency with Air Quality Management Plan” subsection on page 4.3-18 of Section 4.3 as follows:

The 2007 ~~and 2012~~ AQMPs ~~was~~ were prepared to accommodate growth, to reduce the high levels of pollutants within areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Consistency with the AQMP can be assessed by determining how a project accommodates increases in population or employment. Generally, a project that is planned in a way that minimizes VMT would also minimize air pollutant emissions. This type of project would be consistent with the goals of the AQMP.

- Mitigation Measure **AQ1** on page 4.3-19 of Section 4.3 regarding regional construction impacts has been updated as follows:

~~As a condition of approval for any~~ Any approval of a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall ensure ~~require~~ all contractors ~~to~~ include the following best management practices in contract specifications:

- Use properly tuned and maintained equipment.
- Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations.
- Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g. engine catalysts) to the extent they are readily available and feasible.
- Use heavy duty diesel-fueled equipment that uses low NO<sub>x</sub> diesel fuel to the extent it is readily available and feasible.
- Use construction equipment that uses low polluting fuels (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible.
- Maintain construction equipment in good operating condition to minimize air pollutants.

- ~~All diesel-powered construction equipment shall meet US Environmental Protection Agency Tier 2 or higher emissions standards according to the following schedule:~~
    - ~~— **January 1, 2012 to December 31, 2014:** All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by California Air Resource Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.~~
    - **Post January 1, 2015:** All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technologies BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible.
  - Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic.
  - Construction contractors shall utilize super-compliant architectural coatings as defined by the South Coast Air Quality Management District (VOC standard of less than ten grams per liter).
  - Construction contractors shall utilize materials that do not require painting, as feasible.
  - Construction contractors shall use pre-painted construction materials, as feasible.
  - Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
  - Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site as feasible.
  - Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas as feasible.
  - Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM<sub>10</sub> generation.
- Mitigation Measure **AQ2** on page 4.3-20 regarding Toxic Air Contaminants has been updated as follows:

The City recently amended the LAMC to require ASHRAE Standard 52.2 MERV 13 air filtration systems in new buildings located within 1,000 feet of a freeway. The MERV filtration is a legal regulatory requirement, and Mitigation Measure AQ2 is no longer needed to ensure implementation of air filters. Additionally, based on the decision in *CBA v. BAAQMD* (2015), mitigation measures are not required to mitigate impacts of the existing environment on the project.

~~**AQ2**—As a condition of approval for any Discretionary or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, that contains sensitive receptors, the City shall require the consideration of the guidelines in the California Air Resources Board’s *Air Quality and Land Use Handbook: A Community Health Perspective*. This includes projects constructing uses sensitive to air pollution (e.g., residences, schools, medical facilities, elderly housing, etc.) and projects that may expose existing sensitive receptors to new pollution (e.g., warehouses). For projects with sensitive receptors located within 500 feet of the Santa Monica Freeway, a health risk assessment shall be completed that demonstrates that indoor and outdoor sensitive receptors would not be exposed to significant levels of toxic air contaminants in accordance with South Coast Air Quality~~

~~Management District (SCAQMD) guidelines. The health risk assessments shall be circulated to the SCAQMD for review and comment.~~

~~In order to lessen the levels of indoor toxic air contaminants, the City of Los Angeles may condition approval of private projects located in the vicinity of major transportation corridors (within 500 feet of a freeway for commercial and industrial uses and residential uses that front on a Major Highway or are located adjacent to an active heavy rail line) to install and maintain an air filtration system having efficiency equal to or exceeding American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2 Minimum Efficiency Reporting Value (MERV 13) (excluding storage/warehouse areas or garages). In addition, windows facing freeways may be conditioned inoperable and the property perimeter nearest the freeway may be required to be landscaped with a dense mixture of shrubs and trees to maximize passive filtration of particulate air contaminants.~~

- The “Significance of Impacts” subsection regarding Toxic Air Contaminants on page 4.3-21 of Section 4.3 has been updated to include the following:

Impacts related to toxic air contaminants were determined to be less than significant without mitigation. ~~Mitigation Measure AQ2 would reduce the impacts to less than significant.~~

#### SECTION 4.4 BIOLOGICAL RESOURCES

- Paragraph 2 on page 4.4-2 of Section 4.4 has been updated to include the following:

**Migratory Bird Treaty Act (MBTA).** The MBTA (16 U.S.C. Sections 703–711) includes provisions for the protection of migratory birds, including the non-permitted take of migratory birds, under the authority of the USFWS and the CDFW. The MBTA protects over 800 species, including geese, ducks, shorebirds, raptors, songbirds, and many common species.

Under this Act, taking, killing, or possessing migratory birds is unlawful. Projects that are likely to result in the taking of birds protected under the MBTA will require the issuance of take permits from the USFWS. Activities that would require such a permit would include, but not be limited to, the destruction of migratory bird nesting habitat during the nesting season when eggs or young are likely to be present. Under this Act, surveys are required to determine if nests will be disturbed and, if so, a buffer area with a specified radius around the nest would be established so that no disturbance or intrusion would be allowed until the young had fledged and left the nest. If not otherwise specified in the permit, the size of the buffer area would vary with species and local circumstances (e.g., presence of busy roads), and would be based on the professional judgment of the monitoring biologist.

- The first sentence of paragraph 4 on page 4.4-2 of Section 4.4 has been updated as follows:

#### **California Fish and Game Code Sections ~~3500~~ 355 through ~~3705~~ 357, Migratory Bird Protection**

- The following legislative updates have been included after paragraph 5 on page 4.4-2 of Section 4.4:

**Natural Community Conservation Act (NCCA).** The NCCA (CFGF Chapter 10, Division 3, Sections 2800 et seq.) was enacted in 1991. The NCCA is administered by the CDFW. The goal of the act is to identify and secure habitat areas for protection of biodiversity. Habitat areas are identified by the CDFW and plans are prepared for habitat protection. When a development project is proposed, a determination is made concerning the potential impacts of the project on biodiversity and the best means of avoiding or mitigating them. The NCCA allows local, State or federal agencies to enter into agreements with public and private entities to implement a "natural community conservation plan (NCCP)", e.g., habitat and species protection within a specified geographic area. Participation in an NCCP does not exempt a development project from CEQA. Mitigation measures pursuant to CEQA

may, as an alternative, include participation in an NCCP in order to reduce the burden for onsite mitigation.

**Porter-Cologne Water Quality Control Act.** Waters of the United States are defined by the Porter-Cologne Water Quality Control Act as “any surface water or groundwater, including saline waters, within the boundaries of the state.” The State Water Board protects all waters in its regulatory scope, but has special responsibility for isolated wetlands and headwaters. These waterbodies have high resource value, are vulnerable to filling, and may not be regulated by other programs, such as CWA Section 404. Waters of the State are regulated by the Water Boards under the State Water Quality Certification Program, which regulates discharges of dredged and fill material under CWA Section 401 and the Porter-Cologne Water Quality Control Act. Projects that require a USACE permit, or fall under other federal jurisdiction, and have the potential to impact Waters of the United States are required to comply with the terms of the Water Quality Certification Program. If a proposed project does not require a federal license or permit, but does involve activities that could result in a discharge of harmful substances to Waters of the United States, the Water Boards have the option to regulate such activities under its state authority in the form of Waste Discharge Requirements or Certification of Waste Discharge Requirements.

- Paragraph 3 on page 4.4-3 of Section 4.4 has been updated as follows:

**Los Angeles Municipal Code (LAMC) Tree Preservation Ordinance.** In response to the declining oak population in the City of Los Angeles, the City enacted an oak tree protection ordinance in 1982. Although the ordinance slowed the oak tree decline, the oak population and other native tree species continued to decline. In an effort to further slow the decline of native tree habitat, the City amended the Los Angeles Municipal Code (LAMC) in April 2006. The amended Native Tree Protection Ordinance became law on April 23, 2006. The law includes protection of all native oak tree species (*Quercus* spp), Western sycamore (*Platanus racemosa*), California bay (*Umbellularia californica*), and California black walnut (*Juglans californica*) on any property within the City.<sup>3</sup> Protected tree removal requires a removal permit by the Board of Public Works. Any act that may cause the failure or death of a protected tree anywhere in the city requires inspection by the City’s Urban Forest Division.

- The last paragraph on page 4.4-3 of Section 4.4 has been updated as follows:

**City of Los Angeles Tentative Map Requirements.** The Tentative Tract Map filing guidelines issued by the DCP state that, in addition to protected trees (addressed above), other trees (generally non-native) with a diameter at breast height (DBH) of ~~±2~~ 8 inches or greater that are located within the proposed limits of disturbance be identified and mapped on a site plan, and that desirable “mature” trees be replaced at a 1:1 ratio.

- Paragraph 2 on page 4.4-15 of Section 4.4 regarding tree preservation has been updated as follows:

Heritage trees are individual trees of any size or species that are specially designated as heritage because of their historical, commemorative, or horticultural significance. There are 187 Heritage Trees within the West Adams CPA.<sup>4</sup> Five tree species are protected under the City of Los Angeles Tree Preservation Ordinance, and are referred to as ordinance protected trees. These are the Coast Live Oak (*Quercus agrifolia*), Valley Oak (*Quercus lobata*), Western Sycamore (*Platanus racemosa*), California Black Walnut (*Juglans californica*), and California Bay (*Umbellularia californica*).<sup>5</sup> Ordinance protected trees are illegal to remove or fatally harm without the issuance of a permit anywhere in the city. Of these, five

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<sup>4</sup>City of Los Angeles Department of Public Works, Navigate LA website, <http://navigatela.lacity.org>, accessed February 15, 2012.

<sup>5</sup>City of Los Angeles Department of City Planning, *Ordinance No. 177404*, March 2006, available at [http://cityplanning.lacity.org/Code\\_Studies/Other/ProtectedTreeOrd.pdf](http://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf), accessed February 13, 2012.

<sup>3</sup>City of Los Angeles, Urban Forestry Division website, <http://www.laparks.org/dos/forest/urbanforest.htm>, accessed February 15, 2012.



~~are protected under the City of Los Angeles Tree Preservation Ordinance. The five tree species that are included in the City's Protected Tree Ordinance~~

- The Habitat Conservation Plans subsection on page 4.4-15 of Section 4.4 has been updated to include the following information as footnoted:

There are a number of Significant Ecological Areas (SEAs) located within the City of Los Angeles boundaries. The City's General Plan Conservation Element recognizes SEAs as significant habitats identified by Los Angeles County as important for the preservation and maintenance of biodiversity. Los Angeles County defines SEAs as ecologically important land and water systems that support valuable habitat for plants and animals, and are often integral to the preservation of rare, threatened or endangered species and the conservation of biological diversity in the County.<sup>4</sup> These areas are classified as one or more of the following: (a) habitats for rare and endangered species of plants and animals, (b) restricted natural communities - ecological areas that are scarce on a regional basis, (c) habitats restricted in distribution in the county, (d) breeding or nesting grounds, (e) unusual biotic communities, (f) sites with critical wildlife and fish value, and (g) relatively undisturbed habitats. The nearest SEA to the West Adams CPA is the Griffith Park SEA, located approximately eight miles to the north.<sup>5</sup>

- Paragraphs 2 and 3 on page 4.4-18 of Section 4.4 have been updated as follows:

As stated above, while the majority of the West Adams CPA currently encompasses residential, commercial, and industrial development, migratory bird species still exist therein. These habitats are located primarily on lands within Kenneth Hahn State Recreation Area situated in the southwest boundary of the West Adams CPA (**Figure 4.4-2**). Many of the land use changes under the proposed project consist of General Plan Amendments to create consistency with Framework Land Use designations. Although, the City has analyzed the entire West Adams CPA, only certain areas are proposed to undergo zoning and land use changes. However Further, the proposed project could potentially result in some development or infrastructure projects on undeveloped/vacant lands within the West Adams CPA.

The Kenneth Hahn State Recreation Area would remain open space and no substantial changes in land use patterns are proposed as a result of the West Adams New Community Plan and implementing ordinances. As most of the new development in the West Adams Community Plan area would be infill of existing urban spaces in areas of active change, ~~these~~ potential projects are not expected to directly impact migratory bird species or habitats.

Additional "active" changes include intensifying development around transit stations within the TOD CPIO districts. These transit-oriented districts associated with the West Adams CPIO are located directly adjacent to Phase I of the Expo LRT stations at Exposition/Crenshaw Boulevards, La Brea/Farndale Avenues, Jefferson/La Cienega Boulevards, and Venice/Robertson Boulevards. In addition, TOD areas associated with the Crenshaw Corridor Specific Plan Amendments are considered at station areas for the Crenshaw/LAX LRT at the intersections of Crenshaw/Exposition Boulevards, Crenshaw/Martin Luther King Jr. Boulevards, Crenshaw Boulevard/Vernon Avenue, and Crenshaw Boulevard/Slauson Avenue. Similarly, as As mentioned above, TOD areas do not include areas that act as a true wildlife corridors, movement pathways, or linkages of note between larger habitat areas for terrestrial wildlife; however, trees within these TOD areas could potentially support migratory birds. Additionally, construction activities associated with potential projects in these areas could adversely impact non-status nesting birds, which are protected by the MBTA and California Fish and Game Code (refer to Regulatory Framework above), by removal or destruction of an active nest (defined as a nest with eggs or young being attended by one or more adults) or direct mortality or injury of individual birds.

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<sup>6</sup>County of Los Angeles, General Plan, 2011.

<sup>7</sup>County of Los Angeles. *Significant Ecological Areas*. Retrieved from: [http://planning.lacounty.gov/assets/upl/data/map\\_t02-sea-2-2010.pdf](http://planning.lacounty.gov/assets/upl/data/map_t02-sea-2-2010.pdf), 2011.

- The construction impacts analysis regarding Tree Preservation (paragraph 5) on page 4.4-18 of Section 4.4 has been updated as follows:

Development in the CPIO Districts and Specific Plan Amendment change areas where “active” changes would occur under the Proposed Plan are likely to include, or have adjacency to, tree species protected by local laws. Therefore, development in the active change areas could impact these trees, and without mitigation, the Proposed Project would result in a significant impact related to tree preservation.

~~Many areas within the West Adams CPA are known to have protected tree species. Many of the land use changes under the proposed project consist of General Plan Amendments to create consistency with Framework Land Use designations. However, implementation of the proposed project could result in development or infrastructure projects on parcels that are adjacent to protected tree species. Specific development and infrastructure projects have the potential to result in the loss of protected trees within the West Adams CPA. Therefore, without mitigation, the proposed project would result in a significant impact related to tree preservation.~~

- The first sentence of Mitigation Measures **BR1** and **BR2** on page 4.4-20 of Section 4.4 has been updated as follows:

~~As a condition of approval of any~~ Any approval of a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall ensure require that....

- The last sentence of Mitigation Measure **BR1** on page 4.4-20 of Section 4.4 has been updated as follows:

The report should be submitted to the California Department of Fish and ~~Game~~ Wildlife (CDFW) within two months of the completion of the monitoring activities.

## SECTION 4.5 CULTURAL RESOURCES

- The Federal Regulatory Framework subsection beginning on page 4.5-1 of Section 4.5 has been updated to include the following:

**National Historic Preservation Act (NHPA).** Cultural resources are considered during federal undertakings, primarily under NHPA Section 106. Section 106 requires federal agencies to take into account the effects of their undertakings on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register and to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings (36 Code of Federal Regulations [CFR] 800.1). Under Section 106, cultural resources must be identified and evaluated, and effects to historic properties must be reduced to acceptable levels through mitigation measures or agreements among consulting and interested parties. Historic properties are those resources that are listed in or are eligible for listing in the National Register per the criteria listed below (36 CFR 60.4; Advisory Council on Historic Preservation 2000). Properties, sites, districts, structures, or landscapes nominated for listing in the National Register must possess integrity of location, design, setting, feeling, workmanship, association, and materials in addition to meeting any or all of the following criteria:

- Are associated with events that have made a significant contribution to the broad patterns of our history;
- Are associated with the lives of persons significant in our past;
- Embody the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- Have yielded, or may be likely to yield, information important in prehistory or history.

- The State Regulatory Framework subsection beginning on page 4.5-3 of Section 4.5 has been updated to include the following:

**Senate Bill 18.** As of March 1, 2005, Senate Bill 18 (Government Code Sections 65352.3 and 65352.4) requires that, prior to the adoption or amendment of a general plan proposed on or after March 1, 2005, a city or county must consult with Native American tribes with respect to the possible preservation of, or the mitigation of impacts to, specified Native American places, features, and objects located within that jurisdiction.

- The Local Regulatory Framework subsection regarding the City’s HPOZ ordinance beginning with paragraph 3 on page 4.5-6 of Section 4.5 has been updated as follows:

As required by the Ordinance, the construction, addition, demolition, reconstruction, alteration, removal, or relocation of any publicly or privately owned building, structure, landscaping, natural feature, lot, street features, furniture or fixtures within a HPOZ identified as a contributing element in the historic resources survey for the zone must obtain a certificate of appropriateness by the Director of the City’s Department of City Planning (DCP) or Area Planning Commission. The determination to approve, conditionally approve or disapprove of a certificate of appropriateness for construction, addition, alteration or reconstruction is based on the project’s conformance to the HPOZ’s Preservation Plan, compliance with the United States Secretary of Interior’s Standards of Rehabilitation, if no Preservation Plan exists, and whether the project protects and preserves the historic and architectural qualities and the physical characteristics which make the building, structure, landscape, or natural feature a contributing element of the preservation zone. Any person proposing to demolish, remove or relocate any contributing building, structure, landscaping, or natural feature within a preservation zone not qualifying as conforming work on contributing elements shall apply for a certificate of appropriateness and must conduct appropriate environmental review. No certificate of appropriateness shall be issued to demolish, remove or relocate any building, structure, landscaping, natural feature or lot within a HPOZ that is designated as a contributing element unless it can be demonstrated that the owner would be deprived of all economically viable use of the property.

- Mitigation Measures **CR1, CR2, CR3** and **CR4** beginning on page 4.5-21 of Section 4.5 have been updated as follows:

The City has completed subsequent phases of the SurveyLA Historic Resources Survey Report: West Adams-Baldwin Hills-Leimert Community Plan Area that include analysis of industrial and manufacturing land uses, and therefore, Mitigation Measure CR3 is no longer needed to ensure that implementation of Mitigation Measure CR4 is applied to all projects including those within an industrial or manufacturing land use category involving existing structures.

~~As a condition of approval for any~~ Before approval of any building permits for a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, developed in a Historic Preservation Overlay Zones, the City shall require written approval from the Department of City Planning Office of Historic Resources ~~prior to the issuance of building permits.~~

~~**CR3** As a condition of approval for any Discretionary or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, and until subsequent phases of the SurveyLA Historic Resources Survey Report: West Adams Baldwin Hills Leimert Community Plan Area have been completed to include analysis of industrial and manufacturing land uses, the City shall require all projects within an industrial or manufacturing land use category involving existing structures to be evaluated by a qualified architectural historian for the purposes of determining if they are historically significant. If the structures are found to be historically significant the project shall comply with the recommendations of the qualified architectural historian and the architectural survey report written by the qualified architectural historian. The report shall be submitted to the City for documentation.~~

**CR4** ~~Before approval of a Discretionary project or “Active Change Area Project” involving properties identified in~~ As a condition of approval for any Discretionary or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall ~~:- the project applicant shall review the most current~~ the SurveyLA Historic Resources Survey Report: “West Adams – Baldwin Hills - Leimert Community Plan Area” as eligible for listing ~~to determine whether the project site has been previously surveyed and whether the property appears eligible for historic listing. The SurveyLA Historic Resources Survey Report: West Adams Baldwin Hills Leimert Community Plan Area shall be periodically updated as additional resources are identified. If the project site is eligible for listing, the City of Los Angeles Office of Historic Resources (OHR) shall find that the project shall ensure that such historic resources are appropriately renovated and maintained, and that is consistent with the preservation, rehabilitation, restoration, and reconstruction or adaptive reuse of the historical resource shall meet the U.S. Secretary of the Interior's Standards for Rehabilitation or that upon further review or study, the property is not eligible for designation as a historic resource. (Secretary’s Standards). Any proposal to preserve, rehabilitate, restore, reconstruct, or adaptively reuse a known historical resource in accordance with the Secretary’s Standards shall be deemed to not be a significant impact under CEQA and, in such cases, no additional mitigation measures will be required if the project does not require discretionary action. Identify potential impacts to historical resources. The project applicant shall review the SurveyLA Historic Resources Survey Report: West Adams Baldwin Hills–Leimert Community Plan Area, dated August 2011 (and subsequent phases of the report that will evaluate industrial/manufacturing land uses), to determine whether the project site has been previously surveyed and whether historical resources were identified.~~

- ~~Ensure that designated historic buildings, are appropriately renovated and maintained, and that the preservation, rehabilitation, restoration, and reconstruction or adaptive reuse of a known historical resource shall meet the U.S. Secretary of the Interior's Standards for Rehabilitation (Secretary’s Standards). Any proposal to preserve, rehabilitate, restore, reconstruct, or adaptively reuse a known historical resource in accordance with the Secretary’s Standards shall be deemed to not be a significant impact under CEQA and, in such cases, no additional mitigation measures will be required if the project does not require discretionary action.~~
  - ~~Ensure that incentive areas where Floor Area Ratio (FAR) increases may be proposed are in compliance with the Secretary’s Standards, and require that all projects within these areas that may potentially impact historic resources meet the Secretary’s Standards. The project would also be subject to any other historic resources review process triggered by any other historic designation. This requirement would be reviewed for compliance by Office of Historic Resources staff.~~
  - ~~Require, where feasible, noise buffers/walls and/or visual buffers/landscaping or some other material to be constructed by the prime construction contractor to preserve the contextual setting of significant built resources.~~
- The first sentence of Mitigation Measures **CR5, CR6, CR7, CR8, CR9** and **CR10** beginning on page 4.5-22 of Section 4.5 has been updated as follows:

~~As a condition of approval for a~~ Any approval of a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall ~~require~~ ensure that...

## SECTION 4.6 GEOLOGY AND SOILS

- The Federal Regulatory Framework subsection beginning on page 4.6-1 of Section 4.6 has been updated to include the following:

**U.S. Code Title 42.** Federal law codified in the U.S. Code Title 42, Chapter 86 (Earthquake Hazard Reduction Act of 1977) where enacted to reduce the risks to life and property from earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. Implementation of these requirements are regulated, monitored, and enforced at the state and local level.

**National Pollutant Discharge Elimination System (NPDES) Phase I Permit.** The NPDES Phase I Permit is prepared when a project is proposed on a site. As part of the NPDES permit, a Stormwater Pollution Prevention Plan (SWPPP) prepared in compliance with an NPDES Permit. The SWPPP includes a description of a project site or area, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of post-construction sediment and erosion control measures and maintenance responsibilities, and non-stormwater management controls. Dischargers are required to inspect construction sites before and after storms to identify stormwater discharge from construction activity, and to identify and implement controls where necessary.

The City implements these requirements through its Standard Urban Stormwater Mitigation Plan (SUSMP), which addresses stormwater pollution from new construction and redevelopment projects. The SUSMP requirements contain a list of minimum Best Management Practices (BMPs) that must be employed to infiltrate or treat stormwater runoff, control peak flow discharge, and reduce the post-project discharge of pollutants from stormwater conveyance systems. Refer to Section 4.8, Hydrology and Water Quality, for additional information.

- The State Regulatory Framework subsection regarding the California Building Code (CBC) beginning with paragraph 2 on page 4.6-2 of Section 4.6 has been updated as follows:

CBC Appendix J applies to grading, excavation, and earthwork construction, and requires that no grading shall be performed without first having obtained a permit from the building official. Section J104.3 requires the preparation of a geotechnical report that contains at least the following:

- The nature and distribution of existing soils
- Conclusions and recommendations for grading procedures
- Soil design criteria for any structures or embankments required to accomplish the proposed grading
- Where necessary, slope stability studies, and recommendations and conclusions regarding site geology
- Additionally, for sites with mapped maximum considered earthquake spectral response accelerations at short periods (S<sub>s</sub>) greater than 0.5 g as determined by Section 1613 of the CBC, a liquefaction potential study of the site shall be provided, and the recommendations incorporated in grading and construction plans.

- The Local Regulatory Framework subsection beginning on page 4.6-2 of Section 4.6 has been updated to include the following:

**Los Angeles Local Hazard Mitigation Plan (LHMP).** The City of Los Angeles approved its LHMP in 2011. The plan identifies potential natural and human-caused hazards, and potential scenarios and estimated losses, addresses existing and proposed mitigation policies, programs and projects, and response programs. With regard to earth resources, the LHMP identifies earthquake as a high-risk hazard, but landslides/mudslides and tsunamis are considered low-risk hazards.

- The first and second sentences of the last paragraph of page 4.6-12 of Section 4.6 have been updated to include the following clarifications:

**Liquefaction.** As previously shown in **Figure 4.6-2**, large portions of the West Adams CPA are in liquefaction zones. Implementation of the proposed West Adams New Community Plan includes zone changes, land use designation and district Specific Plan amendments, and the establishment of overlay zones and that include TOD areas. Refinements to zoning regulations in the “Active Change” areas are proposed to enable opportunities for increased employment and new housing; particularly along commercial corridors at centers, and at transit stations.

## SECTION 4.7 GREENHOUSE GAS EMISSIONS

- The State Regulatory Framework subsection beginning on page 4.7-2 of Section 4.7 has been updated to include the following footnoted legislative update:

**Assembly Bill 1493 (AB 1493).** Assembly Bill (AB) 1493 (referred to as Pavley I), adopted in 2002, required the California Air Resource Board (CARB) to develop and adopt standards for vehicle manufacturers to reduce GHG emissions coming from passenger vehicles and light-duty trucks at a “maximum feasible and cost effective reduction” by January 1, 2005. Pavley I took effect for model years starting in 2009 and extending to 2016 and Pavley II, which is referred to as the Low Emission Vehicle (LEV) III GHG, will cover 2017 to 2025. It is estimated that the standard will reduce climate change emissions by 30 percent in 2016 compared to the emissions in the same year without the standards.<sup>4</sup>

- The last paragraph on page 4.7-5 of Section 4.7 has been updated as follows:

**California’s Energy Efficiency Standards for Residential and Nonresidential Buildings.** Located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as “Title 24,” these energy efficiency standards were established in 1978 in response to a legislative mandate to reduce California’s energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.<sup>7</sup> At the time this Draft EIR was published the most recent update to Title 24 was adopted by the California Energy Commission on April 23, 2008. The California Energy Commission adopted the 2008 changes to the Building Energy Efficiency Standards to respond to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs.

- The Existing Setting subsection beginning on page 4.7-10 of Section 4.7 has been updated to include the following text and footnotes preceding paragraph 1:

### **GLOBAL**

In addition to CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and water vapor. CO<sub>2</sub> is the most abundant pollutant that contributes to climate change through fossil fuel combustion.<sup>8</sup> The other GHGs are less abundant but have higher global warming potential than CO<sub>2</sub>. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent of CO<sub>2</sub>, denoted as CO<sub>2</sub>e. CO<sub>2</sub>e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. **Table 4.7-1A** shows various GWP.

<sup>4</sup>CARB, *Clean Air Standards - Pavley, Assembly Bill 1493*, May 6, 2013.

<sup>7</sup>California Energy Commission, California’s Energy Efficiency Standards for Residential and Nonresidential Buildings website, <http://www.energy.ca.gov/title24>, accessed August 8, 2011.

<sup>8</sup>U.S. Department of Energy - Energy Information Administration, Office of Integrated Analysis and Forecasting, *Emissions of Greenhouse Gases in the United States, 1995*.

<b>TABLE 4.7-1A: GLOBAL WARMING POTENTIAL FOR VARIOUS GREENHOUSE GASES</b>			
<b>Pollutant</b>	<b>Lifetime (Years)</b>	<b>Global Warming Potential (20-Year)</b>	<b>Global Warming Potential (100-Year)</b>
Carbon Dioxide	100	1	1
Nitrous Oxide	121	264	265
Nitrogen Trifluoride	500	12,800	16,100
Sulfur Hexafluoride	3,200	17,500	23,500
Perfluorocarbons	3,000-50,000	5,000-8,000	7,000-11,000
Black Carbon	days to weeks	270-6,200	100-1,700
Methane	12	84	28
Hydrofluorocarbons	Uncertain	100-11,000	100-12,000

SOURCE: California Air Resources Board, *First Update to the Climate Change Scoping Plan*, May 2014.

The primary effect of rising global concentrations of atmospheric GHG levels is a rise in the average global temperature of approximately 0.2 degrees Celsius per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling using 2000 emission rates shows that further warming is likely to occur given the expected rise in global atmospheric GHG concentrations from innumerable sources of GHG emissions worldwide (e.g., economically developed and developing countries and deforestation), which would induce further changes in the global climate system during the current century.<sup>9</sup> Intergovernmental Panel on Climate Change’s (IPCC) 2007 IPCC Fourth Assessment Report projects the global mean temperature to increase from 1.4 to 5.8 degrees Celsius (2.5 to 10.4 °F) between 1990 and 2100. In the past, gradual changes in the earth’s temperature changed the distribution of species, availability of water, etc. However, human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime.<sup>10</sup>

Adverse impacts from global climate change worldwide and in California include:

- Declining sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates with a corresponding increase in atmospheric water vapor due to the atmosphere’s ability to hold more water vapor at higher temperatures;<sup>11</sup>
- Rising average global sea levels primarily due to thermal expansion and the melting of glaciers, ice caps, and the Greenland and Antarctic ice sheets;<sup>12</sup>
- Changing weather patterns, including changes to precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones;<sup>13</sup>
- Declining Sierra Mountains snowpack levels, which account for approximately half of the surface water storage in California, by 70 percent to as much as 90 percent over the next 100 years;<sup>14</sup>
- Increasing the number of days conducive to ozone formation (e.g., clear days with intense sun light) by 25 percent to 85 percent (depending on the future temperature scenario) in high ozone areas located in the Southern California area and the San Joaquin Valley by the end of the 21<sup>st</sup> Century;<sup>15</sup> and

<sup>9</sup>Environmental Protection Agency, Draft Endangerment Finding, 74 Fed. Reg. 18886, 18904 (April 24, 2009) (“cumulative emissions are responsible for the cumulative change in the stock of concentrations in the atmosphere”); 74 Fed. Reg. 66496, 66538 (same in Final Endangerment Finding).

<sup>10</sup>IPCC, *Climate Change*, 2007.

<sup>11</sup>*Ibid.*

<sup>12</sup>*Ibid.*

<sup>13</sup>*Ibid.*

<sup>14</sup>California Environmental Protection Agency, Climate Action Team, *Climate Action Report to Governor Schwarzenegger and the California Legislator*, March 2006.

<sup>15</sup>*Ibid.*

- Increasing the potential for erosion of California’s coastlines and seawater intrusion into the Sacramento Delta and associated levee systems due to the rise in sea level.<sup>16</sup>
- Paragraph 6 on page 4.7-10 of Section 4.7 has been updated include the following clarifying term:  

The Forest sector is unique in that forests both emit GHG and uptake CO<sub>2</sub>. While the current inventory shows forests as a “carbon sink” of 4.7 million metric tons of CO<sub>2</sub>e, carbon sequestration has declined since 1990. For this reason, the 2020 projection assumes no net emissions from forests.
- The last sentence of paragraph 5 on page 4.7-13 of Section 4.7 has been updated as follows:  

**Table 4.7-3** shows estimated GHG emissions under existing (2008) conditions and under future (2030) conditions with implementation of the Proposed Plan. Estimated future emissions from area sources, electricity consumption, and landfills do not account for reductions that would occur under ClimateLA. This is due to 1) such reductions are highly uncertain as most policies will only “encourage” or “promote” various measures, and 2) the reductions that could be achieved by these measures are difficult to quantify without specific data. Furthermore, a large amount of the increase in emissions is a direct result of increased VMT. Estimated future VMT under the proposed project does include reductions that would result from the Travel Model outputs described in the Transportation Improvement and Mitigation Program (TIMP) and in particular, those generating an increase in the modal split will be facilitated through the implementation of TOD.
- Mitigation Measure **GHG1** on page 4.7-16 of Section 4.7 has been updated in order to further address Comment Letter 12 as follows:  

~~As a condition of approval for a~~Any approval of a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall require ensure that developers to implement the following greenhouse gas reduction measures are incorporated into project design: applicable GHG reduction measures in project design and comply with regulatory targets. Sources of GHG reduction measures include the California Attorney General’s Office *Addressing Climate Change at the Project Level* (January 6, 2010) document and the California Air Pollution Control Officers Association *Model Policies for Greenhouse Gases in General Plans* (June 2009) document.

  - Install energy efficient lighting (e.g., light emitting diodes), heating and cooling systems, appliances, equipment, and control systems).
  - Install light colored “cool” roofs and cool pavements.
  - Create water-efficient landscapes.
  - Install water-efficient fixtures and appliances.

## SECTION 4.8 HAZARDS AND HAZARDOUS MATERIALS

- The Regulatory Framework subsection beginning on page 4.8-1 of Section 4.8 has been updated to include the following:  

Los Angeles County Operational Area Emergency Response Plan. The Los Angeles County Operational Area Emergency Response Plan does not address normal day-to-day emergencies or the well-established and routine procedures used in coping with them. Instead, the operational concepts reflected in this plan focus on potential large-scale disasters like extraordinary emergency situations associated with natural and man-made disasters and technological incidents which can generate unique situations requiring an unusual or extraordinary emergency response. The purpose of the plan is to incorporate and coordinate all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient Operational Area organization capable of responding to any emergency using a Standard Emergency Management

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<sup>16</sup>*Ibid.*



System (SEMS), mutual aid and other appropriate response procedures. The goal of the plan is to take effective life-safety measures and reduce property loss. Provide for the rapid resumption of impacted businesses and community services, and provide accurate documentation and records required for cost-recovery.

- The Construction Impacts subsection beginning on page 4.8-24 of Section 4.8 has been updated to include the following:

The West Adams New Community Plan describes the capacity for future development for a portion of the City. ~~and does not constitute a commitment to any project specific construction. Therefore, no further discussion of construction impacts is necessary.~~ While the proposed project includes a series of implementing ordinances, it is not an implementation plan in and of itself, and its adoption does not constitute a commitment to any project-specific construction. However, construction related to future capacity within the West Adams CPA would have the following impacts.

#### **TRANSPORT, USE, AND DISPOSAL**

To ensure that workers and others at individual development sites within the CPA are not exposed to unacceptable levels of risk associated with the use and handling of hazardous materials, employers and businesses are required to implement existing hazardous materials regulations, with compliance monitored by state (e.g., OSHA in the workplace or DTSC for hazardous waste) and local jurisdictions (e.g., the Los Angeles County Fire Department). Additionally, before construction activities can take place at documented hazardous materials sites, contamination must be remediated and cleaned up under the supervision of the DTSC. Compliance with existing safety standards related to the handling, use, and storage of hazardous materials, and compliance with the safety procedures mandated by applicable federal, state, and local laws and regulations (RCRA, California *Hazardous Waste Control Law*, and principles prescribed by the California Department of Health Services, Centers for Disease Control and Prevention, and National Institutes of Health) is mandated.

During the construction of new development, future projects within the CPAs may generate hazardous and/or toxic waste depending on the age of structures to be redeveloped or other potential soil or groundwater contamination based on previous uses. Operation of future development under the proposed plans includes residential, commercial, industrial, public facilities and open space uses. Federal, state, and local regulations govern the disposal of wastes identified as hazardous which could be produced in the course of demolition and construction. Therefore, construction impacts related to transport, use, and disposal for the proposed project would be less than significant.

#### **EMERGENCY RESPONSE PLANS**

Construction and operation activities within the CPA with respect to emergency response or evacuation plans due to temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, and a street closure permit is required when a street closure becomes necessary for project completion. Therefore, construction impacts related to emergency response plans for the proposed project would be less than significant.

- The Construction Mitigation Measures subsection on page 4.8-27 of Section 4.8 has been updated as follows:

The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project specific construction. Construction impacts under the Proposed Project as they apply to hazards and hazardous materials would be less than significant. Therefore, no mitigation measures are required.

- Mitigation Measure **HM1** on page 4.8-27 has been updated to include the following:

~~As a condition of approval for a~~Any approval of a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City that involves new construction that will involve soil disturbance shall require ensure that a Phase I Environmental Site Assessment (ESA) to be is prepared to ensure that potential hazards are evaluated and mitigated. The assessment shall be prepared by a Registered Environmental Assessor (REA) in accordance with State standards/guidelines to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, State, and federal regulations and policies. Any further study found necessary by an REA or relevant federal, state or local agency shall be performed prior to project approval and any remediation found necessary by the REA or any relevant federal, state or local agency shall be performed prior to project approval or made a condition on the project if that is found to be adequate for remediation by an REA or the relevant federal, state or local agency.

- The Significance of Impacts After Mitigation subsection related to Construction on page 4.8-28 of Section 4.8 has been updated to include the following:

~~The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project specific construction.~~ Construction impacts under the Proposed Project as they apply to hazards and hazardous materials were determined to be less than significant without mitigation.

## SECTION 4.9 HYDROLOGY AND WATER QUALITY

- The “Local Regulatory Settings” subsection of Section 4.9 has been updated to include the following text under the heading, ”Local” on page 4.9-4:

**Enhanced Watershed Management Plans.** On November 8, 2012, the Regional Board adopted the current municipal stormwater permit (NPDES Permit No. CAS004001, Order No. R4-2012-0175). This Permit contains the most extensive provisions to date with 32 incorporated TMDLs, of which 22 affect the City, expanded programs for Minimum Control Measures (MCMs), development and implementation of watershed management plans, and expanded monitoring provisions.

This 2012 Stormwater NPDES Permit provides for the development of Enhanced Watershed Management Programs (EWMPs) by the MS4 permittees to implement the requirements of the Permit on a watershed scale through customized strategies, control measures, and BMPs. These EWMPs will also address the compliance requirements of the 22 TMDLs that currently are effective, as well other elements of the City’s Stormwater Program. As the largest agency within its own watersheds, the City will coordinate the development of four EWMPs, engage the technical services of a consultant, and coordinate the planning activities with other municipalities in the watersheds, the County, and stakeholder organizations. The EWMPs are due to the RWQCB as draft documents by June 2015, and as final documents by April 2016.

**Integrated Regional Water Management Plan (IRWMP).** Proposition 50, approved by California voters in 2002, set aside \$380 million for IRWMP related grants. Integrated planning involves local agencies and interest groups working together to coordinate planning activities across jurisdictional boundaries. In this regional approach, individual agencies’ efforts are combined in order to leverage resources and meet multiple water resource needs at the same time. The result is a multi-objective approach that multiplies the benefits of any individual agency’s single project. The Greater Los Angeles County Region, comprised of five sub-regions (Upper Los Angeles River, North Santa Monica Bay, South Bay, Upper San Gabriel River and Rio Hondo River and Lower San Gabriel and Los Angeles

River), are collaborating to develop an IRWMP for the region that would describe regional objectives and priorities, water management strategies, implementation, impacts and benefits, data management, financing, stakeholder involvement, relationship to local planning, and state and federal coordination.

- The “Local Regulatory Settings” subsection of Section 4.9 has been updated to include the following text after the last paragraph on page 4.9-9:

**LA’s Drinking Water Quality Report (2013).** The Annual Drinking Water Report (also known as a Consumer Confidence Report) is required by the California Department of Public Health and is prepared in accordance with their guidelines. Los Angeles Department of Water and Power collects over 25,000 water samples across the City, and performed more than 240,000 water quality tests. They tested for more than 200 contaminants and constituents, including both regulated contaminants, such as arsenic, chromium, lead, and disinfection by-products, as well as constituents of interest such as sodium and hardness.

**Water Quality Compliance Master Plan for Urban Runoff (WQCMP).** In 2009, the City of Los Angeles adopted the WQCMP. This document is a 20- year strategy for clean stormwater and urban runoff in the City of Los Angeles and to meet all water quality regulations for the City’s rivers, lakes, and coastal waters. The Master Plan provides an overview of the existing status of urban runoff management in the City, including a description of watersheds in the City, urban runoff pollutant sources, regulatory requirements for water quality, existing watershed management, and plans for compliance with regulatory requirements. In addition, the Master Plan plans for the future of urban runoff management in the City and discusses three initiatives: Water Quality Management Initiative, Citywide Collaboration Initiative, and Outreach Initiative. Lastly, the Plan contains a financial outlook that evaluates current and future revenues, provides an estimate of the costs needed for implementing the strategies proposed, and presents opportunities for funding.

- Paragraph 4 on page 4.9-17 of Section 4.9 under the “Existing Deficiencies and Proposed Upgrades” subsection has been updated as follows:

In particular, Proposition 50 set aside \$380 million for ~~Integrated Regional Water Management Plan (IRWMP)~~ IRWMP related grants. Integrated planning involves local agencies and interest groups working together to coordinate planning activities across jurisdictional boundaries. In this regional approach, individual agencies’ efforts are combined in order to leverage resources and meet multiple water resource needs at the same time. For instance, water supply, water quality, and habitat projects might be combined with a flood control project in a manner that benefits a much larger area than the original jurisdiction. The result is a multi-objective approach that multiplies the benefits of any individual agency's single project.

- The second bullet of the first paragraph on page 4.9-20 of Section 4.9, under the Thresholds of Significance subsection has been updated to include the following text:
  - Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);
  - Otherwise substantially degrade water quality;

- The “Construction” impacts subsection of Section 4.9 has been modified to include the following addition after paragraph 2 on page 4.9-21.

For most of the land area within the West Adams CPA, the maximum floor area ratio (FAR) would not be altered. However, underlying zoning within TOD and Major Intersection Node areas of the CPIO District and within the Crenshaw Corridor Specific Plan would change FAR values by increasing the permitted maximum buildable area in these targeted areas. Some of the proposed changes could result in changes to building density, building bulk, or increases in impervious surfaces; however, if changes in building density or bulk are made to areas that are already developed, only an insubstantial increase in non-point pollution would occur. Since less than one percent of the land in the West Adams CPA is undeveloped, the changes proposed by the West Adams New Community Plan will not result in substantial new sources or quantities of urban pollutants.

- The “Surface Water Quality” construction impacts subsection on page 4.9-21 of Section 4.9 has been updated as follows:

### **Surface Water Quality**

Surface Water Quality within the West Adams CPA is highly influenced by the Ballona Creek. Ballona Creek flows through the West Adams CPA, ultimately conveying runoff and flood flows from the West Adams CPA to Santa Monica Bay. Ballona Creek is highly modified, having been channelized with concrete along most of its length.

Impacts on surface water quality during construction related to the proposed project would be short-term. However, grading, excavation, and other construction activities associated with the implementation of the proposed project could impact water quality due to erosion resulting from exposed soils that may be transported from the project area in stormwater runoff. ~~In addition, construction related to the proposed project also has the potential to generate short-term water pollutants, including sediment, trash, construction materials, and equipment fluids. Compliance with the NPDES program would ensure these stormwater pollutants would not substantially degrade water quality. The County wide MS4 permit requires construction sites to develop a SWPPP and implement BMPs to reduce the potential for construction induced water pollutant impacts. All new development within the West Adams CPA would be required to comply with these regulations. Therefore, the proposed project would result in less than significant impacts related to surface water quality.~~

The City of Los Angeles has comprehensive standard requirements for development to ensure that violations of water quality standards do not occur. These standard requirements are recorded in the LAMC. For example, the City enforces its SUSMP, a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. The goals and objectives of the SUSMP are achieved through the use of BMPs that attempt to manage runoff water quality. As required by the SUSMP, all foreseeable development projects, including projects that could be constructed in the CPA (as applicable) would be required to implement operational BMPs to control release of pollutants in stormwater runoff as part of the project permitting process. The SUSMP identifies the types and size of private development projects that are subject to these requirements.

Required elements of the SUSMP include provisions for:

- Peak stormwater runoff discharge rates
- Conservation of natural areas
- Minimization of stormwater pollutants of concern
- Protection of slopes and channels
- Storm drain system stenciling and signage
- Properly designed outdoor material storage areas
- Properly designed trash storage areas

- Proof of ongoing BMP Maintenance
- Design standards for structural or treatment control BMPs
- Provisions for individual priority project categories
- Limitations on use of infiltration BMPs

Site design or planning management BMPs would be used to minimize runoff from new development and to discourage development in environmentally sensitive areas that are critical to maintaining water quality. Source control BMPs are usually the most effective and economical in preventing pollutants from entering storm and non-storm runoff. Treatment Control (or structural) BMPs involve physical treatment of the runoff, usually through structural means. Requirements of the SUSMP are enforced through the City's plan approval and permit process and all new development projects are subject to City inspection. Compliance with the SUSMP would ensure that development projects occurring under the proposed West Adams New Community Plan do not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality.

Furthermore, discharges associated with the proposed West Adams New Community Plan would not create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. Implementation of the proposed West Adams New Community Plan would not compromise the beneficial uses of nearby waterbodies, or the facilities which serve those beneficial uses, nor would it impair the waters of the state in a way that creates a hazard to public health or diminishes the community enjoyment of property.

All applicable projects must comply with Article 4.4 of LAMC, Section 64.72, which governs project operation pollutant control requirements. Compliance with the LAMC would ensure that the proposed project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Additionally, the Conservation Element, the General Plan Framework, and the proposed project contain policies that would help minimize this potential impact (**Table 4.9-1** above). Adoption and implementation of the proposed West Adams New Community Plan, in conjunction with individual project compliance with the federal, State, and local regulations, code requirements, and permit provisions would prevent significant impacts related to the discharge of potentially polluted runoff into surface water. Therefore, the proposed project would result in less-than-significant impact related to surface water quality.

- The “Groundwater” construction impacts subsection on page 4.9-21 of Section 4.9 has been updated as follows:

#### **Groundwater**

The proposed West Adams New Community Plan does not propose any drilling that would create a net deficit in aquifer volume, yields, or change the rate or direction of groundwater. Proposed land use changes in the West Adams New Community Plan consist of General Plan Amendments and proposed zone changes to maintain General Plan land use consistency. Though these zone changes will provide development incentives to revitalize commercial corridors, they do not substantially change the overall land use patterns within the West Adams CPA.

As shown in **Figure 4.9-3** above, the West Adams CPA is located within the geographic boundaries of the Los Angeles Coastal Plain Groundwater Basin. According to the Basin Plan, the general quality of groundwater in the Los Angeles region has degraded substantially from background levels. Much of the degradation reflects urbanized land uses that have developed in the Los Angeles Coastal Plain Groundwater Basin. However, as previously discussed, all new development within the West Adams CPA would be required to occur in compliance with the City's SUSMP requirements, applicable LAMC water quality standards, and the General Plan Framework, which would prevent significant groundwater quality impacts.

Interference with groundwater recharge is largely caused by the construction of impervious surface area (buildings, road, parking lots, etc.) In most instances, the maximum FAR permitted on those properties affected by the proposed West Adams New Community Plan does not change. Where FAR changes are proposed in targeted CPIO District and Specific Plan subareas, they do increase permitted maximum buildable area, and could result in greater building intensity. However, since approximately less than one percent of the land in the West Adams CPA is vacant or undeveloped, any new development in the West Adams CPA, whether more intense than existing conditions or not, would not result in a substantial increase of impervious surfaces. Therefore, the West Adams CPA is not a significant area for groundwater recharge, and implementation of the proposed West Adams New Community Plan would not involve direct groundwater withdrawal or injection. The West Adams CPA is not a significant area for groundwater recharge. In addition, General Plan Framework policies would help minimize potential impacts to groundwater. Therefore, the proposed project would result in less than significant impacts related to groundwater.

The stormwater quality BMPs described above would aid in ensuring that surface water is effectively maintained so that stormwater infiltration, if any, would not represent a substantial risk to groundwater quantity or quality. Future development would be subject to the development standards in the CPIO District, which would require future development projects to provide landscaping within setback areas and parking lots, which could provide a means for infiltrating or detaining stormwater.

Furthermore, implementation of the proposed West Adams New Community Plan would not have a significant impact on groundwater level in a way that would change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for:

- public water supplies
- conjunctive use purposes
- storage of imported water
- supply for summer/winter peaking
- response to emergencies and drought

Construction of future development in the West Adams CPA as a result of the adoption and implementation of the proposed West Adams New Community Plan would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table to a level which would not support existing land uses or planned uses for which permits have been granted. While construction activities may use water provided by the Los Angeles Department of Water and Power for varying purposes, the duration of such activities and the amount of water used would be limited, and does not have the potential to deplete groundwater supplies. No other activities would occur as a result of the proposed NCP that would have an effect on groundwater.

Compliance with the City's Stormwater and Urban Runoff Pollution Control Ordinance and NPDES GCASP permit requirements is mandatory. These regulations would help to ensure that any construction activities associated with future development would not adversely affect groundwater by utilizing the added protections of SWPPP design and implementation. The SWPPP has two major objectives: (1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater, as well as non-stormwater discharges. The stormwater quality BMPs would aid in ensuring that surface water is effectively maintained so that stormwater infiltration, if any, would not represent a substantial risk to groundwater quantity or quality. No other activities would occur as a result of the proposed NCP that would have an effect on groundwater.

Implementation of the proposed project would not interfere with public uses of the groundwater supply, reduce the water yields of adjacent wells or well fields, adversely change the rate or direction of

groundwater flow, or reduce groundwater recharge capacity. Compliance with applicable water quality and stormwater regulations would ensure that impacts would remain less than significant. Therefore, construction impacts related to groundwater would be less than significant.

- The “Stormwater Drainage” construction impacts subsection on page 4.9-22 of Section 4.9 has been updated as follows:

### **Stormwater Drainage**

The proposed West Adams New Community Plan could result in grading activities on individual parcels during development. The largest land use changes would occur within the proposed CPIO subdistricts and Specific Plan subareas in the form of transit-oriented developments and increased capacity for commercial development along commercial corridors at major intersection sites. Most of this land is already developed, however, and any redevelopment would be subject to City regulations and requirements. Additionally, the proposed changes primarily promote smaller in-fill type projects rather than large scale new developments that would result in the type of land alteration that would have a greater potential to substantially alter existing drainage patterns, cause substantial erosion and siltation, reduce or increase the amount of surface water in a water body, or change the current or direction of water flow.

Because the proposed West Adams New Community Plan would otherwise continue to allow the development of the CPA as envisioned by the existing Community Plan, such development could require grading on individual parcels, which could result in small, localized changes in surface drainage patterns that could cause increased erosion potential when soils are exposed during construction. Grading for most structures that would be a reasonably foreseeable effect of implementing the proposed West Adams New Community Plan is expected to be minimal, consisting of grading for foundations, building pads, access roads, and utility trenches in areas that are already developed. Additionally, future development within the Active Changes Areas would occur primarily as infill on previously developed or vacant sites. Because the West Adams CPA is highly urbanized and covered largely by paved and other non-permeable surfaces, future development within these areas, regardless of building densities and lot coverage, would not result in a substantial increase in non-permeable surfaces such that surface drainage patterns would cause erosion or siltation.

~~Any new individual project that could have a stormwater drainage impact would be required to conform to the requirements of the SUSMP, as enforced through the City’s plan approval and permit process. Additionally, all applicable projects must comply with Article 4.4 of the LAMC, Section 64.72, which governs project operation pollutant control requirements. Compliance with the LAMC would ensure that the proposed project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality through erosion or siltation. Therefore, the proposed project would result in less than significant impacts related to stormwater drainage.~~

As described above, all new development projects are subject to the SUSMP and City inspection. The SUSMP requirements integrate Low Impact Development practices and standards for the prevention of stormwater pollution mitigation from surface water drainage, including precautions for erosion and sedimentation, and maximize open, green and pervious space on all development consistent with the City’s landscape ordinance and other related requirements. Compliance with the City’s SUSMP requirements which are required as part of the building permit process for all new development, including by-right projects, would ensure that future development within the West Adams CPA would not result in changes to surface drainage patterns by reducing surface drainage and erosion potential at individual sites that would cause increased erosion or siltation.

Further, all earthwork and grading activities require grading permits from the Department of Building and Safety that include requirements and standards designed to limit potential impacts to acceptable levels. All on-site grading and site preparation must comply with applicable provisions of LAMC

Chapter IX, Division 70, which addresses grading, excavations, and fills, and the recommendations of a site-specific geotechnical report. The City requires the preparation of a site-specific geotechnical report to evaluate soils issues for new development. Additionally, all applicable projects must comply with LAMC Article 4.4, Section 664.72, which governs pollutant control requirements and construction activity. Compliance with these precautions within the LAMC would reduce erosion and sedimentation potential within the West Adams CPA.

Additionally, the RWQCB, through administration of the NPDES permit process, works to reduce the effects of sedimentation to receiving water bodies. The NPDES permit sets erosion control standards and requires implementation of nonpoint source control of surface drainage through the application of a number of BMPs to decrease the effects of erosion and sedimentation associated with grading. These BMPs are meant to reduce the amount of constituents, including eroded sediment, that enter streams and other water bodies. A SWPPP, as required by the RWQCB as part of NPDES permitting, describes the stormwater BMPs (structural and operational measures) that would control the quality and quantity of stormwater runoff for any project that would potentially cause sedimentation to a receiving water body. NPDES permit requirements would ensure that future development within the CPA would not result in changes to surface drainage patterns that could cause increased erosion or siltation.

With implementation of these policies and projects, the adoption and implementation of the proposed West Adams New Community Plan would not substantially alter the existing drainage pattern of the West Adams CPA resulting in erosion/siltation or result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. Therefore, the proposed project would result in less-than-significant impacts related to stormwater drainage.

- The “Flood and Inundation” construction impacts subsection on page 4.9-22 of Section 4.9 has been updated as follows:

#### **Flooding and Inundation**

Flood protection in the region is managed by three agencies: (1) the U.S. Army Corps of Engineers (USACE) oversees construction of projects associated with navigable bodies of water, including the Los Angeles River-related flood control systems and ocean harbors; (2) the LADPW oversees construction of ancillary Los Angeles County Flood Control District facilities and designs and/or maintains the flood control drainage facilities, including the Los Angeles River system (under the guidance of the USACE) to reduce the impacts of 100- and 500-year storms; and (3) the BOE oversees construction and maintenance of the City’s storm drain system, which is designed to reduce the impacts of 50-year magnitude storms. Various City agencies implement development permit, slope stability, and watershed protection regulations.

Excessive stormwater runoff is the cause of most flooding in the Los Angeles Area. The major flood control facility in the vicinity of the West Adams CPA is Ballona Creek. All runoff from the West Adams CPA is ultimately directed into Ballona Creek where it then flows west into the Pacific Ocean. The land use changes proposed by the West Adams New Community Plan would not structurally change land use patterns within the West Adams CPA. However, the proposed West Adams New Community Plan could result in grading activities on individual parcels during development. The proposed changes primarily promote smaller in-fill type projects rather than large-scale new developments which would have a greater potential to substantially alter existing drainage patterns, therefore, resulting in flooding. ~~However, if any new large-scale (major) developments were proposed, they would be subject to site-specific environmental review as required by the City’s Site Plan Review process.~~

~~Furthermore, the City of Los Angeles requires that all storm drainage improvements in new hillside developments be designed to accommodate a 50-year storm event. With implementation of the existing City of Los Angeles policies, the proposed West Adams New Community Plan would not lead to~~



~~increased flooding as a consequence of increased capacity for development. Therefore, the proposed project would result in less than significant impacts related to flooding and or an increase in runoff.~~

As shown on **Figure 4.9-4** above, the flood prone areas within the West Adams CPA are located in the vicinity of Ballona Creek in the northern portion of the West Adams CPA, and in the central and eastern-central portions of the West Adams CPA.

Some of the CPIO ~~subdistricts~~ subareas contain areas that are within a 100-year flood plain (Jefferson/La Cienega Boulevards, La Brea/Farndale Avenues, Hyde Park Industrial Corridor, and the Commercial Corridors and Major Intersection Nodes). As a result, some of the capacity for more densely proposed development associated with the proposed project would be created within a flood zone. However, any new development that occurs as a result of the proposed project would be subject to restrictions and requirements as part of the City's existing permitting process. Prior to any building activity in these areas, the City would review FEMA flood maps to verify whether the buildings are within the current FEMA 100-year flood plain. Additionally, a detailed computerized flood hazard analysis would be required in accordance with current standards set forth by FEMA. If the detailed analysis shows that the proposed development area is outside of the 100-year flood plain and floodway, new development could be constructed with no further mitigation. If the analysis shows that the proposed development area is within the 100-year flood plain or floodway, appropriate flood plain management measures would be required to be incorporated into the design of all new buildings. Flood plain management measures include, but are not limited to, constructing new residences so that the lowest floor is at least one foot above the 100-year flood level, and requiring nonresidential development in flood prone areas to be anchored and flood-proofed to prevent damage from a 100-year flood or elevated to at least one foot above the 100-year flood level.

~~Implementation of the existing regulatory requirements mentioned above would ensure the proposed West Adams New Community Plan would not place housing or structures within a flood hazard zone or in an area that would impede or redirect flood flows without incorporating proper mitigation measures. Therefore, the proposed project would result in less than significant impacts related to flooding and inundation.~~

As previously discussed, less than one percent of the land in the West Adams CPA is vacant or undeveloped; although new development could occur as part of the proposed project, it would not result in substantial changes to building density, bulk, or decreases in setbacks throughout the plan area. Therefore, new development would not result in large amounts of impervious surfaces that would cause an increase in the volume of stormwater runoff or increase in the amount of surface water in a water body. Consequently, the proposed West Adams New Community Plan would not be expected to create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and result in flooding.

Implementation of the proposed West Adams New Community Plan would not substantially reduce or increase the amount of surface water in a water body; or result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. Stormwater runoff within the West Adams CPA would continue to be directed toward Ballona Creek via storm drains, curbs and gutters (street flows), and urban sheet flow. As a result, the proposed West Adams New Community Plan would not cause a substantial increase in the peak flow rates or volumes of stormwater runoff that could lead to an increase in the amount of surface water in a water body that would alter flow direction or current in a manner that would cause on-site or off-site flooding.

Implementation of the existing regulatory requirements mentioned above would ensure the proposed West Adams New Community Plan would not place housing or structures within a flood hazard zone or in an area that would impede or redirect flood flows without incorporating proper mitigation measures. Compliance with applicable water quality and stormwater regulations would ensure that impacts would

remain less than significant. Therefore, the proposed project would result in less-than-significant impacts related to flooding and inundation.

- A “50-year Developed Storm Event” construction impacts subsection has been added after paragraph 2 on page 4.9-23 of Section 4.9 as follows:

**50-year Developed Storm Event**

The proposed West Adams New Community Plan does not substantially change land use patterns in the CPA. As a result, there would not be new large areas of impermeable surfaces that would change the way that stormwater runoff or peak flows currently move through the West Adams CPA. Some changes in runoff could occur because the proposed NCP could result in the construction of new development on vacant land. However, due to the highly urbanized nature of the CPA, the existence of vacant land is minimal and new development would occur primarily as infill on underutilized lots. These changes would represent a negligible increase in impermeable surfaces compared to existing conditions, and the runoff characteristics of the West Adams CPA would remain unchanged. Therefore, little change in stormwater runoff to the City’s storm drain system is expected.

The City’s network of natural and constructed channels that convey stormwater flows, debris basins, pump plants, underground pipelines and catch basins are designed to handle an excess of water during localized street flooding or heavy rainfall. The existing system provides sufficient capacity to manage up to at least a 50-year storm. Los Angeles Municipal Code Section 17.05(M) prescribes performance standards for storm drain systems. Storm drains must be designed in conformance with standards approved by the City Engineer. Storm drain facilities that intercept and convey all runoff to a suitable point of disposal are required when runoff exceeds the limiting depth of street flow as determined by the City Engineer. Storm drains must be of sufficient capacity in all cases to prevent flooding of building sites from a storm of a 50-year frequency. Any subsequent project facilitated by the approval of the proposed NCP would be required to demonstrate to the satisfaction of the City that appropriate capacity is available, and that storm drain facilities are designed to incorporate proper drainage design to the satisfaction of the City Engineer.

The General Plan Framework and Safety Elements are used to ensure that system capacity is maintained in project planning, and would be used as guidelines for the construction of any new development to further reduce the potential for impact. Framework Policies 9.5.1, 9.5.3, and 9.5.4 call for the City to ensure sufficient storm drainage capacity, correct deficiencies in the stormwater collection system, and adequately maintain the City’s drainage system. Policy 9.5.2 calls for the City to assign the cost of stormwater system improvements to reflect the level of runoff generated and benefits. Similarly, Policy 9.6.1 guides the City to link the sources of revenue for stormwater system improvements with sources of runoff and project beneficiaries.

Furthermore, the City of Los Angeles requires that all storm drainage improvements in new hillside developments be designed to accommodate a 50-year storm event. With implementation of the existing City of Los Angeles policies, the proposed West Adams New Community Plan would not lead to increased flooding as a consequence of increased capacity for development.

As a result of compliance with existing required regulations and the existing highly developed nature of the CPA, the proposed NCP would not cause a substantial increase in the peak flow rates or volumes of stormwater runoff in a manner that would cause on-site or off-site flooding during a 50-year storm event or exceed the drainage capacity of existing or planned drainage systems. Therefore, impacts related to the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological species would be less than significant.

- The “Inundation by Seiche, Tsunami, or Mudflow” construction impacts subsection on page 4.9-23 of Section 4.9 has been updated as follows:

**Inundation by Seiche, Tsunami, or Mudflow**

~~Construction related to the proposed project would not affect inundation by seiche, tsunami, or mudflow. Therefore, no further discussion of construction impacts to seiche, tsunami, or mudflow is necessary.~~

There are no surface water bodies in the West Adams CPA that are potentially susceptible to seiche events during strong earthquakes or are potential sources of inundation. The West Adams CPA is located more than five miles inland from the Pacific Ocean and the elevation ranges from approximately 100 to 425 feet above sea level. Therefore, the potential for tsunamis to affect the project site is considered low. Construction related to the proposed project would not affect inundation by seiche, tsunami, or mudflow. As discussed in Section 4.6 Geology and Soils, the adoption and implementation of the proposed West Adams New Community Plan, in combination with the City’s standard grading and building permit requirements, would not expose people or structures to potential substantial risk due to geologic hazards that lead to seiches or tsunamis. Additionally, existing Safety Element policies would further minimize this impact.

Implementation of existing City policies and standards, and the West Adams CPA’s location relative to the Pacific Ocean, would ensure the adoption and implementation of the proposed West Adams New Community Plan would not result in significant impacts from inundation by seiche, tsunami, or mudflow. Therefore, the proposed project would result in less-than-significant impacts related to inundation by seiche, tsunami, or mudflow.

- A “Levee or Dam Failure” construction impacts subsection has been added following paragraph 3 on page 4.9-23 of Section 4.9 as follows:

**Levee or Dam Failure**

There are no dams or reservoirs in the West Adams CPA. As discussed above, the existing highly developed nature of the CPA, the proposed West Adams New Community Plan would not cause a substantial increase in the peak flow rates or volumes of stormwater runoff in a manner that would cause on-site or off-site flooding, or exceed the drainage capacity of existing or planned drainage systems. The LACPW estimates that 32 percent of the Los Angeles River watershed is covered in impervious surfaces. The major flood control facility within the West Adams CPA is Ballona Creek, a channelized tributary to the Pacific Ocean. Ballona Creek is highly modified, having been covered in impervious (i.e., asphalt, concrete) surfaces along a large portion of its length. No other large bodies of water are present in the immediate vicinity of the CPA.

Dam inundation is defined as the flooding that occurs as the result of structural failure of a dam. Structural failure may be caused by seismic activity. Seismic activity may also cause inundation by the action of a seismically induced wave, which overtops the dam without causing structural failure; this action is referred to as a seiche. The most proximate dam to the West Adams CPA is the Pacoima Dam, located 34 miles north. The Pacoima Dam has recently undergone extensive seismic upgrades. Failure of the dam during a catastrophic event, such as a severe earthquake, is considered very unlikely event. The affect of flooding due to dam failure on the West Adams CPA would be minimal due to its distance from the dam.

Implementation of the proposed West Adams New Community Plan would create new housing, population, and employment capacity in the West Adams CPA. However, no dams or levees are located in or near the CPA. Therefore, there would be no impacts related to injury or death from flooding caused by dam or levee failure.

- The “Groundwater” operations impact subsection on page 4.9-24 of Section 4.9 has been updated as follows:

### **Groundwater**

The proposed West Adams New Community Plan does not propose any drilling that would create a net deficit in aquifer volume, yields, or change the rate or direction of groundwater. Proposed land use changes in the West Adams New Community Plan consist of General Plan Amendments and proposed zone changes to maintain General Plan land use consistency. Though these zone changes will provide development incentives to revitalize commercial corridors, they do not substantially change the overall land use patterns within the West Adams CPA.

The stormwater quality BMPs described above would aid in ensuring that surface water is effectively maintained so that stormwater infiltration, if any, would not represent a substantial risk to groundwater quantity or quality. Future development would be subject to the development standards in the CPIO districts, which would require future development projects to provide landscaping within setback areas and parking lots, which could provide a means for infiltrating or detaining stormwater.

Compliance with the City’s Stormwater and Urban Runoff Pollution Control Ordinance and NPDES GCASP permit requirements is mandatory. These regulations would help to ensure that any construction activities associated with future development would not adversely affect groundwater by utilizing the added protections of SWPPP design and implementation. The SWPPP has two major objectives: (1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater, as well as non-stormwater discharges. The stormwater quality BMPs would aid in ensuring that surface water is effectively maintained so that stormwater infiltration, if any, would not represent a substantial risk to groundwater quantity or quality. No other activities would occur as a result of the proposed NCP that would have an effect on groundwater.

Implementation of the proposed project would not interfere with public uses of the groundwater supply, reduce the water yields of adjacent wells or well fields, adversely change the rate or direction of groundwater flow, or reduce groundwater recharge capacity. Compliance with applicable water quality and stormwater regulations would ensure that impacts would remain less than significant. Therefore, the operational impacts related to groundwater would be less than significant.

- The “Stormwater Drainage” operations impact subsection on page 4.9-24 of Section 4.9 has been updated as follows:

### **Stormwater Drainage**

As described above, all new development projects are subject to the SUSMP and City inspection. The SUSMP requirements integrate Low Impact Development practices and standards for the prevention of stormwater pollution mitigation from surface water drainage, including precautions for erosion and sedimentation, and maximize open, green and pervious space on all development consistent with the City’s landscape ordinance and other related requirements. Compliance with the City’s SUSMP requirements which are required as part of the building permit process for all new development, including by-right projects, would ensure that future development within the West Adams CPA would not result in changes to surface drainage patterns by reducing surface drainage and erosion potential at individual sites that would cause increased erosion or siltation.

Policies from the General Plan Conservation and Framework Elements would help minimize any potential impacts, and projects implemented by the IRWMP would also minimize potential impacts. With implementation of these policies and projects, the adoption and implementation of the proposed West Adams New Community Plan would not substantially alter the existing drainage pattern of the West Adams CPA resulting in erosion/siltation or result in a permanent, adverse change to the movement

of surface water sufficient to produce a substantial change in the current or direction of water flow. Therefore, the proposed project would result in less-than-significant impacts related to stormwater drainage.

- A “50-year Developed Storm Event” operations impact subsection has been added after paragraph 2 on page 4.9-25 of Section 4.9 as follows:

**50-year Developed Storm Event**

As a result of compliance with existing required regulations, described above, and the existing highly developed nature of the CPA, the proposed NCP would not cause a substantial increase in the peak flow rates or volumes of stormwater runoff in a manner that would cause on-site or off-site flooding during a 50-year storm event or exceed the drainage capacity of existing or planned drainage systems. Therefore, impacts related to the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological species would be less than significant.

- A “Levee or Dam Failure” operations impact subsection has been added after paragraph 4 on page 4.9-25 of Section 4.9 as follows:

**Levee or Dam Failure**

Implementation of the proposed West Adams New Community Plan would create new housing, population, and employment capacity in the West Adams CPA. However, no dams or levees are located in or near the CPA. Therefore, there would be no impacts related to injury or death from flooding caused by dam or levee failure.

**SECTION 4.10 LAND USE AND PLANNING**

- The “Regional Regulatory Framework” subsection beginning on page 4.10-1 of Section 4.10 has been updated as follows:

**Regional Transportation Plan (RTP).** SCAG’s 2012 RTP, adopted in April 2012, presents a long-term transportation vision through the year 2035 for the SCAG region.- Specific issues addressed within the RTP include mobility, air quality, climate change, energy, transportation financing, security and safety, environmental justice and mitigation, revenues and expenditures, transportation conformity, implementation and monitoring, corridor preservation, and future connections and growth. The RTP provides a basic policy and program framework for long-term investment in the regional transportation system in a coordinated, cooperative, and continuous manner. Transportation investments in the SCAG region that receive State or federal transportation funds must be consistent with the RTP and must be included in the RTIP when ready for funding. The RTP also includes population, housing, and employment forecasts that provide advisory information to local jurisdictions for use in planning activities.

The Proposed Project utilized the 2004 SCAG RTP as the available resource for estimating existing population, housing and employment conditions at the time of the NOP. Subsequent release of the 2008 and 2012 RTPs during the course of the preparation of the DEIR are identified and their policy implications regarding the Land Use and Planning Section are described and analyzed herein. Also refer to Final EIR Section 3.2 and Appendix M for supplemental analysis.

- Paragraph 4 on page 4.10-2 of Section 4.10 has been corrected as follows:

**Regional Comprehensive Plan (RCP).** SCAG has also prepared and issued the 2008 RCP in response to SCAG’s Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.<sup>17</sup> The 2008 RCP is an advisory

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<sup>17</sup>SCAG, 2008 Regional Comprehensive Plan, 2008, available at <http://www.scag.ca.gov/rcp/index.htm>, accessed February 14, 2012.

document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The RCP ~~may be voluntarily~~ is used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the Compass Blueprint Growth Vision and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

- The “Regional Housing Needs Assessment(RHNA)” subsection beginning on page 4.10-2 of Section 4.10 has been updated as follows:

**Regional Housing Needs Assessment (RHNA).** The RHNA is a key tool for SCAG and its member governments to plan for this growth. The RHNA quantifies the need for housing within each jurisdiction over an eight year period. Communities then plan, consider and decide how they will address this need through the process of completing the Housing Elements of their General Plans. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment. The RHNA is mandated by State Law and produced periodically by SCAG ~~mandated by State law~~, to coincide with the region’s schedule for preparing Housing Elements. It consists of two measurements of housing need: (a) existing need; and (b) future need.

The existing need assessment is based on data from the most recent U.S. Census to measure ways in which the housing market is not meeting the needs of current residents. These variables include the number of low-income households paying more than 30 percent of their income for housing, as well as severe overcrowding.

The future need for housing is determined primarily by the forecasted growth in households in a community, based on historical growth patterns, job creation, household formation rates, and other factors to estimate how many households will be added to each community over the projection period. The housing need for new households is then adjusted to account for an ideal level of vacancy needed to promote housing choice, maintain price competition and encourage acceptable levels of housing upkeep and repair. The RHNA also accounts for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors household growth, vacancy need and replacement need form the “construction need” assigned to each community. The City of Los Angeles was assigned a RHNA of 112,876 dwelling units for the 2006 to 2014 planning period and 82,002 for the 2013-2021 planning period.

- The third sentence of paragraph 1 on page 4.10-16 of Section 4.10 has been updates as follows:

The purpose of the ~~Sale of Alcohol~~ Sales Specific Plan is to revise the procedures for obtaining conditional uses for the sale of alcoholic beverages.

- The third sentence of paragraph 3 on page 4.10-16 of Section 4.10 has been updates as follows:

**Figure 4.10-3** shows the location of the ~~Sale of Alcohol~~ Sales Specific Plan area within the West Adams CPA.

- The “Construction “impacts subsection of Section 4.10 has been updated to include the following addition to last paragraph on page 4.10-21.

The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project-specific construction. The impacts analysis for Land Use and Planning look at land use compatibility, land use consistency, and any contradictions to

habitat conservation plans caused by implementation of the West Adams New Community Plan. For example, the EIR analyzes whether the proposed plan would substantially divide or isolate existing neighborhoods, communities, or land uses, conflict with any applicable land use plan, or result in a substantial increased potential for land use conflicts. The land use analysis herein presents the proposed plan’s land use and zone changes, and the proposed plan’s policies relevant to land use and discussed how they are consistent with a range of regional policy and land use plans, including but not limited to the following: SCAG’s 2012-2035 RTP/SCS, SCAG’s Compass Growth Vision, South Coast Air Quality Management District’s (SCAQMD) Air Quality Management Plan (AQMP), Metro’s Congestion Management Program, and the City’s General Plan. While construction may occur in the future under the proposed plan, an analysis of construction impacts with relation to land use is not warranted here. Therefore, no further discussion of construction impacts is necessary.

- Table 4.10-5 on page 4.10-22 of Section 4.10 has been updated as follows:

TABLE 1.10-5 CRENSHAW CORRIDOR SPECIFIC PLAN AMENDMENTS		
Ministerial sign-off procedure for signs, minor façade repair/storefront rehabilitation, paint and Leimert Park Village neighborhood serving uses. 1.5:1 Maximum FAR (Portions of all subareas) 2:1 Maximum FAR (Portions of all subareas, except G, E) 3:1 Maximum FAR (Mixed Use Projects in all subareas except B, D and G portions of Subarea A, B, C, F) Increased street frontage setbacks for projects with outdoor amenities (Subareas D and G, E) Maximum FAR may be increased by up to 1.0 when allowed by height district, through introducing one square foot of floor area for each square foot of podium or surface parking area relocated to subterranean levels 48 foot Maximum Height (portions of subareas B, D, E, F and H) 60 foot Maximum Height (portions of subareas A, B, C, E, F and H) 75 foot Maximum Height (Mixed Use Projects in Portions of Subarea A, B, C, E, F and H) Setback transition to Residential Neighborhoods Discretionary projects involving an Eligible Historic Resource may require compliance with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings as mitigation pursuant to CEQA.	Nomenclature change of General Commercial land use category to Neighborhood Commercial Restriction of incompatible uses Consistent with SCAG Principles, Policies, and Goals	The Proposed Project does not take place within an HCP, therefore no CPIO standards/guidelines are needed

- The second sentence of paragraph 3 on page 4.10-27 has been updated as follows:  
 The West Adams New Community Plan is a refinement of the 1998 Community Plan. Existing goals and policies would be ~~retained and augmented~~ updated.
- The “Habitat Conservation Plans” operations impact subsection on page 4.10-32 of Section 4.10 has been updated as follows:

**Habitat Conservation Plans**

Endangered Species Act Section 10(a)(1)(B) Habitat Conservation Plans (HCPs) are planning documents required when a project will affect a species identified as listed, non-listed, or eligible under the Act. A HCP details how those impacts will be minimized, or mitigated; and how the HCP is to be funded.

There are no species identified in the CPA that are protected by the Endangered Species Act, and thus, there are no applicable HCPs.

The Natural Community Conservation Planning (NCCP) program of the Department of Fish and Game takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity.<sup>18</sup> A NCCP identifies and provides for the regional or area wide protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. The primary objective of NCCPs is to conserve natural communities at the ecosystem scale while accommodating compatible land use. As discussed in Section 4.4, Biological Resources, there are no HCPs or NCCPs within the CPA. Therefore, implementation of the Proposed Project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan as the area is not subject to any such applicable plans. No impact would occur.

~~As discussed in Section 4.4 Biological Resources, there are no habitat conservation plans within the West Adams CPA. Therefore, no impact related to habitat conservation plans would occur.~~

#### SECTION 4.11 MINERAL RESOURCES

- The “State Regulatory Framework” subsection beginning on page 4.11-1 of Section 4.11 has been updated as follows:

**Division of Oil, Gas, and Geothermal Resources (DOGGR).** The DOGGR within the State Department of Conservation supervises the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells to protect the environment, and encourage good conservation practices. The DOGGR collects data on the location of groundwater, oil, gas, and geothermal resources, and records the location of all drilled and abandoned wells. Existing law requires an operator of a well to obtain approval from the State Oil and Gas Supervisor or district deputy before beginning the work of drilling a well.

Senate Bill 4 (Pavley) was approved by Governor Brown on September 20, 2013 and is included in the California Public Resource Code Section 3015-3161. It requires DOGGR to exercise additional requirements over the existing laws that regulate drilling, operations, maintenance, and abandonment of oil and gas wells, tanks and facilities in order to increase transparency and accountability to the public regarding well stimulation treatments. The owner and or operator of a well is required to record and report all data on acid treatments and well stimulation treatments. In addition, an operator is required to apply for a permit before performing a well stimulation treatment of well. It prohibits the operator from either conducting a new stimulation treatment or repeating a well stimulation treatment without a valid, approved permit from the DOGGR.

~~**Division of Oil, Gas, and Geothermal Resources (DOGGR).** The DOGGR within the State Department of Conservation supervises the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells to protect the environment, public health and safety, and encourage good conservation practices. The DOGGR collects data on the location of groundwater, oil, gas, and geothermal resources, and records the location of all drilled and abandoned wells.~~

- An “Air Quality Management District (AQMD)” regulatory framework subsection has been added after the header, “Local” on page 4.11-2 of Section 4.11 as follows:

**Air Quality Management District (AQMD)** . The South Coast Air Quality Management District (SCAQMD) has rules that govern oil and gas related activity within the South Coast Air Basin, including Rule 1148.2 (Notification and Reporting Requirements for Oil and Gas wells and Chemical Suppliers). The rule, which was adopted in April of 2013 and became effective in June of 2013, gathers air quality-related data on oil and gas well drilling, well completion and well reworks. Operators of onshore oil and

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<sup>18</sup>California Department of Fish and Game, Natural Community Planning Program, available at <http://www.dfg.ca.gov/habcon/nccp/>, accessed March 5, 2009.



gas wells located within the District are required to electronically notify and report to SCAQMD on their activity. The SCAQMD also regulates production equipment such as flares or gas separation equipment used in oil and gas drilling. These are regulated via standard air quality permits which are pulled by operators or suppliers of equipment and are enforced by SCAQMD inspectors. At present, the SCAQMD standard air quality permits or registration permits are independent of all City or State permitting processes.

#### SECTION 4.12 NOISE AND VIBRATION

- Paragraph 5 on page 4.12-13 of Section 4.12 regarding mobile noise operations impacts has been updated as follows:

The proposed project would encourage transit-oriented development (TOD) along the Expo LRT Line. Light rail movements typically generate a noise level of approximately 82 dBA  $L_{eq}$  at 50 feet. Based on guidance provided by the FTA, LRT can generate impacts at land uses within 350 feet ~~and with an unobstructed view of the rail line. Land uses within 175 feet and with an obstructed view of the rail line may also be impacted.~~ TOD districts would potentially be located within 350 feet of the Expo LRT Line. Therefore, without mitigation, the proposed project would result in a significant impact related to transit noise exposure.

- The source reference of Table 4.12-8 on page 4.12-15 of Section 4.12 has been updated as follows:

**SOURCE:** TAHA, 2012 [TAHA to include additional description]

- The first sentence of Mitigation Measure N1 on page 4.12-15 of Section 4.12 has been updated as follows:

**N1** ~~As a condition of approval for a~~ Any approval of a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall require ensure that all ~~contractors to~~ include the following best management practices in contract specifications:

- Mitigation Measures N2 and N3 on page 4.12-16 of Section 4.12 have been updated as follows:

**N2** ~~As a condition of approval for a~~ Prior to any approval of a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City that is adjacent to buildings listed or determined eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, designated as a Historic-Cultural Monument by the City of Los Angeles, or within a Historic Preservation Overlay Zone (“historic buildings”) shall require project proponents to assess (subject to City review and approval) consider potential vibration impacts to historic buildings-, the City shall ensure all of the following requirements are or will be met: The project proponents shall coordinate with the City to

- Historic buildings adjacent to the project’s construction zones are identified, located within 20 feet of general construction activity or 76 feet of pile driving activity.
- Projects with construction zones adjacent to activity within these distances from historic buildings shall develop a A Vibration Control Plan is prepared and approved by the City. ~~to mitigate potential impacts.~~
- The Vibration Control Plan shall be completed by a qualified structural engineer.
- The Vibration Control Plan shall ~~and~~ include a pre-construction survey letter establishing baseline conditions at potentially affected buildings. The survey letter shall provide a shoring design to protect the identified land uses from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels such as sonic pile driving or caisson drilling instead of impact pile driving.

At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).

~~N3 As a condition of approval for a~~Any approval of a Discretionary project or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall require that proposed includes industrial projects ~~uses~~ located within 1,000 feet of a residential land use ~~to~~ shall ensure that ~~complete~~ a noise study is completed that ~~using~~ the significance thresholds established in the City of Los Angeles CEQA Thresholds Guide (including as it may be amended in the future). Identified impacts shall be mitigated per the City’s Noise Ordinance or through any measures identified in the noise study.

- Mitigation Measures N4 on page 4.12-16 of Section 4.12 has been updated as follows:

Note: Mitigation Measure N4 is not necessary to mitigate a CEQA impact. Pursuant to the holding in CBIA v. BAAQMD (2015), impacts from the existing environment on the project or future users or residents of the project are not CEQA impacts.

~~N4 As a condition of approval for any project, as defined in Section 3.4 of the Project Description, the City shall require that proposed land uses within 175 feet with an obstructed view or 350 feet with an unobstructed view of the Exposition Light Rail Transit Line to complete a noise study using the significance thresholds established in the City of Los Angeles CEQA Thresholds Guide. Identified impacts shall be mitigated per the City’s Noise Ordinance.~~

- The first sentence of the first paragraph on page 4.12-17 of Section 4.12 regarding significance of construction noise impacts after mitigation has been revised as follows:

Impacts related to construction noise were determined to be significant without mitigation. Mitigation Measure N1 would ~~control~~ reduce construction noise levels at sensitive land uses.

- Paragraph 3 on page 4.12-17 of Section 4.12 regarding significance of operational noise impacts after mitigation has been revised as follows:

Implementation of Mitigation Measure N3 ensures compatibility between proposed industrial land uses and existing residences. The mitigation measure requires new industrial projects within 1,000 feet residences to prepare a Noise Study that demonstrates industrial noise would not exceed the impact thresholds established by the City as they relate to the City’s Land Use and Noise Compatibility Matrix. The specific mitigation measure to reduce noise would be dependent on the activity at the industrial site. Example noise reductions measures in a Noise Study may include mufflers for mechanical equipment or solid barriers between a noise source and residence. Implementation of Mitigation Measure N4 ensures compatibility between proposed residences and light rail transit lines. The mitigation measure requires residential projects within 350 feet of the light rail lines to demonstrate interior noise levels of 45 dBA CNEL, which is consistent with the California Building Code. The specific mitigation measure to reduce noise would be dependent on precise location of proposed residences. Example noise reductions measures in a Noise Study may include double-paned windows or increased wall insulation. Implementation of Mitigation Measures N3 and N4 would reduce the impacts to less than significant.

## SECTION 4.13 POPULATION, HOUSING, AND EMPLOYMENT

- The following “SCAG Compass Blueprint Growth Vision Report” and “2012 UPDATE - SCAG’s Regional Comprehensive Plan (RCP)” local regulatory framework subsections have been added ahead of the RHNA subsection on page 4.13-3 of Section 4.13 as follows:

**SCAG Compass Blueprint Growth Vision Report.** The Growth Vision Report presents the comprehensive growth vision for the six-county SCAG region and identifies a series of implementation steps that will guide Southern California towards its envisioned future. The Compass Blueprint Growth Vision Report was developed in response to the land use and transportation challenges facing the Southern California region in the present and future. The Growth Vision is driven by four key principles; mobility, livability, prosperity, and sustainability. To realize these principles; the Growth Vision encourages the following:

- Focusing growth in existing and emerging centers and along major transportation corridors
- Creating significant areas of mixed-use development and walkable communities
- Targeting growth around existing and planned transit stations
- Preserving existing open space and stable residential areas

Implementation steps identified in the Growth Vision Report include tools for each guiding principle as well as overarching implementation strategies. The Growth Vision Report concentrates on the physical aspects of regional growth such as where people and jobs locate, the type and quantity of buildings that may be constructed, and how people and goods move in the region.

The Growth Vision notes that limitations on the amount of undeveloped land suitable for development may hinder the ability to accommodate new housing and jobs within the region. The report determined that under current adopted general plans, only 29 percent of the SCAG 2030 growth projection for the coastal basin of Los Angeles and Orange counties could be accommodated through new development on vacant land. Infill or new development in already developed areas will be relied upon to provide locations for nearly half of the anticipated new housing region-wide. The Growth Vision Report concludes that the strategy of combining compact, mixed-use development with housing and jobs near major transportation infrastructure will be of enormous benefit in accommodating future growth, while also recognizing that incremental and strategic changes in small parts of the region can yield great benefits to the region as a whole, as well as to individual cities.<sup>19</sup>

**2012 UPDATE - SCAG’s Regional Comprehensive Plan (RCP).** In 2008, SCAG prepared and issued the RCP in response to SCAG’s Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.<sup>20</sup> The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The land and housing goal of the RCP is to successfully integrate land and transportation planning and achieve land use and housing sustainability by implementing SCAG’s Compass Blueprint Growth Vision which would result in significant land use changes to only 2 percent of the total land area in the region. These significant land use changes are referred to as the 2% Strategy. The desired land use and housing outcomes identified in the RCP related to population, housing and employment include:

- Significantly increase the number of city and county general plans consistent with Compass Blueprint principles by 2012 (General Plans are the local blueprints for growth and best indicate whether local governments have adopted Compass Blueprint planning principles.).

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<sup>19</sup>SCAG, *Southern California Compass Growth Vision Report*, June 2004, available at <http://www.compassblueprint.org/files/scag-growthvision2004.pdf>, accessed February 14, 2012.

<sup>20</sup>SCAG, *2008 Regional Comprehensive Plan*, 2008, available at <http://www.scag.ca.gov/rcp/index.htm>, accessed February 14, 2012.

- Significantly increase the number and percentage of new housing units and jobs created within the Compass Blueprint 2% Strategy Opportunity Areas by 2012 and improve the regional jobs-housing balance (tracking the number of new units will measure the region’s progress in accommodating forecasted growth. Percentage of housing and jobs developed within the Opportunity Areas will indicate the locational efficiency of growth.).
  - Add one new housing unit to stock for every 3 persons in population growth and one new housing unit for every 1.5 full-time equivalent jobs, whichever is greater (housing supply measures the availability of housing in comparison to population and jobs.).
  - Achieve a regional housing vacancy rate of 1.5 percent for owner-occupied units and 5 percent for rental units (these vacancy rates are indicators of a healthy housing market.).
- The following “Affordable Housing Trust Fund” and “City of Los Angeles Density Bonus Ordinance (Ordinance 176,681)” local regulatory framework subsections have been added following the LAMC subsection on page 4.13-5 of Section 4.13 as follows:

**Affordable Housing Trust Fund.** Contained within the LAMC, the City created and administers the City of Los Angeles Affordable Housing Trust Fund (Fund). The Fund establishes a special fund for the purposes of receiving and disbursing monies to address the affordable housing needs of the City. The Fund requires 25 percent of the received initial and continuing net revenue of the 2001 business tax and payroll expense tax amnesty program and the revenue program of the Revenue and Taxation Code Section 1955.1 (AB 63) be allocated to the Fund.

**City of Los Angeles Density Bonus Ordinance (Ordinance 176,681).** The purpose of the City’s Density Bonus Ordinance, codified as LAMC Section 12.22(A)(25), is to establish procedures for implementing State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, and to increase the production of affordable housing, consistent with City policies. Subject to the provisions of LAMC Section 12.22(A)(25), Housing Development Projects that include an affordable housing component and Senior Citizen Housing Development projects may be granted a density bonus, allowing for a density increase over the otherwise maximum allowable residential density under the applicable zoning ordinance and/or specific plan. The density bonus is determined based on the percentage and type of restricted affordable housing units provided and shall not exceed 35 percent. The amount of parking required for these projects may also be reduced. In addition, a Housing Development Project that qualifies for a Density Bonus may be granted incentives set forth in the ordinance that allow for modification to a City development standard or requirement.

- The following “1998 West Adams-Baldwin Hills-Leimert Community” local regulatory framework subsection has been added following the first paragraph on page 4.13-6 of Section 4.13 as follows:

**1998 West Adams-Baldwin Hills-Leimert Community Plan.** The existing West Adams Community Plan, also referred to as the “Current Plan”, establishes land use designations, implementing measures, and land use policies for the West Adams Community Plan Area. The Current Plan was designed to accommodate the anticipated growth in population, housing units and employment projected for the West Adams CPA to the Year 2010. The 1998 West Adams Community Plan encourages the preservation and enhancement of existing residential neighborhoods, while providing a variety of opportunities for compatible new housing. The Current Plan also incentivizes improvement to the function, design and economic vitality of commercial corridors, facilitates the enhancement of existing uses which provide community identity, and plans the remaining commercial and industrial development opportunity sites for needed job producing uses.

- The “Construction” impacts subsection on page 4.13-11 of Section 4.13 has been updated as follows:

The West Adams New Community Plan describes the capacity for future development for a portion of the City, and does not constitute a commitment to any project-specific construction. Further, the analysis of population, housing, and employment considers population and housing unit growth that would occur with implementation of the proposed NCP, and whether this growth is within citywide, local planning sub-region or regional forecasts, whether it can be considered substantial with respect to remaining growth potential in the City as articulated in the City’s Framework, and/or whether it would result in the physical displacement of housing or people. The analysis is not conducive to an evaluation of construction impacts. Therefore, no further discussion of construction impacts is necessary.

- The “Operations” impact analysis subsection on page 4.13-11 of Section 4.13 has been updated as follows:

**Population Growth.** While the entire West Adams CPA has been analyzed for the West Adams New Community Plan, only certain areas are identified for proposed changes of significance. The change areas are classified into different types, the CPIO District and Specific Plan Amendment subareas, the nomenclature changes, and the zone changes to establish consistency. The CPIO District and Specific Plan subareas are where a majority of the population growth will likely occur. These subareas include:

- Additional text has been added following paragraph 4 on page 4.13-12 of Section 4.13 as follows:

As discussed in Chapter 3.0, Project Description, the West Adams New Community Plan addresses the creation of new housing options, mostly in areas identified for transit-oriented, mixed use development, in accordance with General Plan Framework guiding policy to focus growth in higher-intensity commercial centers close to transportation and services. The West Adams New Community Plan accommodates growth in that it plans for infill development, focusing a greater percentage of SCAG’s Citywide projection for population and housing in proximity to 10 light rail transit stations within the CPA, where it is anticipated there will be a greater demand for housing supply. Many of the community’s neighborhoods, and in particular, single-family neighborhoods, are established and not expected to change as growth in other parts of the community occurs. The proposed plan would preserve the character of existing single-family and lower density neighborhoods by maintaining lower density land use designations and limiting the allowed residential density of some residential and neighborhood commercial areas. In this regard, the Proposed Plan will direct growth away from existing residential neighborhoods towards transit-oriented districts and mixed-use nodes consistent with the goals and policies of the General Plan Framework.

- The “Operations” impact analysis subsection on page 4.13-14 of Section 4.13 has been updated as follows:

**Housing Displacement.** As the West Adams New Community Plan does not make substantial changes to zoning and land use designations, it is not expected that any existing housing, affordable or otherwise, would be permanently displaced as a result of the proposed project. Any potential displacement of dwelling units would be temporary in nature, as the West Adams New Community Plan provides for an overall increase of 19,703 dwelling units compared to existing conditions as the proposed plan seeks to conserve existing stable residential neighborhoods, promote the preservation of neighborhood character in balance with facilitating new development, support current homeowners, promote affordable rental housing, facilitate the maintenance of existing housing, preserve RSO housing units, and facilitate the housing balance at a Citywide level.

Additionally, the General Plan Framework and Housing Elements contain objectives and policies that would help minimize the risk of permanent displacement of substantial numbers of existing housing. These policies include General Plan Framework Element Objectives and Policies 3.4.1, 3.5, and 4.3, and Housing Element Policies 1.1.1, 1.1.2, 1.2.1, 1.2.2, 1.3.3, 2.2.4, 2.4.3, and 2.4.4, which seek to conserve existing stable residential neighborhoods and promote preservation of neighborhood character in balance

with facilitating new development. Since the West Adams New Community Plan will not cause the displacement of housing, the proposed project is also consistent with other adopted City and regional housing policies such as the Comprehensive Housing Affordability Study (CHAS) and State redevelopment law, which ~~policies are~~ were designed to protect low-income housing and provide relocation assistance for displaced households.

The West Adams New Community Plan is consistent with the Framework and Housing Element, and other adopted City and regional housing policies designed to protect low-income housing and provide relocation assistance for displaced households, such as the CHAS and State redevelopment law. Additionally, the West Adams New Community Plan would incorporate a system that would require developers to provide public benefits, including affordable housing, into project design. Therefore, adoption and implementation of the proposed project would not lead to the displacement of substantial numbers of existing housing. ~~In addition, the West Adams New Community Plan is designed to be consistent with policies in the General Plan Framework and Housing Elements.~~ Therefore, the proposed project would not result in less-than-significant impacts related to housing displacement and would not be inconsistent with adopted City and regional housing policies.

#### SECTION 4.14 PUBLIC SERVICES

- The “Regulatory Framework” subsection beginning on page 4.14-1 of Section 4.14 has been updated as follows:

##### **FEDERAL**

~~There are no federal fire protection and emergency services regulations applicable to the proposed project.~~

**Federal Emergency Management Act (FEMA).** In March 2003, FEMA became part of the U.S. Department of Homeland Security. FEMA's continuing mission is to lead the effort to prepare the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

**Disaster Mitigation Act of 2000.** The Disaster Mitigation Act of 2000 (42 United States Code [U.S.C.] Section 5121) was signed into law to amend the Robert T. Stafford Disaster Relief Act of 1988 (42 U.S.C. Section 5121-5207). Among other things, this legislation reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide, and is aimed primarily at the control and streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of the Act include:

- Funding pre-disaster mitigation activities;
- Developing experimental multi-hazard maps to better understand risk;
- Establishing state and local government infrastructure mitigation planning requirements;
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP); and
- Adjusting ways in which management costs for projects are funded.

The mitigation planning provisions outlined in Section 322 of the Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

**Federal Fire Safety Act (FFSA).** The FFSA of 1992 is different from other laws affecting fire safety as the Law applies to federal operations, and there is no requirement for local action unless a private building owner leases space to the federal government. The FFSA requires federal agencies to provide sprinkler protection in any building, whether owned or leased by the federal government that houses at least 25 federal employees during the course of their employment.

#### STATE

~~There are no State fire protection and emergency services regulations applicable to the proposed project.~~

**California Fire Code.** Title 24, Part 9 of the California Code of Regulations (CCR) is the California Fire Code. Title 24, Part 9 of the CCR sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The 2007 California Fire Code is the incorporation of the 2006 International Fire Code of the International Code Council with necessary California amendments. Development under the proposed NCP would be subject to applicable regulations of the California Fire Code.

**Title 8 California Code of Regulations (CCR) Sections 1270 and 6773.** In accordance with CCR, Title 8 Sections 1270 “Fire Prevention” and 6773 “Fire Protection and Fire Equipment,” the California Occupational Safety and Health Administration (Cal-OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hosing sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

**California Health and Safety Code.** State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which includes regulations for building standards (as set forth in the California Building Code), fire protection and notification systems, fire protection devices, and fire suppression training.

**Mutual Aid Agreements (MAA).** The Emergency Managers Mutual Aid (EMMA) system is a collaborated effort between city and County emergency managers in the Office of Emergency Services (OES) in the coastal, southern, and inland regions of the state. EMMA provides service in the emergency response and recovery efforts at the Southern Regional Emergency Operations Center (REOC), local Emergency Operations Centers (EOCs), the Disaster Field Office (DFO), and community service centers. The purpose of EMMA is to support disaster operations in affected jurisdictions by providing professional emergency management personnel. In accordance with the MAA, local and state emergency managers have responded in support of each other under a variety of plans and procedures.

**California Governor’s Office of Emergency Management Agency (Cal-EMA).** The Standard Emergency Management System (SEMS) program (Title 19 CCR §2401 et seq.) sets forth measures by which a jurisdiction should handle emergency disasters. Non-compliance with SEMS could result in disaster relief resources from the State being withheld from a jurisdiction in the event of an emergency disaster for non-compliance.

In the state of California, Cal-EMA serves as the lead state agency for emergency management, while the primary responsibility for emergency management resides with local governments. Cal-EMA coordinates the state response to major emergencies, and obtains Federal funding in support of local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more

from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system. The SEMS provides the mechanism by which local government requests assistance and Cal-EMA maintains oversight of the state’s mutual aid system.

- The “Regulatory Framework” subsection on page 4.14-3 of Section 4.14 has been updated after paragraph 2 as follows:

**2011 UPDATE: LAFD Deployment Plan 2011-2012.** The Los Angeles Fire Department has implemented a deployment plan to efficiently and effectively allocate resources, create long term structural change, and provide stable and permanent savings in the City budgetary constraints. The new Deployment Plan allows the LAFD to permanently end the Modified Coverage Plan (MCP), ending the disruptive rotating closures that resulted from it.

**1998 West Adams-Baldwin Hills-Leimert Community Plan.** The existing West Adams Community Plan, also referred to as the “Current Plan”, establishes land use designations, implementing measures, and land use policies for the West Adams Community Plan Area. The 1998 West Adams Community Plan encourages the preservation and enhancement of existing residential neighborhoods, while providing a variety of opportunities for compatible new housing. The Current Plan also incentivizes improvement to the function, design and economic vitality of commercial corridors, facilitates the enhancement of existing uses which provide community identity, and plans the remaining commercial and industrial development opportunity sites for needed job producing uses.

- The “Existing Setting” subsection on page 4.14-6 of Section 4.14 has been updated with text and footnotes after Table 4.14-5 as follows:

**Supplemental Discussion:**

The LAFD keeps extensive records of response times, and monitors them regularly to determine emergency service needs.<sup>3</sup> According to the LAFD, turnout and travel times are the response components that are most relevant to the Department.<sup>4</sup> A critical factor in the effectiveness of any emergency response agency is the ability to get personnel and equipment to the scene of the emergency in a timely manner. For non-emergency and emergency service response times, the LAFD uses the NFPA 1710, *Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments* standards to monitor changes in response times.<sup>5</sup> Prior to 2010, LAFD analyzed emergency response times using a six-minute standard that included call processing time.<sup>6</sup> Currently, LAFD analyzes response times in accordance with NFPA Standard 1710 for turnout and travel time only.<sup>7</sup> The Department allocates resources according to these response time numbers, and also uses the data to seek funding and resources.

In 2012, the Los Angeles Controller’s Office analyzed LAFD’s response time performance. In the report, it was found that compared to the full deployment period between January 2007 and July 2009, citywide average response times for turnout and travel for Emergency Medical Services (EMS) incidents had increased by 12 seconds, from 4 minutes and 45 seconds to 4 minutes and 57 seconds.<sup>8</sup> In contrast to EMS times, response times for turnout and travel for fire and non- EMS incidents have decreased by

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<sup>3</sup>LAFD Response Metrics, Available: [https://data.lacity.org/A-SafeCity/LAFD\\_ResponseMetrics\\_RawData/cthf-nngn#column-menu](https://data.lacity.org/A-SafeCity/LAFD_ResponseMetrics_RawData/cthf-nngn#column-menu), Accessed: February 11, 2014.

<sup>4</sup>City of Los Angeles Controller Report on LAFD Incident Response Times, May 18, 2012, Available: [http://controller.lacity.org/stellent/groups/electedofficials/@ctr\\_contributor/documents/contributor\\_web\\_content/lacityp\\_020450.pdf](http://controller.lacity.org/stellent/groups/electedofficials/@ctr_contributor/documents/contributor_web_content/lacityp_020450.pdf), Accessed February 11, 2015.

<sup>5</sup>*Ibid.*

<sup>6</sup>*Ibid.*

<sup>7</sup>*Ibid.*

<sup>8</sup>Los Angeles Department of City Planning 2014 Growth and Infrastructure Report.



21 seconds since the end of full deployment, from an average of 5 minutes and 18 seconds to 4 minutes and 57 seconds.<sup>9</sup> It should be noted that prior to 2010, LAFD analyzed emergency response times using a six-minute standard that included call processing time.<sup>10</sup> Currently, LAFD analyzes response times in accordance with NFPA Standard 1710 for turnout and travel time only.<sup>11</sup> The LAFD seeks funding and allocates resources according to these numbers. **Table 4.14-5A** demonstrates the average travel time in minutes for non-emergency services and emergency services for the LAFD stations servicing the West Adams CPA for the year 2014, as well as the citywide average non-emergency services and emergency services response times. It is the response times for the stations demonstrated in **Table 4.14-5A** that would help guide the LAFD to determine service needs for non-emergency/emergency services in the West Adams CPA.

<b>Station Number</b>	<b>Average Travel Time in District (in minutes) for Non-Emergency / Emergency /a/</b>
26	3:35 / 3:49
34	4:28 / 4:16
43	4:07 / 3:38
58	4:21 / 4:20
66	4:14 / 4:18
68	4:29 / 4:09
94	3:59 / 4:07
<b>Citywide Average (2014)</b>	<b>4:11 / 4:05</b>

*/a/ Incident data was recorded in the year 2014.*  
**SOURCE:** Los Angeles Fire Department Fire Station Response Metrics Available: [http://www.lafd.org/sites/default/files/pdf\\_files/02-10-2014\\_AllStations.pdf](http://www.lafd.org/sites/default/files/pdf_files/02-10-2014_AllStations.pdf), accessed: 02/10/2015.

- The “Construction” impacts subsection on page 4.14-7 of Section 4.14 has been updated as follows:  
~~The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project specific construction. Therefore, no further discussion of construction impacts is necessary. During construction activities, project construction managers and supervisory personnel would be trained in emergency response and fire safety operations and fire suppression equipment specific to project construction activities would be maintained on-site in accordance with Occupational Safety and Health Administration (OSHA) and Fire Code requirements. Furthermore, in accordance with LAFD requirements, all required fire hydrants would be installed, tested, and accepted prior to building construction, and vehicular access to such hydrants would be maintained during construction. As necessary, LAFD would be notify of any lane closures or other road construction activities, and a Construction Traffic Management Plan would be implemented to ensure adequate emergency access is maintained to minimize traffic interference and construction vehicle travel on congested streets. Temporary traffic control in the form of a flag person and/or detours would also be provided during the construction activities to ensure safe traffic operations, as necessary.~~
- The first sentence of the last paragraph on page 4.14-7 of Section 4.14 regarding operations impacts has been updated as follows:  
~~In terms of the geographic location of physical resources, the farthest proposed TOD from a fire station would be the Venice/National and La Cienega/Jefferson Boulevards locations, which are located approximately 1.6 miles from LAFD Fire Station Numbers 68 and 94.~~

<sup>9</sup>Ibid.  
<sup>10</sup>Ibid.  
<sup>11</sup>Ibid.

- The third paragraph beginning on page 4.14-8 of Section 4.14 regarding operations impacts has been updated as follows:

The proposed project could result in a net residential and employment population increase of up to 36,141 residents and 8,334 employees, respectively. It is anticipated that a proportionally greater demand for fire protection and emergency services will occur as a result of the greater number of residents, employees, and commercial activities within the West Adams CPA, creating an increased demand for services at LAFD Fire Station Numbers 26, 34, 43, 58, 66, 68, and 94. To maintain an adequate level of fire protection and emergency services, additional LAFD personnel would be required. However, the incremental increase in population within the West Adams CPA would take place over a period of approximately 20 years. Because the LAFD continuously monitors response times, and makes improvements accordingly, this iterative planning process for emergency services will act to ensure that services are provided in the CPA at or below NFPA standards as growth occurs over the next 20 years. The Infrastructure and Public Services Element of the City of Los Angeles General Plan includes policies that require the evaluation of fire service needs based on existing and future conditions. Areas with deficient fire and emergency facilities are identified, and priority is given to the areas in need of upgraded facilities based on established fire protection standards. In addition, the West Adams New Community Plan contains the following goals and policies related to fire protection and emergency services to further reduce the impacts of this growth-accommodating land use plan:

- The “Regulatory Framework” subsection beginning on page 4.14-10 of Section 4.14 has been updated as follows:

#### **STATE**

~~There are no State police protection services regulations applicable to the proposed project.~~

**California Penal Code.** All law enforcement agencies within the State of California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers.

**Title 13 California Code Regulations (CCR) Division 2.** Division 2 of Title 13 of the CCR governs the operations of the California Highway Patrol.

**1998 West Adams-Baldwin Hills-Leimert Community Plan.** The existing West Adams Community Plan, also referred to as the “Current Plan”, establishes land use designations, implementing measures, and land use policies for the West Adams Community Plan Area. The 1998 West Adams Community Plan encourages the preservation and enhancement of existing residential neighborhoods, while providing a variety of opportunities for compatible new housing. The Current Plan also incentivizes improvement to the function, design and economic vitality of commercial corridors, facilitates the enhancement of existing uses which provide community identity, and plans the remaining commercial and industrial development opportunity sites for needed job producing uses.

- The “Existing Setting” subsection on page 4.14-12 of Section 4.14 has been updated with text and footnotes after Table 4.14-8, as follows:

#### **Supplemental Discussion**

The LAPD provides ongoing and iterative planning and reporting for the maintenance of police services throughout the city. Part of this process is the regular production of reports by the Department to determine where funding requests may be warranted and resources allocated. These reports are described below.

**Los Angeles Police Department “Year in Review 2012” Report.** The Los Angeles Police Department (LAPD) prepares annual Year in Review Reports to provide statistical and historical information on the Department. The Year in Review includes Annual Report, Crime Statistics Summary, Statistical Digest, and the Departmental newsletter and magazine.<sup>20</sup>

**Sworn Personnel by Rank, Gender, and Ethnicity Report (SPRGE) 2014.** The Los Angeles Police Department keeps track of its workforce and growth through the Sworn Personnel by Rank, Gender, and Ethnicity Report (SPRGE). According to the Report, the Department has a total of 12,803 sworn and civilian personnel as of September 2014.<sup>21</sup>

**Los Angeles Police Department “End of Year Crime Snapshot 2013” Report.** The Los Angeles Police Department produced a End of Year Crime Snapshot Report from January 1, 2013 through December 31, 2013 to provide statistical data on citywide Part I crime rates. According to the Report, all eight categories of Part I crime rates (homicide, rape, aggravated assault, robbery, burglary, larceny, and vehicle theft) maintained a downward trend since 2008 until 2013: homicide by 34.6 percent; rape by 32.7 percent; aggravated assault by 35.8 percent; robbery by 41.4 percent; burglary by 21.6 percent; larceny by 6.6 percent; and vehicle theft by 37.6 percent.<sup>22</sup>

- The ‘Construction’ impacts subsection on page 4.14-13 of Section 4.14 has been updated as follows:

~~The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project-specific construction. Therefore, no further discussion of construction impacts is necessary. During construction, fencing would typically be placed around any project site to prevent public entry and theft. As necessary, a Construction Traffic Management Plan would be implemented to ensure adequate emergency access is maintained to minimize traffic interference, and the LAPD would be notified of any lane closures or other road construction activities, temporary traffic control in the form of a flag person and/or detours would also be provided during any construction activity to ensure safe traffic operations, as necessary.~~

- The first, second and last paragraphs of the “Operations” impacts subsection beginning on page 4.14-13 of Section 4.14 have been updated as follows:

~~As previously discussed, the West Adams New Community Plan includes elements, such as changes in FAR, which would increase the permitted intensity of development and result in an increase of residents within certain portions of the West Adams CPA, especially in the proposed TOD areas of the CPIO District. The proposed project would guide development in the CPA through the year 2030. Using the National Association of City Managers and Police Department standard of 4 police officers per 1,000 residents to determine the adequate level of deployment of police officers by 2030, the project’s increased 2030 capacity for population growth of 36,141 would require an increase of approximately 145 officers. Although an increase in population could result in an increase in demand for police protection services within the West Adams CPA, this change would be incremental and occur over an extended period of approximately 20 years. Using the National Association of City Managers and Police Department standard of 4 police officers per 1,000 residents to determine the adequate level of deployment of police officers by 2030, the project’s increased 2030 capacity for population growth of 36,141 would require an increase of approximately 145 officers, or 184 officers over the 20 year planning period.~~

The proposed project would increase traffic conditions within the West Adams CPA, which would result in significant impacts to the circulation system. These traffic impacts could reduce police response times (see Section 4.15 Transportation and Traffic). ~~With implementation of the Transportation Improvement~~

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<sup>20</sup>Los Angeles Department of City Planning 2014 Growth and Infrastructure Report.

<sup>21</sup>*Ibid.*

<sup>22</sup>*Ibid.*

~~and Mitigation Program (TIMP), as discussed in Section 4.15 Transportation and Traffic, impacts to the circulation system would be reduced.~~ In addition, the West Adams New Community Plan includes the following goals and policies related to police protection services to further reduce the impacts of this growth-accommodating land use plan:

Additionally, the incremental increase in population occurring over the course of the 20 year planning period would ultimately result in an increase in demand for police protection services within the West Adams CPA. The LAPD would be expected to monitor and forecast demand for existing and projected police services, and maintain acceptable response times through the addition of new officers in accordance with the City of Los Angeles General Plan as development allowed under the NCP is established. Because new developments allowed under the proposed project would result in the need for increased police protection services on site, the proposed West Adams NCP would result in a significant impact related to police protection services.

~~In accordance with the City of Los Angeles General Plan, the LAPD would be expected to monitor and forecast demand for existing and projected police services and maintain acceptable response times through the addition of new officers as projects associated with the West Adams New Community Plan are built.~~

- The first sentence of Mitigation Measure **PS1** on page 4.14-14 of Section 4.14 has been updated as follows:

**PS1** ~~As a condition of approval for a~~Discretionary projects in the CPIO or the Crenshaw Corridor Specific Plan or “Active Change Area Project”, as defined in Section 3.4 of the Project Description, the City shall ~~require~~be reviewed at the discretion of the ~~that each applicant provide project plans to the~~Los Angeles Police Department (LAPD).

- The State “Regulatory Framework” subsection beginning on page 4.14-15 of Section 4.14 has been updated as follows:

**Senate Bill 50 and School Facility Fees.** The Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50), placed a \$9,200,000,000 State bond measure on the ballot at the November 3, 1998 election ("Proposition 1A"). SB 50 imposes new limitations on the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development and suspends the series of cases known as "Mira/Hart/Murrieta". The Bill also authorizes school districts to levy statutory developer fees at levels which may be significantly higher than those previously permitted, although school districts must follow more stringent rules to do so. Development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation" for the purposes of CEQA or for any other reason. A local agency may not deny approval of a legislative or adjudicative action under CEQA relating to real estate development on the basis of the inadequacy of school facilities.

**California Education Code.** School facilities and services are subject to the rules and regulations of the California Education Code and the governance of the State Board of Education (SBE). The SBE is the 11-member governing and policymaking body of the California Department of Education (CDE) that sets K–12 education policy in the areas of standards, instructional materials, assessment, and accountability. The CDE and the State Superintendent of Public Instruction are responsible for enforcing education law and regulations; and for continuing to reform and improve public elementary school, secondary school, and childcare programs, as well as adult education and some preschool programs. The CDE’s mission is to provide leadership, assistance, oversight, and resources so that every Californian has access to an education that meets world-class standards. The core purpose of the CDE is to lead and support the continuous improvement of student achievement, with a specific focus on closing achievement gaps.

**California Department of Education (CDE).** The CDE is the government agency responsible for public education throughout the state. The department oversees funding, and student testing and

achievement levels for all state schools. A sector of the CDE, the California State Board of Education is the governing and policy making sector responsible for education policies regarding standards, instructional materials, assessment, and accountability.

**Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998.** Proposition 1A, the Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998 (Ed. Code, §100400–100405) is a school construction funding measure that was approved by the voters on the November 3, 1998 ballot. The Act created the School Facility Program where eligible school districts may obtain state bond funds.

- The Local “Regulatory Framework” subsection has been updated to include the following, as footnoted, after the first paragraph on page 4.14-16 of Section 4.14:

**Reauthorization Act of 2004, Section 204 of Public Law 108-265.** The LAUSD plan is comprehensive and addresses violence prevention, emergency preparedness, traffic safety, crisis intervention, and coordinated school health. It is known as the Blueprint for Wellness, and was created as a guide to produce and maintain a safe and healthy school environment. LAUSD also issued Reference Guide 1242.2, *Update of Safe School Plans Volumes 1 and 2 (8/28/06)*, and Bulletin No. 58, *Essential Safety Standards Checklist*, as guides to completing the Safe School Plan.<sup>24</sup>

**1998 West Adams-Baldwin Hills-Leimert Community Plan.** The existing West Adams Community Plan, also referred to as the “Current Plan”, establishes land use designations, implementing measures, and land use policies for the West Adams Community Plan Area. The 1998 West Adams Community Plan encourages the preservation and enhancement of existing residential neighborhoods, while providing a variety of opportunities for compatible new housing. The Current Plan also incentivizes improvement to the function, design and economic vitality of commercial corridors, facilitates the enhancement of existing uses which provide community identity, and plans the remaining commercial and industrial development opportunity sites for needed job producing uses.

- The “Construction” impacts subsection on page 4.14-19 of Section 4.14 has been updated as follows:

The West Adams New Community Plan describes the capacity for future development for a portion of the City. ~~and does not constitute a commitment to any project specific construction. Therefore, no further discussion of construction impacts is necessary.~~ The West Adams New Community Plan does not include project-specific construction projects. As development allowed under the NCP is established, construction would likely occur throughout the lifespan of the plan (through 2030) at no predetermined intervals. The analysis of public schools impacts for this community-plan level document is primarily concerned with the long-term implications of development once construction is completed. These concerns are related to whether or not there are sufficient public school facilities to accommodate the projected 2030 population capacity that could exist in the CPA given the land use changes allowed under the proposed West Adams New Community Plan.

- The last sentence of the first paragraph of the “Operations” impacts subsection on page 4.14-19 of Section 4.14 has been updated as follows:

**Table 4.14-12** shows the estimated generation of elementary school, middle school, and high school students that could be anticipated within the West Adams CPA if the land uses allowed under the NCP were built to capacity and occupied.

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<sup>26</sup>Los Angeles Unified School District, *Coordinated Safe and Healthy School Plan*, July 2007, available at [http://www.lausd-oehs.org/docs/SSPVOLUME1/SSPV1\\_Main\\_Fillable\\_Document.pdf](http://www.lausd-oehs.org/docs/SSPVOLUME1/SSPV1_Main_Fillable_Document.pdf), accessed September 1, 2011.

- The first paragraph on page 4.14-20 of Section 4.14 of the “Operations” impacts subsection has been updated with footnotes as follows:

In general, and as shown in Table 4.14-11, existing public, non-charter elementary, middle, and high schools serving the West Adams CPA are not above or near capacity and can accommodate an additional enrollment of 2,485 elementary students, 1,201 middle school students, and 1,469 high school students.<sup>26</sup> LAUSD enrollment forecasts are limited to five-year increments, and do not extend out over the West Adams NCP’s 20 year planning period. Thus, a comparison to LAUSD forecasts for the year 2030 is not possible. Additionally, while this increase in student enrollment could be accommodated by the current capacity forecasts for the middle schools and elementary schools serving the CPA, the current capacity at high schools serving the CPA would not accommodate the number of new students that could be generated by the proposed West Adams New Community Plan if conditions were to remain the same in 2030 as they were in 2008. However, student population may change during the intervening years depending on actual demand for the land uses that would be allowed under the plan.

The proposed project could increase enrollment at public, non-charter elementary, middle, and high schools serving the West Adams CPA by 2,946 elementary school students, 1,502 middle school students, and 1,813 high school students, respectively. These increases in enrollment would exceed the current available capacity of existing schools. Population increases are expected to occur in the residential areas as well as the proposed TOD subareas, which may further impact the currently overcrowded Alexander Hamilton High School. However, in addition to the 16 elementary schools, 2 middle schools, and 3 high schools, there are 13 charter schools and 1 magnet school that also serve the West Adams CPA. Charter schools are part of the public education system and could relieve overcrowding at existing non-charter schools by accommodating the overflow of students from schools that are at, or near, capacity. In this regard, New Era Charter High School is close to the Jefferson/La Cienega Boulevards area and would likely serve the projected increase of high school student population.

- The last paragraph on page 4.14-20 of Section 4.14 of the “Operations” impacts subsection has been updated as follows:

Any development associated with the proposed West Adams New Community Plan would be subject to California Government Code Section 65995, which would allow the LAUSD to collect impact fees from developers of new residential and commercial/industrial space. Furthermore, SB 50 protects schools from overcrowding as it authorizes schools to collect fees which would offset costs associated with increasing school capacity, as a result of development projects. Conformance to California Government Code Section 65995 and SB 50 are deemed to provide full and complete mitigation of school facilities impacts. These fees collected on residential and commercial development may be used to pay for all of the following: land (purchased or leased) for school facilities, design of school facilities, permit and plan checking fees, construction or reconstruction of school facilities, testing and inspection of school sites and school buildings, furniture for use in new school facilities, and interim school facilities (purchased or leased) to house students generated by new development while permanent facilities are constructed. Such development would assist in funding efforts necessary to alleviate school overcrowding, and would ensure that new development under the proposed NCP would bear its fair share of the cost of housing additional students generated. With payment of appropriate fees, impacts related to public schools would be less than significant.

Framework polices would help to minimize any impacts to public schools in the CPA. Framework Policies 9.31.1, 9.32.1 through 9.32.3, 9.33.1, and 9.33.2 call for the City to participate in the development of demographic estimates for school planning, to cooperate with LAUSD to expand schools facilities commensurate with population growth, explore alternatives for new school sites, and to strategize on planning and access for school facilities. In addition, the City of Los Angeles provides standard City mitigation measures that are applied on a project-by-project basis, where applicable. These

standard City mitigation measures are part of the conditions of approval for projects that are subject to approval and permitting by the City. Although the existing schools serving the West Adams CPA do not have the capacity to accommodate the potential increase in student enrollment from the adoption and implementation of the proposed NCP, these policies, in conjunction with state-mandated funding mechanisms would help reduce impacts to school services. Therefore, impacts to school services would be less than significant.

~~Furthermore, any development associated with the proposed project would be subject to Section 65995 of the California Government Code, which would allow the LAUSD to collect impact fees from developers of new residential and commercial/industrial space. In addition, SB 50 authorizes the LAUSD to collect fees associated with increasing school capacity as a result of development. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts. Therefore, the proposed project would result in less than significant impacts related to public schools.~~

- The “Mitigation Measures “ and “Significance of Impacts After Mitigation” subsections on page 4.14-21 of Section 4.14 have updated as follows:

### **CONSTRUCTION**

~~The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project specific construction. Therefore, no mitigation measures are required.~~

No mitigation measures are required. Conformance to California Government Code Section 65995 and Senate Bill 50 are deemed to provide full and complete mitigation of school facilities impacts. Impacts related to creating additional demand for public school enrollment are less than significant.

### **OPERATIONS**

~~Impacts related to public schools would be less than significant. No mitigation measures are required.~~

No mitigation measures are required. Conformance to California Government Code Section 65995 and Senate Bill 50 are deemed to provide full and complete mitigation of school facilities impacts. Impacts related to creating additional demand for public school enrollment are less than significant.

### **CONSTRUCTION**

~~The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project specific construction. Therefore, no impacts related to construction would occur.~~

Impacts related to public schools were determined to be less than significant without mitigation.

- The State “Regulatory Framework” subsection on page 4.14-22 of Section 4.14 has been updated after the Quimby Act paragraph as follows:

**State Public Park Preservation Act of 1971.** The primary instrument for protecting and preserving parkland is the State Public Park Preservation Act of 1971 (Public Resources Code, §5400–5409). Under the Act, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

- The Local “Regulatory Framework” subsection on page 4.14-24 of Section 4.14 has been updated to include the following:

**1998 West Adams-Baldwin Hills-Leimert Community Plan.** The existing West Adams Community Plan, also referred to as the “Current Plan”, establishes land use designations, implementing measures,

and land use policies for the West Adams Community Plan Area. The 1998 West Adams Community Plan encourages the preservation and enhancement of existing residential neighborhoods, while providing a variety of opportunities for compatible new housing. The Current Plan also incentivizes improvement to the function, design and economic vitality of commercial corridors, facilitates the enhancement of existing uses which provide community identity, and plans the remaining commercial and industrial development opportunity sites for needed job producing uses.

- The last paragraph of the “Existing Setting” subsection related to parks and other public services on page 4.14-24 of Section 4.14 has been updated with footnote as follows:

Local recreation standards are long-range and may not be reached during the life of the existing West Adams Community Plan. As shown in updated Table 4.14-13A, ~~44.32~~ 26.62 and ~~84.48~~ 63.91 acres of neighborhood and community recreational facilities are present in the West Adams CPA, respectively. The existing demand for recreational facilities is shown in updated Table 4.14-14A. Currently, there is an insufficient amount of available neighborhood, community, and regional parks/recreational facilities in the CPA. The City's Public Recreation Plan states that to meet long-range recreational standards, a project must have a minimum of two acres of neighborhood and community recreational facilities for every 1,000 persons and a minimum of six acres of regional recreational facilities for every 1,000 persons.<sup>33</sup> At present, and based on the City's standards, deficits exist of ~~320.68~~ 338.38 acres of neighborhood parks, ~~280.52~~ 297.63 acres of community parks, and ~~809.41~~ 757 acres of regional recreational facilities (see Table 4.14-15) in the West Adams CPA.

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<sup>33</sup>County of Los Angeles Department of Regional Planning, *Draft General Plan Conservation and Open Space Element*, 2008.



<b>TABLE 4.14-13A: PARKS, OPEN SPACES, AND RECREATION CENTERS LOCATED WITHIN 0.25 MILES OF WEST ADAMS CPA</b>		
<b>Name</b>	<b>Location</b>	<b>Acreage</b>
<b>CITY OF LOS ANGELES DEPARTMENT OF RECREATION AND PARKS FACILITIES</b>		
<b><i>Vest Pocket Parks</i></b>		
Reynier Park	2803 S. Reynier Ave. at Hargis St.	1.03 <del>1.52</del>
Westside Neighborhood Park	3085 S. Clyde Ave. Fairfax Ave. at Smiley Dr.	1.21 <del>4.74</del>
Leslie N Shaw Park	2250 W. Jefferson Blvd. at 3 <sup>rd</sup> Ave.	0.63 <del>0.46</del>
Leimert Park Plaza	4395 S. Leimert Blvd. at W. Vernon Ave.	1.02 <del>2.66</del>
Angeles Mesa Park (formerly 48 <sup>th</sup> St. and 8 <sup>th</sup> Ave. Park)	W. 48 <sup>th</sup> St. at 4726 8 <sup>th</sup> Ave.	0.15 <del>4.38</del>
Chesterfield Square Park	1950 W. 54 <sup>th</sup> St. 4810 W. Slauson Ave.	1.89 <del>2.93</del>
Robertson Recreation Center	1641 Preuss Rd.	1.24 <del>2.46</del>
Queen Anne Recreation Center	1240 West Blvd.	5.23 <del>2.42</del>
Benny Potter W. Adams Park (formerly 2 <sup>nd</sup> Ave. Park)	2413 2 <sup>nd</sup> Ave. at W. 24 <sup>th</sup> St.	1.60 <del>4.48</del>
East Gramercy Park	E. Gramercy Park Ave at W. Gramercy Park Ave	0.7
Vineyard Recreation Center	2942 Vineyard Ave.	0.93 <del>4.32</del>
<b>Total Vest Pocket Park Acreage</b>		<b>15.00 <del>27.44</del></b>
<b><i>Neighborhood Parks</i></b>		
Baldwin Hills Recreation Center	5401 Highlight Place	10.87 <del>9.73</del>
Genesse Ave. Park	2330 S. Genesse Ave. at S. Glennie Lane	0.75 <del>7.15</del>
<b>Total Neighborhood Park Acreage</b>		<b>11.62 <del>16.88</del></b>
<b>LOS ANGELES COUNTY DEPARTMENT OF PARKS AND RECREATION FACILITIES</b>		
<b><i>Community Parks</i></b>		
Rancho Cienega Sports Center Park	5001 Rodeo Rd.	28.97 <del>25.7</del>
Norman O Houston Park	4800 S. La Brea Ave. at Stocker St.	9.50 <del>15.24</del>
Jim Gilliam Recreation Center	4000 S. La Brea Ave.	17.63 <del>13.9</del>
Ruben Ingold County Parkway	Stocker St. at Overhill Dr.	49.94
Van Ness Recreation Center	5720 S. 2 <sup>nd</sup> Ave. S. Van Ness Ave. and W. Slauson Ave.	7.81 <del>9.73</del>
<b>Total Community Park Acreage</b>		<b>63.91 <del>84.48</del></b>
<b>LOS ANGELES COUNTY DEPARTMENT OF PARKS AND RECREATION FACILITIES</b>		
<b><i>Community Parks</i></b>		
Ruben Ingold County Parkway	Stocker St. at Overhill Dr.	3.46
<b>Total Community Park Acreage</b>		<b>3.46</b>
<b><i>Regional Parks</i></b>		
Kenneth Hahn State Recreation Area	Between S. La Cienega Blvd & S. La Brea Ave	338.00 <del>285.59</del>
<b>Total Regional Park Acreage</b>		<b>338.00 <del>285.59</del></b>
<b>Total Park Acreage within 0.25 Miles of the West Adams CPA</b>		<b>431.99</b>
<small><b>SOURCE:</b> City of Los Angeles Department of Recreation and Parks, Planning, Construction and Maintenance Division, written correspondence with Cid Macaraeg, Director of Real Estate on February 21, 2013. County of Los Angeles Department of Parks and Recreation, Development Division, written correspondence with Lee Barocas on February 27, 2013. Recreation-Centers website, <a href="http://www.ci.la.ca.us/rap/dos/reccenter/reccenter.htm">http://www.ci.la.ca.us/rap/dos/reccenter/reccenter.htm</a>, accessed February 16, 2012; and TAHA, 2012.</small>		

- Updated **Table 4.14-13A** and **Table 4.14-14A** have been added after **Table 4.14-13** and **Table 4.14-14**, respectively, on page 4.14-26 of Section 4.14 as follows:

<b>TABLE 4.14-14A: EXISTING DEMAND FOR PARKS AND RECREATIONAL FACILITIES IN THE WEST ADAMS CPA</b>					
<b>Recreational Facility Type</b>	<b>Population in Recreational West Adams CPA (2008)</b>	<b>Demand for Recreational Facilities /a/</b>	<b>Acres of Recreational Space Available</b>	<b>Demand Met</b>	<b>Acreage Deficit</b>
Neighborhood Parks	182,600	365	<del>26.62</del> 44.32	No	<u>338.38</u>
Community Parks	182,600	365	<del>67.37</del> 84.48	No	<u>297.63</u>
Regional Parks /b/	182,600	1,095	<del>338.00</del> 285.59	No	<u>757</u>
<p><small>/a/ Existing demand is based on open space provisions as provided for each facility type by the City of Los Angeles Public Recreation Plan (i.e., 2 acres for every 1,000 residents for neighborhood facilities; 2 acres for every 1,000 residents for community facilities; 6 acres for every 1,000 residents for regional parks).</small></p> <p><small>/b/ Regional parks serve the city region. For purposes of our analysis, it is assumed that the majority of the population visiting the regional park would come from a 2-mile radius.</small></p> <p><b>SOURCE:</b> SCAG, <i>Regional Transportation Plan</i>, 2008; 2000 U.S. Census; TAHA, 2012 2013.</p>					

- The “Construction” impacts subsection on page 4.14-28 of Section 4.14 has been updated as follows:

~~The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project-specific construction. Therefore, no further discussion of construction impacts is necessary.~~

The West Adams New Community Plan describes the capacity for future development for a portion of the City. The West Adams New Community Plan does not include project-specific construction projects. As development allowed under the NCP is established, construction would likely occur throughout the lifespan of the plan (through 2030) at no predetermined intervals. The analysis of parks and other public services (libraries) impacts for this community-plan level document is primarily concerned with the long-term implications of development once construction is completed. These concerns are related to whether or not there are sufficient facilities to accommodate the projected 2030 population capacity that could exist in the CPA given the land use changes allowed under the proposed West Adams New Community Plan.

- The second paragraph of the operational impacts subsection related to public parks on page 4.14-28 of Section 4.14 has been updated as follows including the addition of **Table 4.14-16**:

Based on the criteria of two acres per 1,000 persons for neighborhood and community parks/recreation facilities and six acres per 1,000 persons for regional parks/recreation facilities, an additional ~~393~~ 411 acres of neighborhood, ~~353~~ 370 acres of community parks, and ~~1,026~~ 974 acres of regional parks, respectively, would be required to meet the needs of the projected build-out population in the West Adams CPA (**Table 4.14-16** Future (2030) Demand for Parks and Recreational Facilities in the West Adams CPA). The existing open space and public facilities land uses and zoning designations would remain unchanged under the proposed project. Similarly, the overall acreage of open space land uses would remain unchanged and the overall acreage of public facilities land uses (which includes: agricultural uses, parking under freeways, fire and police stations, government buildings, public libraries, post offices, public health facilities, public elementary and secondary schools) would decrease slightly by seven acres, or two percent. Consequently, the acreage of open space and public facilities within the West Adams CPA would remain insufficient.

**TABLE 4.14-16: FUTURE (2030) DEMAND FOR PARKS AND RECREATIONAL FACILITIES IN THE WEST ADAMS CPA**

<u>Recreational Facility Type</u>	<u>Acres per 1,000 residents Standard /a/</u>	<u>Future Population (2030) /b/</u>	<u>Future Ratio (Acres per 1,000 residents)</u>	<u>Existing Acres /c/</u>	<u>Needed Acres /d/</u>	<u>Acres Deficit</u>
Neighborhood Parks	2	218,741	0.12	26.62	437.48	410.86
Community Parks	2		0.31	67.37	437.48	370.11
Regional Parks	6		1.54	338.00	1,312.45	974.45
<b>TOTAL</b>	<b>10</b>		<b>1.97</b>	<b>431.99</b>	<b>2,187.41</b>	<b>1,755.42</b>

*/a/ Recommended standard per the City of Los Angeles Public Recreation Plan.  
/b/ Reasonable expected population based on capacity of the proposed NCP. Southern California Association of Governments, Southern California Compass Growth Vision Report, June 2004.  
/c/ Includes parks, open spaces and recreational centers located within 0.5 mile of the West Adams CPA.  
/d/ Acres needed to meet Public Recreation Plan standards.*

- The first sentence of the first paragraph on page 4.14-29 of Section 4.14 has been updated as follows:

The Bicycle Plan, a component of the ~~City of Los Angeles Transportation Element~~ Mobility Element, identifies a 139-mile "Green Network" that enhances access to the City's open spaces through bike paths and shared use paths.

- The operational impacts subsection related to public libraries on page 4.14-29 of Section 4.14 has been updated as follows including the addition of **Table 4.14-16**:

The proposed project would guide development through 2030, and the land use changes allowed under the proposed project could be expected to accommodate an increase in the population within the West Adams CPA by up to approximately 36,141 persons. As described in Table 4.14-15A, the anticipated increase in population, if reached, would ~~is anticipated to~~ increase the demand for library services and resources of the LAPL System. As mentioned above, the LAPL Branch Facilities Plan establishes criteria for the size and features of libraries in order to accommodate their corresponding populations served. For example, branch libraries that serve a population above 45,000 persons must have a facility of at least 14,500 square feet on a 40,000-square-foot property. The Angeles Mesa Branch Library, located within the West Adams CPA, has a current square footage of just 5,243 square feet. In accordance with the LAPL Branch Facilities Plan, the LAPL's published strategic plan, this library is scheduled to be rebuilt to 12,500 square feet with additional parking on-site. It is expected that the LAPL Branch Facilities Plan will continue to forecast future demand for library facilities and ensure that adequate facilities and related improvements are available to serve the new developments within the West Adams CPA. However, the majority of the projected increase in population would likely use the Washington Irving and Baldwin Hills Libraries and require the expansion of the existing libraries or the development of a new library. Therefore, without mitigation, the proposed project would result in a significant impact related to public libraries.

**TABLE 4.14-15A: PUBLIC LIBRARIES SERVING WEST ADAMS CPA**

<u>Library</u>	<u>Address</u>	<u>Approximate Building Size (Square Feet)</u>	<u>Population Served (Persons) (2008)</u>	<u>Projected Population of CPA (Persons) (2030)</u>
Baldwin Hills	2906 S La Brea Ave.	12,000	74,420	78,389
Washington Irving	4117 W Washington Blvd.	12,269	58,429	62,036
Jefferson	2211 W Jefferson Blvd.	9,000	48,910	51,557
Angeles Mesa	2700 W 52 <sup>nd</sup> St.	5,243	31,974	33,678
Hyde Park	2205 W Florence Ave.	10,500	24,811	26,101

**SOURCE:** Los Angeles Public Library, Library Facilities Division, Joseph Molles, written correspondence, April 18, 2011; Southern California Association of Governments, Southern California Compass Growth Vision Report, June 2004.

- The Mitigation Measure subsection regarding the operation of public parks on page 4.14-29 of Section 4.14 has been updated as follows:

The population increase, due to implementation of the Proposed Project, would cause significant impacts to public parks and recreational facilities. Although the City is currently seeking to update park fees associated with implementation of the State Quimby Act that would generate greater funding for parks as a result of new development, the existing deficits in park acreage cannot be improved or resolved by fees on new development alone. Although the following mitigation measures have been identified, no feasible mitigation measures were identified to reduce the significant impact related to public parks to less than significant.

**PS2** Subject to available resources and funding, the City shall prioritize the implementation of recreation and park projects in parts of the West Adams Community Plan Area with the greatest existing deficiencies.

**PS3** Subject to available resources and funding, the City shall establish joint-use agreements with the Los Angeles Unified School District and other public and private entities which could contribute to the availability of recreational opportunities in the West Adams Community Plan Area.

**PS4** Subject to available resources and funding, the City shall monitor appropriate recreation and park statistics and compare with population projections and demand to identify the existing and future recreation and park needs of the West Adams Community Plan Area.

- The Mitigation Measure subsection regarding the operation of public libraries on page 4.14-29 of Section 4.14 has been updated as follows:

~~No feasible mitigation measures were identified to reduce the significant impact related to public libraries to less than significant.~~

- The Significance of Impacts subsection regarding the operation of public parks on page 4.14-30 of Section 4.14 has been updated as follows:

Implementation of Mitigation Measures **P2**, **P3** and **P4** would not reduce the impacts to less than significant. ~~No feasible mitigation measures were identified to reduce the significant impact related to public libraries to less than significant.~~ Therefore, the proposed project would result in a significant and unavoidable impact related to public parks.

- The Significance of Impacts subsection regarding the operation of public libraries on page 4.14-30 of Section 4.14 has been updated as follows:

~~No feasible mitigation measures were identified to reduce the significant impact related to public libraries to less than significant. Therefore, the proposed project would result in a significant and unavoidable impact related to public libraries.~~

#### SECTION 4.15 TRANSPORTATION AND TRAFFIC

- The Federal “Regulatory Framework” subsection on page 4.15-1 of Section 4.15 has been updated as follows:

~~There are no federal transportation/traffic regulations applicable to the proposed project.~~

**Americans with Disabilities (ADA) Act of 1990.** Titles I, II, III, and V of the ADA have been codified in Title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination on the basis of disability in “places of public accommodation” (businesses and non-profit agencies that

serve the public) and “commercial facilities” (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48” for the pedestrian travelway, and a vibration-free zone for pedestrians.

- The State “Regulatory Framework” subsection on page 4.15-1 of Section 4.15 has been updated as follows:

**Proposition 111.** In 1990, the California Legislature enacted the Congestion Management Program (CMP) to implement Proposition 111, a state-wide transportation funding proposal that required local governments to implement mitigation measures to offset the impacts from new development on the regional transportation system. The goal was to link land use, transportation, and air quality decisions at the regional and local level. To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, the Congestion Management Program (CMP) was enacted by Proposition 111 in June 2000. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process.

**UPDATE - Complete Streets Act.** Assembly Bill 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64, an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

**Statewide Transportation Improvement Program (STIP).** Transportation programming is the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. It commits expected revenues over a multi-year period to transportation projects. The STIP is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources.

**UPDATE - Senate Bill 743.** SB 743 directs the Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. On September 27, 2013, Governor Brown signed Senate Bill 743 into law and started a process that could fundamentally change transportation impact analysis as part of CEQA compliance. These changes will include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts in many parts of California (if not statewide). Further, parking impacts are not considered significant impacts on the environment for select development projects within infill areas with nearby frequent transit service. According to the legislative intent contained in Senate Bill 743, these changes to current practice were necessary to “...more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.”

On August 6, 2014, OPR released the *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*. Of particular relevance to this proposed project is the text of the proposed new Section 15064.3 that relates to the determination of the significance of transportations impacts, alternatives and mitigation measures. The following key text concerning the analysis of transportation impacts is taken directly from the document:

(b) *Criteria for Analyzing Transportation Impacts.*

Section 15064 contains general rules governing the analysis, and the determination of significance, of environmental effects. Specific considerations involving transportation impacts are described in this section. For the purposes of this section, “vehicle miles traveled” refers to distance of automobile travel associated with a project.

- (1) *Vehicle Miles Traveled and Land Use Projects.* Generally, transportation impacts of a project can be best measured using vehicle miles traveled. A development project that is not exempt and that results in vehicle miles traveled greater than regional average for the land use type (e.g. residential, employment, commercial) may indicate a significant impact. For the purposes of this subdivision, regional average should be measured per capita, per employee, per trip, per person-trip or other appropriate measure. Also for the purposes of this subdivision, region refers to the metropolitan planning organization or regional transportation planning agency within which the project is located. Development projects that locate within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor generally may be considered to have a less than significant transportation impact. Similarly, development projects, that result in net decreases in vehicle miles traveled, compared to existing conditions, may be considered to have a less than significant transportation impact. Land use plans that are either consistent with a sustainable communities strategy, or that achieve at least an equivalent reduction in vehicle miles traveled as projected to result from implementation of a sustainable communities strategy, generally may be considered to have a less than significant impact.
- (2) *Induced Vehicle Travel and Transportation Projects.* To the extent that a transportation project increases physical roadway capacity for automobiles in a congested area, or adds a new roadway to the network, the transportation analysis should analyze whether the project will induce additional automobile travel compared to existing conditions. The addition of general purpose highway or arterial lanes may indicate a significant impact except on rural roadways where the primary purpose is to improve safety and where speeds are not significantly altered. Transportation projects that do not add physical roadway capacity for automobiles, but instead are for the primary purpose of improving safety or operations, undertaking maintenance or rehabilitation, providing rail grade separations, or improving transit operations, generally would not result in a significant transportation impact. Also, new managed lanes (i.e. tolling, high-occupancy lanes, lanes for transit or freight vehicles only, etc.), or short auxiliary lanes, that are consistent with the transportation projects in a Regional Transportation Plan and Sustainable Communities Strategy, and for which induced travel was already adequately analyzed, generally would not result in a significant transportation impact. Transportation projects (including lane priority for transit, bicycle and pedestrian projects) that lead to net decreases in vehicle miles traveled, compared to existing conditions, and may also be considered to have a less than significant transportation impact.

- The Local “Regulatory Framework” subsection beginning on page 4.15-1 of Section 4.15 has been updated after the Regional Transportation Plan (RTP) paragraph as follows:

**Long Range Transportation Plan (LRTP).** The LRTP recommends highway, high-occupancy vehicle (HOV) lanes, bus, rail, and demand management improvements, and identifies funding sources and implementation schedules over the 20-year period. The LRTP also includes funding for general categories of improvements, such as arterial improvements, non-motorized transportation, rideshare and other incentive programs, park-and-ride lot expansion, and Intelligent Transportation System (ITS) improvements for which Call for Project Applications can be submitted.

**UPDATE - Short Range Transit Plan 2012-13 (March 2013).** The Short Range Transit Plan provides an overview of the transit system in the City of Los Angeles including transit services provided and areas served, ridership, and inventory of fleet and equipment. The Plan also discusses budget and financial resources to support the Department’s goals and objectives for fiscal years 2012-15. The City of Los Angeles, through LADOT’s Transit Bureau, provides fixed-route and demand-response (paratransit) services throughout the City.

**UPDATE - SCAG’s 2008 Regional Comprehensive Plan (RCP).** SCAG has prepared the RCP in collaboration with its constituent members and other regional planning agencies. The SCAG Regional Council adopted the RCP in October 2008 as an advisory informational document only and is intended to serve as a framework to guide decision-making with respect to the growth and changes that can be anticipated in the region through the year 2035. The RCP features nine chapters that focus on specific areas of planning or resource management that includes: Land Use and Housing; Open Space and Habitat; Water; Energy; Air Quality; Solid Waste; Transportation; Security and Emergency Preparedness and Economy. Local governments are required to use the RCP as the basis for their own plans and are required to discuss the consistency of projects of regional significance with the RCP. The Transportation chapter of the RCP focuses on addressing demand on the transportation system from growth in population, employment and households; preserving, wisely utilizing, and, when necessary, expanding our infrastructure, and funding.

**Compass Blueprint.** SCAG has also undertaken the Compass Blueprint effort to emphasize the need to increase the overall quality of life for all residents, regardless of race, ethnicity, or income class. The Compass Blueprint informs the development of the Regional Transportation Plan and the Sustainable Communities Strategy, which assists local government planning efforts and is driven by the four key principles of mobility, livability, prosperity, and sustainability for the foreseeable future.

**Los Angeles Municipal Code (LAMC).** LAMC Section 12.26 contains required Transportation Demand Management (TDM) and Trip Reduction Measures. TDM is defined as the alteration of travel behavior through programs of incentives, services, and policies, including encouraging the use of alternatives to single-occupant vehicles such as public transit, cycling, walking, carpooling/vanpooling and changes in work schedule that move trips out of the peak period or eliminate them altogether (as in the case in telecommuting or compressed work weeks). Trip Reduction is defined as reduction in the number of work-related trips made by single-occupant vehicles. Specific requirements for developments of various sizes are summarized from the code below.

- Development in excess of 25,000 square feet of gross floor area shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest numbers of employees are likely to see it. The transportation information displayed should include, but is not limited to current routes and schedules for public transit serving the site; telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations; ridesharing promotion material supplied by commuter-oriented organizations; regional/local Bicycle Route and facility information; and a listing of on-site services or facilities that are available for carpoolers, vanpoolers, bicyclists, and transit riders.

- Development in excess of 50,000 square feet of gross floor area shall provide the above plus: (1) designated parking areas for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s); (2) one permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area; and (3) parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles and other amenities.
  - Development in excess of 100,000 square feet of gross floor area shall provide the above plus: (1) a safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area; (2) sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development; (3) possible bus stop improvements; and (4) safe and convenient access from the external circulation system to bicycle parking facilities on-site.
- The Local "Regulatory Framework" subsection on page 4.15-3 of Section 4.15 has been updated **after Table 4.15-1** as follows:

**UPDATE 2010 - City of Los Angeles 2010 Bicycle Plan.** The City of Los Angeles adopted the 2010 Bicycle Plan on March 1, 2011. The Bicycle Plan as a component of the 1999 Transportation Element is fully incorporated into the adopted Mobility Plan 2035 as part of the City's General Plan. The purpose of the Bicycle Plan is to increase, improve, and enhance bicycling in the City as a safe, healthy, and enjoyable means of transportation and recreation. It establishes policies and programs to increase the number and type of bicyclists in the City and to make every street in the City a safe place to ride a bicycle.

The City is implementing the bicycle plan in a series of Five Year Implementation Strategies, monitored, advised, and assisted by the Bicycle Advisory Council and the Bicycle Plan Implementation Team. The First Five-Year Implementation Strategy, started in 2011, prioritizes the first 253 miles of new bikeways for implementation. As the City updates each of its 35 Community Plans, it can include localized recommendations that address community-specific conditions and are consistent with and complementary to the 2010 Bicycle Plan. As each Community Plan is updated, future bicycle lanes in that planning area would be analyzed for potential environmental impacts.

The Bicycle Plan has been updated to reflect public input received since the 2010 Bicycle Plan was adopted on March 1, 2011. The 2010 Bicycle Plan, in its entirety is proposed to be incorporated into the various chapters of the proposed MP 2035 and would not be a standalone chapter devoted to a single mode but instead would reflect the City's commitment to a holistic and balanced complete street approach that acknowledges the role of multiple modes (pedestrians, bicycles, transit, and vehicles). The Technical Design Handbook is proposed to be incorporated into the MP 2035's Complete Streets Manual, including sections on design needs, bicycle paths, bicycle lanes, bicycle routes and neighborhood friendly streets, network gaps, signalized intersections, bicycle parking, bikeway signage, non-standard treatments, and street sections.

**UPDATE – 2015 City of Los Angeles Mobility Plan (MP) 2035.** MP 2035 (formerly the Transportation Element of the City of Los Angeles General Plan) is the transportation blueprint for the City of Los Angeles. This update adopted in November of 2015 is an update to the Transportation Element, last updated in 1999, reflects the policies and programs that will give Angelinos a full range of options to meet their mobility needs, including bicycling, carpooling, driving, transit, and walking. MP 2035 sets the policy foundation for safe, accessible and enjoyable streets for pedestrians, bicyclists,



transit users, and vehicles alike. MP 2035 includes a Complete Streets Manual and a Mobility Atlas. The MP 2035 incorporated and replaced the 2010 Bicycle Plan.

The Complete Streets Act (Assembly Bill 1358), mandates that the circulation element of the 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. Compliance with the Complete Streets Act is expected to result in increased options for mobility; less greenhouse gas (GHG) emissions; more walkable communities; and fewer travel barriers for active transportation and those who cannot drive such as children or people with disabilities. Complete Streets play an important role for those who would choose not to drive if they had an alternative as well as for those who do not have the option of driving.

MP 2035 is also consistent with the 2012-2035 RTP/SCS. MP 2035 addresses vehicular LOS but also addresses VMT, and mode share metrics in anticipation of the CEQA Guidelines revisions under development by the Governor's OPR (see discussion above).

**Los Angeles Department of Transportation (LADOT).** As part of project review, LADOT evaluates project site plans to ensure that they follow standard engineering practice and City design guidelines. The department's traffic study policies and procedures manual includes the requirements related to elements such as driveway design, use of off-street parking, and loading facilities. These design related requirements are often imposed through zone changes, conditional uses, or the traffic review process. In many cases it is necessary to clear these traffic requirements, i.e., certify that they have been carried out. This is done by LADOT's representative on the Subdivision Committee, who must approve any plans affected by such requirements.

- The "Existing Setting" subsection beginning on page 4.15-3 of Section 4.15 has been updated after the last paragraph as follows:

**SUPPLEMENTAL INFORMATION:**

**City of Los Angeles Complete Streets Manual<sup>1,2</sup>**

Modifications to the existing roadway classification system have occurred as part of Mobility Plan (MP) 2035 to provide additional detail on context-sensitive and multi-modal cross section elements. 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 Manual, and a revised Bicycle Plan, all of which can influence the network conditions and surrounding context for the CPA upon implementation. A summary of the circulation system according to the Complete Streets Manual is as follows:

- **Boulevard I (Major Highway Class I).** Class I Boulevards are generally defined as having three to four lanes in each direction along with a median turn lane. The roadway width of a Class I Boulevard is usually 100 feet, with a typical sidewalk width of 18 feet and a target operating speed of 40 miles per hour (mph).
- **Boulevard II (Major Highway Class II).** Class II Boulevards are generally defined as having two to three lanes in each direction along with a median turn lane. The roadway width of a Class II Boulevard is usually 80 feet, with a typical sidewalk width of 15 feet and a target operating speed of 35 mph.

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<sup>1</sup>Complete Streets Manual, *Chapter Nine of the City of Los Angeles Mobility Plan*, available: <http://planning.lacity.org/Cwd/GnlPln/MobiltyElement/Text/CompStManual.pdf>.

<sup>2</sup>*Ibid.*

- **Avenue I (Secondary Highway)**. Class I Avenues typically have one to two lanes in each direction. The roadway width of an Avenue I is 70 feet, with a normal sidewalk width of 15 feet and a target operating speed of 35 mph. An Avenue I typically includes streets with a high amount of retail uses and local destinations.
- **Avenue II (Secondary Highway)**. Avenue II streets usually have one to two lanes in each direction, with a typical roadway width of 56 feet, a typical sidewalk width of 15 feet and a target operating speed of 30 mph. Such streets are typically located in parts of the City with dense active uses, and a busy pedestrian environment.
- **Avenue III (Secondary Highway)**. Avenue III streets are defined to have one to two lanes in each direction, with a roadway width of 46 feet, a normal sidewalk width of 15 feet, and a target operating speed of 25 mph. This classification was developed to maintain roadway widths in older, more historic parts of the City.
- **Collector Street**. Collector streets generally have one travel lane in each direction, with a roadway width of 40 feet and a sidewalk width of 13 feet. The target operating speed for collector streets is 25 mph. Such streets are typically intended for vehicle trips that start or end in the immediate vicinity of the street.
- **Industrial Collector Street**. Industrial collector streets vary from normal collector streets in that larger curb returns are incorporated to allow for the wider turning radii of trucks.
- **Local Street (Continuous/Non-continuous)**. Local streets typically have one lane in each direction, and are designed to have a 30-36 foot roadway width, 10-12 foot sidewalks, and a target operating speed of 15-20 mph. Such streets are not designed for through traffic; rather, their focus is to allow access to and from destination points. Unrestricted parking is typically available on both sides of the street.
- **Industrial Local Street**. Although similar to normal local streets, industrial local streets differ primarily in width for the purpose of providing adequate space for trucks to maneuver. The typical roadway width for an industrial local street is 44 feet, with 10-foot sidewalks and a target operating speed of 20 mph.

**Signalized Intersections and Traffic Control Devices**. The signal system in the City of Los Angeles is partially updated to the Automated Traffic Surveillance and Control (ATSAC) system. This system allows monitoring and control of the signal from a central Traffic Operations Center at City Hall. The importance of linking to the ATSAC system is the ability to coordinate the signals in relationship with other signals along a travel corridor. Signal coordination minimizes delay, due to stops, and enhances vehicle flow. Studies by the Los Angeles Department of Transportation (LADOT) have shown that the ATSAC system reasonably increases capacities on roadways by approximately seven percent. Once complete, the entire signal system in CPA will be online with the ATSAC system. The majority of the CPA is already online with the exception of a small area located in the northern portion of the CPA. This area is anticipated to be online by the year 2035.

- The following has been added after the second “bullet point” in the “Thresholds of Significance” subsection on page 4.15-13 of Section 4.15:
  - Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- The “Construction” impacts subsection on page 4.15-14 of Section 4.15 has been updated as follows:

The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project specific construction. Therefore, no further discussion of construction impacts is necessary. While the proposed project includes a series of

implementing ordinances, it is not an implementation plan in and of itself, and its adoption does not constitute a commitment to any project-specific construction. However, construction related to future capacity within the West Adams CPA would have the following impacts.

### **Emergency Access**

Existing emergency response routes would be maintained in their existing locations and all related development would be designed in accordance with City standards, which include provisions that address emergency access (e.g., minimum street widths, minimum turning radii, maximum lengths of cul-de-sacs, etc.). Compliance with these standards would help minimize the potential emergency access impacts. Further, construction activities within the CPA with respect to emergency access due to temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, which is coordinated with the Police and Fire Departments to ensure that emergency access is maintained at all times. This coordination for emergency response planning would help to ensure that the construction and operation associated with the related projects and other future development in the City and surrounding area would not interfere with adopted emergency response or evacuation plans. Therefore, the proposed project would result in less-than-significant construction impacts related to emergency access.

- The first sentence on page 4.15-21 of Section 4.15 has been corrected as follows:

The following public transit improvements and policies are proposed as part of the West Adams CPA New Community Plan to encourage and facilitate transit ridership:

- The titles of paragraphs 5 and 6 on page 4.15-22 of Section 4.15 have been updated as follows:

**Year 2030 Traffic Scenarios With and Without Year 2030 Traffic Conditions with Proposed TIMP.**

**Year 2030 Traffic Volumes Without and With Proposed TIMP.**

- The “Mitigation Measures” and “Significance of Impacts After Mitigation” subsections regarding construction on page 4.15-28 of Section 4.15 have been updated as follows:

### **CONSTRUCTION**

#### **Emergency Access**

Impacts associated with emergency access would be less than significant. No mitigation measures are required.

- The “Mitigation Measures” subsection regarding operations on page 4.15-28 of Section 4.15 has been updated as follows:

### **OPERATIONS**

#### **Circulation System**

No feasible mitigation measures were identified ~~to reduce the significant impact related to the circulation system to less than significant, because none of the three proposed TIMP scenarios would maintain the same number (or fewer) of segments at LOS E or F when compared to existing (Year 2008) conditions.~~

#### **Congestion Management Program**

No feasible mitigation measures were identified ~~to reduce the significant impact related to the CMP to less than significant, because taking additional right-of-way for vehicular traffic would conflict with a number of other policies.~~

- The “Significance of Impacts After Mitigation” subsection regarding operations on page 4.15-28 of Section 4.15 has been updated as follows:

**Circulation System**

No feasible mitigation measures were identified ~~to reduce the significant impact related to the circulation system to less than significant.~~ Therefore, the proposed project would result in a significant and unavoidable impact related to the circulation system.

**Congestion Management Program**

No feasible mitigation measures were identified ~~to reduce the significant impact related to the CMP to less than significant.~~ Therefore, the proposed project would result in a significant and unavoidable impact related to the CMP.

**SECTION 4.16 UTILITIES AND SERVICE SYSTEMS**

- The federal “Regulatory Framework” subsection regarding water on page 4.16-1 of Section 4.16 has been updated as follows:

**FEDERAL**

~~There are no federal water regulations applicable to the proposed project.~~

The Clean Water Act (CWA) is discussed below in the subsection for wastewater.

**Safe Drinking Water Act (SDWA).** The SDWA ensures the quality of Americans' drinking water. The law requires actions to protect drinking water and its sources (e.g., rivers, lakes, reservoirs, springs and groundwater wells) and applies to public water systems serving 25 or more people. It authorizes the U.S. Environmental Protection Agency (USEPA) to set national health-based standards for drinking water to protect against both naturally occurring and manmade contaminants. In addition, it oversees the states, municipalities and water suppliers that implement the standards. USEPA standards are developed as a Maximum Contaminant Level (MCL) for each chemical or microbe. The MCL is the concentration that is not anticipated to produce adverse health effects after a lifetime of exposure, based upon toxicity data and risk assessment principles. USEPA’s goal in setting MCLs is to assure that even small violations for a period of time do not pose significant risk to the public's health over the long run. National Primary Drinking Water Regulations (NPDWRs) are legally enforceable standards that limit the levels of contaminants in drinking water supplied by public water systems. Secondary standards are non-enforceable guidelines regulating contaminants that may cause cosmetic effects (such as skin or tooth discoloration) or aesthetic effects (such as taste, odor, or color) in drinking water. USEPA recommends secondary standards to water systems but does not require systems to comply. However, states may choose to adopt them as enforceable standards.

- The state “Regulatory Framework” subsection regarding water on page 4.16-1 of Section 4.16 has been updated as follows:

**STATE**

~~**Executive Order S-06-08.** On June 4<sup>th</sup>, 2008, California Governor Arnold Schwarzenegger issued Executive Order S-06-08, which declared that there is a Statewide drought and encouraged local water districts and agencies to “reduce water consumption locally and regionally for the remainder of 2008 and prepare for potential worsening water conditions in 2009.” In response to the Executive Order, the City and the Los Angeles Department of Water and Power (LADWP) amended and implemented by ordinance the Emergency Water Conservation Plan (EWCP).~~

**UPDATE 2014 - Governor’s Declaration of a State of Emergency.** On January 17, 2014, California Governor Edmund G. Brown, Jr. proclaimed a state of emergency due to drought conditions. This proclamation directs all local urban water suppliers and municipalities to immediately implement their

local water shortage contingency plans. In response to the proclamation, the City and the LADWP activated the Water Conservation Response Unit to implement the Emergency Water Conservation Plan (EWCP).

- The last sentence of Paragraph 3 entitled, “Water Supply Assessments”(WSA), on page 4.16-2 of Section 4.16 has been updated to include the following “bullet points”:

A WSA would be required under the following circumstances:

- A proposed residential development of more than 500 dwelling units;
  - A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
  - A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
  - A proposed hotel or motel, or both, having more than 500 rooms;
  - A mixed-use project that includes one or more of the projects specified in this subdivision; and/or
  - A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.
- The state “Regulatory Framework” subsection regarding water has been updated to include the following subsection after the last paragraph on page 4.16-2 of Section 4.16:

**UPDATE - 2010 California Green Building Standard Code.** The California Green Building Standards Code is Part 11 of twelve parts of the official compilation and publication of the adoption, amendment and repeal of building regulations to the California Code of Regulations, Title 24, also referred to as the California Building Standards Code. The purpose of this code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The provisions of this code shall apply to the planning, design, operation, construction, use and occupancy of every newly constructed building or structure, unless otherwise indicated in this code, throughout the State of California.

- The following “bullet points” have been added after the last sentence of the subsection entitled, “Model Water Efficient Landscape Ordinance” on page 4.16-4 of Section 4.16:

Below is a summary of measures required under the ordinance:

- Installation of high-efficiency toilets with flush volume of 1.0 gallons of water per flush
- Indoor faucet (other than City Ordinance No. 181480 requirements) flow rate of 1.5 gallons per minute or less
- Waterless urinals
- No more than one showerhead per stall
- Public restroom faucet flow rate of 0.5 gallons per minute or less
- Showerhead flow rate of 2.0 gallons per minute or less
- Limit of one showerhead per shower stall
- High efficiency clothes washers (commercial/residential)
- Individual metering and billing for water use
- Domestic water heating system located in close proximity to point(s) of use, as feasible; use of tankless and on-demand water heaters as feasible
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers
- Water-saving pool filter system
- Leak detection system for swimming pools and jacuzzis
- Use of recycled water (if available) for appropriate end uses (irrigation, cooling towers, sanitary)
- Single pass cooling shall be prohibited (e.g., any vacuum pumps or ice machines)

- Drought tolerant plants to comprise 100 percent of total landscaping in the public-right-of-way and 70 percent of landscaping on private property
- Rainwater harvesting
- Irrigation shall include:
  - Weather-based irrigation controller with rain shutoff
  - Rotating sprinkler nozzles with a flow rate of 0.5 gallons per minute or less
  - Flow sensor and master valve shutoff (for large landscaped areas)
  - Matched precipitation (flow) rates for sprinkler heads
  - Drip/microspray/subsurface irrigation where appropriate
  - Minimum irrigation system distribution uniformity of 75 percent
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
  - Water conserving turf
  - Use of landscape contouring to minimize precipitation runoff
- The local “Regulatory Framework” subsection regarding water has been updated to include the following subsection after the “Model Water Efficient Landscape Ordinance” subsection on page 4.16-4 of Section 4.16:

**UPDATE - 2014 Los Angeles Amendment Green Building Code, No. 182849.** The purpose of the Green Building Program is to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional, and global ecosystems. The program consists of a Standard of Sustainability and Standard of Sustainable Excellence. The program addresses five key areas: (1) Site: location, site planning, landscaping, storm water management, construction and demolition recycling; (2) Water Efficiency: efficient fixtures, wastewater reuse, and efficient irrigation; (3) Energy & Atmosphere: energy efficiency, and clean/renewable energy; (4) Materials & Resources: materials reuse, efficient building systems, and use of recycled and rapidly renewable materials; and (5) Indoor Environmental Quality: improved indoor air quality, increased natural lighting, and improved thermal comfort/control. No building permit shall be issued for the following categories of Projects unless the Project meets the intent of the criteria for certification pursuant to Subsections D or E of this section as determined by the Department of City Planning. (1) A new non-residential building or structure of 50,000 gross square feet or more of floor area; (2) A new mixed use or residential building of 50,000 gross square feet or more of floor area in excess of six stories; (3) A new mixed use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential uses; (4) The alteration or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building; or (5) The alteration of at least 50 dwelling units in an existing mixed use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.

- The local “Regulatory Framework” subsection regarding water has been updated to include the following subsection after the “Ordinance No. 166,080” subsection on page 4.16-4 of Section 4.16:

**1998 West Adams-Baldwin Hills-Leimert Community Plan.** The existing West Adams Community Plan, also referred to as the “Current Plan”, establishes land use designations, implementing measures, and land use policies for the West Adams Community Plan Area. The Current Plan was designed to accommodate the anticipated growth in population, housing units and employment projected for the West Adams CPA to the Year 2010. The 1998 West Adams Community Plan encourages the preservation and enhancement of existing residential neighborhoods, while providing a variety of opportunities for compatible new housing. The Current Plan also incentivizes improvement to the function, design and economic vitality of commercial corridors, facilitates the enhancement of existing

uses which provide community identity, and plans the remaining commercial and industrial development opportunity sites for needed job producing uses.

- The “Existing Setting” subsection regarding water supply has been updated as follows:

The LADWP manages the water supply for the City of Los Angeles. The LADWP serves approximately 4.1 million residents, 716,531 water connections, and over 7,100 miles of water pipelines. The City’s water supply has four sources of water: the Metropolitan Water District (MWD), the Los Angeles Aqueduct (LAA), groundwater, and recycled water. These four water sources comprise 71, 18, 10, and 1 percent of the City’s water supply, respectively.<sup>1</sup> **Table 4.16-3 and Table 4.16-3A** shows the historic LADWP water supplies. During 2008, LADWP supplied approximately 642,041 acre-feet and during 2012, LADWP supplied approximately 552,660 acre-feet<sup>2</sup>.

<b>Year</b>	<b>LAA (acre-feet)</b>	<b>Local Groundwater (acre-feet)</b>	<b>MWD (acre-feet)</b>	<b>Recycled Water (acre-feet)</b>	<b>Transfer, Spread, Sills, and Storage (acre-feet)</b>	<b>Total (acre-feet)</b>
2003	251,340	56,341	317,015	1,759	2,528	653,928
2004	203,190	75,696	391,678	1,774	-2,958	675,296
2005	376,394	57,623	184,605	1,401	3,140	616,883
2006	380,235	67,299	188,598	3,893	-1,336	641,361
2007	127,392	88,041	435,278	3,595	1,044	653,261
2008	148,407	64,604	429,170	7,048	1,664	647,565
2009	137,261	66,998	350,918	7,570	3,052	559,695
2010	251,126	68,346	203,745	6,900	-938	531,055
2011	357,752	49,915	119,381	7,708	-153	534,909
2012	166,858	57,784	325,439	5,965	3,386	552,660

**SOURCE:** Los Angeles Department of Water and Power, 2014.

- The “Existing Setting” subsection entitled, “Metropolitan Water District of Southern California (MWD)” on page 4.16-6 of Section 4.16 has been updated to include the following:

**SUPPLEMENTAL DISCUSSION**

On November 19, 2013, the California Department of Water Resources, acting as the watermaster, initially approved a five percent allocation (approximately 95,575 acre-feet per year) increase for long-term WSWP contractors. In addition, MWD maintains an emergency supply of 626,000 acre feet as of January 1, 2014.

- The construction impacts subsection regarding water use on page 4.16-9 of Section 4.16 has been updated as follows:

The Proposed Project describes the capacity for future development for a portion of the City and does not constitute a commitment to any project-specific construction. Construction that may occur during the lifespan of the West Adams New Community Plan would occur over time with the reasonably expected build-out of the project not anticipated to be reached until 2030. Temporary increases in water use associated with construction activities (such as dust suppression) would occur. Such use would not be substantial in relation to overall water use in the area. In addition, the increase in water use associated

<sup>2</sup>LADWP, Facts and Figures website, [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?\\_adf.ctrl-state=1cotehi19\\_4&\\_afsrLoop=49530163083866](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=1cotehi19_4&_afsrLoop=49530163083866), accessed April 11, 2011.

<sup>3</sup>An acre-foot of water is equivalent to 325,851 gallons of water.

with construction activities in the CPA relative to the operation of the proposed project would be temporary, involving projects constructed over time, and therefore nominal, both individually and cumulatively. Therefore, construction activity that may occur during the lifespan of the proposed plan would have a less-than-significant impact on water supply. Therefore, no further discussion of construction impacts is necessary.

- The operational impacts subsection regarding water supply on page 4.16-9 of Section 4.16 has been updated to include the following additional text after the first paragraph:

As projects within the CPA are proposed, each applicant would be required to coordinate with the LADWP in order to ensure that existing and/or planned water conveyance facilities are capable of meeting water demand/pressure requirements. Any specific on- and off-site improvements needed to ensure that impacts related to water facilities would be identified at the time that a water connection permit application is submitted. Furthermore, each applicant would coordinate with the Los Angeles Fire Department and Building and Safety Department in order to ensure that existing and/or planned fire hydrants are capable of meeting fire flow demand/pressure requirements. The issuance of building permits will be dependent upon submission, review, approval, and testing of fire flow demand and pressure requirements, as established by the Los Angeles Fire Department and Building Safety Department prior to occupancy.

- The third paragraph of the operational impacts subsection regarding water supply on page 4.16-9 of Section 4.16 has been updated to include the following additional text as footnoted:

The proposed project could potentially allow for a 29.6 percent growth in housing development and a 18.6 percent increase in employment by year 2030. **Table 4.16-7** details the estimated water usage within the West Adams CPA by land use resulting from this full implementation of the proposed project. Implementation of the proposed project in year 2030 would result in an increase of 3,809,937 gallons per day over existing water usage in the West Adams CPA. However, this increase in demand for water is expected to increase incrementally over the lifespan of the proposed project. This amounts to an almost 17 percent increase in water demand as compared to existing water usage within the West Adams CPA through 2030 were development in the CPA to reach build-out of the land uses allowed under the proposed plan. When compared to total water supplied by LADWP in 2008, the increase in water usage at full implementation of the proposed project in year 2030 would represent an additional 0.66 percent of water supplied by LADWP in year 2008 (**Table 4.16-3** above). Of total expected water supplies available in year 2030, the water usage increase within the West Adams CPA due to the proposed project would represent an additional 0.61 percent of total expected water supplies (less than one percent), and this increase in water demand has been planned for by the City.

#### **SUPPLEMENTAL DISCUSSION:**

The Los Angeles Department of Water and Power (LADWP) prepares an *Urban Water Management Plan* (UWMP) every five years, the most current UWMP was prepared in 2010. The 2010 UWMP utilized the SCAG 2008 demographic forecast for its water demand projections. According to the UWMP, “the LADWP will be able to reliably provide water to its customers through the 25-year planning period” covered by the plan, which considers projected water supply for normal, single-dry, and multiple-dry years through 2035.<sup>12</sup>

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<sup>12</sup>Los Angeles Department of Water and Power. Available:[https://ladwp.com/ladwp/faces/ladwp/commercial/customerservice/c-cs-formsand\\_publications](https://ladwp.com/ladwp/faces/ladwp/commercial/customerservice/c-cs-formsand_publications). Accessed: December 2014.



- Additional discussion has been added to the operational impacts subsection regarding water supply after Table 4.16-8 on page 4.16-10 of Section 4.16 as follows:

**SUPPLEMENTAL DISCUSSION:**

Further, the City of Los Angeles' policy is that future water needs shall be met by expanding water recycling and conservation. All new development within the CPA would be required to implement the following water conservation measures under the proposed plan. Note that any existing development within the CPA that is not redeveloped would not be required to conform to these measures, although community pressure and pricing controls are anticipated to continue to reduce water demand from existing uses.

- Installation of high-efficiency toilets with flush volume of 1.0 gallons of water per flush
- Indoor faucet (other than City Ordinance No. 181480 requirements) flow rate of 1.5 gallons per minute or less
- Waterless urinals
- No more than one showerhead per stall
- Public restroom faucet flow rate of 0.5 gallons per minute or less
- Showerhead flow rate of 2.0 gallons per minute or less
- Limit of one showerhead per shower stall
- High efficiency clothes washers (commercial/residential)
- Individual metering and billing for water use
- Domestic water heating system located in close proximity to point(s) of use, as feasible; use of tankless and on-demand water heaters as feasible
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers
- Water-saving pool filter system
- Leak detection system for swimming pools and jacuzzis
- Use of recycled water (if available) for appropriate end uses (irrigation, cooling towers, sanitary)
- Single pass cooling shall be prohibited (e.g., any vacuum pumps or ice machines)
- Drought tolerant plants to comprise 100 percent of total landscaping in the public-right-of-way and 70 percent of landscaping on private property
- Rainwater harvesting
- Irrigation shall include:
  - Weather-based irrigation controller with rain shutoff
  - Rotating sprinkler nozzles with a flow rate of 0.5 gallons per minute or less
  - Flow sensor and master valve shutoff (for large landscaped areas)
  - Matched precipitation (flow) rates for sprinkler heads
  - Drip/microspray/subsurface irrigation where appropriate
  - Minimum irrigation system distribution uniformity of 75 percent
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
  - Water conserving turf
  - Use of landscape contouring to minimize precipitation runoff

New development within the CPA would also be required to comply with the Water Efficiency Requirements Ordinance - City Ordinance No.180822, Los Angeles Green Building Code Ordinance - City Ordinance No. 181480, and the 2010 California Green Building Standard Code.

Therefore, the anticipated increase in demand for water supplies within the West Adams CPA represents a ~~small proportion~~ less than one percent of total anticipated water supplies in year 2030. Additionally, water conservation efforts, a cornerstone of the City's water policy agenda, can be relied on to effectively attenuate some of the added demand for water resources as the proposed project gradually reaches full implementation. Moreover, the impacts to water demand for future water resources are minimized because full implementation of the proposed project in year 2030 would occur incrementally

over the 20-year lifespan of the proposed project and is continuously planned for by the City. Therefore, the proposed project would result in less-than-significant impacts related to water supplies.

- The local “Regulatory Framework” subsection regarding wastewater has been updated to include the following subsections after Table 4.16-9 on page 4.16-13 of Section 4.16:

**City of Los Angeles Integrated Resources Plan (IRP).** The IRP is a planning document prepared by the Bureau of Sanitation (BOS) and the LADWP to address the City’s wastewater, stormwater management and recycled water needs. Phase I of the IRP project, which took place between 1999 and 2001, addressed the interrelationship of the Los Angeles basin-wide water, wastewater, and stormwater systems and the needs of these programs to serve the population of the City through the year 2020. The Integrated Plan for the Wastewater Program (IPWP) addressed the anticipated needs of the City in the year 2020. Phase I studies focused on gaps in the ability of the City’s current water resources systems to serve future population and focused on ways to bridge those gaps through planning of future facilities, resource management, and demand management. Phase I resulted in the development of a set of performance-based guiding principles for future planning of water resources management. Phase II of the IRP, undertaken between 2002 and 2006, identified various alternative approaches to the management of the City’s water resources. The Los Angeles City Council certified the Final EIR in November 2006 and adopted a final alternative for implementation by 2020. The approved Alternative is intended to increase wastewater collection and treatment capacity, water reclamation storage and beneficial use, water conservation, and runoff management opportunities.

**Wastewater Capital Improvement Program.** Every 10 years, the BOS updates the City’s 10-Year Capital Improvement Program, which identifies the wastewater system upgrades, equipment, and modifications to be funded by the City within a 10-year period. Many of these improvements are necessary in order to comply with State and Federal Clean Water Act regulations. The most recent update, the Wastewater Capital Improvement Program Fiscal Year 2006/2007 through 2015/2016, identifies improvements scheduled through 2016 for the four treatment plants, collection system, pumping plants, and system-wide operations.

**Los Angeles Municipal Code (LAMC).** LAMC Section 64.11 and 64.12 require approval of a sewer permit, also called an “S” Permit, prior to connection to the wastewater system. New connections are assessed a Sewerage Facilities Charge, which are deposited in the City’s Sewer Construction and Maintenance Fund for wastewater-related purposes including but not limited to industrial waste control and water reclamation purposes. LAMC Section 6415 requires that a Sewer Capacity Availability Request (SCAR) be performed by the Department of Building and Safety when a sewer permit is sought for a new connection to the City’s wastewater system, or in the event a proposed increase in discharge to a public wastewater line or proposed future development anticipated to generate 10,000 gallons or more of wastewater per day. A SCAR evaluates the existing wastewater collection system to determine whether adequate capacity exists to convey project-related wastewater to the appropriate treatment plant. If capacity is available, the Department of Building and Safety accepts project plans and specifications for plan check; otherwise, projects are placed on a waiting list to receive an allocation of forthcoming capacity, or applicants are required to construct a connection to the nearest wastewater line with available capacity. The Department of Building and Safety accepts project plans and specification for plan check if the project is on the waiting list, although the project may not connect to the City’s wastewater system until capacity is available and a sewer permit is available.

**1998 West Adams Community Plan (Current Plan).** The existing West Adams Community Plan establishes land use designations, implementing measures, and land use policies for the West Adams CPA. The existing West Adams Community Plan was designed to accommodate the anticipated growth in population, housing and employment of the West Adams CPA to the year 2010. The 1998 West Adams Community Plan encouraged the preservation and enhancement of existing residential

neighborhoods, while providing a variety of housing opportunities through compatible new development and improvement of the function, design, and economic vitality of the community.

- The “Existing Setting” subsection regarding wastewater has been updated following Table 4.16-12 on page 4.16-17 of Section 4.16 as follows:

#### **WATER QUALITY MONITORING**

Dischargers regulated under Waste Discharge Requirements (WDRs) are required to “self-monitor,” that is, to collect regular samples of their effluent and receiving waters according to a prescribed schedule to determine facility performance and compliance with their requirements.

In addition to self-monitoring by dischargers, the LARWQCB makes unannounced inspections and collects samples to determine compliance with discharge requirements and receiving water objectives and to provide data for enforcement actions. The LARWQCB also responds to a variety of incidents, including accidental and illegal discharges of oil from offshore pipelines, oily waste discharges, and dumping in the storm drains.

Each regional board in the State prepares a biennial Water Quality Assessment (WQA) Report using data collected by regional planning, permitting, surveillance, and enforcement programs. The regional reports contain inventories of the pollutants in the major water bodies of the region.

- The “Thresholds of Significance” subsection regarding wastewater has been updated following the second “bullet point” on page 4.16-17 of Section 4.16 as follows:
  - Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- The introductory paragraph of the “Impacts” subsection regarding wastewater on page 4.16-18 of Section 4.16 has been updated to include the following after the last sentence:

While there are wastewater impacts to consider within the CPA, they are subject to the State and local policies and guidelines described above. As projects within the CPA are proposed, each applicant would be required coordinate with the BOS in order to ensure that existing and/or planned wastewater conveyance facilities are capable of meeting demand/pressure requirements.

For discussion of operations impacts associated with the proposed project, full implementation of the project (year 2030) will be analyzed.

- The construction impacts subsection regarding wastewater on page 4.16-18 of Section 4.16 has been updated as follows:

The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project-specific construction. For this community-plan level of analysis where the details of specific development projects are unknown, the evaluation of the effects of the West Adams New Community Plan on wastewater conveyance is made using the expected demand for wastewater conveyance as a result of the reasonably foreseeable build-out of the CPA under the implementation of the proposed plan. In addition, the increase in wastewater generation associated with construction activities in the CPA relative to the operation of the proposed project would be temporary and nominal. Therefore, construction activity that may occur during the lifespan of the proposed plan would have a less-than-significant impact on wastewater resources. Therefore, no further discussion of construction impacts is necessary.

- The first paragraph on page 4.16-19 of Section 4.16 regarding wastewater treatment operational impacts has been updated as follows:

It is important to consider the existing and anticipated wastewater generation within the West Adams CPA in relation to current average daily flows experienced by all four treatment plants, as well as in proportion to remaining capacity of the system. Accordingly, as noted above, the four treatment plants collectively experience an average daily flow of 466.5 mgd. As a proportion of total average daily flow experienced by the four treatment plants, the existing wastewater generation within the West Adams CPA accounts for 4.3 percent. The proposed project anticipates population, housing and commercial infrastructure, and employment growth to produce an additional 5.5 mgd of wastewater within the West Adams CPA (**Table 4.16-13**). This would be a 26.82% percent increase in wastewater generation as compared to existing usage within the West Adams CPA through 2030 were development in the CPA to reach full build out of the land uses allowed under the proposed plan. This estimated increase in wastewater generation from full implementation of the proposed project is 1.2 percent of the total existing average wastewater flows of the City of Los Angeles, and 4.9 percent of remaining wastewater treatment capacity for the four sites. By considering the anticipated wastewater generation within the West Adams CPA as a proportion of total capacity, total average daily flows, and remaining capacity of the four treatment plants, the increased wastewater generation due to the proposed project is minimal.

- The fourth sentence of the last paragraph on page 4.16-19 of Section 4.16 regarding wastewater conveyance infrastructure operational impacts has been updated as follows:

The WCIP was originally adopted in 2006 and most recently updated in ~~2008~~ 2013.

- Supplemental analysis has been added following the first paragraph on page 4.16-20 of Section 4.16 regarding wastewater conveyance infrastructure operational impacts as follows:

#### **SUPPLEMENTAL ANALYSIS**

The 2013/2014 WCIP recognizes necessary projects to maintain, bolster, and expand the existing system allocating over \$4.5 billion to do so during Fiscal Year 2008/2009 to 2017/2018. Multiple projects identified in the WCIP are upgrades for the HTP. These projects are necessary to ensure that the HTP complies with RWQCB permit requirements and will refurbish various plant facilities in order to meet future operating requirements. Many of these upgrades are already funded and under construction and all upgrades are scheduled to be completed by 2020.

- Additional text has been added following the last sentence of the third paragraph on page 4.16-20 of Section 4.16 regarding wastewater conveyance infrastructure operational impacts as follows:

Further, new development occurring under the proposed plan would comply with all provisions of the NPDES program, as enforced by the RWQCB, and would be required to comply with all applicable wastewater discharge requirements issued by the State Water Resources Control Board (SWRCB) and RWQCB.

- Additional text has been added following the fourth paragraph on page 4.16-20 of Section 4.16 regarding wastewater conveyance infrastructure operational impacts as follows:

#### **Storm Water Drainage Infrastructure**

Drainage and flood control within the West Adams CPA is regulated by the LADPW and the Los Angeles County Department of Public Works (LACDPW). The County has jurisdiction over regional drainage facilities. The LACPW's Hydrology Manual requires that a storm drain system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. Areas with sump conditions are required to have a storm drain conveyance system capable of conveying flow from a 50-year storm event. The County also limits the allowable discharge into existing storm drain facilities based on the MS4 Permit and is enforced on

all new developments that discharge directly into the County’s storm drain system. Any proposed drainage improvements of County owned storm drain facilities such as catch basins and storm drain lines requires the approval/review from the LACFCD department. Moreover, these entities proactively monitor the drainage facilities to preemptively identify and resolve deficiencies before they can become problematic. Further, new development occurring under the proposed plan would comply with all provisions of the NPDES program, as enforced by the RWQCB, and would be required to comply with all applicable storm water discharge requirements issued by the SWRCB and RWQCB.

As discussed in Section 4.9 Hydrology and Water Quality, the West Adams New Community Plan would not result in a substantial increase in impervious surfaces. Accordingly, the proposed plan would not cause a substantial increase in the peak flow rates or volumes that would exceed the drainage capacity of existing stormwater drainage facilities, and would therefore not warrant the construction of new stormwater drainage facilities or the expansion of existing facilities. The continuous monitoring of drainage facilities in the West Adams CPA, and the improbability of a drainage capacity exceedance would reduce the need for any expansion of existing, or the construction of new, storm water drainage facilities under the proposed plan. Therefore, implementation of the West Adams New Community Plan would result in a less-than-significant impact related to construction of new storm water drainage facilities, or the expansion of existing facilities.

- The “Mitigation Measures” subsection regarding operations on page 4.16-21 of Section 4.16 has been updated as follows:

**Storm Water Drainage Infrastructure**

Impacts related to storm water drainage infrastructure would be less than significant. No mitigation measures are required.

- The “Significance of Impacts After Mitigation” subsection regarding operations on page 4.16-21 of Section 4.16 has been updated as follows:

**Storm Water Drainage Infrastructure**

Impacts related to storm water drainage infrastructure were determined to be less than significant without mitigation.

- The federal “Regulatory Framework” subsection regarding solid waste on page 4.16-22 of Section 4.16 has been updated as follows:

**FEDERAL**

~~There are no federal solid waste regulations applicable to the proposed project.~~

**Federal Agencies and Regulations.** Title 40 Code of Federal Regulations, Part 258 Subtitle D of the Resource Conservation and Recovery Act (RCRA) establishes minimum location standards for siting municipal solid waste landfills. Because California laws and regulations governing the approval of solid waste landfills meet the requirements of Subtitle D, the USEPA delegated the enforcement responsibility to the State of California.

- The State “Regulatory Framework” subsection regarding solid waste on page 4.16-22 of Section 4.16 has been updated as follows:

**Senate Bill (SB 63).** On July 28, 2009, SB 63 was approved and filed, allowing the abolishment of the California Integrated Waste Management Board and transfer of its duties and responsibilities to a new department called the Department of Resources Recycling and Recovery, or CalRecycle. This legislation was passed in order to combine the State’s solid waste and recycling programs which went into effect on January 1, 2010.

- The local “Regulatory Framework” subsection regarding solid waste has been updated after the “ City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP)” subsection on page 4.16-23 of Section 4.16 as follows:

**Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA Plan).** A resource management blueprint called RENEW LA was adopted by the City Council in February 2006.<sup>34</sup> This 20-year plan is the blueprint that will guide the City in reducing the use of landfills by maximizing recycling and reuse, and converting much of the solid waste that currently would go to landfills into clean energy and/or valuable raw materials. Many of the plan components have been, and continue to be implemented. RENEW LA calls for the following actions:

- Establish RENEW LA Oversight Committee
- Adopt RENEW LA Blueprint and Zero Waste Policy
- Modify Zoning Code to allow Alternative Technology by right in M2 (light industrial) and M3 (heavy industrial) zones with conditions
- Establish site areas for Alternative Technology in each of the Collection Districts
- Site and develop the first and second Alternative Technology facility
- Establish a fund from Sunshine Canyon host fees for development of facilities that reduce landfilling
- Implement recycling in 50 percent of the commercial sector
- Mandate a time-certain reduction in City MSW disposed at Sunshine Canyon
- Expand Multi-Family Recycling to 50 percent of the City
- Establish City tax breaks for Zero Waste and new re-manufacturing companies
- Establish a green energy producer bonus from the Department of Water and Power
- Add residential food waste to the green bin program

**UPDATE 2010 - Citywide Construction and Demolition (C&D) Waste Recycling Ordinance (Ordinance 181519).** On March 5, 2010, the City Council approved the Citywide C&D Waste Recycling Ordinance (Ordinance 181519) that requires all mixed C&D waste generated within City limits be taken to City certified C&D waste processors. The Bureau of Sanitation (BOS) is responsible for this new C&D waste recycling policy that is effective January 1, 2011. All haulers and contractors responsible for handling C&D waste must obtain a Private Solid Waste Hauler Permit from BOS prior to collecting, hauling and transporting C&D waste and C&D waste can only be taken to City certified C&D Processing Facilities. Effective January 1, 2011, noncompliance penalties of up to \$5,000 will be assessed for every load of C&D waste not taken to City certified processors. Among the various purposes of this program is the goal of maintaining an open and competitive market for all companies providing solid waste and disposal services in the City, and to mandate the recycling of construction and demolition waste.<sup>35</sup>

**UPDATE 2010 - Citywide Recycling Chute Ordinance (Ordinance 181227).** On July 7, 2010, the City Council approved the Citywide Recycling Chute Ordinance that requires all new development projects, all existing multiple-family residential development projects of four or more units where the addition of floor area is 25 percent or more, and all other existing development projects where the addition of floor area is 30 percent or more, to provide an adequate recycling area or room for the collection and loading of recyclable materials. When a new development project provides a trash chute or an existing development project adds a trash chute, a recycling chute shall also be provided in both cases. Recycling chutes shall be clearly marked "recycling only" at every point of entry.

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<sup>34</sup>City of Los Angeles Department of Public Works, Bureau of Sanitation, *Fact Sheet: City's Solid Waste Policies and Programs*, website, [http://www.lacitysan.org/srssid/swirp/files/info/fact\\_sheet/SWIRPPolicyNprogramsFactSheet\\_032009.pdf](http://www.lacitysan.org/srssid/swirp/files/info/fact_sheet/SWIRPPolicyNprogramsFactSheet_032009.pdf), accessed February 9, 2014.

<sup>35</sup>City of Los Angeles Department of Public Works, Bureau of Sanitation, *Construction and Demolition Recycling, Citywide Construction and Demolition (C&D) Waste Recycling Ordinance (Ordinance 181519)*, [http://www.lacitysan.org/solid\\_resources/recycling/c&d.htm](http://www.lacitysan.org/solid_resources/recycling/c&d.htm), accessed February 9, 2014.

- The local “Regulatory Framework” subsection regarding solid waste has been updated after the “City of Los Angeles Curbside Recycling Program” subsection on page 4.16-23 of Section 4.16 as follows:

**1998 West Adams-Baldwin Hills-Leimert Community Plan.** The existing West Adams Community Plan, also referred to as the “Current Plan”, establishes land use designations, implementing measures, and land use policies for the West Adams Community Plan Area. The 1998 West Adams Community Plan encourages the preservation and enhancement of existing residential neighborhoods, while providing a variety of opportunities for compatible new housing. The Current Plan also incentivizes improvement to the function, design and economic vitality of commercial corridors, facilitates the enhancement of existing uses which provide community identity, and plans the remaining commercial and industrial development opportunity sites for needed job producing uses.

- The introductory paragraph of the “Impacts” subsection regarding solid waste on page 4.16-26 of Section 4.16 has been updated after the last sentence as follows:

As projects within the CPA are proposed, each applicant would be required to coordinate with the BOS in order to ensure that existing and/or planned solid waste facilities are capable of meeting demand/pressure requirements.

~~For discussion of operations impacts associated with the proposed project, full implementation of the project (year 2030) will be analyzed.~~

- The last sentence of the first paragraph of the operational impacts subsection regarding solid waste on page 4.16-27 of Section 4.16 has been updated as follows:

The development capacity that would be allowed under the proposed project could incrementally increase population, housing, and employment within the West Adams CPA by 5.9 percent, 5.9 percent, and 7.9 percent, respectively, until the buildout year of 2030.

- The second paragraph of the operational impacts subsection regarding solid waste on page 4.16-27 of Section 4.16 has been updated as follows:

As shown in **Table 4.16-17** the increases development capacity would increase dwelling and work space capacity (and hence population, housing, and employment) and would cause solid waste generation in the West Adams CPA to increase by 202,289 pounds per day, or roughly 101 tons. This amounts to nearly a 25 percent increase over existing solid waste generation in the West Adams CPA. The calculation of the project’s estimated solid waste generation is a worst-case-scenario and does not take into consideration the City’s successful efforts to divert disposal of solid waste by 50 percent, in compliance with AB 939. Additionally, the calculation does not take into consideration the reduction in landfill disposal due to the City’s current and future efforts to achieve a “zero waste” level (a 90 percent diversion rate) by the year 2025. All solid waste-generating activities within the City of Los Angeles are subject to the requirements set forth in AB 939 and other local ordinances.

- The third paragraph of the operational impacts subsection regarding solid waste on page 4.16-27 of Section 4.16 has been updated after the first sentence as follows:

This would be a 24.81% percent increase in solid waste generation as compared to existing usage within the West Adams CPA through 2030 were development in the CPA to reach full build out of the land uses allowed under the plan.

- The operational impacts subsection regarding solid waste on page 4.16-28 of Section 4.16 has been updated after the first paragraph as follows:

According to Los Angeles County Department of Public Works' 2008 Annual Report, landfills serving the City of Los Angeles have closure dates ranging from August 2012 to January 2041. Two landfills with the nearest closure dates are the Lancaster and Puente Hills Landfills. In 2008, these two landfills received approximately 460 and 480 tons per day, respectively, from the City of Los Angeles. The remaining landfills have the capacity to accommodate these closures and still support the construction of future developments occurring under the West Adams New Community Plan. Currently, the City of Los Angeles' average daily disposal rate is only 5.9 percent of the available daily intake capacity.

- The State "Regulatory Framework" subsection regarding energy has been updated after the subsection entitled, "SB 1368, Greenhouse Gas Emissions Performance Standard for Major Power Plant Investments" on page 4.16-31 of Section 4.16 as follows:

**SB 2, Renewables Portfolio Standard (RPS).** Established in 2002 under SB 1078, accelerated in 2006 under SB 107 and expanded in 2011 under SB 2, RPS is one of the most ambitious renewable energy standards in the country. This law requires investor owned utilities such as Pacific Gas and Electric, SCE and San Diego Gas and Electric, to have 33 percent of its electricity come from renewable sources by 2020. Previously, State law required investor owned utilities have 20 percent of its electricity come from renewable sources by 2010.

- The State "Regulatory Framework" subsection regarding energy has been updated after the subsection entitled, "SB 97, CEQA Guidelines for Greenhouse Gas Emissions" on page 4.16-32 of Section 4.16 as follows:

**UPDATE - CEQA Guidelines for Greenhouse Gas Emissions (Senate Bill 97 [SB 97]).** SB 97 requires the Governor's Office of Planning and Research (OPR) to prepare CEQA guidelines for the mitigation of greenhouse gas emissions, including, but not limited to, effects associated with transportation or energy consumption. OPR must prepare these guidelines and transmit them to the Resources Agency by July 1, 2009. The Resources Agency must then certify and adopt the guidelines by January 1, 2010. OPR and the Resources Agency are required to periodically review the guidelines to incorporate new information or criteria adopted by California Air Resources Board pursuant to the Global Warming Solutions Act, scheduled for 2012.

**UPDATE - CEQA Guidelines Appendix F: Energy Conservation.** CEQA Guidelines Appendix F provides a goal of conserving energy in the state of California. The appendix indicates the following methods to achieve this goal: (1) decreasing overall per capita energy consumption, (2) decreasing reliance on natural gas and oil, and (3) increasing reliance on renewable energy sources.

- The local "Regulatory Framework" subsection regarding energy has been updated after the subsection entitled, "The City of Los Angeles GREEN LA Plan" on page 4.16-33 of Section 4.16 as follows:

**1998 West Adams Community Plan (Current Plan).** The existing West Adams Community Plan establishes land use designations, implementing measures, and land use policies for the West Adams CPA. The existing West Adams Community Plan was designed to accommodate the anticipated growth in population and employment of the West Adams CPA to the year 2010. The 1998 West Adams Community Plan encouraged the preservation and enhancement of existing residential neighborhoods, while providing a variety of housing opportunities through compatible new housing, improvement of the function, design, and economic vitality of the community.



- The last sentence of the “Impacts” subsection regarding energy on page 4.16-38 of Section 4.16 has been updated as follows:

~~For discussion of operations impacts associated with the Proposed Project, full implementation of the project (year 2030) will be analyzed.~~

- The construction impacts subsection regarding energy on page 4.16-38 of Section 4.16 has been updated as follows:

~~The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project-specific construction. Therefore, no further discussion of construction impacts is necessary.~~

The West Adams New Community Plan describes the capacity for future development for a portion of the City and does not constitute a commitment to any project-specific construction. Construction that may occur during the lifespan of the West Adams New Community Plan would occur over time with the reasonably expected build out of the project not anticipated to be reached until 2030. Temporary increases in energy use associated with construction activities (such as for construction lighting) would occur. Such use would not be substantial in relation to overall energy use in the area. In addition, the increase in energy use associated with construction activities in the CPA relative to the operation of the Proposed Project would be temporary and nominal. Therefore, construction activity that may occur during the lifespan of the proposed plan would have a less-than-significant impact on energy resources.

- The last paragraph on page 4.16-40 of Section 4.16 regarding the operational impacts relative to electricity has been updated to include the following sentence:

Considering the impacts discussed above, there is no need for new (off-site) electrical generation facilities or major enhancements to accommodate the Proposed Project. This is because the Proposed Project would incrementally build towards expected usage rates in year 2030. When prorated over the effective lifespan of the Proposed Project (i.e., 20 years), the increase from existing electricity usage rate (year 2008) is 8.2 million kwh per year. This would be a 22.38 percent increase in electricity usage as compared to existing usage within the West Adams CPA through 2030 were development in the CPA to reach full build out of the land uses allowed under the plan. This amount is a 1.1 percent increase over year 2008 usage rates for each year of the project. Such an amount would not exceed the electricity generation potential of LADWP or the capacity of the distribution infrastructure.

- The paragraph following Table 4.16-22 on page 4.16-42 of Section 4.16 regarding the operational impacts relative to natural gas has been updated to include the following sentence:

The 2010 California Gas Report provides estimates of projected supply and demand within the SoCalGas service area over the 2010 to 2030 planning horizon.<sup>72</sup> In 2030, SoCalGas projects gas demand to be 2,467 million cubic feet per day and to have an available supply of 3,875 million cubic feet per day. This would be a 23.35% percent increase in natural gas usage as compared to existing usage within the West Adams CPA through 2030 were development in the CPA to reach full build out of the land uses allowed under the plan. As shown in **Table 4.16-22**, the project would result in a net increase demand of 73,396,361 cubic feet per month and, therefore, would consume much less than 0.01 percent of SoCalGas’ 2030 projected available supply. Therefore, the Proposed Project would result in less-than-significant impacts related to natural gas.

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<sup>72</sup>Southern California Gas Company, California Gas Report, 2010, available at [http://www.socalgas.com/regulatory/documents/cgr/2010\\_CGR.pdf](http://www.socalgas.com/regulatory/documents/cgr/2010_CGR.pdf), accessed on September 29, 2011.

## CHAPTER 5.0 ALTERNATIVES

- The “Proposed Project Objectives” subsection beginning on page 5-2 of Section 5.0 has been updated as follows:

### **Proposed Project Goals, Objectives and Project Features**

As called for by the CEQA Guidelines, the achievement of project objectives must be balanced by the ability of an alternative to reduce the significant impacts of the project. The ~~proposed project’s~~ Proposed Project’s goals, objectives and project features, as detailed in Section 1.3 of the Introduction, are listed below in order of priority:

#### NCP Program Goals and Objectives:

- 1) Guide land use development over a twenty year planning horizon.
  - Accommodate citywide projected population, housing and employment growth.
  - Implement smart growth goals and policies.
  - Minimize lengthy discretionary approvals.
  - Assess public infrastructure, service and facility needs.

#### Proposed Project Goals and Objectives:

- 1) Revitalization
  - Facilitate commercial and industrial corridor revitalization.
  - Incentivize TOD
  - Improve commercial area function and design.
  - Enhance jobs and housing.
  - Support Regional Center development.
  - Provide a diverse jobs-producing economic base.
- 2) Neighborhood Conservation
  - Maintain character of existing low-scale residential neighborhoods.
  - Include a program of historic and cultural resource protection.
  - Retain and enhance historic and cultural resource neighborhoods.
- 3) Improved Quality of Life
  - Improve public health by creating more pedestrian friendly environments.
  - Limit certain uses.
- 4) Increase Mobility
  - Develop transportation alternatives.
  - Make streets more walkable.
  - Improve parking resources.
- 5) Plan for adequate public infrastructure and services
  - Provide for the development of community facilities.

#### Proposed Project features:

- West Adams-Baldwin Hills-Leimert Community Plan text (Policy Document),
- Updated General Plan land use designations and corresponding zones (also referred to as the “Plan Map”
- General Plan amendments
- Modifications to the street designations and amendments to the Transportation (Mobility) Element.
- Amendments to the General Plan Framework Long Range Land Use Diagram
- Updated Community Plan map footnotes and symbol changes
- Zone and height district changes
- Amendments to the Crenshaw Corridor Specific Plan

- Establishment of the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay District (CPIO)
- CPIO and the Crenshaw Corridor Specific Plan project approvals, including those approved by administrative clearance.
  - ~~Guide land use development through 2030;~~
  - ~~Encourage smart growth;~~
  - ~~Identify appropriate locations for new development;~~
  - ~~Assess public infrastructure, service, and facility needs;~~
  - ~~Minimize lengthy discretionary approvals;~~
  - ~~Provide certainty and predictability for developers, homeowners, and anyone else concerned with future development in Los Angeles; and~~
  - ~~Create enough capacity to meet or exceed SCAG 2030 projections for housing, employment, and population.~~
- The first sentence of the last paragraph on page 5-2 of Section 5.0 has been updated as follows:

Any evaluated alternative should meet as many of these project goals and objectives as possible.
- The “Alternatives Considered But Rejected from Further Consideration” subsection on page 5-3 of Section 5.0 has been updated as follows:

**No Development Alternative.** Under this scenario, a community plan-wide moratorium would be placed on all new development. Building permits would be issued only for maintenance, repair, or correction of an emergency or hazardous condition. Under this scenario, the population and dwelling unit count would theoretically be limited to Census 2010 levels, with any additional growth occurring informally through the construction of un-permitted units or increased persons-per-household. As Since the West Adams CPA is subject to an existing community plan that allows development, the No Development Alternative does not represent a scenario that would likely occur. This alternative was rejected from further consideration given the infeasibility of mandating such a long term moratorium on new development without any plausible rationale or urgency warranting such action.
- Paragraph 2 of the “Limited Development Alternative” subsection on page 5-3 of Section 5.2 has been updated as follows:

With this alternative, some population growth could occur within the West Adams CPA, to the extent that existing residential units, or units that have already been approved, could accommodate additional residents, or due to the change of use of existing structures which could occur under this alternative (e.g., an older commercial structure could be renovated and changed to residential uses). ~~However~~ Similarly, there could be increased intensity of non-residential uses by maintaining through this alternative the existing [Q]CM zoning existing along several east/ west corridors. This zoning which currently prohibits residential, and would be maintained along the shallow lot segments of the commercial corridors thereby preserving land for low level employment uses (e.g., warehouse, storage) in lieu of a broad mix that encourages higher-level employment uses (e.g., office or retail) adjacent to and includes residential.
- Additional discussion has been added after paragraph 2 of the “Limited Development Alternative” subsection on page 5-3 of Section 5.2 has been updated as follows:

This alternative was eliminated from further consideration because the West Adams CPA is predominately residential, only 15% of the land area is devoted to commercial and industrial uses. Limiting development as proposed through this Alternative would require comprehensive down planning and down zoning of current residential areas primarily in the Low Medium II Residential category which includes the Restricted Density RD2 and RD1.5 zones. The resulting reduction in capacity would not accommodate current or future growth projections based from SCAG’s RTP 2004, and therefore would

be inconsistent with projections for the CPA. Furthermore, adequate capacity could not be absorbed through infill of vacant lots nor within commercial or commercial manufacturing areas without significant up-zoning above what has been recommended through the Proposed Project (see Uniform Corridor Alternative, below), thus compromising the primary goal to maintain established neighborhood character.

To describe in further detail, recent “windshield” surveys and review of LA County Assessor’s data regarding several residential neighborhoods throughout the CPA with Restricted Density (RD) zones indicates that their low-scaled, fine-grained, single-family development pattern often remains intact despite the potential to aggregate lots and build to a 45 foot height limit as permitted by the underlying RD zoning within Height District 1. Additional units, if any, are modest, and accommodated either as rear yard additions or within the envelope of the original house. In order to achieve this Limited Development Alternative, areas with a General Plan land use designation of Low Medium II Residential would be amended to Low Medium I Residential, effectively reducing the residential capacity within this designation (which accounts for 36% of the Plan area) by half. The reduction in capacity across the Community Plan Area through this General Plan amendment alone would decrease the 1998 Community Plan’s Low Medium II residential population capacity of 75,025 to 43,099, thereby reducing the overall 1998 “Current” Plan capacity to 174,434, which is 26,786 under SCAG’s RTP 2004 allotted 2030 projection of 201,220 for the West Adams CPA. This change applied to the Proposed Project capacity of 218,741 yields a capacity of 186,815, which is still 14,405 under SCAG’s 2030 projection of 201,220 for the West Adams CPA. The Proposed Project, as recommended by the CPC (see changes to the Proposed Project), would reduce overall capacity of 214,012 to 183,117, which is 18,103 under SCAG’s 2030 projection. In order to recapture this deficiency within the commercial and commercial manufacturing areas of the CPA, additional height and residential density would need to be accommodated along the commercial corridors and commercial manufacturing areas of the CPA in excess of what has been recommended through the Proposed Project (see Uniform Corridor Growth Alternative below). This would involve increasing development intensity (FAR) from 1.5:1 to 3:1 along most of the commercial and commercial manufacturing corridors throughout the Plan Area, increasing the maximum permitted height from 45 feet to 60 feet, and eliminating neighborhood conservation controls such as transitional height between commercial and residential properties. All in order to provide a development envelope that facilitates the construction of medium residential and mixed-use projects. Once again, this Limited Development Alternative, as applied to the recommendations of Proposed Project, was rejected from further consideration as it would not accommodate the minimum population projections for the CPA in fulfilling the overarching goal of the NCP Program to guide growth over a twenty year period, and would further jeopardize the Proposed Project’s primary goal of Neighborhood Conservation by creating an incongruent relationship between commercial/ manufacturing development and adjacent residential properties through increased height and intensity of development along entire corridors instead of focused at commercial nodes and TOD areas.

- The last paragraph of the “Limited Development Alternative” subsection on page 5-3 of Section 5.0 has been deleted as follows:

~~This alternative was rejected as infeasible because with close to 75% of the total developable land area within the West Adams CPA devoted to residential uses and only 15% devoted to commercial and industrial uses, the reduction in capacity through down planning and down zoning of current residential areas could not be addressed across commercial or manufacturing acreage in a manner that would accommodate current or future growth forecasts by SCAG and would, therefore, be inconsistent with population, housing, and employment projections.~~

- The “Reduced Height and Development” subsection on page 5-3 of Section 5.2 has been updated as follows:

**Reduced Height and Development.** With this alternative, new building heights and FAR would be lower than under the proposed project, but all other land use and transportation policies of the plan would

remain as proposed. Currently, most all parcels within the West Adams CPA are zoned Height District 1, 1VL or 1XL. The Reduced Height and Development Alternative would further refine current zones consistent with Height District 1XL, which limits structures to 30 feet. New land uses would be limited to 35 feet in height. A maximum FAR of 1.5:1 is assumed for all commercial and industrial development. In recognition of the projected amount of growth and economic development pressures over the coming 20 years, it is anticipated that under this alternative new land uses would be geographically spread out to more residential parcels across the West Adams CPA and that there would be inadequate land available to accommodate the projected growth at more appropriate targeted areas adjacent to fixed route transit areas. Under this alternative, it is expected that less mixed-use development would occur in these focused areas than the proposed project. This alternative was rejected as infeasible because it would not accommodate the future growth forecasted by SCAG in a manner that addresses the Sustainable Communities Strategy as outlined through SB 375 nor the goals and objectives of the City's General Plan Framework and would, therefore, be inconsistent with State, Regional and local land use policy.

- The "Uniform Corridor Growth" subsection on page 5-4 of Section 5.2 has been updated as follows:

**Uniform Corridor Growth.** Through this alternative, the ~~proposed plan~~ Proposed Project concentrates future growth along the commercial corridors of Pico, Venice, Washington, Adams, West, Jefferson, Martin Luther King Jr., and Crenshaw Boulevards, Slauson and Florence Avenues, and 48<sup>th</sup> and 54<sup>th</sup> Streets. Because little development is considered elsewhere in the West Adams CPA, the capacity of Low Medium II Residential areas would be reduced, similar to the Limited Development Alternative, while commercial and commercial manufacturing corridors would be zoned to the optimal intensity and density conceptualized through the General Plan Framework designation for Mixed-Use Boulevards whereby FAR is increased from the currently allowable 1.5:1 to 3:1 and the maximum height of 60 feet is allowed at the front, side and rear property line regardless of adjacency to low and low medium residential land uses. This alternative would create a population capacity of 228,055 people, which is 9,314 greater than the proposed project and 26,835 over the SCAG 2004 RTP 2030 projection of 201,220 persons for the West Adams CPA. Zoning along corridors would be similar to that proposed for the Major Intersection Nodes of the proposed project and consist of C2, C4, C1.5 and CM zoning within Height District 2D. The "D" Limitation would limit the maximum FAR to 3:1 and the maximum height to 60 feet without any mitigating neighborhood conservation regulations such as transitional "stepback" height adjacent to residential. In essence, the development parameters of this Alternative would be consistent with those of the RAS3 and RAS4 Zones.

Although this Alternative reduces residential capacity similar to the Limited Development Alternative, and involves a comprehensive increase in residential capacity along all commercial and commercial manufacturing corridors in a manner that would meet SCAG's RTP 2004 projection for the West Adams CPA, this Alternative was eliminated from further consideration because it would create adverse impacts community plan area-wide through the distribution of bulk, height and residential density in a manner incongruous with State, Regional and local land use policy. Distributing growth uniformly along the corridors of the West Adams CPA would not reduce the significant and unavoidable impacts of the proposed project. In addition, as most of the West Adams CPA is residential, distributing growth consistently along the corridors will not achieve the Proposed Project's primary goal of neighborhood conservation nor the City's goals of conserving the integrity of existing adjacent residential neighborhoods. In fact, more uniformly spread-out growth would likely result in greater impacts. Increased building height impacts would also be greater to sensitive residential areas, an impact that would occur to a much lesser degree under the proposed project. Also, there would likely be increased VMT, as future growth would not be exclusively concentrated at existing and emerging transportation hubs where employees, residents, and visitors can take advantage of existing transit opportunities, thereby impacting the Proposed Project's secondary goal to increase mobility through improvement of transportation alternatives. The City carefully considered those areas in the West Adams CPA with the highest potential to accommodate future growth while limiting environmental impacts. ~~Other areas of~~

~~the West Adams CPA do not have the same potential to accommodate the same level of growth that is required to be consistent with SCAG growth forecasts.~~ Therefore, this alternative was rejected from further consideration.

- The heading entitled, “5.2 Alternatives to the Proposed Project” on page 5-4 of Section 5.0 has been corrected as follows:

## 5.1 ALTERNATIVES TO THE PROPOSED PROJECT

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- The title of the “Alternative 1 – No Project Alternative” subsection beginning on page 5-4 of Section 5.3 has been updated as follows:

### **Alternative 1 – No Project (SCAG Forecast) Alternative.**

- Text following the second paragraph of the “Alternative 1 – No Project Alternative” subsection on page 5-5 of Section 5.3 has been updated as follows:

- The No Project Alternative is considered the SCAG Forecast Alternative because the Current Plan population capacity is very close to SCAG projections for the CPA. In particular, the Current Plan, adopted in 1998, planned for a 2010 Horizon Year population capacity of 201, 408 persons. This was consistent with SCAG’s 2010 projection for the CPA of 200, 981 and very close to SCAG’s 2004 RTP Year 2030 projection for the CPA of 201, 220 persons. Both the SCAG and DCP projections remained very similar primarily because land use and zoning within the CPA did not change over the last seventeen years that the Current Plan has been in place. With preparation of the Proposed Project, DCP re-calculated the Current Plan’s population capacity using methodology factors consistent with those applied to the Proposed Project (refer to Final EIR Appendix M, Methodology, for further discussion). The more recent calculation of Current Plan population capacity as analyzed through this EIR was projected to be 206, 521 persons which is considered consistent with the SCAG 2030 projection.

- The “Alternative 2 – Proposed Project without Transit-Oriented Development” subsection on page 5-5 of Section 5.3 has been updated as follows:

Under this Alternative, most of the changes to the existing West Adams Community Plan would be similar as under the ~~Proposed Project~~. The land use designations and zoning for residential neighborhoods would remain unchanged. General Plan amendments, “upzones” and height district increases would occur at opportunity sites located at the intersection of major arterial streets consistent with the “Major Intersections Nodes” CPIO subarea. However, this Alternative would not shift development intensity to focused transit-oriented development (TOD) areas to the same degree recommended under the Proposed Project. Instead, this alternative would create smaller nodes at the LRT station areas consistent with the approach found within the “Commercial Corridors” and “Major Intersections Nodes” CPIO Subareas. Stated more simply, the development standards and guidelines for these TOD areas would be the same as those contained within the ~~Commercial Corridors and Major Intersection~~ “Nodes” CPIO Subarea and would not allow for ~~further tailoring of building heights above 60 feet, development intensities and reduced parking requirements.~~ The result would result in somewhat less intense development that does not exceed a 3:1 FAR and R3 density and the exclusion of regulations specific to TOD subareas, such as reduced parking standards. Overall, Alternative 2 would involve a scenario where ~~somewhat less population would be reduced by 4,878 persons, 1,920 less housing units, and 635 less jobs employment growth capacity would take place~~ compared to the Proposed Project.

- The first paragraph under the heading “ Environmentally Superior Alternative” beginning on page 5-14 of Section 5.3 has been updated as follows:

Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts while fulfilling as many of the goals and objectives as possible. If the No Project alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

- Table 5-4 has been inserted following Table 5-3 on page 5-15 of Section 5.3 as follows:

<b>TABLE 5-4: COMPARISON OF GOALS/OBJECTIVES ATTAINMENT BETWEEN ALTERNATIVES AND THE PROPOSED PROJECT</b>		
<b>Goals and Objectives</b>	<b>Alternative 1- No Project</b>	<b>Alternative 2 – Proposed Project without TOD</b>
• <b>Guide land use development over a twenty year planning horizon.</b>	<u>Less than Proposed Project</u>	<u>Same as Proposed Project</u>
○ <u>Accommodate citywide projected population, housing and employment growth.</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Implement smart growth goals and policies.</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Minimize lengthy discretionary approvals.</u>	<u>Less than Proposed Project</u>	<u>Same as Proposed Project</u>
○ <u>Assess public infrastructure, service and facility needs.</u>	<u>Less than Proposed Project</u>	<u>Same as Proposed Project</u>
• <b>Revitalization</b>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Facilitate commercial and industrial corridor revitalization.</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Incentivize TOD</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Improve commercial area function and design.</u>	<u>Less than Proposed Project</u>	<u>Same as Proposed Project</u>
○ <u>Enhance jobs and housing.</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Support Regional Center development.</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Provide a diverse jobs-producing economic base.</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
• <b>Neighborhood Conservation</b>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Maintain character of existing low-scale residential neighborhoods.</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Include a program of historic and cultural resource protection.</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Retain and enhance historic and cultural resource neighborhoods.</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
• <b>Improved Quality of Life</b>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Improve public health by creating more pedestrian friendly environments.</u>	<u>Less than Proposed Project</u>	<u>Same as Proposed Project</u>
○ <u>Limit certain uses</u>	<u>Less than Proposed Project</u>	<u>Same as Proposed Project</u>
○ <u>Increase Mobility</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Develop transportation alternatives</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
○ <u>Make streets more walkable</u>	<u>Less than Proposed Project</u>	<u>Same as Proposed Project</u>
○ <u>Improve parking resources</u>	<u>Less than Proposed Project</u>	<u>Less than Proposed Project</u>
• <b>Plan for adequate public infrastructure and services</b>	<u>Less than Proposed Project</u>	<u>Same as Proposed Project</u>
○ <u>Provide for the development of community facilities.</u>	<u>Less than Proposed Project</u>	<u>Same as Proposed Project</u>
<b>SOURCE: DCP, 2015.</b>		

- The last two paragraphs of the “Environmentally Superior Alternative” subsection beginning on page 5-15 of Section 5.3 have been updated as follows:

Of the two alternatives, Alternative 2 would be considered the environmentally superior alternative because it produces the fewest impacts when compared to the proposed project. ~~While Alternative 2 is superior from a strictly environmental stand point, it~~ Notwithstanding, Alternative 2 does not meet the all the goals and objectives of the City in terms of encouraging a multimodal transportation system and creating a more sustainable land use pattern by focusing change near transit stations and nodes. While it accommodates some of the SCAG’s forecasted projected growth in population, it does not create as

much capacity as the Proposed Project toward successfully implementing the primary objective of TOD for the 10 LRT station areas serving the CPA for all of it. Furthermore, in-light of the release of SCAG's RTP 2016, which identifies a 2040 population projection for the CPA larger than the RTP 2004's 2030 projection and closer to that of the Proposed Project's horizon year, the DCP wanted to have a Proposed Project that will continue to satisfy the program objective to meet SCAG projections.

~~The Proposed Project, on the other hand,~~ accommodates the level of growth forecasted by SCAG for 2030 and allows for a certain level of growth capacity consistent with later year SCAG projections over and above it in order to accommodate TOD and unanticipated fluctuations. The proposed project is also consistent with the City's recent ~~P~~policy ~~D~~irectives and ~~I~~nitatives which aim to create attractive, walkable, and sustainable communities with a focus on TOD areas. This style of development encourages transit ridership, reduces traffic, provides a mix of housing, commercial, and transportation choices, and increases efficiency so that people can utilize alternatives modes of travel for daily trips. In addition, the proposed project, with its TOD CPIO ~~S~~ub~~D~~istricts, is consistent with the City's recent policy direction in promoting active, revitalized communities that reduce barriers to healthful living. In the view of the Department of City Planning, the proposed project best meets the overall planning goals and objectives of the City.

## CHAPTER 6.0 OTHER CEQA SECTIONS

- The "Cumulative Impacts" subsection beginning on page 6-3 of Section 6.0 has been updated as follows:

~~CEQA defines cumulative impacts as two or more individual actions that, when considered together, are considerable or will compound other environmental impacts. Cumulative impacts are the changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be insignificant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.~~

CEQA requires that EIRs discuss a project's potential contributions to cumulative impacts, in addition to project-specific impacts. CEQA Guidelines Section 15130(a)(1) states that a "cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Other projects include past, present, and reasonably probable future projects.

CEQA Guidelines Section 15130(b)(1) states that the approach to the cumulative impact analysis may be based on either of the following approaches, or a combination thereof:

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

For the purposes of this EIR, the analysis of the potential for the proposed project's incremental effects to be cumulatively considerable is based upon a list of related projects identified by the City and neighboring jurisdictions and/or on full implementation of the City's General Plan and/or other planning documents, depending upon the specific impact being analyzed. Table 6-1 describes the cumulative projects that were considered in the cumulative analysis.

The process by which plans and projects were selected for inclusion on the list for cumulative consideration was as follows:

- Reasonably foreseeable land use, transportation, and other resource plans that are different from the Proposed Plan, which govern resources existing within the CPA boundaries.



- Reasonably foreseeable land use, transportation, and other resource plans governing resources outside of the CPA boundaries, which have cumulative influence on the resources governed by the Proposed Plan.
- Reasonably foreseeable projects existing within the CPA boundaries which are not considered by-right under the Proposed Project. This includes development projects looking for exceptions from the Proposed Plan
- Reasonably foreseeable projects outside the CPA which have influence cumulatively on the resources governed by the Proposed Plan.

CEQA recognizes that the analysis of cumulative impacts need not be as detailed as the analysis of project-level impacts, but instead should “be guided by the standards of practicality and reasonableness” (CEQA Guidelines Section 15130(b)). The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the proposed plans alone.

In the section that follows, the impacts associated with the proposed project in conjunction with other past, present, and probable future development in areas causing related impacts is discussed for each technical area evaluated in the EIR. The geographic scope of the cumulative impact analyses and the specific related projects that are included in the analyses may also vary depending on the specific environmental issue being analyzed. The discussion below for each technical area designates the cumulative context for each individual cumulative impact analysis.

- Table 6-1 regarding cumulative projects has been inserted after the introductory paragraph of subsection 6.5 on page 6-3 as follows:

<b>TABLE 6-1: CUMULATIVE PROJECTS</b>		
<b>Name of Project</b>	<b>Location</b>	<b>Project Detail</b>
<b>PLANS</b>		
City of Los Angeles Mobility Plan 2035 (MP 2035)	Citywide	Transportation Plan
Exposition Corridor Transit Neighborhood Plan (ECTNP)	Exposition Light Rail Corridor	Transportation Plan
South Los Angeles New Community Plan	South Los Angeles Community Plan Area	Community Plan
Southeast Los Angeles New Community Plan	Southeast Los Angeles Community Planning Area	Community Plan
<b>PROJECTS</b>		
West LA Community College Master Plan Project	9000 Overland Dr.	College Master Plan 210,729 square feet
Baldwin Hills Crenshaw Plaza Master Plan Project	West Adams-Baldwin Hills-Leimert Community Planning Area (Bordered by 39th Street on the north, Crenshaw Boulevard on the east, Stocker Street on the south, and Santa Rosalia Drive and Marilton Avenue on the west)	Master Plan Retail/Restaurant : 331,838 square feet Office: 143,377 square feet Hotel: 346,500 square feet (400 hotel rooms) Residential: 1,234,500 square feet (961 dwelling units, 551 condominiums, and 410 apartments) Demolition of approximately 90,898 square feet of existing free-standing structures
LAUSD – South Region Middle School #6	46 <sup>th</sup> St./St.Andrews Pl.	School Facility  School facilities: 120,000 square feet Classrooms: 52 Students (two-semester): 1,404 (grades six through eight) Teachers and Staff: 115

<b>TABLE 6-1: CUMULATIVE PROJECTS</b>		
<b>Name of Project</b>	<b>Location</b>	<b>Project Detail</b>
University of Southern California Development Plan	Exposition Blvd. & Figueroa St./ South Los Angeles CPA	University Redevelopment  University: 2,500,000 sf Retail: 242,000 sf Restaurant: 45,000 sf Theater: 2,000 seats Fitness Center: 20,000 sf Student Housing : 2,135,000 sf Hotel: 150 rooms School: 80,000 sf
Pacific Charter School	2941 W. 70 <sup>th</sup> St.	School Facility  Middle School: 400 students High School: 535 students
Pacific Charter Middle School	1371 W. 35 <sup>th</sup> St.	School Facility  Middle School: 300 students
Bright Star Secondary Charter Academy (Stella Academy)	5051 W. Rodeo Rd.	School Facility  Middle School: 650 students
L.A. Memorial Coliseum Renovation	3911 S. Figueroa St./ South Los Angeles CPA	Stadium Project  Stadium seating: 68,000 seats
Baldwin Hills Oil Field	North of Slauson Ave., west of La Brea Blvd., south of Rodeo Rd., east of Jefferson Blvd	Industrial  50 employees
Residential	5813 Washington Blvd.	Apartments  Dwelling Units: 33
Residential	East of La Brea Blvd., north of Slauson Ave.	Single Family  Dwelling Units: 39
Residential	5227 Knowlton St.	Residential Development  Dwelling Units: 187
Residential	3001 S. Western Ave.	Residential Development  Dwelling Units: 66
Commercial Center	1982 W. Adams Blvd./ South Los Angeles CPA	Commercial Development  Retail: 10,000 square feet Office: 22,000 square feet
Commercial	Southeast corner of La Brea Ave. and Florence Ave.	Commercial Development  Retail: 39,800 square feet Restaurant: 10,000 square feet
Mixed Use	4100 Arlington Ave./ South Los Angeles CPA	Condominiums and Retail  Residential: 34 dwelling units Retail: 4,653 square feet
Mixed-Use	9300 Culver Blvd.	Mixed Use  Mixed Use: 112,500 square feet
West Adams Office Project	1999 W. Adams Blvd./ South Los Angeles CPA	Office Development  Office: 75,000 square feet
Culver City Transit Oriented Development Project	Washington Blvd. and National Blvd./ Culver City	Mixed Use Development  Condominiums: 638 dwelling units Retail: 206,608 square feet Office: 154,361 square feet Light Industrial: 485,996 square feet

TABLE 6-1: CUMULATIVE PROJECTS		
Name of Project	Location	Project Detail
Mixed Use	4040 W. Washington Blvd.	Mixed Use  Condominiums: 219 dwelling units Apartments: 200 dwelling units Live/Work Condominiums: 128 dwelling units Retail: 82,500 square feet Restaurant: 18,800 square feet  High Turnover Restaurant: 5,500 square feet
Mixed Use	1636 W. Manchester Ave.	Office Office: 68,250 square feet
Mixed Use	3661/3671 S. Vermont Ave./ South Los Angeles CPA	Mixed Use  Condominiums: 80 dwelling units Retail: 50,000 square feet
Shopping Center	5975 S. Western Ave.	Light Industrial Development  Light Industrial: 225,000 square feet
Jefferson & La Cienega Project	3321-51 La Cienega Blvd./ 5707-5735 W. Jefferson Blvd.	Mixed Use: 1,900,000sqft. Residential: 1,218 Dwelling Units <ul style="list-style-type: none"> <li>o 1-Bedroom: 609</li> <li>o 2-Bedroom: 487</li> <li>o 3-Bedroom: 122</li> </ul> Commercial: 300,000sqft. <ul style="list-style-type: none"> <li>o Office: 200,000sqft.</li> <li>o Grocery Store: 50,000sqft.</li> <li>o Restaurant: 20,000sqft.</li> <li>o Retail: 30,000sqft.</li> </ul> Height: 320 ft. Parking per LAMC

**SOURCE:** Los Angeles Department of City Planning. Available: <http://cityplanning.lacity.org/>, Accessed 07/23/2015. City of Los Angeles Baldwin Hills Crenshaw Plaza Master Plan Project, December 2014, SCH. No. 2008101017.

- The “Aesthetics” subsection related to cumulative impacts on page 6-3 of Section 6.0 has been updated as follows:

**AESTHETICS**

The geographic context for the analysis of cumulative aesthetic impacts is generally localized. or purposes of this analysis, the context for views in the CPA includes the geographic area within and outside the CPA that would have views of and across the CPA to the Santa Monica and San Gabriel Mountain ranges, and the Baldwin Hills. Cumulative impacts with regard to lighting, shadow, and visual quality and character would be within the geographic context of the CPA and the development in nearby communities. The analysis accounts for all anticipated cumulative growth within this geographic area.

The community plans for the communities adjacent to the West Adams CPA include numerous policies intended to protect views, and future development in these areas would be subject to design guidelines, height restrictions, and other regulations to avoid impacts on views. In fact, all development in the City of Los Angeles is subject to design guidelines and development restrictions aimed at preserving views. The proposed project includes its own community-specific design guidelines and policies with mandatory environmental and development standards to protect views and the proposed land use changes would enhance and protect existing character of the City overall.

- The first sentence of the “Agriculture and Forestry Resources” subsection related to cumulative impacts on page 6-4 of Section 6.0 has been updated as follows:

The CPA and surrounding area are fully developed, and vegetation consists largely of non-native ornamental trees, grasses, and shrubs that are typical of urban landscaping. As discussed in Section 4.2 Agriculture and Forestry Resources, no impacts related to implementation of the proposed project would

occur since the West Adams CPA does not contain any lands under the purview of the California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP). Furthermore, 0.69 square miles of area within the City are considered “Important Farmland” by the FMMP, none of which is within the West Adams CPA. Therefore, impacts related to agriculture and forestry resources would not be cumulatively considerable.

- The “Air Quality” subsection related to cumulative impacts on page 6-4 of Section 6.0 has been updated to include the following statement preceding the first paragraph:

The cumulative context for consideration of most air quality impacts is the South Coast Air Basin; the context for localized significance thresholds and CO hotspot analysis would be the CPA.

- The “Biological Resources” subsection related to cumulative impacts on page 6-4 of Section 6.0 has been updated to include the following introductory paragraph:

The CPA is fully urbanized, containing primarily residential, commercial, and industrial development. While sensitive plant and animal species have been known to occur historically within the CPA, the now highly urbanized nature of the CPA makes for limited amounts of undisturbed, natural open space or ecological areas, and limited native vegetation and habitat capable of supporting sensitive plant or animal species. There are currently no special status species or habitats, including riparian habitat or wetlands, that occur in the CPA. Unless otherwise identified below, the geographic context for the analysis of cumulative biological impacts includes the Southern California region, extending essentially from the Los Angeles Basin to the Santa Clarita and Antelope Valleys north, Simi Valley and Ventura County to the west, and San Bernardino County to the east.

- The “Cultural Resources” subsection related to cumulative impacts on page 6-5 of Section 6.0 has been updated to include the following introductory paragraph:

The cumulative analysis for impacts on cultural resources considers a broad regional system of which the CPA is a part. The cumulative context for the cultural resources analysis is the San Fernando Valley and the Los Angeles Basin, including Los Angeles and Orange counties, where common patterns of prehistoric and historic development have occurred. The analysis accounts for anticipated cumulative growth within these areas.

- The “Geology and Soils” subsection related to cumulative impacts on page 6-5 of Section 6.0 has been updated as follows:

The geographic context for the analysis of cumulative impacts resulting from geologic hazards is generally site-specific because each lot in the CPA has a different set of geologic considerations that would be subject to specific site-development and construction standards.

In common with the rest of California, Los Angeles is in a seismically active area and is subject to risk of damage to persons and property as a result of seismic groundshaking. Impacts associated with potential geologic hazards related to fault rupture would occur at individual building sites and would be related to the site’s location relative to fault zones, the composition of the site’s soil, and the structural strength of a particular building. Therefore, cumulative development would not result in an increase in safety hazards, and special studies would be required for any projects located within an Alquist-Priolo zone.

Because the City of Los Angeles uses and enforces the requirements of the California Building Code (CBC) as part of its Building Code, new buildings and facilities in the City are required to be sited and designed in accordance with the most current geotechnical and seismic guidelines and recommendations. In addition, development that could occur as a result of the proposed project would implement all necessary design features recommended by the site-specific geotechnical studies to reduce the risk from seismic activity, unstable slopes, and soil limitations. With adherence to the CBC and related plans,

regulations, and design and engineering guidelines and practices, the project would not make a cumulatively considerable contribution to any potential cumulative impact arising from fault rupture.

To minimize the potential for cumulative impacts that could cause erosion, the project and cumulative projects in the adjacent area are required to conform to the provisions of applicable federal, state, County, and City laws and ordinances pertaining to erosion and sedimentation control. This includes the City's Standard Urban Stormwater Management Plan (SUSMP) requirements, which implement the federal and state National Pollutant Discharge Elimination System (NPDES) program regulations. Because the proposed project would be in compliance with applicable NPDES permit requirements, and would implement and maintain the Best Management Practices (BMPs) required by individual project Storm Water Pollution Prevention Plans (SWPPPs), the project would not make a cumulatively considerable contribution to any potential cumulative impact related to soil erosion, and the cumulative impact would be less than significant.

As with seismic groundshaking impacts, the geographic context for analysis of impacts on development from unstable soil conditions, including landslides, liquefaction, subsidence, collapse, or expansive, unstable, or corrosive soils generally is site-specific. Development is required to undergo analysis of geological and soil conditions applicable to the specific individual project, and restrictions on development would be applied in the event that geological or soil conditions pose a risk to safety as a result of site-specific geologic or soils instability, subsidence, collapse, and/or expansive soil. Development facilitated by the proposed project would also be required to implement appropriate design and construction measures, the project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the cumulative impact of the proposed project would be less than significant.

~~As with other areas of Los Angeles, development resulting from the implementation of the West Adams New Community Plan would be subject to potential geological and soils impacts. In the event of a major geological incident, significant ground shaking could result at various project sites and in the surrounding area. Implementation of recommended mitigation measures would reduce, but not eliminate seismic risks. However, project impacts would be locally contained. Therefore, impacts related to geology and soils would not be cumulatively considerable.~~

- The “Greenhouse Gas Emissions” subsection related to cumulative impacts on page 6-5 of Section 6.0 has been updated to include the following introductory paragraph:

The proposed project will provide a framework for future development in the CPA and will specify the type of uses, densities, and intensities that would be permitted. The proposed project intends to promote the relationship of mutually supportive uses, such as employment, housing, recreation, and community-serving facilities, so as to decrease dependency on the automobile, encourage alternative transportation modes, make efficient use of land and infrastructure, reduce energy consumption, promote sustainability, and foster a strong sense of community. Primary objectives relevant to the GHG analysis include:

- Establish Transit-Oriented District Plans in areas located adjacent to transit lines as well as areas adjacent to the intersection of major bus lines in order to create vibrant and walkable transit neighborhoods that provide a mix of uses including jobs, housing, and retail;
- Increase mobility by:
- Developing and supporting transportation alternatives;
- Focusing new jobs and housing around transit;
- Making streets more walkable;
- Include a comprehensive program of resource protection, enhancement, conservation, and re-use and provide mitigation of impacts;
- Make efficient use of land and infrastructure;

- Support Regional Center development where appropriate and diversified commercial activity centers so that existing stable residential communities have local shopping access; and
  - Provide opportunities to increase public health by creating more pedestrian friendly environments, improving access to public transit and healthy food outlets, and locating jobs and housing within walking or biking distance from one another.
- The “Hazards and Hazardous Materials” subsection related to cumulative impacts on page 6-6 of Section 6.0 has been updated to include the following paragraphs preceding the first paragraph:

The geographic context for the cumulative analysis of hazards and hazardous materials is Los Angeles County, based on the geographic area that could be affected by accidental release into the environment. The cumulative context for the hazards analysis includes future development under the proposed and full build-out of the County of Los Angeles General Plan and the 34 other community plans in the City of Los Angeles.

Cumulative development within City of Los Angeles and Los Angeles County would include land uses that could involve the use of greater quantities and variety of hazardous products. Residential, commercial, industrial, public facilities development and adjacent uses would increase the use of hazardous materials within the area. Hazardous materials use, storage, disposal, and transport could result in a foreseeable number of spills and accidents. New development in the County would be subject to hazardous materials regulations codified in Titles 8, 22, and 26 of the California Code of Regulations (CCR). Furthermore, all construction and demolition activities in the County would be subject to Cal OSHA, South Coast Air Quality Management District (SCAQMD), and Cal EPA regulations concerning the release of hazardous materials. Compliance with all state, federal and local regulations during the construction and operation of new developments in the County would ensure that cumulative impacts from the routine transportation, use, disposal, or release of hazardous materials would be less than significant. Additionally, because the proposed project would also be required to comply with applicable statutes and regulations, which would ensure that future development under the proposed project would not result in significant public hazards through the routine transport, use, or disposal of hazardous materials, the cumulative impact of the project would be less than significant.

Implementation of cumulative development could expose schools to hazardous emissions, depending on the specific location and type of use proposed. Various regulations and guidelines pertaining to abatement of, and protection from, exposure to asbestos and lead have been adopted for demolition activities and would apply to all new development in the County. All demolition that could result in the release of lead and/or asbestos must be conducted according to Cal/OSHA standards. In addition, all businesses that handle or transport hazardous materials would be required to comply with the provisions of the local, state, and federal regulations for hazardous wastes. Businesses that handle more than a specified amount of hazardous materials onsite are required to submit a Hazardous Materials Business Plan. Compliance with existing regulations, and the completion of the mitigation specified above for development planned in areas currently or historically zoned as industrial within the CPA would ensure that schools and the general public would not be exposed to any unusual or excessive risks related to hazardous materials during construction and operational activities. Therefore, the cumulative impacts associated with the exposure of schools to hazardous emissions would be less than significant. Compliance with existing regulations would similarly ensure that future development within the CPA would have a less-than-significant impact associated with the handling of hazardous materials within proximity to school sites. Therefore, the proposed plan would not make a cumulatively considerable contribution to this effect and cumulative impacts would be less than significant.

Construction and operation associated with cumulative development could result in activities that could interfere with adopted emergency response or evacuation plans, primarily by temporary construction barricades or other obstructions that could impede emergency access. Future development projects shall undergo CEQA review of potential impacts on adopted emergency response or evacuation plans.

Compliance with all local, State and federal regulations would ensure that cumulative impacts related to interference with adopted emergency plans, including temporary street closures, remain less than significant.

- The “Hydrology and Water Quality” subsection related to cumulative impacts on page 6-6 of Section 6.0 has been updated as follows:

The analysis of hydrology/water quality impacts resulting from the adoption and implementation of the proposed plan considers the effects of future growth and development throughout the geographic extent of the CPA. The cumulative context for the analysis of hydrology and water quality impacts is a function of the type of impact and geographic considerations. Some cumulative impacts may have a broad, regional context, while others may be limited by site-specific conditions or location.

The cumulative context for storm drainage impacts is the extensive storm drain system operated by the City of Los Angeles. Stormwater flows from the CPA currently combine with those from surrounding development in the greater Los Angeles area and are discharged into the storm drain system. City Municipal Code Section 17.05(M) prescribes performance standards for storm drain systems, which would apply to cumulative development contributing flows to the system. Open space areas in the CPA would be preserved, and future development would be concentrated in areas of the CPA containing impervious surfaces; therefore, flows from areas of future development are already accounted for in system capacity. Potential projects that could be implemented under the proposed project would not result in substantial increases in impervious surfaces due to the type of project (square feet or massing). Therefore, the rate and volume of stormwater flows from the proposed project would represent a negligible contribution to system flows and potential cumulative effects on capacity. The proposed project’s contributions would not be cumulatively considerable, and cumulative impacts related to drainage and potential indirect effects on localized flooding would be less than significant.

Cumulative impacts would not occur for tsunamis, seiche, mudflow/mudslide, dam failure, or sea level rise. Because of the physical location of the CPA, the proposed project would not expose people or structures to those hazards, or create them. There would be no cumulative effect.

With respect to construction, all development within the Los Angeles River watershed is required to conform to applicable Waste Discharge Requirements. Both the City of Los Angeles and Los Angeles County are required to impose these requirements. Stormwater runoff from cumulative development in the watershed, including development that could be facilitated by the proposed project, could contribute to water quality impairments if measures are not implemented to minimize pollutant levels in runoff.

As required by the SUSMP, all foreseeable development projects, including projects that could be constructed in the CPA (as applicable) would be required to implement operational BMPs to control release of pollutants in stormwater runoff. Requirements of the SUSMP are enforced through the City’s plan approval and permit process, and all new development projects are subject to City inspection. Furthermore, all applicable projects must comply with Los Angeles Municipal Code (LAMC) Article 4.4, Section 64.72, which governs pollutant control requirements and construction activity requirements. Future development resulting from implementation of the proposed plan would occur primarily as infill on previously developed or vacant sites, the nature of which would not significantly change the types or amounts of pollutants in stormwater runoff. Therefore, the proposed project’s contribution to known water quality impairments would not be cumulatively considerable and cumulative water quality impacts would be less than significant.

Compliance with State and federal requirements, including development of a Storm Water Pollution Prevention Plan for project-specific construction, and adherence to local regulations for construction and operation of new developments would be required. This would be expected to mitigate any potential cumulative impacts by requiring on-site detention, treatment, or other best management practices for

~~controlling urban runoff. Therefore, impacts related to hydrology and water quality would not be cumulatively considerable.~~

- The “Land Use and Planning” subsection related to cumulative impacts on page 6-6 of Section 6.0 has been updated as follows:

The cumulative analysis for land use and planning considers a regional context. All development projects within the City would be required to be consistent with the General Plan, other applicable plans, and the City’s ordinances, including the zoning ordinance. All projects (past, present, and future) within the City’s jurisdiction are required to be consistent with the City’s plans and ordinances. Additionally, the proposed project would be consistent with the City’s General Plan and zoning ordinance. Future development as a result of the proposed project would generally be consistent with surrounding land uses. The proposed project includes a number of policies intended to maintain, preserve, and protect residential land uses from encroachment by incompatible uses. No land use impacts are expected to result from implementation of the proposed project. Therefore, impacts related to land use and planning would not be cumulatively considerable.

- The “Mineral Resources” subsection related to cumulative impacts on page 6-6 of Section 6.0 has been updated to include the following introductory paragraph:

The geographic context for the analysis of cumulative impacts to mineral resources is generally site-specific. As such, the potential for cumulative impacts to occur is geographically limited. Cumulative development within the City of Los Angeles could interfere with the availability of a locally important mineral resource. It could also occur within areas designated by the state, or a local general plan, specific plan or other land use plan as areas containing mineral resources that are of local and/or state importance. Because urban uses, such as residential and commercial development, would generally be considered inconsistent with mineral extraction activities, development of these uses in the vicinity of mineral resource sites could hinder or preclude mineral extraction activities. Therefore, cumulative development within the region could result in the loss of availability of some mineral resources, which would be considered a potentially significant cumulative impact. However, existing Safety and Conservation Element policies would minimize potential impacts associated with the loss of a known and/or locally important mineral resource.

- The “Noise” subsection related to cumulative impacts on page 6-6 of Section 6.0 has been updated as follows:

For construction impacts, only the immediate area around the specific development site is included in the cumulative context. For operational/roadway related impacts, the context is build-out of the proposed project, including existing and future development of cumulative projects within the CPA, as well as related projects in adjacent communities that would be potentially impacted. Noise is by definition a localized phenomenon, and is significantly reduced in magnitude as distance from the source increases. Consequently, only projects and growth due to occur in the CPA would be likely to contribute to cumulative noise impacts.

The noise analysis assessed construction and operational noise and vibration levels. Temporary noise and vibration levels would be generated by construction activity, and as discussed in Section 4.12, Noise, the proposed project would expose sensitive receptors to noise levels in excess of acceptable City standards. ~~Construction noise levels decrease substantially with distance.~~

Similar to any urban area where new structures are proposed as part of urban development/redevelopment, increases in noise at sensitive uses would occur as a result of construction of various developments, including those associated with the proposed project. Other construction that may occur in the vicinity of the CPA would contribute to noise levels similar to those generated in the CPA due to implementation of the proposed project. Where this development adjoins potential



construction, the combined construction noise levels would have a cumulative effect with respect to increases in ambient noise levels and exceedance of City standards. Consequently, in order to achieve a substantial cumulative increase in construction noise levels, more than one source emitting high levels of construction noise would need to be in close proximity to a noise receptor. The potential exists for overlapping construction activity between individual projects. Thus, the possibility exists that a substantial cumulative increase in construction noise levels could result from construction associated with multiple projects. Therefore, the proposed project would result in a cumulatively considerable impact related to construction noise and vibration.

Per the LAMC, construction activities would be prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturdays, and on Sundays and public holidays unless consideration is given to a noise variance. However, as discussed above, noise levels from various pieces of construction equipment could exceed the City standards. Combined with cumulative development, implementation of the proposed NCP would increase ambient noise levels by more than 10 dBA for activities lasting more than one day, and by more than 5 dBA for construction activities lasting more than ten days in a three month period. The proposed project's contribution to the impact would be cumulatively considerable. Therefore, the cumulative impact of the proposed project's construction-related exposure of persons to noise levels above the City of Los Angeles established standard would be considered significant and unavoidable. Similarly, cumulative construction noise would result in a significant impact related to periodic and temporary noise levels.

For operational impacts, noise impacts would largely come from heating, ventilation, and air conditioning (HVAC) systems on new buildings, but the precise location of these HVAC systems is currently unknown at this time as specific projects have not been planned. Possible HVAC system locations include building basements, street level, and rooftops. Mechanical equipment such as HVAC systems typically generates noise levels of approximately 60 dBA Leq at 50 feet. HVAC systems will be shielded from view to comply with the LAMC, and are not anticipated to significantly increase ambient noise levels. Multiple units would have to be located within 50 feet of a receptor to achieve noise levels that would exceed the City standards. The development types anticipated and allowed under the proposed project and other nearby projects are not so dense that multiple stationary units would need to be so closely spaced, either on or off site. Consequently, the cumulative effect of multiple HVAC units and other mechanical equipment would be less than significant, and the contribution of the project would not be cumulatively considerable. Therefore, the proposed project's contribution would not be considered cumulatively considerable, and the cumulative impact is less than significant.

The mobile source noise analysis completed for the proposed project included an assessment of all cumulative regional traffic growth. The analysis presented in Table 4.12-8 of Section 4.12 Noise, represents cumulative mobile source noise. It was determined that the proposed project would result in a less-than-significant mobile noise impact. Therefore, impacts related to operational noise would not be cumulatively considerable.

It is not anticipated that the West Adams CPA would be developed with substantial sources of vibration (e.g., blasting operations). Operational vibration in the project vicinity would be generated by vehicular travel on the local roadways. As noted above, the mobile source noise analysis completed for the proposed project included an assessment of all cumulative regional traffic growth. Similar to existing conditions, traffic vibration levels would not be perceptible by sensitive receptors. Therefore, impacts related to operational vibration would not be cumulatively considerable.

- The “Population, Housing and Employment” subsection related to cumulative impacts on page 6-7 of Section 6.0 has been updated as follows:

The cumulative context for population, housing and employment growth is the City of Los Angeles. The City of Los Angeles is almost entirely developed, and nearly all future development occurring in the City

would occur as infill on vacant or underutilized parcels. Future projects would be developed consistent with the planned growth in the General Plan, including the Framework and Housing Elements and would similarly be required to be consistent with regional housing policies.

The Southern California Association of Governments (SCAG) SCAG projects a significant increase in population, employment, and housing in the Los Angeles area. The proposed project seeks to accommodate this level of growth. Therefore, the implementation of the proposed project would result in contributing to the growth of housing stock and the creation of greater opportunities for employment. While other community plans, as well as regional plans, seek to accommodate forecasted growth, some of these other plans could result in significant impacts to population, employment, and/or housing. However, the proposed project would not contribute to such impacts in a considerable manner. Therefore, impacts related to population, housing, and employment would not be cumulatively considerable.

- The “Public Services” subsection related to cumulative impacts on page 6-7 of Section 6.0 has been updated as follows:

#### **Fire Protection and Emergency Services**

The cumulative context for Fire Protection and Emergency Services is the City of Los Angeles. Past development has occurred in accordance with the growth allowed under the City of Los Angeles General Plan, and all cumulative development in the City is required to maintain consistency with City of Los Angeles fire protection regulations and policies. Future projects would be developed consistent with the planned growth in the General Plan and would similarly be required to be consistent with fire protection regulations and policies. Future development in the CPA, as well as future development occurring within the Los Angeles Fire Department (LAFD) service area, would be subject to the City’s General Plan Framework and Safety Element policies relating to Fire Services, as well as the City’s Fire Code.

The implementation of the proposed project would result in increased intensity of development in the West Adams CPA, which may require the upgrading or improvements of existing fire protection equipment or infrastructure, or may cause a deterioration in existing operating traffic conditions, which could adversely affect the response times for fire fighting and paramedic services. Increased land use densities would generate an increased demand for fire protection services in the Los Angeles area. All development pursuant to the proposed project would be required to comply with all applicable LAFD fire code requirements associated with adequate fire access, fire flows, and number of hydrants as a condition of project approval. Additionally, any development in areas that are located at distances that exceed response distance requirements would be required to undergo plan review by the Fire Chief who would determine fire suppression measures that would be required for approval of construction on that site. New development would be required to provide LAFD or Los Angeles Department of Water and Power (LADWP)-required upgrades to the water distribution systems serving the LAFD service area. As with the code requirements for fire access, fire flows, number of hydrants, and fire suppression measures these upgrades would be addressed for new development in conjunction with individual project approvals. As a result, it is expected that the Los Angeles Fire Department will maintain acceptable emergency response times with the provision of additional personnel and equipment as needed throughout the City. Therefore, impacts related to fire protection and emergency services would not be cumulatively considerable.

~~The Infrastructure and Public Services Element of the City of Los Angeles General Plan includes policies that require the evaluation of fire service needs based on existing and future conditions. Areas with deficient fire and emergency facilities are identified, and priority is given to the areas in need of upgraded facilities based on established fire protection standards.~~

### **Police Protection Services**

The geographic context for this analysis is the City of Los Angeles as served by the Los Angeles Police Department (LAPD). Both past and present development in the City has not caused a deficit in police protection services and response times. Future cumulative development in this geographic context is not anticipated to create a significant impact. Implementation of the proposed project would create increased development capacity within the CPA, increasing the overall housing, population, and employment capacity of the CPA. Future development in the CPA, as well as future development occurring within the LAPD service area, would be subject to the City's Framework Safety Element and the proposed plan's policies relating to police services. The implementation of the proposed project would likely contribute to the Citywide need for greater and expanded police services. However, this increase in population, employment and development has been anticipated by the City through long-range General Plan Elements, such as the Housing Element and planned for in the City's update of Community Plans. The provision of police protection services in the City of Los Angeles is based on the community's existing and projected needs, as determined by ongoing evaluations. When an evaluation indicates response times have increased, the acquisition of equipment, personnel, and/or new stations is considered and procured. Additionally tThe project includes mitigation measures that would reduce project impacts below a level of significance. It is similarly anticipated that as a result of these polices the project contribution to impacts to Citywide police protection capabilities would not be significant. Therefore, impacts related to police protection services would not be cumulatively considerable.

### **Public Schools**

The geographic context for this cumulative analysis is the City of Los Angeles, as served by the Los Angeles Unified School District. Past and present development in the City as a whole has not caused a deficit in school services, as many schools are under-enrolled compared to capacity. The anticipated student population generated by the proposed project would contribute incrementally to the demand for public school services in the Los Angeles Unified School District (LAUSD). The implementation of the proposed project would result in an increase in the student population in the West Adams CPA. In general, existing public, non-charter student enrollments have been below operating capacities in existing LAUSD schools. It is anticipated that with the operation of the LAUSD New School Construction Program and Facilities Services Division Strategic Execution Plan, as well as provisions of State regulations, school facilities would have the potential to accommodate the anticipated increase in the student population. Therefore, impacts related to public schools would not be cumulatively considerable.

### **Public Parks and Other Public Services**

The geographic context for the analysis of Parks and Other Public Services is the City of Los Angeles as served by the Los Angeles Department of Recreation and Parks (LADRP). Past and present development in the City has contributed to a significant deficit in park resources. Community plan standards require one acre of neighborhood park space per 1,000 persons and one acre of community park space per 1,000 persons for a combined total of two acres of park space. Local recreation standards require two acres of neighborhood park space per 1,000 persons and two acres of community park space for a combined total of four acres of park space. Currently, there is an insufficient amount of available neighborhood, community, and regional parks/recreational facilities within the City. Future cumulative development in this geographic context would exacerbate the already significant impact.

The existing overall parkland acreage in the West Adams CPA is not adequate to accommodate the anticipated increase in population because there is currently an acute shortage in the West Adams CPA and in nearby community plan areas. Implementation of the proposed project would further exacerbate this shortage in the West Adams CPA and surrounding community plan areas. The proposed project includes mitigation measures that would reduce the impacts from the CPIO subareas ~~subdistricts~~ and Crenshaw Corridor Specific Plan amendments. However, impacts related to public parks would still

result in a significant impact. Therefore, the proposed project would result in a cumulatively considerable impact related to public parks.

The geographic context for this cumulative analysis is the City of Los Angeles, as served by the Los Angeles Public Library (LAPL). The analysis of library service impacts resulting from the adoption and implementation of the proposed project and implementing ordinances considers the effects of future growth and development throughout the geographic extent of the CPA. Consequently, impacts of cumulative growth are already incorporated throughout the assessment of library service impacts.

Some public libraries located in the West Adams CPA, and in other community plan areas in close proximity to the West Adams CPA, are presently inadequate to serve their residents in terms of the required library space and materials collection. At present, three of the five public libraries servicing the West Adams CPA do not meet the newly adopted library facilities standards in terms of building size for the population served. No feasible mitigation measures were identified to reduce the significant impact related to public libraries to less than significant. Therefore, the proposed project would result in a cumulatively considerable impact related to public libraries.

- The “Transportation and Traffic” subsection related to cumulative impacts on page 6-8 of Section 6.0 has been updated as follows:

This cumulative impact analysis considers development of the proposed project, in conjunction with the other development in the City of Los Angeles and neighboring jurisdictions that are member cities of SCAG. A travel demand forecasting model was used to evaluate future travel patterns that may result from future changes to the transportation system and potential land use alternatives. The travel demand model was used along with future year SCAG and West Adams CPA land use projections to produce forecasts of future traffic flows in the West Adams CPA. To estimate the effectiveness of the proposed West Adams Transportation Improvement and Mitigation Program (TIMP), the 2030 highway network was modified to incorporate the physical improvement elements of the TIMP. In addition, roadway capacity changes associated with three bicycle facility improvement scenarios were applied to the modified 2030 highway network. The TIMP strategies are suggested policies and programs that the City may choose to implement to improve the transportation system in the CPA in coordination with existing regional plans.

While the West Adams TIMP includes many beneficial elements aimed to encourage alternative modes of travel, such as the creation of more pedestrian-friendly environments around transit stations and the provision of bicycle facilities along major corridors, none of the three proposed TIMP scenarios would be effective in improving overall operating conditions over existing (Year 2008) conditions as measured by average volume-to-capacity (V/C) ratio. The West Adams TIMP scenarios are also projected not to maintain the same number (or fewer) of segments at LOS E or F when compared to existing (Year 2008) conditions. Therefore, the proposed project would result in a cumulatively considerable impact related to transportation and traffic.

With respect to inadequate emergency access, future development in the City could obstruct emergency access during construction. This could be a potentially significant cumulative impact, particularly if construction occurs concurrently in a given area. The City requires that all development plans are submitted to the City for review and approval to ensure that all new development has adequate emergency access, including turning radius in compliance with existing City regulations. Construction and operation activities in the City with respect to emergency response or evacuation plans due to temporary construction barricades or other obstructions that could impede emergency access would be subject to the City’s permitting process, which coordinates with the Police and Fire Departments to ensure that emergency access is maintained at all times. For the proposed project, plan policies and guidelines, and existing rules and regulations would help ensure that emergency access is maintained at

all times, and would reduce this impact. As a result, inadequate emergency access would represent a less-than-significant cumulative impact associated with implementation of the proposed project.

- The first sentence of the “Utilities and Service Systems” water subsection related to cumulative impacts on page 6-8 of Section 6.0 has been updated as follows:

The geographic context for this cumulative analysis is regional as tThe issues of water demand and supply are region-wide in the southern California area and transcend the boundaries of individual community plan areas or even the City.

#### **APPENDIX B - PROPOSED WEST ADAMS COMMUNITY PLAN CHANGE AREAS**

- Appendix B page 1, Proposed Project Change Areas map, has been updated with the CPC Recommended Plan Change Areas map, Appendix H.
- Appendix B beginning on page 2, Proposed Project Change Areas table, has been updated with the CPC Recommended Plan Change Areas table, Appendix H.

#### **APPENDIX D – SURVEY LA HISTORIC RESOURCES SURVEY REPORT (SURVEYLA REPORT): WEST ADAMS-BALDWIN HILLS-LEIMERT COMMUNITY PLAN AREA**

As explained on page 2 of the SurveyLA Report: Field Survey Results Master Report, the findings of SurveyLA are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed.<sup>44</sup> As a result, the SurveyLA Report for the West Adams CPA has been updated since the release of the Draft EIR. The most current version of the SurveyLA Report for the West Adams CPA can be found on the City’s SurveyLA website.<sup>45</sup> However, in direct response to comments received on the Draft EIR, specific revisions to the SurveyLA Report’s findings with regard to the Arlington Heights Neighborhoods are provided in this section.

- Appendix D, pages 728 and 729, Arlington Heights Planning District, replace with the Arlington Heights Historic Preservation Overlay Zone SurveyLA findings shown on page 3-30.

#### **APPENDIX G - WEST ADAMS TRANSPORTATION IMPROVEMENT AND MITIGATION PROGRAM (TIMP)**

- Appendix G page 2, Subsection 1.1.2, first paragraph, modify first sentence as follows:

Table 1-1 shows a comparison of existing (Year 2008) and Year 2030 forecast population, ~~household,~~ housing units and employment estimates.

- Appendix G page 5, Figure 3-4, modify figure as shown on the following page.
- Appendix G page 14, Subsection 2.5, first paragraph, modify first sentence as follows:

The existing (Year 2008) socioeconomic data was obtained from the City of Los Angeles Department of City Planning. Table 2-1 shows the population, housing units, and total employment in the West Adams-Baldwin Hills-Leimert CPA under existing (Year 2008) conditions. As shown in Table 2-1, the West Adams-Baldwin Hills-Leimert CPA had a population of 182,600 in 2008 and approximately 66,415 ~~households~~ housing units in 2008.

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<sup>44</sup>[http://www.preservation.lacity.org/files/SurveyLA\\_Cover%20Report\\_Final\\_0.pdf](http://www.preservation.lacity.org/files/SurveyLA_Cover%20Report_Final_0.pdf)

<sup>45</sup>[http://www.preservation.lacity.org/surveyla-field-survey-findings-and-reports#West Adams - Baldwin Hills - Leimert](http://www.preservation.lacity.org/surveyla-field-survey-findings-and-reports#West%20Adams%20-%20Baldwin%20Hills%20-%20Leimert)

- Appendix G page 15, Table 2-1, modify “Households” to “Housing Units”.
- Appendix G page 33, first paragraph, modify text as follows:

~~As mentioned, much of the West Adams-Baldwin Hills-Leimert CPA is comprised of mature communities with established building setback lines. Major street widenings areis not likely to be feasible in most areas without significant disruption and/or neighborhood impacts. It is recommended that eventual roadway widening, which may include vehicular roadbed and/ or pedestrian realm (parkway/ sidewalk) improvements be accomplished by conditioning the approval of individual property developments as generally required through LAMC Section 12.37 regarding Highway and Collector Street Dedication and Improvement. Specifically, under most circumstances LAMC Section 12.37 requires a newly developed parcel to dedicate property and improve adjacent roadways to their designated standards. With ROW and improvements obtained through LAMC Section 12.37, the City could ultimately widen sections of roadways to a defined standard to meet specific community goals and objectives such as enhancement of the pedestrian realm, conservation of desirable neighborhood character, or, increase to vehicular capacity. This method of roadway widening could be used in combination with the CPIO mechanism to tailor development standards within the West Adams Baldwin Hills Leimert CPA to minimize disruption to neighboring businesses and residents and potentially improve both pedestrian and bicycle mobility as well as traffic circulation beyond what is projected in this TIMP. Additionally, gGiven the Plan Area’s established early 20<sup>th</sup> Century development pattern especially along most east/ west corridors, roadway improvement involving vehicular roadbed widening would take a long time before sufficient ROW could be obtained toward effectively improving vehicular capacity. Therefore, the Plan modifies the majority of corridors throughout the Plan Area in order to (1) avoid future roadway widening that would disrupt neighborhood character or to (2) utilize limited dedication for pedestrian realm improvements or improvements for modes other than the automobile. However, selected highway infrastructure improvements are proposed in the TIMP in order to promote vehicular circulation. While generally the Plan takes the approach of modifying streets to reflect existing build-out or require limited dedication for bicycle, transit or pedestrian improvements, a targeted number of corridors have been identified as vehicular priority streets along Therefore, it is recommended that the Plan Area’s current street designation standards further clarify that roadway dedication and improvement required through LAMC Section 12.37 facilitate mobility by way of a variety of modes, not just the automobile, and in particular that pedestrian, bicycle and mass transit be prioritized along major corridors with vehicular prioritization applied to key north/south corridors, such as including La Cienega Boulevard.~~

- Appendix G TIMP page 35, Section 5.9, Parking Policies, second bullet point, modify text as follows:  
Establish maximum parking requirements for targeted individual projects. For example, consider existing LAMC parking requirements to be the maximum number of parking spaces allowed for certain projects.
- Appendix G TIMP, Appendix H Street System Reclassifications, replace with revised TIMP Appendix H provided on page 3-32.