

CHAPTER 4

ENVIRONMENTAL IMPACTS

Introduction

The purpose of Chapter 4 is to inform decision makers and the public of the type and magnitude of the changes to the existing environment that could result from implementation of the Proposed Project described in Chapter 3, *Project Description*. Chapter 4 describes the physical environment in the study area that may be affected by the project, the potential impacts to that physical environment, and the measures proposed to mitigate those impacts, as required.

Environmental issues addressed in this Draft EIR are those that were determined to be potentially significant pursuant to the Notice of Preparation (NOP) (included in Appendix C, *Notice of Preparation/Scoping*, to this EIR), as informed by input from the community in their comment letters on the NOP and comments provided at the scoping meetings. Through this process, the City has determined that the EIR analysis should focus on the following resource areas:

- Air Quality
- Biological Resources
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise and Vibration
- Transportation

Organization of the Chapter

The analysis of each environmental issue includes the following components:

- The **Introduction** briefly describes the environmental issues addressed in the analysis and identifies related topics. The Introduction also identifies any specific issue area that is not being addressed in the EIR and provides a discussion explaining the reasons why. In many cases, a number of specific issue areas were evaluated, and impacts determined to be less than significant, in the NOP, included as Appendix C, *Notice of Preparation/Scoping*, of this EIR. In accordance with Sections 15063(c)(3)(A) and 15128 of the State CEQA Guidelines, further analysis of specific issue areas where impacts were determined to be less than significant in the NOP is not required and is not provided in this chapter.
- The **Regulatory Framework** presents an overview of the federal, state, regional, and local laws and regulations applicable to each environmental review topic.
- The **Existing Setting** presents the environmental setting for this EIR by generally describing the physical conditions that existed at the time the NOP was published (May 2014). A discussion of the environmental baseline is provided below under *Analytical Framework*.

- The **Methodology** describes how the issue was approached from an environmental analysis standpoint, including explanations of any assumptions, equations, or calculations, and identification of information sources used for the analysis.
- **Thresholds of Significance** are quantitative or qualitative criteria used to determine the significance of the project's impacts. In general, and unless otherwise noted, the thresholds of significance used in the analysis of impacts reflect guidance provided in Appendix G of the State CEQA Guidelines and/or criteria or guidance included in the L.A. CEQA Thresholds Guide (City of Los Angeles, 2006).
- The **Impacts** section presents the analysis of impacts and determination of significance for each individual impact (using terms detailed below in *Terminology Used in This Environmental Analysis*) prior to mitigation. Impacts were compared to the thresholds of significance to determine whether they would be significant or less than significant under CEQA. In order to determine significance, potential impacts were compared to the environmental baseline conditions, as further described in the *Analytical Framework* below. For purposes of this EIR, it is assumed that all of the proposed improvements on the updated project lists would be implemented by 2035.
- **Mitigation Measures** are specified procedures, plans, policies, or activities proposed for adoption by the lead agency to reduce or avoid the significant impacts identified in the analysis of environmental impacts. This section presents mitigation measures proposed to reduce significant impacts that would occur with implementation of the Proposed Project. In accordance with the requirements of CEQA, a Mitigation Monitoring and Reporting Program (MMRP) would be adopted as part of the project approvals to ensure that implementation of mitigation measures is properly monitored and documented.
- **Significance of Impacts After Mitigation** presents the level of impact remaining after the implementation of mitigation measures, if applicable, and identifies significant unavoidable impacts, if any, that could not be reduced to a less than significant level through any feasible mitigation measure(s). These "significant unavoidable impacts" are also listed in Section 5.4, *Significant Environmental Effects that Cannot be Avoided if the Proposed Project is Implemented*, of this EIR.

Terminology Used in This Environmental Analysis

In evaluating the potential impacts of the Proposed Project and the project alternatives, the level of significance is determined by applying the threshold of significance (significance criteria) presented for each resource evaluation area. The following terms are used to describe each impact and, where significant impacts are determined, how mitigation measures are addressed:

- No Impact: A designation of no impact is made when no adverse or beneficial changes in the environment are expected.
- Less than Significant Impact: An impact is identified as less than significant when the Proposed Project would not cause a change in the environment that would exceed the threshold of significance.

- Significant Impact: A significant impact would create a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the Proposed Project. Such an impact would exceed the applicable significance threshold.
- Significant Unavoidable Impact: As required by Section 15126.2(b) of the State CEQA Guidelines, a significant unavoidable impact is identified when a significant impact could not be reduced to a less than significant level through any feasible mitigation measure(s).
- Mitigation: Mitigation refers to measures that could be implemented to avoid or lessen potentially significant impacts. Mitigation includes:
 - avoiding the impact completely by not taking a certain action or parts of an action
 - minimizing the impact by limiting the degree or magnitude of the action and its implementation
 - rectifying the impact by repairing, rehabilitating, or restoring the affected environment
 - reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action
 - compensating for the impact by replacing or providing substitute resources or environments

The recommended mitigation measures would be proposed as a condition of project approval and would be monitored to ensure compliance and implementation.

- Significance of Impacts after Mitigation: This is the level of impact after the implementation of mitigation measures.

Analytical Framework

Focus of the Environmental Analysis

Pursuant to CEQA Guidelines Section 15064(d), direct physical changes and reasonably foreseeable indirect physical changes in the environment that may be caused by the project should be considered in evaluating the significance of an environmental effect.

The Proposed Project would not approve or entitle any improvements to the transportation system. However, the Proposed Project includes updates to the lists of transportation improvements to be funded, in part, by the Transportation Impact Assessment (TIA) fees collected under the specific plans. Implementation of the transportation improvements could result in direct and/or indirect physical changes to the environment (e.g., direct impacts associated with construction of new sidewalks or other physical features and indirect impacts associated with implementing limits on street parking). Therefore, pursuant to Section 15064(d) of the State CEQA Guidelines, the EIR evaluates potential environmental impacts associated with the future implementation of the new list of transportation improvements.

As noted above, the transportation improvements on the specific plan project lists are not proposed to be implemented, and would not be entitled or constructed, as part of this project. These improvements are conceptual at this time, and no detailed designs or implementation plans have been developed for the individual components. Therefore, the potential for significant impacts to

occur is assessed at a programmatic, regional scale. As individual transportation improvements move forward for implementation, they would be subject to review and approval in accordance with CEQA.

The proposed updates to the Coastal Transportation Corridor Specific Plan (CTCSP) and West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP) TIA fee programs and the administrative revisions to the specific plans would not result in any direct physical changes in the environment. However, these updates have the potential to result in reasonably foreseeable indirect physical changes in the environment. These potential indirect changes in the environment are addressed in this EIR.

Environmental Baseline

Section 15125 of the State CEQA Guidelines requires that an EIR describe the physical environmental conditions in the vicinity of a proposed project "as they exist at the time the notice of preparation is published...." and further states that "[t]his environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."

The NOP for the CTCSP/WLA TIMP Specific Plans Amendment EIR was first published in May 2014. Therefore, in accordance with the provisions of CEQA, 2014 is the baseline date for characterizing existing conditions in the environmental analysis.

Two recent CEQA cases address the issue of the appropriate baseline to use for the analysis of project impacts: 1) Sunnyvale West Neighborhood Assoc. v. City of Sunnyvale City Council (6th Dist. 2010) 190 Cal.App.4th 1351 (Sunnyvale West) and 2) Neighbors for Smart Rail v. Exposition Metro Line Construction Authority (2013) 57 Cal.4th 439 (Expo II). The first case indicated that project impacts should be compared directly to existing conditions. The second case clarified that the lead agency has discretion concerning the appropriate baseline to use for comparison, and emphasized an EIR's role as an informational document. The case further states that "nothing in CEQA law precludes an agency... from considering both types of baseline—existing and future conditions—in its primary analysis of the project's significant adverse effects."

For purposes of this EIR, existing (2014) conditions are used as the baseline against which the impacts of the project are compared for the purpose of determining significant impacts. In addition, for those environmental topics that are based on activity levels—namely, transportation, air quality, greenhouse gas emissions, and noise/vibration—future conditions with the project are compared to future conditions without the project for informational purposes, as described further below.

Analysis Scenarios

CEQA requires an EIR to identify a project's significant effects on the environment. Typically, an EIR evaluates only the impacts of the project, and then compares those impacts to existing conditions (often called an "Existing with Project" analysis). However, for a planning project that would be implemented over time, such as the Proposed Project, isolating the impacts of the project from other changes in the environment would yield an analysis that could be misleading. For example, an Existing with Project analysis of this nature would assume that there are no additional changes to the transportation network in the future, even though many such projects are currently under construction or have been approved. Moreover, an analysis that narrowly focused on project impacts would assume that activity levels would not change from existing (2014) conditions, even though population and growth is expected to occur over time. In summary, in an Existing with Project

scenario, the analysis would evaluate the impacts of existing traffic volumes on a transportation network that would include only project-related transportation improvements.

In reality, as noted above, there are a number of transportation improvements that will be in place in 2035 with or without implementation of the Proposed Project. Moreover, on a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by the Southern California Association of Governments (SCAG). This growth will occur with or without implementation of the Proposed Project, and is sometimes referred to as “background growth.” The background growth not only influences the transportation analysis, it also influences those environmental topics whose analysis is based on transportation volumes and patterns (i.e., activity levels), including air quality, greenhouses gas, and noise. If the CTCSP/WLA TIMP Specific Plans Amendment EIR were to strictly evaluate project-related environmental conditions in the future without including future background growth, and then were to compare that project-related future condition to the existing conditions in 2014, the analysis would not account for the overall cumulative nature of the potential impacts and could underestimate the expected future conditions. By assuming lower activity levels than the Future with Project scenario, an Existing with Project scenario would represent a less conservative approach to identifying impacts.

Instead, the EIR analyzes future conditions, including background growth, with project implementation (referred to as “Future with Project” conditions), and compares these conditions to existing conditions in 2014. The future year used for this analysis for these topics is 2035, the horizon year of SCAG’s 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (SCAG,2012), which provides the forecasts used to represent regional background growth in this EIR. Use of a Future with Project scenario is a more realistic comparison scenario for a long-range transportation planning project where improvements will be implemented gradually over time.

A second future scenario was also studied. This scenario, called the “Future without Project” scenario, assumes that planned transportation improvements, such as those identified in SCAG’s 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), would be in place by 2035, and that background growth would occur as forecasted by SCAG. However, this scenario does not include any changes to the transportation network associated with the Proposed Project, nor does it assume that projects from the original Specific Plans that have not yet been implemented would be constructed. This EIR compares the Future without Project scenario to Existing Conditions (2014) and also to Future with Project conditions. These comparisons are provided for informational purposes only. The comparison of Future with Project conditions to Future without Project conditions is intended to inform the decision-maker as to how impacts would change in the future with the Proposed Project compared to reasonably-foreseeable conditions without implementation of the Proposed Project. The comparison of Future with Project conditions to Existing Conditions (2014) is the primary comparison that is used to reach a determination of significance under CEQA.

The following scenarios are analyzed:

1. Existing Conditions (2014)
2. Future without Project (2035) (includes background growth)
3. Future with Project (2035) (include background growth)

In addition, the following comparisons between scenarios are provided:

1. Future with Project (2035) vs. Existing Conditions (2014) (CEQA required comparison)
2. Future with Project (2035) vs. Future without Project (2035) (informational comparison)
3. Future Without Project (2035) vs. Existing Conditions (2014) (informational comparison)

The City believes that the comparison of Future with Project (2035) to Existing Conditions (2014) provides the most realistic and conservative analysis. This EIR also provides a comparison of Existing with Project to Existing Conditions (2014) in Appendix G, *Analysis of Project Impacts Compared to Existing Conditions*. The latter comparison is typically the primary comparison expected under CEQA analysis; however, in this case, Existing with Project is determined to be a less realistic scenario. It should be noted that the EIR includes two environmental topics—Biological Resources and Land Use and Planning—that are not affected by background activity levels. For these analyses, project impacts are compared to Existing Conditions (2014).