



## City of Los Angeles

Department of City Planning  
City Hall • 200 N. Spring Street, Room 667 • Los Angeles, CA 90012

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# ***FINAL ENVIRONMENTAL IMPACT REPORT ADDENDUM***

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## ***West Adams-Baldwin Hills-Leimert Community Plan***

*Case Number: ENV-2008-478-EIR*

*State Clearinghouse Number: 2008021013*

**Project Location:** The West Adams-Baldwin Hills-Leimert Community Plan Area has a total acreage of 8,710 and is generally bordered 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.

**Council Districts:** 5 – Paul Koretz, 8 – Marqueece Harris-Dawson, 10 – Herb J. Wesson, Jr.

**Project Description:** This document is an Addendum to the Environmental Impact Report (EIR) for the West Adams-Baldwin Hills-Leimert New Community Plan Update certified on June 29, 2016. The New Community Plan Update consisted of amendments to the West Adams-Baldwin Hills-Leimert Community Plan map and text with associated land use designation and nomenclature changes, zone and height district changes, the creation of the West Adams Community Plan Implementation Overlay District (CPIO) and Crenshaw Corridor Specific Plan amendments, as well as related amendments to the Mobility Element and the General Plan Framework Element (the Community Plan). In accordance with the California Environmental Quality Act (CEQA), this Addendum analyzes three modifications (“Modified Project”) to the West Adams Community Plan Update. The modifications are to properties located at 5870, 5880, and 5890 West Jefferson Boulevard and 5869, 5871, 5877, and 5901 West Rodeo Road. First, a zone and height district change would modify the floor area ratio (FAR) for the properties from a 1.5:1 FAR to a 2:1 FAR. Second, these properties would be moved from Parcel Group A to Parcel Group F in the Jefferson/La Cienega TOD Subarea in the West Adams CPIO. Third, the supplemental development regulations that apply to Parcel Group F would now apply to these properties. In part, these changes would result in the maximum height for these properties being increased from 45 feet to 75 feet. The existing land use designation for both properties of Limited Industrial would remain unchanged.

**APPLICANT:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

Pomeroy Environmental Services

**ON BEHALF OF:**

The City of Los Angeles  
Department of City Planning  
Community Planning Division

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***April 2018***

**West Adams - Baldwin Hills - Leimert Community Plan  
(June 2016)**

**Final Environmental Impact Report Addendum**

**Prepared for:**

**City of Los Angeles  
Department of City Planning**

**Prepared by:**



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**April 2018**

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# I. INTRODUCTION

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This environmental document has been prepared under the requirements of California Environmental Quality Act (CEQA), Public Resources Code Sections 21000 *et seq.*, including CEQA Section 21166, and the guidelines promulgated in connection therewith at 14 California Code of Regulations Section 15000 *et seq.* (the “CEQA Guidelines”).<sup>1</sup> The City Council adopted the West Adams-Baldwin Hills-Leimert Community Plan and the associated Final Environmental Impact Report (EIR) on June 29, 2016. This Final Environmental Impact Report Addendum (“Addendum”) discloses whether new or more severe environmental effects would occur as a result of the proposed changes to the West Adams Community Plan (hereafter referred to as the “Modified Project”).

## 1. PROJECT BACKGROUND

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 Community Plan included 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 serve to regulate development standards such as: height of structures, setbacks, lot coverage, density and intensity, open space, use of land, parking, and design. The West Adams Community Plan Implementation Overlay District (CPIO) regulates development that is consistent with the General Plan, to enhance the unique character of neighborhoods, and to address growth within the West Adams CPA. The City Council adopted the West Adams Community Plan and associated EIR on June 29, 2016 (hereafter referred to as the “Community Plan” and “Certified EIR”).

## 2. PURPOSE AND USE

To satisfy the requirements of CEQA, this document is an Addendum to the Certified EIR prepared for the Community Plan. The purpose of this Addendum is to inform decision-makers, community stakeholders, and the general public of the potential environmental effects associated with the Modified Project as compared to the Community Plan.

An Addendum to a previously certified EIR is permitted under CEQA Guidelines Sections 15162 and 15164 for projects where there are no substantial changes in the project or in circumstances surrounding the project, and where the project would not have new significant impacts or more severe impacts than those previously disclosed in the previously certified EIR. Specifically, Section 15164 of the CEQA Guidelines states:

- A. The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

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<sup>1</sup> Based on 2017 CEQA Statute and Guidelines.

- B. An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- C. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- D. The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- E. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

Section 15162 of the CEQA Guidelines states:

- a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
  - 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
  - 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
    - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required

under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

- c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.
- d) A subsequent EIR or subsequent negative declaration shall be given the same notice and public review as required under Section 15087 or Section 15072. A subsequent EIR or negative declaration shall state where the previous document is available and can be reviewed.

As detailed in this Addendum, the proposed changes to the Community Plan would not fulfill any of the conditions outlined in CEQA Guidelines Section 15162. This Addendum provides the substantial evidence required by CEQA Guidelines Sections 15162 and 15164(e) to support the finding that a Subsequent EIR is not required and that an Addendum to the Certified EIR is the appropriate environmental document.

The findings in the Certified EIR would be applicable to the Modified Project, and with implementation of mitigation measures identified in this Addendum, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

### **3. CERTIFIED EIR**

The Los Angeles City Council adopted the West Adams Community Plan Update and certified the EIR on June 29, 2016.

The Certified EIR disclosed that implementation of the Community Plan would result in significant and unavoidable impacts associated with:

- Aesthetics (Shade and Shadow). During the Winter Solstice, shadows generated from the implementation of the Proposed Project would impact residential land uses located within and around the CPIO subareas and Crenshaw Corridor Specific Plan.
- Air Quality (Construction Regional and Localized Emissions). During construction, regional and localized emissions would exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds.
- Greenhouse Gas Emissions (Operational GHG Emissions and Applicable Plans, Policies, or Regulations). During operation of the Proposed Project, GHG emissions would not be reduced to less than existing levels. This 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.
- Noise (Construction Noise and Vibration). In the absence of detailed noise and vibration analyses associated with specific projects, it is anticipated that construction noise and vibration levels at various sensitive land uses would still exceed the City's thresholds of significance.

- Public Services (Public Parks and Libraries). Implementation of the Proposed Project could increase the population within the West Adams CPA by approximately 31,412 persons and could cause potentially significant impacts to public parks and recreational facilities. Similarly, 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. No feasible mitigation measures were identified to reduce the significant impact related to public parks and libraries to less than significant.
- Transportation and Traffic (Circulation System and Congestion Management Plan). No feasible mitigation measures were identified to reduce the significant impact related to the circulation system and Congestion Management Plan to less than significant.

Other potentially significant environmental impacts were identified in the Certified EIR; however, all of these impacts were determined to be reduced to less-than-significant levels with implementation of the mitigation measures. All of those adopted mitigation measures would be applied to the Modified Project, as appropriate.



## II. PROJECT DESCRIPTION

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This section provides a description of the proposed changes and compares the Modified Project to the Community Plan. The project description describes the project location and provides an overview of the Community Plan and the Modified Project.

### 1. PROJECT LOCATION

The 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. See Figure II-1, Regional Location. The West Adams CPA is generally bordered 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. The West Adams CPA is one of 35 Community Plans in the City of Los Angeles and is bordered by the South Los Angeles CPA on the east, the Wilshire CPA on the north, and portions of the West Los Angeles and Palms-Mar Vista-Del Rey CPAs on the west. The Santa Monica Freeway (I-10 Freeway) is the only freeway traversing the West Adams CPA. Major north-south corridors include (from east to west) Arlington Avenue, Crenshaw Boulevard, La Brea and Fairfax Avenues, La Cienega and Robertson Boulevards. Major east-west corridors include (from north to south) Pico, Venice, Washington, Adams, Jefferson, Exposition, Martin Luther King Jr., and Leimert Boulevards, Slauson and Florence Avenues.

### 2. COMMUNITY PLAN

The Community Plan promotes the physical arrangement of land uses that best encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the West Adams CPA. The Community Plan allocates land for the range of uses that the community will need through 2030, including improving the link between land use and transportation in a manner that is consistent with the Framework Element.

The Community Plan was developed with a variety of policies to provide for new housing opportunities, improve the function, design, and economic vitality of the community's commercial corridors; and preserve and enhance neighborhood character and existing uses that provide the foundation for community identity. The Community Plan includes design strategies that address scale, height, bulk, setbacks and appearance, and maximizes development opportunities along transit corridors, while minimizing adverse impacts. The Community Plan also supports and guides the development of commercial and industrial opportunity sites with job-producing uses with the intentions of improving the economic and physical condition of the West Adams CPA.

The Community Plan includes new policies and programs, as well as zone changes, General Plan land use designation, General Plan footnote and Specific Plan amendments, and establishes overlay zones, as appropriate. The zoning serves to regulate development standards such as heights of structures, setbacks, lot coverage, density and intensity, open space, use of land, parking, and design. Establishment of the West Adams CPIO and amendments to the Crenshaw Corridor Specific Plan will regulate development, enhance the unique character of neighborhoods, and address growth within the West Adams CPA.

While the policies and programs contained in the Community Plan apply throughout the West Adams CPA, it is important to note that zone changes being proposed are targeted to specific geographic areas and do not affect every parcel in the West Adams CPA. See Figure II-2, Community Plan Land Use Designations for zone changes in the Community Plan. Development proposed outside these zone change areas 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 Community Plan.

In addition to policies addressing the distribution of land uses and building intensity, the Community Plan is also concerned with mobility, historic preservation, urban design, provisions for public infrastructure, public safety, and healthy and sustainable communities. The Community Plan intends to allocate land uses in a manner which promotes economic, social, and physical welfare of the community, providing sufficient land for housing, jobs, and recreation while preserving historic, cultural, and environmental resources.

Under the Community Plan, the West Adams CPA would have a total capacity of approximately 84,257 dwelling units, 214,012 residents, and 53,556 jobs by 2030. Housing, population and employment capacity within the West Adams CPA would accommodate the SCAG 2030 projections and be consistent with the General Plan Framework Element through a series of General Plan amendments and zone changes proposed within targeted areas.

### **3. MODIFIED PROJECT**

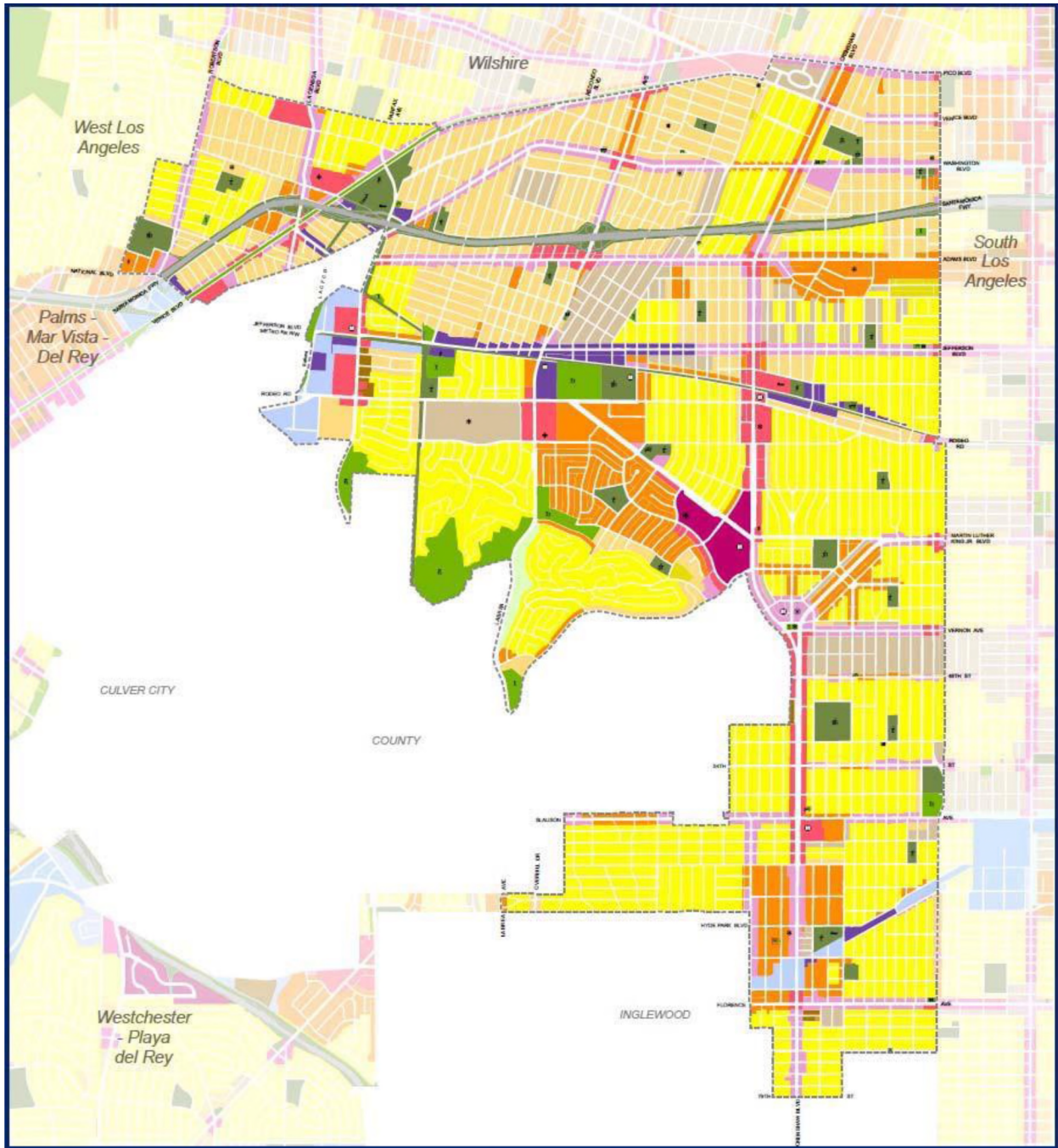
The Modified Project includes three modifications to properties located at 5870, 5880, and 5890 West Jefferson Boulevard and 5869, 5871, 5877, and 5901 West Rodeo Road at the corner of Jefferson Boulevard and Rodeo Road (Subject Site). See Figure II-3, Location of Subject Site. The Subject Site is located at the southwest corner of a “superblock” bounded by Jefferson Boulevard on the west, West Jefferson Boulevard on the North, South La Cienega Boulevard on the east and West Rodeo Road on the south. The Subject Site is within the Jefferson/La Cienega Transit Oriented Development (TOD) in the West Adams CPIO. The Jefferson/La Cienega TOD Subarea is further divided into eight parcel groups, which are Parcel Groups A, B, C, D, E, F, G, and H, each with different development standards. Under the Community Plan the Subject Site is within Parcel Group A which has a maximum of 1.5:1 FAR.

The Modified Project includes a zone and height district change modifying the FAR for the properties from a 1.5:1 FAR to a 2:1 FAR. Additionally, these properties would be moved from Parcel Group A to Parcel Group F in the Jefferson/La Cienega TOD Subarea in the West Adams CPIO. The supplemental development regulations that apply to Parcel Group F would now apply to these properties. These changes would result in the maximum height for the Subject Site being increased from 45 feet to 75 feet. The existing land use designation for the properties of Limited Industrial would remain unchanged.

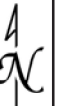
The Modified Project would increase the maximum FAR and height for the Subject Site. Therefore, the maximum square footage allowed at the Subject Site would increase compared to the Community Plan. See Table II-1, Summary of Subject Site Land Use, for Community Plan and Modified Project density. As shown, the Modified Project would add a net increase of 231,750 square feet. However, it should be noted that the Modified Project does not include any specific development project at this time, and any proposed future development at the Subject Site would be subject to its own environmental review and clearance process.

<b>Proposed FAR</b>	<b>Subject Site</b>
Modified Project (2:1)	927,000 square feet
Community Plan (1.5:1)	695,250 square feet
<b>Net Increase</b>	<b>231,750 square feet</b>





- |                           |                            |                              |
|---------------------------|----------------------------|------------------------------|
| West Adams CPA            | Medium Residential         | Limited Industrial           |
| Minimum Residential       | High Medium Residential    | Open Space                   |
| Low II Residential        | Neighborhood Commercial    | Public Facilities            |
| Low III Residential       | Community Commercial       | Public Facilities - Freeways |
| Low Medium I Residential  | Regional Center Commercial |                              |
| Low Medium II Residential | Hybrid Industrial          |                              |



Source: City of Los Angeles



Figure II-2  
Community Plan Land Use Designations

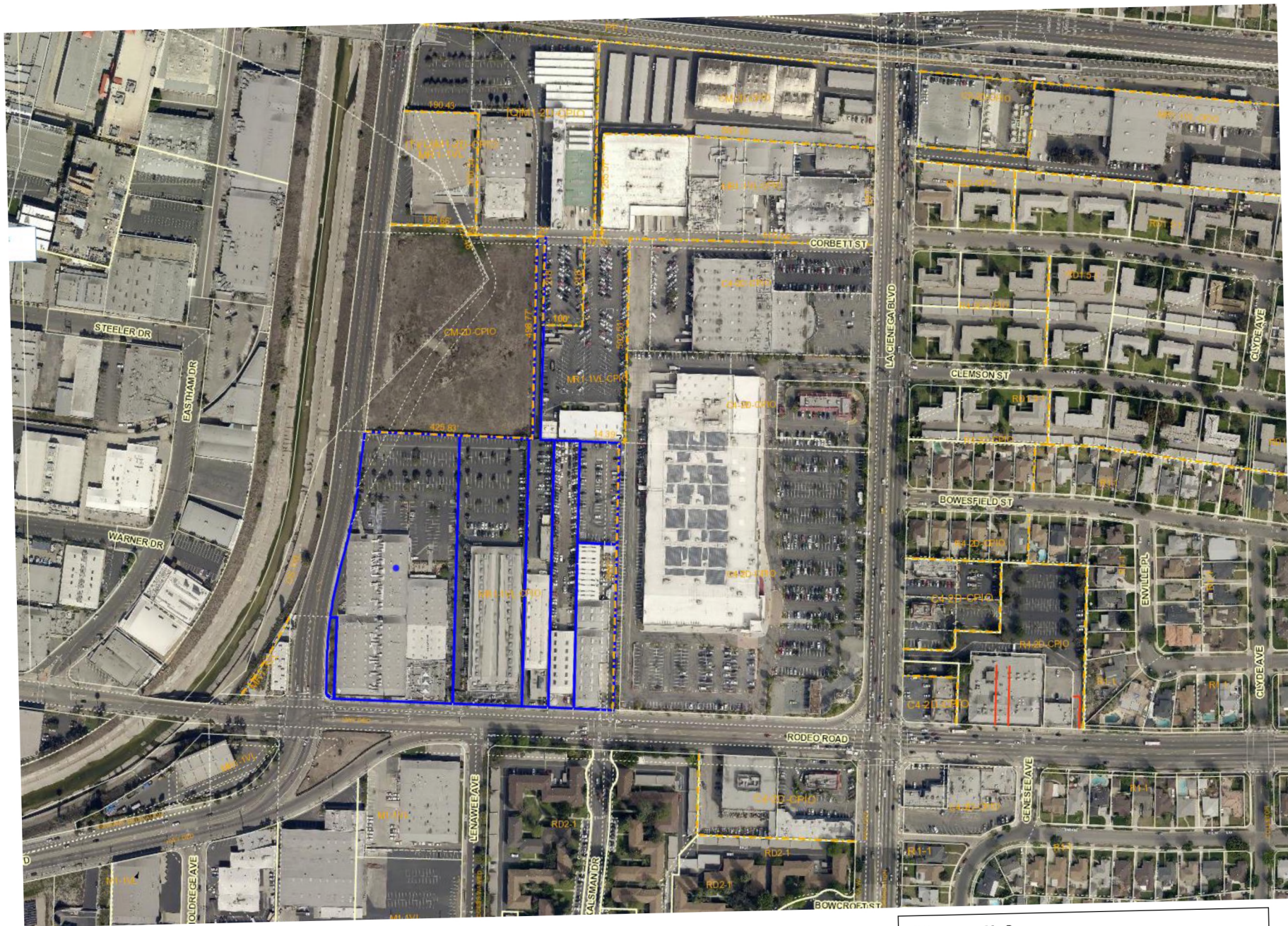


Figure II-3  
Location of Subject Site

# III. IMPACT ANALYSIS

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This section compares the environmental impacts of the Community Plan to the Modified Project to determine if the Modified Project would result in new significant environmental effects or a substantial increase in the severity of significant effects identified in the Certified EIR.

## 1. AESTHETICS

### COMMUNITY PLAN ANALYSIS

The Certified EIR stated that implementation of the Community Plan would not structurally change land use patterns nor result in a drastic change in the existing visual character of the West Adams CPA. However, the Community Plan increases the existing height/floor area ratios in some areas, resulting in a change in visual character. Mitigation Measure **AE1** would ensure that these aspects of neighborhood character are maintained by implementing transitional height policies. The Certified EIR stated the Community Plan would not impact any identified scenic vistas or recognized views and is geared toward maintaining consistent neighborhood character, encouraging adaptive reuse and rehabilitation, improving business and employment opportunities, and preserving existing retail and neighborhood services. Therefore, the Community Plan resulted in less-than-significant impacts related to views and vistas and resources. The Certified EIR stated that the West Adams CPIO and Crenshaw Corridor Specific Plan could potentially increase the amount of glare in the West Adams CPA due to the intensification of residential and commercial development. Mitigation Measures **AE2** and **AE3** would reduce impacts from light and glare. Therefore, without Mitigation Measures **AE2** and **AE3**, the Community Plan would have resulted in a significant impact related to light and glare. The Certified EIR stated that future development in the CPIO subdistricts and Specific Plan area could cause shadow impacts. Mitigation Measures **AE1** would reduce impacts related to shade and shadow. However, shade and shadow effects during the months of December and January could still result in a significant impact. Therefore, the Community Plan resulted in a significant and unavoidable impact related to shade and shadow.

**Community Plan Mitigation Measures.** The following mitigation measures were included in the Certified EIR to reduce impacts related to aesthetics:

**AE1** Any approval of a Discretionary project or “Active Change Area Project”, with new construction located on commercial or industrially planned land in CPIO subareas or the Crenshaw Corridor Specific Plan that directly abuts or is across an alley from residentially planned land 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 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 or Specific Plan ordinances when more restrictive.
- New construction located opposite the front yard setback of residentially zoned 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 procedures when more restrictive through adjustment, otherwise, through the exception procedures pursuant to the Los Angeles Municipal Code.

**AE2** Any approval of a Discretionary project or “Active Change Area Project”, shall ensure that all lighting be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties.

**AE3** Any approval of a Discretionary project or “Active Change Area Project”, shall 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.

### **MODIFIED PROJECT ANALYSIS**

As stated before, the Subject Site will be changed from Parcel Group A to Parcel Group F in the Jefferson/La Cienega TOD Subarea. This increases the FAR at the site to 2:1 and the maximum allowable height to 75 feet. The Subject Site is currently developed with industrial and commercial uses and will retain its land use designation of Limited Industrial. Additionally, the Subject Site is mostly surrounded by commercial and industrial uses, with one residential area located to the south across Rodeo Road. As such, the Modified Project would not alter the characteristics of the surrounding area and would be subject to the Certified EIR Mitigation Measure **AE1** which minimizes aesthetic impacts to surrounding residential neighborhoods. Therefore, the Modified Project would not result in a new significant impact to visual character. The Certified EIR found no significant impacts to views and vistas for all Parcel Groups in the Jefferson/La Cienega TOD Subarea. Views in the vicinity of the Subject Site are largely constrained by the existing structures on the Subject Site and adjacent properties, and the area’s relatively flat topography. Therefore, the Modified Project would not result in a new significant impact related to scenic vistas. Moreover, the Modified Project would not result in a new significant impact related to scenic resources as the Certified EIR development standards would protect scenic resources and no scenic highways are located in the vicinity of the Subject Site. The proposed FAR and height increase at the Subject Site could potentially increase the amount of light and glare due to the intensification of industrial and commercial development. However, the Modified Project would remain subject to Mitigation Measures **AE2** and **AE3** which ensures all lighting be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties, and that glare effects be limited by using non-reflective building and construction materials, such as concrete, wood, and stucco. Therefore, the Modified Project would not result in a new significant impact to light and glare. The Certified EIR found that shade and shadow impacts in the Jefferson/La Cienega TOD Subarea would be significant during December and January and less-than-significant with mitigation otherwise. However, impacts were still found to be significant and unavoidable. The Modified Project would remain subject to Mitigation Measure **AE1** which sets building height standards for developments near residential uses. Specifically, new construction located opposite the front yard setback of residentially zoned land along local streets can 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. Therefore, the Modified Project would not result in an increase in the significant and unavoidable impacts related to shade and shadow. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.



**Modified Project Mitigation Measures.** The Certified EIR Mitigation Measures **AE1** through **AE3** from the Community Plan would be applicable and enforced for the proposed Modified Project.

## 2. AGRICULTURE AND FORESTRY RESOURCES

### COMMUNITY PLAN ANALYSIS

The Certified EIR stated that a review of the maps compiled by the DOC FMMP indicates that the West Adams CPA is mapped as an “urbanized area” and does not have properties that contain prime or important farmlands. There are no properties located in the West Adams CPA that are zoned for agriculture use, and there are no agriculture land uses in the West Adams CPA. 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 timberlands in the vicinity of the West Adams CPA. As stated in the Certified EIR, the City land use and zoning maps show there are no forest land defined as timberland or timberland production in the West Adams CPA. As there are no agriculture or forestry resources within the West Adams CPA, the Community Plan and its implementing ordinances do not contain any specific guidelines that would affect farmland, agricultural land, timberland, or forest land. Therefore, the Community Plan has no construction or operational impacts related to agriculture and forestry resources.

**Community Plan Mitigation Measures.** No impacts related agriculture and forestry resources were determined for the Community Plan and no mitigation measures were required.

### MODIFIED PROJECT ANALYSIS

As stated in the Certified EIR, the West Adams CPA does not contain land uses that are considered prime or important farmlands, agricultural land uses, timberlands, or forest land. Moreover, the Subject Site is currently developed with commercial and industrial land uses and will remain designated as Limited Industrial. Therefore, the Modified Project would not result in new significant construction or operational impacts related to agriculture and forestry resources. The Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** None required.

## 3. AIR QUALITY

### COMMUNITY PLAN ANALYSIS

**Construction.** The Certified EIR stated that implementation of the Community Plan would allow for an increase in the capacity for development in the West Adams CPA by 3.8 million square feet of commercial space, 2.3 million square feet of public facility, and 19,703 dwelling units. Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from individual project sites. As shown in the Certified EIR, average construction emissions for the potential West Adams CPA developments would exceed SCAQMD regional thresholds for VOC and NO<sub>x</sub>, but would be well below the CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> thresholds. Moreover, the Certified EIR stated that construction activity 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 Community Plan resulted in a significant impact related to regional and localized construction emissions. Mitigation

Measure **AQ1** was adopted in the Certified EIR to ensure compliance with South Coast Air Quality Management District (SCAQMD) Rule 403, to reduce VOC emissions, control exhaust emissions, and limit pollutant concentrations. Nonetheless, the Certified EIR concluded that with implementation of Mitigation Measure **AQ1** impacts related to regional and localized air quality emissions would remain significant and unavoidable. Odors may be emitted during project construction by equipment exhaust and architectural coatings, however, these sources would be localized and temporary in nature. Therefore, impacts from construction odors would be less-than-significant. As stated in the Certified EIR, the Community Plan would not interfere with the implementation of the standards and strategies of the AQMP. Therefore, the Community Plan resulted in less-than-significant impacts related to consistency with the AQMP.

**Operation.** As stated in the Certified EIR, future daily emissions under implementation of the Community Plan are expected to decrease from existing emissions for all of the assessed pollutants 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. The Certified EIR stated that VOC emissions would increase as a result of architectural coating emissions associated with new residential land uses. However, the increase in VOC emissions would be less than half the SCAQMD daily significance threshold. Therefore, the Community Plan resulted in a less-than-significant impact related to regional operational concentrations. As stated in the Certified EIR, the State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at any intersection within the West Adams CPA. Therefore, the Community Plan resulted in a less-than-significant impact related to mobile source CO concentrations. 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 City of Los Angeles recently amended the LAMC to require new residential and commercial buildings located within 1,000 feet of freeways follow standards to reduce health risks from mobile sources. Therefore, the Community Plan resulted in a less-than-significant impact related to operational toxic air contaminant emissions. According to the Certified EIR, 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. Therefore, the Community Plan resulted in a less-than-significant impact related to operational odors. The Community Plan is consistent with the AQMP goals to reduce pollution levels. Therefore, the Community Plan resulted in a less-than-significant impact related to consistency with the AQMP.

**Community Plan Mitigation Measures.** The following mitigation measures were included in the Certified EIR to reduce impacts related to air quality:

**AQ1** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure that 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 NOX 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 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 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 PM10 generation.

### MODIFIED PROJECT ANALYSIS

**Construction.** The Modified Project would increase the FAR at the Subject Site to 2:1 and the maximum allowable height to 75 feet, thus increasing the potential building square footage for the two properties at the Subject Site. Under the Community Plan the Subject Site would be expected to have 452,250 square feet of space for Property 1, and 243,000 square feet of space for Property 2. Under the Modified Project the Subject Site would be expected to have 603,000 square feet of space for Property 1, and 324,000 square feet of space for Property 2. This would increase the square footage by 150,750 square feet for Property 1 and 81,000 square feet for Property 2 for a total of 231,750 square feet. The Subject Site's land use designation of Limited Industrial will remain unchanged.

The Modified Project would not interfere with the implementation of the standards and strategies of the AQMP and no new significant impact to consistency with the AQMP will occur. The Community Plan would

allow for an increase in the capacity for development in the West Adams CPA by 3.8 million square feet of commercial space. As mentioned previously, average construction emissions for the Community Plan would exceed SCAQMD regional thresholds for VOC and NO<sub>x</sub> and the localized significance thresholds for NO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>. Moreover, the Modified Project would increase the buildable square footage on the Subject Site, increasing the potential for construction air quality emissions and contributing to the exceedance of the SCAQMD regional and localized significance thresholds. The Subject Site's net increase of 231,750 square feet under the Modified Project would account for approximately 6.1% of the estimated 3.8 million square foot increase of commercial space in the Community Plan. As such, the Modified Project's small net increase in air quality emissions would not be capable of substantially increasing the Community Plan's air quality emissions causing an exceedance of regional or localized thresholds which were not already accounted for in the Certified EIR. Moreover, a majority of the Community Plan construction emissions are from residential construction, which would not be increased under the Modified Project as the Subject Site will remain designated for Limited Industrial only. The Modified Project would remain subject to Mitigation Measure **AQ1**. However, impacts related to regional and localized air quality emissions would remain significant and unavoidable. As such, the Modified Project would not result in a substantial increase in the significant and unavoidable impacts related to regional and localized air quality emissions. Similar to the Community Plan, construction odors for the Modified Project would be localized and temporary in nature. Therefore, the Modified Project would not result in a new significant impact related to construction odors. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Operation.** The Modified Project would not interfere with the implementation of the standards and strategies of the AQMP and no new significant impact to consistency with the AQMP will occur. As mentioned previously, future daily emissions under implementation of the Community Plan are expected to decrease from existing emissions for all of the pollutants except VOC, which would remain well below the SCAQMD threshold. The Modified Project would increase the number of potential trips for the Subject Site. However, as stated in the Certified EIR, vehicle emissions would be reduced between 2008 and 2030 due to stricter regulations and improved technology. Additionally, the Subject Site is located within the Jefferson/La Cienega TOD which reduces automobile reliance. Moreover, CO emissions under the Community Plan are well below the SCAQMD threshold. The Modified Project's addition of 231,750 square feet would account for approximately 6.1% of the estimated 3.8 million square foot increase of commercial space in the Community Plan. As such, the Modified Project's small net increase in air quality emissions would not be capable of substantially increasing the Community Plan's air quality emissions causing an exceedance of regional or localized thresholds. Therefore, the Modified Project would not result in new significant impacts related to regional and localized air quality emissions. The Modified Project would comply with the LAMC to require new residential and commercial buildings located within 1,000 feet of freeways follow standards to reduce health risks from mobile sources. Moreover, the Limited Industrial land use designation at the Subject Site does not allow the development of residential uses. Therefore, the Modified Project would not result in a new significant impact related to exposing sensitive receptors to substantial pollutant concentrations. The Modified Project would remain designated for Limited Industrial uses and is not anticipated to be developed with land uses that are typically associated with odor complaints, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. Therefore, the Modified Project would not result in a new significant impact related to operational odors. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects

at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** The Certified EIR Mitigation Measure **AQ1** from the Community Plan would be applicable and enforced for the proposed Modified Project.

## 4. BIOLOGICAL RESOURCES

### COMMUNITY PLAN ANALYSIS

The Certified EIR stated that the majority of the West Adams CPA is fully urbanized, containing primarily residential, commercial, and industrial development. Though most of the Community Plan development would be infill of existing urban spaces, these projects are not expected to directly impact candidate, sensitive, or special status plant and animal species or habitats. Similarly, areas which have the capacity for more intense development, like the transit-oriented development (TOD) areas, would not directly impact habitats which are considered significant for candidate, sensitive, or special status species. Furthermore, no changes in land use patterns would occur at the portion of the Kenneth Hahn State Recreation Area that is located within the West Adams CPA. Therefore, the Community Plan resulted in less-than-significant impacts related to candidate, sensitive, or special status species.

As the Community Plan did not change land use patterns within the Kenneth Hahn State Recreation Area, and with existing City Codes and regulatory requirements, the Community Plan resulted in less-than-significant impacts to riparian habitats and wetlands. As stated in the Certified EIR, the West Adams CPA does not act as a true wildlife corridor, movement pathway, or linkage of note between larger habitat areas for terrestrial wildlife. However, trees within the West Adams CPA could potentially support migratory birds which could be impacted during construction activities. Mitigation Measure **BR1** would ensure the protection of native nesting birds during construction of a specific project. Therefore, with Mitigation Measure **BR1**, the Community Plan resulted in a less-than-significant impact related to migratory birds. Specific development and infrastructure projects have the potential to result in the loss of protected trees within the West Adams CPA. Mitigation Measure **BR2** would ensure projects follow the City of Los Angeles Tree Preservation Ordinance including provisions to either protect in place the existing protected trees in or adjacent to the project site. Therefore, with Mitigation Measure **BR2**, the Community Plan resulted in a less-than-significant impact related to tree preservation. Currently, there are no species identified within the West Adams CPA that are protected by the Endangered Species Act and thus, no applicable habitat conservation plans are identified for the West Adams CPA. Therefore, the Community Plan resulted in less-than-significant impacts related to habitat conservation plans.

**Community Plan Mitigation Measures.** The following mitigation measures were included in the EIR to reduce impacts related to biological resources to a less-than-significant level:

**BR1** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure 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 Wildlife (CDFW) within two months of the completion of the monitoring activities.

**BR2** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure that during the final design phase of the Community Plan, 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.

## **MODIFIED PROJECT ANALYSIS**

As mentioned previously, the majority of the West Adams CPA is fully urbanized. Moreover, the Modified Project would not alter land use patterns at the portion of the Kenneth Hahn State Recreation Area that is located within the West Adams CPA. The Subject Site is currently fully developed with commercial and industrial uses and any development projects occurring at the site would not result in the removal of habitat. Therefore, the Modified Project would not result in new significant impacts related to candidate, sensitive, or special status species. Moreover, with existing City Codes and regulatory requirements, the Modified Project would not result in new significant impacts to riparian habitats and wetlands. The Modified Project would allow more commercial development at the Subject Site which could result in the removal of existing trees that could serve as habitat for migratory birds and may conflict with federal and State laws protecting native birds and active nests. However, the Modified Project would remain subject to Mitigation Measure **BR1** which ensures the protection of native nesting birds during construction of a specific project. Moreover, the West Adams CPA does not act as a true wildlife corridor, movement pathway, or linkage of note between larger habitat areas for terrestrial wildlife. Therefore, the Modified Project would not result in a new significant impact related to migratory wildlife. Development of the Subject Site could impact protected tree species. However, the Modified Project would remain subject to Mitigation Measure **BR2** which ensures projects follow the City of Los Angeles Tree Preservation Ordinance including provisions to either protect in place the existing protected trees in or adjacent to the project site. Therefore, the Modified Project would not result in a new significant impact related to tree preservation. As stated previously, no applicable habitat conservation plans are identified for the West Adams CPA. Therefore, the Modified Project would not result in a new significant impact related to habitat conservation plans. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. The Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** The Certified EIR Mitigation Measures **BR1** and **BR2** from the Community Plan would be applicable and enforced for the proposed Modified Project.

## **5. CULTURAL RESOURCES**

### **COMMUNITY PLAN ANALYSIS**

The Certified EIR stated that there are various City, State, and federally-designated historical resources in the West Adams CPA, including HCMs and HPOZs. The Community Plan contains numerous policies and programs to protect significant historic resources and does not include modifications to historical resources or historic districts in the West Adams CPA. Development that would occur under the

Community Plan has the potential to occur near or adjacent to designated historical resources, as well as on properties that are eligible for designation as historical resources, which could impact historical resources either through direct effects to historical resources, or through indirect affects to the area surrounding a resource. Mitigation Measures **CR1** through **CR3** would reduce impacts to historical resources. Therefore, with implementation of Mitigation Measures **CR1** through **CR3**, the Community Plan resulted in a less-than-significant impact related to historical resources. As stated in the Certified EIR the West Adams CPA is highly disturbed and any archeological resources that may have existed at the surface have likely been disturbed by past development. However, there is reasonable potential that the development that would occur under the Community Plan would be located on a site with previously unknown archaeological or paleontological resources. Mitigation Measures **CR4** through **CR9** would reduce impacts to archaeological and paleontological resources. Therefore, with implementation of Mitigation Measures **CR4** through **CR9**, the Community Plan resulted in a less-than-significant impact related to archeological and paleontological resources. As stated in the Certified EIR, 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. However, it is possible that unknown human remains could be located on sites developed under the Community Plan. Mitigation Measure **CR10** would reduce impacts to human remains. Therefore, with implementation of Mitigation Measure **CR10**, the Community Plan resulted in a less-than-significant impact related to human remains.

**Community Plan Mitigation Measures.** The following mitigation measures were included in the Certified EIR to reduce impacts related to cultural resources:

**CR1** Before approval of a Discretionary project or “*Active Change Area Project*”, involving properties designated as Historic-Cultural Monuments or listed in or determined eligible for the National Register or California Register, the project shall be reviewed by the Department of City Planning Office of Historic Resources.

**CR2** 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 Zone, the City shall require written approval from the Department of City Planning Office of Historic Resources.

**CR3** Before approval of a Discretionary project or “*Active Change Area Project*”, 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.

**CR4** Any approval of a Discretionary project or “*Active Change Area Project*”, City shall ensure 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.

**CR5** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure 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.

**CR6** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure 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.

**CR7** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure 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.

**CR8** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure 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.

**CR9** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure 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.

**CR10** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure 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.

### **MODIFIED PROJECT ANALYSIS**

The Modified Project would remain subject to Mitigation Measures **CR1** and **CR3** which protect historic resources from development. Therefore, the Modified Project would not result in a new significant impact to historic resources. Additionally, the Subject Site is currently fully developed with commercial and industrial uses. However, future development of the site has the potential to encounter archaeological and paleontological resources during excavation activities. The Modified Project would remain subject to Mitigation Measures **CR4** through **CR9** which set regulatory measures minimizing impacts to archeological and paleontological resources. Therefore, the Modified Project would not result in new significant impacts related to archaeological and paleontological resources. The Modified Project would remain subject to Mitigation Measure **CR10** which sets regulatory measures for the unearthing of human remains during construction of a specific project. Therefore, the Modified Project would not result in a new significant impact to human remains. The Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** The Certified EIR Mitigation Measures **CR1** through **CR10** from the Community Plan would be applicable and enforced for the proposed Modified Project.



## 6. GEOLOGY AND SOILS

### COMMUNITY PLAN ANALYSIS

**Construction.** The Certified EIR stated that construction related to the Community Plan would not affect seismicity. However, the Community Plan involves new construction, which would result in an increase in grading and subsequent erosion and loss of topsoil within the West Adams CPA. However, all earthwork and grading activities associated with the Community Plan would require grading permits from the Department of Building and Safety that include requirements and standards designed to limit potential impacts related to soil erosion, unstable soils, and expansive soils. Implementation of the City's codes, regulatory requirements, standard grading and building permit requirements, and the application of Best Management Practices, would ensure that potential impacts from erosion or loss of top soils, unstable soils, and expansive soils would be less-than-significant. As stated in the Certified EIR, the West Adams CPA is currently served by City-owned wastewater treatment and disposal facilities and does not utilize a septic system. Therefore, no impacts related to septic tanks would occur.

**Operation.** The Certified EIR stated that the increased intensity of development within certain portions of the West Adams CPA would result in a greater number of people exposed to potential seismic hazards. However, any new structures constructed within the West Adams CPA would be required to comply with the seismic safety guidelines in the City's General Plan Safety Element, as well as the seismic safety requirements in the CBC and the City of Los Angeles Building Code. In addition, redevelopment would likely result in the replacement of old buildings that are not built to current seismic standards with new buildings that meet the most recent building codes and regulations, reducing the risk of loss, injury or death as a result of seismic activity. Therefore, the Community Plan resulted in less-than-significant impacts related to fault rupture and ground shaking. As stated in the Certified EIR, prior to construction of new structures in liquefaction-prone areas, a site-specific geotechnical evaluation is required that would specifically address and include measures to minimize liquefaction. Any new development under the Community Plan would comply with the recommendations identified in the geotechnical evaluation, as well as the City of Los Angeles Building and Grading Codes and any specific requirements established by the Department of Public Works and/or the City Engineer. Therefore, the Community Plan resulted in less-than-significant impacts related to liquefaction. Portions of the West Adams CPA that are susceptible to landslides have not been identified as areas of change under the Community Plan. Therefore, under the Community Plan no impacts related to landslides occur. As stated in the Certified EIR, operation of the Community Plan would not affect soils and geologic materials. Moreover, the West Adams CPA is currently served by City-owned wastewater treatment and disposal facilities and does not utilize a septic system. Therefore, no impacts related to septic tanks would occur.

**Community Plan Mitigation Measures.** Less-than-significant impacts related geology and soils were determined for the Community Plan.

### MODIFIED PROJECT ANALYSIS

**Construction.** The Modified Project would remain subject to the City's codes, regulatory requirements, standard grading and building permit requirements, and the application of Best Management Practices that limit potential impacts from erosion or loss of top soils, unstable soils, and expansive soils. Therefore, the Modified Project would not result in new significant impacts to erosion or loss of top soils, unstable soils, and expansive soils. Moreover, the West Adams CPA is currently served by City-owned wastewater treatment and disposal facilities and does not utilize a septic system. Therefore, the Modified Project would not result in a new significant impact to septic tanks. Lastly, the Modified Project does not propose

a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Operation.** Any new structures constructed within the West Adams CPA including the Modified Project would be required to comply with the seismic safety guidelines in the City's General Plan Safety Element, as well as the seismic safety requirements in the CBC and the City of Los Angeles Building Code. In addition, redevelopment would likely result in the replacement of old buildings that are not built to current seismic standards with new buildings that meet the most recent building codes and regulations, reducing the risk of loss, injury or death as a result of seismic activity. Therefore, the Modified Project would not result in new significant impacts related to fault rupture and ground shaking. Any new development under the Modified Project would comply with the recommendations identified in the geotechnical evaluation, as well as the City of Los Angeles Building and Grading Codes and any specific requirements established by the Department of Public Works and/or the City Engineer. Therefore, the Modified Project would not result in a new significant impact related to liquefaction. Portions of the West Adams CPA that are susceptible to landslides have not been identified as areas of change under the Modified Project. Therefore, the Modified Project would not result in a new significant impact related to landslides. Moreover, the West Adams CPA is currently served by City-owned wastewater treatment and disposal facilities and does not utilize a septic system. Therefore, the Modified Project would not result in a new significant impact to septic tanks. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** No mitigation measures identified.

## 7. GREENHOUSE GAS EMISSIONS

### COMMUNITY PLAN ANALYSIS

**Construction.** The Certified EIR stated that the Community Plan could result in a number of construction projects occurring simultaneously every year. Strong economic years would typically lead to increased development projects and above average emissions. Conversely, weak economic years would experience fewer projects and below average emissions. In addition, equipment emissions would decrease in future years as engines become more efficient under new regulations. Construction-related GHG emissions cannot be avoided during construction of any project. The Community Plan does not increase construction GHG emissions beyond what is anticipated for construction GHG emissions under the previous community plan. Therefore, the Community Plan resulted in a less-than-significant impact related to construction GHG emissions. As stated in the Certified EIR, the Community Plan would not impede implementation of GHG reducing measures. Therefore, the Community Plan resulted in a less-than-significant impact related to applicable construction plans, policies, and regulations.

**Operation.** Long-term project emissions would be generated by on-road vehicles, general electricity use, water-related electricity use, wastewater management, solid waste decomposition, and natural gas use. The Certified EIR stated that the increase in emissions 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 Community Plan resulted in a significant impact related to operational GHG emissions. Moreover, the Community Plan's overall growth in population and

development results in higher total emissions that would interfere with GHG reduction plans. Therefore, without mitigation, the Community Plan resulted in a significant operational impact related to GHG plans, policies, and regulations. Mitigation Measure **GHG1** was adopted to reduce greenhouse gas emissions during operation of future developments. Nonetheless, the Certified EIR concluded that impacts related to greenhouse gas emissions and applicable plans, policies, and regulations would remain significant and unavoidable.

**Community Plan Mitigation Measures.** The following mitigation measure was included in the Certified EIR to reduce impacts related to greenhouse gas emissions:

**GHG1** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure that the following greenhouse gas reduction measures are incorporated into the project design:

- 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.

### **MODIFIED PROJECT ANALYSIS**

**Construction.** The Modified Project would increase the FAR at the Subject Site to 2:1 and the maximum allowable height to 75 feet, thus increasing the potential building square footage for the two properties at the Subject Site. The Subject Site’s net increase of 231,750 square feet under the Modified Project would account for approximately 6.1% of the estimated 3.8 million square foot increase of commercial space in the Community Plan. This increase would be minimal and would not result in a significant increase in construction related GHG emissions compared to the Community Plan. In addition, equipment emissions would decrease in future years as engines become more efficient under new regulations. Therefore, the Modified Project would not result in a new significant impact related to construction GHG emissions. Similar to the Community Plan, the Modified Project would not impede implementation of GHG reducing measures. Therefore, the Modified Project would not result in a new significant impact related to applicable construction plans, policies, and regulations. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Operation.** As mentioned previously, long-term project emissions would be generated by on-road vehicles, general electricity use, water-related electricity use, wastewater management, solid waste decomposition, and natural gas use. The Modified Project’s increase in potential buildable square footage would increase the operational GHG emissions analyzed under the Community Plan. Though the increase in emissions would be minimal, the Community Plan will continue to interfere with implementation of the ClimateLA plan, and subsequently interfere with the State’s ability to meet its goals under AB 32. As such, the Modified Project would not result in a substantial increase in the significant and unavoidable impacts related to operational GHG emissions as previously disclosed in the Certified EIR. The Modified Project would increase potential development at the Subject Site. As stated previously, the Community Plan’s overall growth in population and development results in higher total emissions that would interfere with

GHG reduction plans. While the Modified Project would not increase population estimates of the Community Plan, it would increase potential commercial development of the Subject Site. Though the Modified Project would remain subject to the GHG reduction measures under Mitigation Measure **GHG1**, and the increase in emissions would be minimal, the Community Plan will continue to interfere with GHG reduction plans. As such, the Modified Project would not result in a substantial increase in the significant and unavoidable impacts related to GHG plans, policies, and regulations as previously disclosed in the Certified EIR. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** The Certified EIR Mitigation Measure **GHG1** from the Community Plan would be applicable and enforced for the proposed Modified Project.

## 8. HAZARDS AND HAZARDOUS MATERIALS

### COMMUNITY PLAN ANALYSIS

The Certified EIR stated that implementation of the Community Plan would result in a reduction of industrial land within the West Adams CPA. Moreover, industrial uses allowed within the West Adams CPA would be required to comply with all federal, state, and local regulations that deal with hazardous materials use and transport. In addition, the Certified EIR stated that based on the years of construction for some of the existing buildings within the West Adams CPA, demolition of the buildings could have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or removed prior to demolition. However, removal of these materials is well regulated. Therefore, with implementation of all applicable local, State, and federal regulations, the Community Plan resulted in a less-than-significant impact related to the use, transport, and disposal of hazardous materials. As stated in the Certified EIR, the Community Plan would replace older structures that may have been built prior to the most recent building codes and regulations. Moreover, the Certified EIR states that future projects within the West Adams CPA will be required to complete all applicable environmental review processes and to conform with environmental regulations related to new construction and hazardous materials storage, use and transport. Existing hazardous materials regulations would minimize the potential for exposure to adverse health or safety effects. Therefore, the Community Plan reduces the risk of upset and accident conditions involving the release of hazardous materials.

Though nearly a dozen Methane Zones occur in the West Adams CPA, new construction would be required to comply with the California Department of Conservation, Division of Oil and Gas requirements, and the SCAQMD regulations regarding methane gas. Therefore, impacts related to methane gas were reduced to less-than-significant. Compliance with all applicable local, State, and federal laws and regulations, as described in the regulatory framework, would regulate, control, or respond to hazardous waste, transport, store, disposal, and clean-up in order to ensure that hazardous materials do not pose a significant risk to nearby receptors. Therefore, the Community Plan resulted in less-than-significant impacts related to schools. As stated in the Certified EIR, there are 174 LUST cleanup sites, other clean-up sites, and permitted underground UST facilities within the West Adams CPA. Future development of sites 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. Mitigation Measure **HM1** would minimize impacts related to hazardous materials sites. Therefore, with implementation of Mitigation Measure

**HM1**, the Community Plan resulted in a less-than-significant impact related to hazards and hazardous materials. As stated in the Certified EIR, the Community Plan would have no impact to airport hazards. Additionally, though the Community Plan increases the population, it will comply with polices to minimize potential impact of interference with emergency response plans. Therefore, the Community Plan resulted in less-than-significant impacts related to emergency response plans. As stated in the Certified EIR, local implementation of existing local regulations would help minimize wildland fire hazards. Therefore, the Community Plan resulted in less-than-significant impacts related to wildland fire.

**Community Plan Mitigation Measures.** The following mitigation measure was included in the Certified EIR to reduce impacts related to hazards and hazardous materials to a less-than-significant level:

**HM1** Any approval of a Discretionary project or “*Active Change Area Project*”, that will involve soil disturbance shall ensure that a Phase I Environmental Site Assessment (ESA) is prepared. 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.

## **MODIFIED PROJECT ANALYSIS**

The Modified Project would retain a land use designation of Limited Industrial which could result in an increase in industrial or commercial development on the Subject Site. However, industrial uses would be required to comply with all federal, state, and local regulations that deal with hazardous materials use and transport. As such, the Modified Project would not result in a new significant impact related to the use, transport, and disposal of hazardous materials. Projects under the Modified Project would be required to complete all applicable environmental review processes and to conform with environmental regulations related to new construction and hazardous materials storage, use and transport. Therefore, the Modified Project would not result in new significant impacts related to risk of upset and accident conditions involving the release of hazardous materials.

Construction under the Modified Project would be required to comply with the California Department of Conservation, Division of Oil and Gas requirements, and the SCAQMD regulations regarding methane gas. Therefore, the Modified Project would not result in a new significant impact related to methane gas. The Modified Project would comply with all applicable local, State, and federal laws and regulations, as described in the regulatory framework, would regulate, control, or respond to hazardous waste, transport, store, disposal, and clean-up in order to ensure that hazardous materials do not pose a significant risk to nearby receptors. Therefore, the Modified Project would not result in a new significant impact related to schools. Future development of the Subject Site could have the potential to create a significant hazard to the public or the environment unless an environmental site assessment is conducted to determined potential risks and appropriate mitigation. The Modified Project would remain subject to Mitigation Measure **HM1** which minimizes impacts related to hazardous materials sites. As such, the Modified Project would not result in a new significant impact related to hazardous materials sites. The Modified Project would not result in a new significant impact to airport hazards. The Modified Project

would comply with polices to minimize potential impact of interference with emergency response plans. Therefore, the Modified Project would not result in a new significant impact related to emergency response plans. As stated in the Community Plan, implementation of existing local regulations would help minimize wildland fire hazards. The Modified Project would comply with the Community Plan regulations that minimize wildland fire hazards. Therefore, the Modified Project would not result in a new significant impact related to wildland fire. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** The Certified EIR Mitigation Measure **HM1** from the Community Plan would be applicable and enforced for the proposed Modified Project.

## 9. HYDROLOGY AND WATER QUALITY

### COMMUNITY PLAN ANALYSIS

**Construction.** The Certified EIR stated that grading, excavation, and other construction activities associated with the implementation of the Community Plan could impact water quality due to erosion resulting from exposed soils that may be transported from the project area in stormwater runoff. However, 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 West Adams 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. Additionally, a site-specific SWPPP in accordance with the NPDES permit requirements would be required for the implementation of individual projects. Therefore, the Certified EIR concluded that with compliance with the aforementioned regulatory requirements, impacts related to surface water quality would be less-than-significant. As stated in the Certified EIR, the West Adams CPA is not a significant area for groundwater recharge and implementation of the Community Plan does not involve direct groundwater withdrawal or injection. Therefore, the Community Plan resulted in less-than-significant impacts related to groundwater. The Certified EIR stated that implementation of the existing regulatory requirements would ensure the 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. Moreover, the West Adams CPA is not located near the Pacific Ocean. Therefore, the Community Plan resulted in less-than-significant impacts related to flooding and inundation, and inundation by seiche, tsunami, or mudflow. As no dams or levees are located near the West Adams CPA there are no impacts related to injury or death from flooding caused by dam or levee failure.

**Operation.** As stated in the Certified EIR, adoption and implementation of the 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 Community Plan resulted in a less-than-significant impact related to surface water quality. Implementation of the Community Plan does 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. Therefore, the Community Plan resulted in a less-than-significant impact related to

groundwater. Moreover, the Community Plan does not substantially alter the existing drainage pattern of the West Adams CPA. Therefore, the Community Plan resulted in a less-than-significant impact related to stormwater drainage. As mentioned previously, no dams or levees are located in or near the West Adams CPA. Therefore, there are no impacts related to injury or death from flooding caused by dam or levee failure. The Certified EIR stated that implementation of existing regulatory requirements would ensure the 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. Moreover, the West Adams CPA's is not located near the Pacific Ocean. Therefore, the Community Plan resulted in less-than-significant impacts related to flooding and inundation, and inundation by seiche, tsunami, or mudflow.

**Community Plan Mitigation Measures.** Impacts related to hydrology and water quality were determined to be less-than-significant without mitigation.

### **MODIFIED PROJECT ANALYSIS**

**Construction.** As stated in the Community Plan, a site-specific SWPPP in accordance with the NPDES permit requirements would be required for the implementation of individual projects under the Modified Project. The SWPPP would specify BMPs to be used during construction, which would include but not be limited to erosion control, sediment control and non-stormwater management and materials management. Therefore, the Modified Project would not result in a new significant impact related to surface water quality. As stated previously, the West Adams CPA is not a significant area for groundwater recharge. Moreover, direct groundwater withdrawal or injection is not anticipated under the Modified Project. Therefore, the Modified Project would not result in a new significant impact related to groundwater. The Modified Project would comply with existing regulatory requirements for placing housing or structures within a flood hazard zone or in an area that would impede or redirect flood flows without incorporating proper mitigation measures. As mentioned previously, no dams or levees are located in or near the West Adams CPA and the West Adams CPA is not located near the Pacific Ocean. Therefore, the Modified Project would not result in new significant impacts related to flooding and inundation, and inundation by seiche, tsunami, or mudflow. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Operation.** The Modified Project would comply with the federal, State, and local regulations, code requirements, and permit provisions related to the discharge of potentially polluted runoff into surface water. Therefore, the Modified Project would not result in a new significant impact related to surface water quality. The Modified 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. Therefore, the Modified Project would not result in a new significant impact related to groundwater. The Modified Project would not substantially alter the existing drainage pattern of the West Adams CPA. Therefore, the Modified Project would not result in a new significant impact related to stormwater drainage. As mentioned previously, no dams or levees are located in or near the West Adams CPA and the Modified Project 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. Moreover, the West Adams CPA is not located near the Pacific Ocean. Therefore, the Modified Project would not result in new significant impacts related to flooding and inundation, and inundation by seiche, tsunami, or mudflow. Lastly, the Modified Project does not propose

a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** None required.

## 10. LAND USE AND PLANNING

### COMMUNITY PLAN ANALYSIS

The Certified EIR stated that the implementation of the Community Plan would introduce ordinances that propose changes regarding land use compatibility. Such changes include zone and height district changes and establishing CPIO subdistricts. Moreover, under the Community Plan several land use designations no longer exist or were refined, and new categories have been added. Existing goals and policies of the 1998 West Adams Community Plan were retained and augmented. The Community Plan focuses on land use, related mobility issues, and urban design. Beyond these changes, the Community Plan and implementing ordinances do not introduce major changes to land use in the West Adams CPA. The Community Plan includes General Plan Amendments to maintain consistent neighborhood character, retain existing uses, improve business, employment and housing opportunities, and preserve existing retail and neighborhood services. The Community Plan is consistent with land use policies of SCAG's RCP, RTP, and the Compass Growth Vision. As stated in the Certified EIR, the Community Plan would not conflict with, and would work to implement, key regional policies applicable to the West Adams CPA and surrounding areas. As stated in the Certified EIR, the Community Plan's zoning and General Plan land use designations would be consistent the Zoning Ordinance set forth in Section 12.00 of the LAMC. Therefore, the Community Plan resulted in less-than-significant impacts related to land use compatibility and consistency. As discussed in the Certified EIR Section 4.4, Biological Resources, there are no HCPs or NCCPs within the West Adams CPA. Therefore, implementation of the Community Plan does not conflict with the provisions of an adopted HCP, NCCP, or other Community local, regional, or state habitat conservation plan. No impact would occur.

**Community Plan Mitigation Measures.** Impacts related to land use and planning were determined to be less-than-significant without mitigation.

### MODIFIED PROJECT ANALYSIS

The Modified Project includes a change from Parcel Group A to Parcel Group F and will increase the FAR at the Subject Site to 2:1 and the maximum allowable height to 75 feet. However, the Subject Site's land use designation of Limited Industrial will remain unchanged. Moreover, the Subject Site is currently fully developed with commercial and industrial uses and is located in a heavily developed area. Much of the land uses surrounding the Subject Site include commercial and industrial developments. As such, any new development at the Subject Site would not present a substantial change to the surrounding area. Moreover, the Modified Project would not substantially alter any land use ordinances or changes under the Community Plan. Therefore, the Modified Project would not result in new significant impacts related to land use compatibility and consistency. As mentioned, there are no HCPs or NCCPs within the West Adams CPA. Therefore, the Modified Project would not result in new significant impacts to an adopted HCP, NCCP, or other Community local, regional, or state habitat conservation plan. The Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.



**Modified Project Mitigation Measures.** None Required.

## 11. MINERAL RESOURCES

### COMMUNITY PLAN ANALYSIS

The Certified EIR stated that State designated oil fields are located within the central western and northeastern portions of the West Adams CPA. The Community Plan could potentially result in some development or infrastructure projects on undeveloped/vacant lands within the West Adams CPA. However, as most of this development is infill of existing urban spaces, and these projects are not expected to directly impact mineral resources. As stated in the Certified EIR, additional policies in the General Plan seek to implement the provisions of the SMARA, to establish extraction operations at appropriate sites; to minimize operation impacts on adjacent uses, ecologically important areas, and ground water; to protect the public health and safety; and to require appropriate restoration, reclamation and reuse of closed sites. These policies would reduce impacts in areas near and/or overlaying state-designated oil fields within the West Adams CPA and would not interfere with the extraction of oil and gas resources. Additionally, existing City policies would regulate and identify provisions for districts where production of oil and gas is permitted and how it shall be undertaken. Furthermore, implementation of existing City Codes, regulatory requirements, and policies ensure that the Community Plan results in less-than-significant impacts related to Statewide and regional mineral resources. As stated in the certified EIR, the West Adams CPA does not contain any land classified as MRZ-2. Therefore, the West Adams CPA is not underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present or where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. Therefore, no impacts related to local mineral resources occur.

**Community Plan Mitigation Measures.** Impacts related to mineral resources were determined to be less-than-significant without mitigation.

### MODIFIED PROJECT ANALYSIS

Implementation of existing City Codes, regulatory requirements, and policies would ensure that the Modified Project would not result in a new significant impact related to Statewide and regional mineral resources. As mentioned previously, the West Adams CPA does not contain any land classified as MRZ-2 and is not underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present or where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. Therefore, the Modified Project would not result in a new significant impact to local mineral resources. The Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** None required.

## 12. NOISE

### COMMUNITY PLAN ANALYSIS

**Construction.** The Certified EIR stated that construction under the Community Plan would result in temporary increases in ambient noise and vibration levels in the West Adams CPA on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. However, the Certified EIR concluded that under both monitored and presumed noise levels, construction noise would increase ambient noise levels and 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 Community Plan resulted in a significant impact related to construction noise. The Certified EIR stated that 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. Mitigation Measures **N1** and **N2** were adopted to reduce construction noise and vibration levels. However, the Certified EIR concluded that impacts related to construction noise and vibration would remain significant and unavoidable.

**Operation.** As stated in the Certified EIR, the Community Plan objectives promote the internal relationship of mutually supportive uses, such as employment, housing, recreation, and community-serving facilities. It is assumed that the majority of stationary noise associated with the Community Plan would be generated by heating, ventilation, and air conditioning (HVAC) systems. HVAC systems will be shielded from view to comply with the LAMC, and are not anticipated to significantly increase ambient noise levels. Though the planning policies of the Community Plan encourage new industrial development designs to be compatible with adjacent land uses, the potential exists for residential land uses to be exposed to incompatible noise levels associated with industrial facilities. As stated in the Certified EIR, mobile noise generated by the Community Plan would not cause the ambient noise level measured at the property line of the affected uses to increase by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” category or any 5 dBA or more increase in noise level. Therefore, the Community Plan resulted in a less-than-significant impact to mobile noise. The Community Plan encourages TOD along the Expo LRT Line. Land uses within the vicinity of the rail line may be impacted by loud noises generated by rail cars passing by. Mitigation Measures **N3** and **N4** were adopted to reduce operational noise levels. Therefore, with implementation of Mitigation Measures **N3** and **N4**, the Community Plan resulted in a less-than-significant impact related to operational noise. It is not anticipated that the West Adams CPA will be developed with substantial sources of vibration. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. Similar to existing conditions, traffic vibration levels would not be perceptible by sensitive receptors. Therefore, the Community Plan resulted in less-than-significant impacts related to operational vibration.

**Community Plan Mitigation Measures.** The following mitigation measures were included in the Certified EIR to reduce noise impacts:

**N1** Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure that all contractors include the following best management practices in contract specifications:

- 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.

- The construction contractor shall locate construction staging areas away from sensitive uses.
- 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.
- 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.
- Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.
- The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.

**N2** 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"), the City shall ensure all of the following requirements are or will be met:

- Historic buildings adjacent to the project's construction zones are identified.
- A Vibration Control Plan is prepared and approved by the City.
- The Vibration Control Plan shall be completed by a qualified structural engineer.
- 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.

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).

**N3** Any approval of a Discretionary project or "*Active Change Area Project*", that includes industrial uses located within 1,000 feet of a residential land use shall ensure that a noise study is completed that uses 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.

**N3** 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.

### **MODIFIED PROJECT ANALYSIS**

**Construction.** The Modified Project includes a change from Parcel Group A to Parcel Group F and will increase the FAR at the Subject Site to 2:1 and the maximum allowable height to 75 feet. However, the Subject Site's land use designation of Limited Industrial will remain unchanged. The Subject Site's net increase of 231,750 square feet under the Modified Project would account for approximately 6.1% of the estimated 3.8 million square foot increase of commercial space in the Community Plan. This increase would be minimal and would not result in a significant increase in construction intensity compared to the Community Plan. Moreover, construction noise and vibration impacts from development at the Subject Site would be similar to the construction noise and vibration levels assessed in the Community Plan, and sensitive receptor exposure to construction noise and vibration would be similar as disclosed in the Certified EIR. The Modified Project would abide by Mitigation Measures **N1** and **N2** to reduce construction noise and vibration levels. Additionally, as the Subject Site is designated for Limited Industrial uses, it would be subject to Mitigation Measure **N3** which ensures a noise study is completed for industrial uses located within 1,000 feet of residential land. As such, the Modified Project would not result in an increase in the significant and unavoidable impacts related to construction noise and vibration as previously disclosed in the Certified EIR. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Operation.** The Modified Project includes a change from Parcel Group A to Parcel Group F and will increase the FAR at the Subject Site to 2:1 and the maximum allowable height to 75 feet. However, the Subject Site's land use designation of Limited Industrial will remain unchanged. The Subject Site's net increase of 231,750 square feet under the Modified Project would account for approximately 6.1% of the estimated 3.8 million square foot increase of commercial space in the Community Plan. This increase would be minimal and would not generate a substantial number of new trips compared to the Community Plan. Moreover, the Subject Site is located within the Jefferson/La Cienega TOD which reduces automobile reliance. As the Subject Site is designated for Limited Industrial uses, it would be subject to Mitigation Measure **N3** which ensures a noise study is completed for industrial uses located within 1,000 feet of residential land. The Modified Project would encourage transit-oriented development (TOD) along the Expo LRT Line. Land uses within the vicinity of the rail line may be impacted by loud noises generated by rail cars passing by. As such, the Modified Project would remain subject to Mitigation Measure **N4** which would reduce operational noise impacts from the Expo LRT Line. Therefore, the Modified Project would not result in a new significant impact related to operational noise. As stated, the Modified Project would result in a minimal increase of trips to the area compared to the Community Plan. Moreover, the Modified Project is not located within an area highly developed with sensitive receptors. Therefore, the Modified Project would not result in a new significant impact related to operational vibration. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** The Certified EIR Mitigation Measures **N1** through **N4** from the Community Plan would be applicable and enforced for the proposed Modified Project.

## 13. POPULATION AND HOUSING

### COMMUNITY PLAN ANALYSIS

The Certified EIR stated that adoption and implementation of the Community Plan would not directly or indirectly lead to substantial population growth. Moreover, the Community Plan is consistent with the General Plan Framework and Housing Elements. Therefore, the Community Plan resulted in less-than-significant impacts related to population growth. As stated in the Certified EIR, no residential units are specifically proposed to be demolished, converted to market rate, or removed through other means as a result of the Community Plan. However, the increased capacity over existing conditions allowed by the Community Plan could cause temporary population displacement as new buildings are built in place of old ones, or existing buildings are renovated. The temporary nature of this impact, however, does not lead to a significant impact. Moreover, the Community Plan is consistent with the Housing Element. Therefore, the Community Plan resulted in less-than-significant impacts related to population and housing displacement. The Certified EIR states that, the Community Plan serves to more accurately reflect the City's housing policies and balance the vacancy rate by increasing the number of residential units in the West Adams CPA. Therefore, the Community Plan resulted in less-than-significant impacts related to housing growth. As stated in the Certified EIR the West Adams CPA jobs are growing at a rate faster than the City. The Community Plan is consistent with City and SCAG goals and policies by seeking to retain viable existing industrial uses primarily within larger properties, and increasing the amount of commercial zoned land along the area's major east/west commercial corridors. Moreover, the Community Plan allows for an increase of more than 8,000 jobs. Therefore, the Community Plan will not contribute to a substantial jobs/housing imbalance. The Community Plan resulted in less-than-significant impacts related to employment growth and displacement.

**Community Plan Mitigation Measures.** Impacts related to population and housing were determined to be less-than-significant without mitigation.

### MODIFIED PROJECT ANALYSIS

The Modified Project includes a change from Parcel Group A to Parcel Group F and will increase the FAR at the Subject Site to 2:1 and the maximum allowable height to 75 feet. However, the Subject Site's land use designation of Limited Industrial will remain unchanged and no residential uses would be developed on the Subject Site. As such, the Modified Project would not change population and housing estimates under the Community Plan. Therefore, it would not result in a new significant impact to population and housing. Moreover, the Subject Site is not currently developed with residential uses and no residential uses would be developed on the Subject Site under the Modified Project. Therefore, the Modified Project would not result in a new significant impact to population and housing displacement. The Modified Project would increase the potential square footage at the Subject Site by 231,750, which would increase employment opportunities. Therefore, the Modified Project would not result in a new significant impact to jobs/housing imbalance. The Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** None required.

## 14. PUBLIC SERVICES

### COMMUNITY PLAN ANALYSIS

The Certified EIR stated that the Community Plan 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. 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. It is 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 Community Plan is in place. Therefore, the Community Plan resulted in less-than-significant impacts related to fire protection and emergency services.

As stated in the Certified EIR, 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. As stated in the Certified EIR, implementation of the Community Plan 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. 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 Community Plan would implement Mitigation Measure **PS1** to reduce impacts to police services. The Certified EIR concluded that impacts to police services would result in less-than-significant impacts after implementation of this mitigation measure.

With regard to impacts related to schools, any development associated with the 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 Community Plan would bear its fair share of the cost of housing additional students generated. 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 Community Plan policies, in conjunction with state-mandated funding mechanisms

would help reduce impacts to school services. Therefore, the Community Plan resulted in less-than-significant impacts related to public schools.

With regard to impacts related to parks, the Certified EIR stated that the Community Plan would increase the population in the West Adams CPA. Additionally, the existing open space and public facilities land uses and zoning designations remain unchanged under the Community Plan. Similarly, the overall acreage of open space land uses 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) decreased slightly by seven acres, or two percent. Consequently, the acreage of open space and public facilities within the West Adams CPA remains insufficient. The Certified EIR stated that the population increase, due to implementation of the Community Plan, would cause significant impacts to public parks and recreational facilities. Mitigation Measure **PS3** would be implemented to reduce impacts to public parks. Nonetheless, the Certified EIR concluded that with implementation of Mitigation Measure **PS3** impacts related to public parks would be significant and unavoidable.

With regard to impacts related to libraries, the Certified EIR stated that the Community Plan would increase the demand for library services and resources of the LAPL System. Though 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, 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. Mitigation Measure **PS4** would be implemented to reduce impacts to libraries. Nonetheless, the Certified EIR concluded that with implementation of Mitigation Measure **PS4** impacts related to libraries would be significant and unavoidable.

**Community Plan Mitigation Measures.** The following mitigation measures were included in the Certified EIR to reduce impacts related to public services:

**PS1** Discretionary projects in the CPIO or the Crenshaw Corridor Specific Plan shall be reviewed at the discretion of 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.

**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.

## MODIFIED PROJECT ANALYSIS

The Modified Project would result in an increase of potential employment opportunities within the West Adams CPA. As mentioned previously, it is expected that the LAFD will maintain acceptable emergency response times with the provision of additional personnel and equipment as needed. Therefore, the Modified Project would not result in a new significant impact to fire services. The Modified Project would remain subject to Mitigation Measure **PS1** which ensures that the LAPD will determine if any additional crime prevention and security features would be available for specific development projects, and any additional design features identified by the LAPD shall be incorporated into a project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for a project. As such, the Modified Project would not result in a new significant impact related to police services. The Modified Project would remain 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. As such, the Modified Project would not result in a new significant impact related to public schools. The Certified EIR stated that the population increase, due to implementation of the Community Plan, would cause significant impacts to public parks, recreational facilities, and libraries. Though the Modified Project would not increase housing and population in the West Adams CPA, it would remain subject to Mitigation Measures **PS3** and **PS4** which state that parks, recreational, and library services will be monitored and developed by the City. As such, the Modified Project would not result in a substantial increase in the significant and unavoidable impacts related to public parks and libraries. The Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** The Certified EIR Mitigation Measures **PS1** through **PS4** from the Community Plan would be applicable and enforced for the proposed Modified Project.

## 15. TRANSPORTATION/TRAFFIC

### COMMUNITY PLAN ANALYSIS

The Community Plan includes a Transportation Improvement and Mitigation Program (TIMP) that consists of Bicycle Facility Improvements, Transportation Demand Management (TDM) Strategies, a Residential Neighborhood Traffic Management Plan, Transportation Systems Management (TSM) Strategies, Highway Infrastructure Improvements, Street System Classification Changes, and Public Transit Improvements. These plans are designed to reduce traffic impacts and improve the circulation system within the West Adams CPA. However, based on the findings in the Certified EIR the Community Plan resulted in a significant and unavoidable impact related to the circulation system. Additionally, the significant impact criteria established by the CMP states that a project would generate significant regional freeway impacts if the project increases traffic demand on a CMP facility by two percent of capacity ( $V/C \geq 0.02$ ), causing or worsening LOS F ( $V/C \geq 1.00$ ). As stated in the Certified EIR, the adoption of the Community Plan would generate significant regional freeway impacts at one freeway monitoring station due to an increase of traffic demand greater than two percent that would worsen an existing LOS F. Therefore, the Community Plan resulted in a significant and unavoidable impact related to the CMP. Existing emergency response routes are maintained in their existing locations and all related development would be designed in accordance with City standards, which include provisions that address emergency access. In addition, the proposed West Adams TIMP also includes highway infrastructure improvements and street system classification changes that facilitate emergency access. Therefore, the Community Plan resulted in less-than-significant impacts related to emergency access. As stated in the Certified EIR, the West Adams CPA is currently served by 33 Metro bus lines, six LADOT bus lines, and four Santa Monica bus lines.



Implementation of the Community Plan could intensify development around proposed TOD areas which would allow for an increase in both jobs and housing. Locating jobs near housing can help reduce commutes, increase walking and biking rates, thereby creating a benefit for public health. The proposed West Adams TIMP also includes a number of public transit improvements to encourage and facilitate transit ridership and proposes to increase the number of bike lanes along certain corridors. Therefore, the Community Plan resulted in less-than-significant impacts related to public transit, bicycle, and pedestrian facilities.

**Community Plan Mitigation Measures.** No feasible mitigation measures were identified to reduce the significant impacts related to the circulation system and CMP.

### **MODIFIED PROJECT ANALYSIS**

The Modified Project includes a change from Parcel Group A to Parcel Group F and will increase the FAR at the Subject Site to 2:1 and the maximum allowable height to 75 feet. However, the Subject Site's land use designation of Limited Industrial will remain unchanged. The Subject Site's net increase of 231,750 square feet under the Modified Project would account for approximately 6.1% of the estimated 3.8 million square foot increase of commercial space in the Community Plan. This increase would be minimal and would not generate a substantial number of new trips compared to the Community Plan. Moreover, development of the Subject Site would occur within the Jefferson/La Cienega TOD which reduces automobile reliance. As stated previously, the Community Plan resulted in a significant and unavoidable impact related to the circulation system. Though the Modified Project would result in a small net increase of trips it would remain subject to any plans designed to reduce traffic impacts and improve the circulation system within the West Adams CPA. As such, the Modified Project would not result in a substantial increase in the significant and unavoidable impacts related to the circulation system. As stated in the Certified EIR, the Community Plan would generate significant regional freeway impacts at one freeway monitoring station due to an increase of traffic demand. The Modified Project would result in a small net increase of trips however these trips are not anticipated to result in a substantial increase in freeway volumes compared to the Community Plan. As such the Modified Project would remain subject to any plans designed to reduce traffic impacts and improve the circulation system within the West Adams CPA. As such, the Modified Project would not result in a substantial increase in the significant and unavoidable impacts related to the CMP. Under the Modified Project 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. Moreover, the Modified Project would follow the proposed West Adams TIMP. Therefore, the Modified Project would not result in a new significant impact related to emergency access. The Modified Project would intensify development within the Jefferson/La Cienega TOD and would follow the West Adams TIMP which includes a number of public transit improvements to encourage and facilitate transit ridership and proposes to increase the number of bike lanes along certain corridors. Therefore, the Modified Project would not result in a new and significant impact related to public transit, bicycle, and pedestrian facilities. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review, including a project-specific traffic analysis. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** None required.

## 16. UTILITIES AND SERVICE SYSTEMS

### COMMUNITY PLAN

#### Construction

The Certified EIR stated construction that may occur during the lifespan of the 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 with construction activities in the West Adams CPA relative to the operation of the Community Plan 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 Community Plan would have a less-than-significant impact on water supply.

As stated in the Certified EIR, the evaluation of the effects of the Community Plan on wastewater conveyance was made using the expected demand for wastewater conveyance as a result of the reasonably foreseeable build-out of the West Adams CPA under the implementation of the Community Plan. In addition, the increase in wastewater generation associated with construction activities in the West Adams CPA relative to the operation of the Community Plan would be temporary and nominal. Therefore, construction activity that may occur during the lifespan of the Community Plan would have a less-than-significant impact on wastewater resources.

The Certified EIR states that the Community Plan is expected to comply with Section 66.32 of the LAMC during the demolition phase. Compliance with Section 66.32 of the LAMC would ensure that at least 50 percent of the demolition solid waste generated by the Community Plan would be diverted from the landfills serving the City of Los Angeles. Moreover, the Certified EIR states that the remaining landfills have the capacity to accommodate construction of developments as a result of the Community Plan. Therefore, the Community Plan resulted in less-than-significant impacts related to solid waste.

As stated in the Certified EIR, construction that may occur during the lifespan of the 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 West Adams CPA relative to the operation of the Community Plan would be temporary and nominal. Therefore, construction activity that may occur during the lifespan of the Community Plan would have a less-than-significant impact on energy resources.

#### Operation

As stated in the Certified EIR, the anticipated increase in demand for water supplies within the West Adams CPA represents less than one percent of total anticipated water supplies in the year 2030. Moreover, the impacts to water demand for future water resources are minimized because full implementation of the Community Plan in year 2030 would occur incrementally over the 20-year lifespan of the Community Plan and is continuously planned for by the City. Therefore, the Community Plan resulted in less-than-significant impacts related to water supplies.

The Certified EIR states that the increase in wastewater generated by the Community Plan would be 1.2 percent of the total existing average wastewater flows of the City of Los Angeles. As such the existing four

treatment plants would be able to treat wastewater generated under the Community Plan. Therefore, the Community Plan resulted in less-than-significant impacts related to wastewater treatment. As discussed in the Certified EIR Section 4.9 Hydrology and Water Quality, the Community Plan would not result in a substantial increase in impervious surfaces. Accordingly, the Community Plan does not cause a substantial increase in the peak flow rates or volumes that would exceed the drainage capacity of existing stormwater drainage facilities, and therefore does not warrant the construction of new stormwater drainage facilities or the expansion of existing facilities. Moreover, the Certified EIR states that the primary sewer reaches in the West Adams CPA have adequate capacity for the Community Plan. Therefore, implementation of the Community Plan results in a less-than-significant impact related to wastewater conveyance infrastructure, construction of new storm water drainage facilities, and the expansion of existing facilities.

As stated in the Certified EIR, the Community Plan does not conflict with the goals, objectives, and policies in the SRRE, CiSWMPP, Curbside Recycling Program, or the Framework Element which currently govern the solid waste management practices within the West Adams CPA. Additionally, the Community Plan increases the solid waste generated by 10,000 pounds per day or 1.2 percent per year over existing solid waste generation within the West Adams CPA. This level of increase does not disrupt successfully meeting the goals, objectives, and policies contained in any of the solid waste management policy documents of the City. Therefore, the Community Plan resulted in less-than-significant impacts related to solid waste.

As stated in the Certified EIR, the Community Plan's estimated additional fuel consumption represents less than one percent of petroleum fuel demand in 2008 within Los Angeles County. In addition, the Community Plan 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. Moreover, the Community Plan increases development near TOD areas. Accordingly, this reduces automobile reliance and related fuel consumption by providing housing opportunities for the community within close proximity to transit, as well as local-serving businesses and retail. Therefore, the Community Plan resulted in a less-than-significant impact related to petroleum. The Certified EIR states there is no need for new (off-site) electrical generation facilities or major enhancements to accommodate the Community Plan. Moreover, electricity generated by the Community Plan would not exceed the electricity generation potential of LADWP or the capacity of the distribution infrastructure. New development occurring from buildout of the Community Plan would be subject to Title 24, part 6 of the California Administrative code, the Energy Efficiency Standards for Residential and Nonresidential Buildings, and the City of Los Angeles' Green Building Code Energy Efficiency requirements. Consequently, as projects are built within the West Adams CPA, they will be in compliance with all applicable energy conservation plans and policies of the City. Therefore, the Community Plan resulted in less-than-significant impacts related to electricity. As stated in the Certified EIR, the Community Plan would consume less than 0.01 percent of SoCalGas' 2030 projected available supply. Therefore, the Community Plan resulted in less-than-significant impacts related to natural gas.

**Community Plan Mitigation Measures.** Impacts related to utilities and service systems were determined to be less-than-significant without mitigation.

## MODIFIED PROJECT ANALYSIS

**Construction.** Similar to the Community Plan, water usage, wastewater generation, and energy associated with construction activities would be temporary and nominal. Likewise, compliance with Section 66.32 of the LAMC would ensure that at least 50 percent of the demolition solid waste generated during construction would be diverted. Therefore, similar to the Community Plan, impacts related to utilities and service systems during construction would be less-than-significant. Lastly, the Modified Project does not

propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Operation.** The Modified Project's net increase of 231,750 square feet would account for approximately 6.1% of the estimated 3.8 million square foot increase of commercial space in the Community Plan. As stated in the Certified EIR, the anticipated increase in demand for water supplies within the West Adams CPA represents less than one percent of total anticipated water supplies in the year 2030. As such, the Modified Project's small net increase in square footage would not result in a new significant impact related to water services. As stated previously, the increase in wastewater generated by the Community Plan would be 1.2 percent of the total existing average wastewater flows of the City of Los Angeles and the existing four treatment plants would be able to treat wastewater generated under the Community Plan. As such, the Modified Project's small net increase in square footage would not result in a new significant impact related to wastewater services. The Modified Project would comply with all regulatory measures regarding solid waste and would not conflict with the goals, objectives, and policies which currently govern the solid waste management practices within the West Adams CPA. Therefore, the Modified Project would not result in a new significant impact related to solid waste. The Modified Project would increase the amount of buildable square footage at the Subject Site which would increase vehicle trips. However, this increase would be minimal and would occur within the La Cienega/Jefferson TOD which reduces automobile reliance. Therefore, the Modified Project would not result in a new significant impact related to petroleum. New development under the Modified Project would be subject to Title 24, part 6 of the California Administrative code, the Energy Efficiency Standards for Nonresidential Buildings, and the City of Los Angeles' Green Building Code Energy Efficiency requirements. Therefore, the Modified Project would not result in a new significant impact related to electricity. As stated in the Certified EIR, the Community Plan would consume less than 0.01 percent of SoCalGas' 2030 projected available supply. As such, the Modified Project's small net increase in square footage would not result in a new significant impact related to natural gas. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project specific environmental review. As such, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

**Modified Project Mitigation Measures.** None required.

## 17. CONCLUSION

As detailed above, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The Final EIR, as modified by this Addendum, may be used by the City of Los Angeles, acting as the Lead Agency under CEQA, in their consideration of the Modified Project because:

1. The implementation of the Modified Project would not result in new significant environmental effects from those depicted in the EIR. The differences between the impacts associated with the development envisioned in the Community Plan and the implementation of the Modified Project do not constitute a "substantial change" to the project that would require "major revisions" of the EIR due to the involvement of new significant environment effects or a substantial increase in the severity of previously identified significant effects.

2. There is no substantial new information. The Modified Project does not constitute substantial new information as defined in the CEQA Guidelines. Implementation of the Modified Project would not result in additional significant impacts that were not discussed in the EIR. Rather, all significant impacts that were disclosed in the EIR remain the same or will be mitigated. Additionally, the intent of the mitigation measures remains unchanged. Lastly, the Modified Project does not propose a specific development project, and any future proposed development projects at the Subject Site would be subject to project-specific environmental review.