PLANNING DEPARTMENT TRANSMITTAL TO THE CITY CLERK'S OFFICE

CITY PLANNING CASE:	ENVIRONMENTAL DOCUMENT:	COUNCIL DISTRICT:
CPC-2006-5567-CPU-M3	ENV-2008-478-EIR-ADD1	10 - Wesson
PROJECT ADDRESS:		
5870, 5880, 5890 West Jefferson Boulevard; 5869, 5871, 5877, and 5901 West Rodeo Road; APN: 4205-027-019, 4205-027-004, 4205-027-001		
APPLICANT	TELEPHONE NUMBER:	EMAIL ADDRESS:
City of Los Angeles □ New/Changed		
APPLICANT'S REPRESENTATIVE	TELEPHONE NUMBER:	EMAIL ADDRESS:
APPELLANT	TELEPHONE NUMBER:	EMAIL ADDRESS:
APPELLANT'S REPRESENTATIVE	TELEPHONE NUMBER:	EMAIL ADDRESS:
PLANNER CONTACT INFORMATION:	TELEPHONE NUMBER:	EMAIL ADDRESS:
Susan Wong	(213) 978-1372	susan.s.wong@lacity.org
ENTITLEMENTS FOR CITY COUNCIL CONSIDERATION		
Zone Change Ordinance		

FINAL ENTITLEMENTS NOT ADVANCING:			
N/A			
ITEMS APPEALED:			
N/A			
ATTACHMENTS:	REVISED:	ENVIRONMENTAL CLEARANCE:	REVISED:
✓ Letter of Determination		☐ Categorical Exemption	
✓ Findings of Fact		☐ Negative Declaration	
✓ Staff Recommendation Report		☐ Mitigated Negative Declaration	
☐ Conditions of Approval		☑ Environmental Impact Report	
✓ Ordinance		☐ Mitigation Monitoring Program	
✓ Zone Change Map		□ Other	
☐ GPA Resolution			
☐ Land Use Map			
☐ Exhibit A - Site Plan			
✓ Mailing List			
☐ Land Use			
☐ Other			
NOTES / INSTRUCTION(S):			
FISCAL IMPACT STATEMENT:			
□ Yes			
*If determine	ation states ac	Iministrative costs are recovered through fees, i	ndicate "Ves"
PLANNING COMMISSION:	ation states at	minimulative costs are recovered through rees, in	idicate res .
☑ City Planning Commission (CPC) ☐ North Valley Area Planning Commission			
☐ Cultural Heritage Commission (CHC) ☐ South LA Area Planning Commission			
☐ Central Area Planning Commission	☐ Central Area Planning Commission ☐ South Valley Area Planning Commission		nission
☐ East LA Area Planning Commission ☐ West LA Area Planning Commission		on	
☐ Harbor Area Planning Commission			
PLANNING COMMISSION HEARING DATE:		COMMISSION VOTE:	

October 11, 2018	8 - 0
LAST DAY TO APPEAL:	APPEALED:
N/A	N/A
TRANSMITTED BY:	TRANSMITTAL DATE:
James K. Williams Commission Executive Assistant II	November 14, 2018



Los Angeles City Planning Commission

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300 www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: NOV 0 9 2018

Case No. CPC-2006-5567-CPU-M3

Council District: 10 – Wesson

CEQA: ENV-2008-478-EIR-ADD1; SCH No. 2008021013

Plan Area: West Adams-Baldwin Hills-Leimert

Project Site:

5870, 5880, and 5890 West Jefferson Boulevard; 5869, 5871, 5877, and 5901

West Rodeo Road; and APN: 4205-027-019, 4205-027-004, 4205-027-001

("Subject Lots")

Applicant:

City of Los Angeles

At its meeting of October 11, 2018, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

A modification to the West Adams-Baldwin Hills-Leimert Community Plan to amend the Jefferson/La Cienega Transit Oriented Development Subarea in the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay (CPIO) for subject lots from Parcel Group A to Parcel Group F and adopt a zone change ordinance to modify the height district for the subject lots from 1VL to 2D. The modification will result in the re-designation of subject lots from Parcel Group A to Parcel Group F, a maximum height increase from 45 feet to 75 feet and a floor area ratio (FAR) increase from 1.5:1 FAR to a 2:1 FAR. The existing underlying zone of MR1 ("Restricted Industrial Zone") and General Plan land use designation for the subject lots of Limited Industrial will remain.

- 1. Found, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in Environmental Impact Report No. ENV-2008-478-EIR, SCH No. 2008021013, certified on June 29, 2016; and pursuant to CEQA Guidelines 15162 and 15164, and as supported by the addendum dated April 2018, no major revisions are required to the EIR and no subsequent EIR or negative declaration is required for approval of the project;
- Recommended that City Council amend, pursuant to Sections 13.14 C and 12.32 of the 2. Los Angeles Municipal Code (LAMC), the West Adams Community Plan Implementation Overlay District (Ordinance No. 184 794) for the Jefferson/La Cienega TOD Subarea, and provided that the office of the City Attorney review as to form and legality;
- Recommended that City Council adopt, pursuant to LAMC Section12.32 F. a Zone 3. Change Ordinance for the Subject Lots, to modify the Height District from MR1-1VL-CPIO to MR1-2D-CPIO;
- Recommended that City Council adopt the Staff Report as the Council's report on the 4. subject: and
- 5. Recommended that City Council adopt the attached Findings.

The vote proceeded as follows:

Moved:

Perlman

Second:

Padilla-Campos

Ayes:

Ambroz, Choe, Khorsand, Mitchell, Millman, Dake-Wilson

Absent:

Mack

Vote:

8 - 0

James K. Williams, Commission Executive Assistant II

Los Angeles City Planning Commission

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is not appealable.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Amended CPIO Ordinance, Zone Change Ordinance, Findings

c:

Reuben Caldwell, Senior City Planner

Teresa Batson, City Planner

Susan Wong, City Planning Associate

Ordinance	No.		
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An ordinance amending Ordinance 184,794, the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overly District (West Adams CPIO) for the West Adams-Baldwin Hills-Leimert Community Plan Area.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

SECTION 1. Pursuant to Section 13.14 of the Los Angeles Municipal Code and its authority to adopt zoning regulations, the City Council hereby amends Chapter V Jefferson/La Cienega TOD Subarea in the West Adams CPIO to include Figure V-1 Subarea Boundary Map as shown in the attached map which modifies the lots at 5870, 5880, 5890 West Jefferson Boulevard; and 5869, 5871, 5877, 5901 West Rodeo Road (APN: 4205027001, 4205027004, 4205027010, 4205027011, 4205027013, 4205027016, 4205027019) from Parcel Group A to Parcel Group F.



SECTION 2. Pursuant to Section 13.14 of the Los Angeles Municipal Code and its authority to adopt zoning regulations, the City Council hereby amends Chapter V Jefferson/La Cienega TOD Subarea in the West Adams CPIO to include Figure V-2 Height Map as shown in the attached map which modifies the lots at 5870, 5880, 5890 West Jefferson Boulevard; and 5869, 5871, 5877, 5901 West Rodeo Road (APN: 4205027001, 4205027004, 4205027010, 4205027011, 4205027013, 4205027016, 4205027019) from Parcel Group A to Parcel Group F.





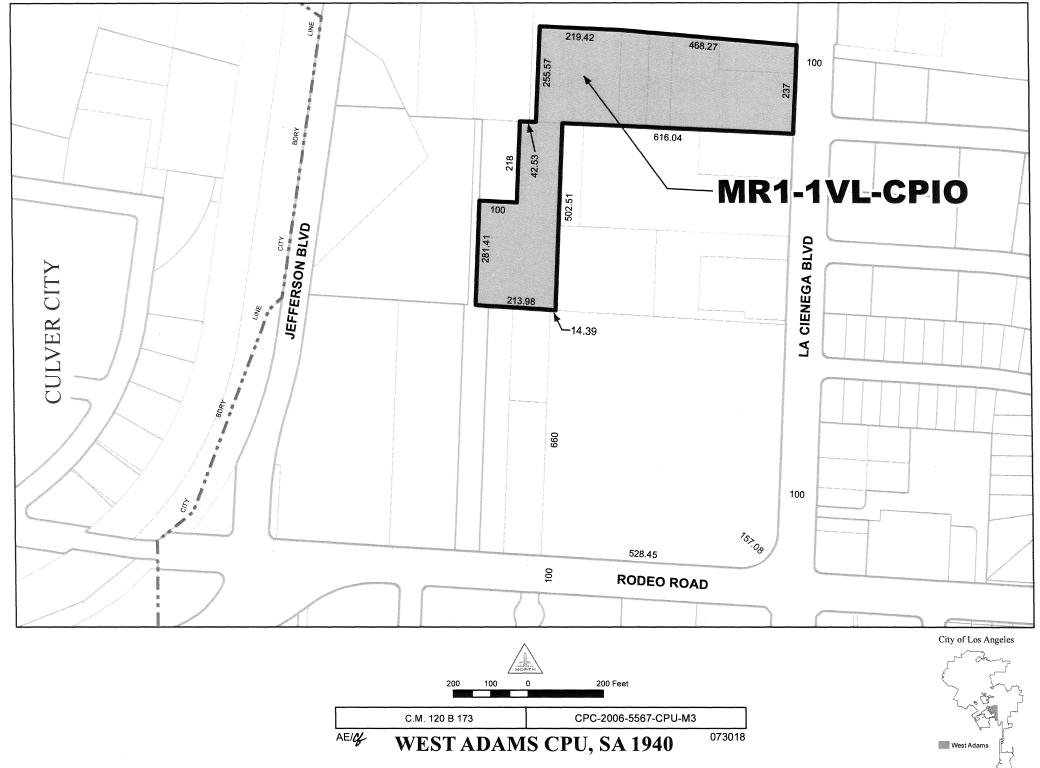
An ordinance amending Section 12.04 of the Los Angeles Municipal Code by amending the zoning map.

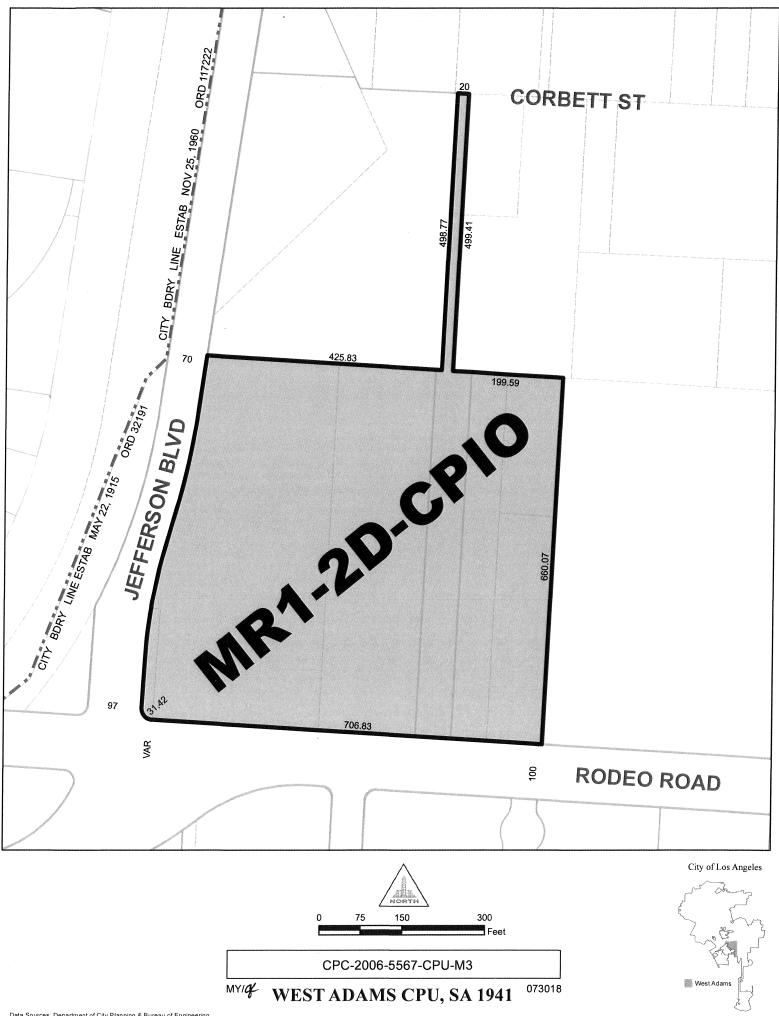
THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

SECTION 1. Section 12.04 of the Los Angeles Municipal Code is hereby amended by changing the zones and zone boundaries shown upon a portion of the Zoning Map attached thereto and made a part of Article 2, Chapter 1 of the Los Angeles Municipal Code, so that such portion of the Zoning Map shall set forth the zone and height district as shown in the table for Section 1 and on the attached Maps in the West Adams-Baldwin Hills-Leimert Community Plan and the Table for Section 2 and the Table for Section 3 attached hereto and incorporated herein by this reference, consistent with the provisions in Sections 2 and 3. The attached maps set forth the changes of zone and height district effectuated by this Ordinance.

Table 1 for Section 1

Subject Site	Existing Zone	New Zone
Lots at 5870, 5880, and 5890	MR1-1VL-CPIO	MR1-2D-CPIO
West Jefferson Boulevard; 5869,		777.7
5871, 5877, and 5901 West		
Rodeo Road		
APNs include: 4205027001,		
4205027004, 4205027010,		
4205027011, 4205027013,		
4205027016, 4205027019		





SECTION. 2. The intent of this Ordinance is to change the height district of the properties shown on the ordinance map in the West Adams-Baldwin Hills-Leimert Community Plan area. The City Council has approved this form of ordinance which utilizes subarea designations, tables, and a map to establish the location of the affected properties and to make the necessary changes for the community plan update process. The zone and height district changes proposed by this Ordinance are identified in the Table, below, identified as "Table for Section 2 - Zone and Height District Changes," (hereinafter, "Table for Section 2"). In the Table for Section 2 there are three columns. The first column titled, "Subarea No.," identifies an area of land that is particularly delineated on the attached map by that subarea number. The second column, titled "Existing Zone and Height District," identifies the existing zoning classification and height district classification for the corresponding subarea prior to adoption of the Ordinance and is provided for informational purposes. The third column, titled "New Zone and/or Height District," identifies the zoning classification and height district classification for the corresponding subarea effectuated by the Ordinance.

Table for Section 2

SUBAREA NO.	EXISTING ZONE AND HEIGHT DISTRICT	NEW ZONE AND/ OR HEIGHT DISTRICT
1941	MR1-IVL-CPIO	MR1-2D-CPIO

SECTION. 3. Pursuant to Section 12.32 G of the Los Angeles Municipal Code, and any amendment thereto, the following limitations are hereby imposed upon the use of that property described in Section 1, which is subject to a Permanent "D" Development Limitation. The "D" Development Limitations proposed by this Ordinance are identified in the Table, below, titled, "Table for Section 3 - 'Q' Conditions and 'D' Limitations," (hereinafter "Table for Section 3"). In the Table for Section 3 there are three columns. The first column titled, "Subarea No.," identifies an area of land that is particularly delineated on the attached map by that subarea and identified in the Table for Section 2. The second column, titled, "New Zone and/or Height District," identifies the zone and height district classifications effectuated by this Ordinance for the corresponding subarea. The third column, titled, "Conditions and Limitations," identifies the conditions and limitations imposed by the "Q" Qualified Classification and/or "D" Development Limitation, as applicable.

Table for Section 3

SUBAREA NO.	NEW ZONE AND/ OR HEIGHT DISTRICT	CONDITIONS AND LIMITATIONS
1941	MR1-2D-CPIO	 "D" DEVELOPMENT LIMITATION New uses and development projects shall comply with the West Adams CPIO District, including the Jefferson/La Cienega TOD Subarea regulations.

Findings

Project Location

The project location consists of seven lots at the northeast corner of West Jefferson Boulevard and West Rodeo Road in Council District 10. The lots include 5870, 5880, and 5890 West Jefferson Boulevard; 5869, 5871, 5877, and 5901 West Rodeo Road; lots with no addresses include APN: 4205027019, 4205027004, and 4205027001.

Charter Findings

Charter Section 556 - In accordance with Charter Sections 556, the proposed ordinances amending the West Adams CPIO (Ordinance No. 184,794, adopted on March 07, 2017) and the West Adams Community Plan zone and height district change ordinance are in substantial conformance with the purposes, intent and provisions of the City's General Plan and all applicable provisions of the Los Angeles Municipal Code (LAMC). The ordinances are consistent with and further accomplish goals objectives and policies in portions of the General Plan including the General Plan Framework.

Charter Section 558 - Los Angeles City Charter Section 558 requires that prior to adopting a land use ordinance, the City Council shall make findings that the ordinance conforms with public necessity, convenience, general welfare, and good zoning practice. The proposed ordinances conform with public necessity and good zoning practice because they support the preservation of industrial land with the goal of creating employment and training opportunities consistent with the goals and objectives of the West Adams CPIO, West Adams-Baldwin Hills-Leimert Community Plan, Los Angeles Municipal Code and the General Plan Framework Element.

The proposed ordinances substantially advance a legitimate public interest, convenience and general welfare because they support the overall fiscal health of the West Adams CPA and City by reasonably increasing the allowable square feet of underutilized limited industrial uses at the subject site in order to increase the industrial development potential for expansion of existing businesses or attraction of new business sectors to support additional employment opportunities. These larger industrially planned parcels possess considerable potential as viable sites for light industrial development or redevelopment due to their quarter mile proximity to the La Cienega Expo Line Transit Hub. The increase of job generating uses at this site supports the City's desire to maintain a strong ratio of good paying local jobs and housing, reduce commute times for residents in the area and retain and attract businesses in growing sectors such as high-tech and clean-tech industries. In addition, the creation of jobs close to a transit station will reduce reliance on automobile trips alleviating traffic congestion as a result which benefits the local residents and the general public at large.

Los Angeles Municipal Code (LAMC) Findings

LAMC 12.32 C - Pursuant to Section 12.32 C of the LAMC, the proposed zone change ordinance and amendment to the CPIO for the subject site within the Jefferson/La Cienega TOD Subarea boundaries of the West Adams CPIO will have no adverse impacts on the General Plan. The proposed ordinances are consistent with the goals and policies of the General Plan Framework. As previously mentioned, the proposed ordinances conform to public necessity, convenience, general welfare, and good zoning because they increase the economic development opportunities

in the Plan area by reasonably increasing the square feet of light industrial land with the goal of retaining and attracting high wage jobs in the clean- tech, high-tech and creative industries near the La Cienega Expo Line Station Transit Hub. The zone change and amendment to the CPIO will continue to assure that future development of light industrial properties is compatible with surrounding properties, the overall pattern of development, and the economic goals in the West Adams CPA.

LAMC 13.14 C.4—In accordance with LAMC 13.14 C.4, the ordinance amending the West Adams CPIO, Ordinance No. 184,794 is consistent with the goals, policies and objectives of the West Adams Community Plan. The Project will re-designate the subject lots in the West Adams CPIO Jefferson/La Cienega TOD Subarea from Parcel Group A to Parcel Group F, and increase the maximum building height and FAR of the subject lots through the accompanying height district zone change. The proposed Project does not currently include a development project, however, over time, the expansion of existing businesses and redevelopment at the subject lots will increase the potential for job generating uses by allowing more flexibility in the building envelope. The increased square feet of industrial land will allow for growth in the Subarea while preserving the character of the surrounding neighborhood through use limitations and development standards as defined in the CPIO. Furthermore, the proposed ordinance will be consistent with the maximum building height and FAR of adjacent industrially zoned lots within the Jefferson/La Cienega TOD Subarea. The approval of the amendment and zone change ordinance will support the mix of uses essential to creating a healthy, viable, and sustainable community in the West Adams CPA.

The proposed ordinances conform to public necessity, convenience and general welfare and good zoning practice in a number of ways. The proposed changes will increase the maximum height of the subject lots from 45 feet to 75 feet, increase the FAR from 1.5:1 to 2:1, and re-designate the subject lots from Parcel Group A To Parcel Group F expanding industrial uses in the West Adams Community Plan Area. Granting the requested amendment and height district zone change will be consistent with public necessity, convenience, general welfare and good zoning practice because they will expand employment opportunities and further the economic development and industrial land use goals of the General Plan and the West Adams Community Plan.

The amendment and zone change will be consistent with public necessity, convenience and general welfare because they further support the preservation of industrial land for job generating and training opportunities within the West Adams CPA. The subject site is located in the Jefferson/La Cienega TOD Subarea of the West Adams CPIO which consists of a mix of commercial and industrial uses. The Subarea is intended to preserve industrial land uses, support the creation of high wage jobs and training opportunities in the local area and encourage a mix of uses to support a balance of jobs, housing and neighborhood serving amenities. The amendment and zone change are consistent with public necessity and the Subarea goals because they allow employment growth to occur for existing businesses that may wish to expand or redevelop at the subject site. The proposed modification will allow a reasonable increase in square feet, supporting the potential for larger industrial building envelopes to expand job generating uses.

Public convenience and general welfare is also met by the proposed modification because it reduces reliance on vehicles by targeting employment growth within a quarter mile of the La Cienega Expo Line Transit Station. The close proximity to the Expo Line increases accessibility to an employment center resulting in the reduction of traffic in nearby neighborhoods. Supporting the subject site as a job center will provide more employment opportunities in the local area as well as provide more options for travel to work by convenient and reliable public transit.

Granting the requested amendment and height district zone change will be consistent with good zoning practice. The proposed ordinances follow good zoning practice in implementing the goals

of the General Plan and the West Adams Community Plan by encouraging job growth in industrial areas adjacent to transit. The amendment and accompanying height district zone change will allow consistent scale and height for the subject lots with adjacent industrial properties to the north fronting West Jefferson Boulevard. The industrial lots immediately north of the subject site have a current maximum height of 75 feet and a floor area ratio of 2:1. The approval of the proposed action will provide a consistent development pattern and building envelope for future industrial uses along the Jefferson Boulevard.

General Plan Findings

The amendment to the West Adams CPIO and the zone change ordinance will have no adverse effect upon the City's General Plan. The ordinances further accomplish goals, objectives and policies contained in portions of the General Plan including the General Plan Framework and Land Use Element.

General Plan Framework

The proposed Ordinances (Exhibit A and B) are consistent with the following goals, objectives, and policies of the General Plan Framework as they relate to Industrial Land and Economic Development:

Industrial Lands

Goal 3J: Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.

Objective 3.14: Provide land and supporting services for the retention of existing and attraction of new industries

Policy 3.14: Provide flexible zoning to facilitate the clustering of industries and supporting uses, thereby establishing viable "themed" sectors (e.g. move /television/media production, set design, reproduction, etc.)

Economic Development

Policy 7.2.8: Retain the current manufacturing and industrial land use designations consistent with other Framework element policies, to provide adequate quantities of land for emerging industrial sectors.

Policy 7.2.11: Ensure that the City has sufficient quantities of land suitable to accommodate existing, new and relocating industrial firms, whose operations are appropriate to a special location in Los Angeles.

Policy 7.10.2: Support efforts to provide all residents with reasonable access to transit infrastructure, employment, and educational and job training opportunities.

The Project will facilitate the above goals, objectives and policies improving the area's economic vitality by increasing industrial land use opportunities in the Jefferson/La Cienega TOD Subarea. The subject lots are currently occupied by low scale light industrial manufacturing, creative office buildings and surface parking lots that do not maximize the employment generating potential. Combined, the seven lots are approximately 467,344 square feet and the combined square feet of current office and industrial building space is approximately 295,889 square feet, approximately 63% lot coverage. The remaining 171,455 square feet of the land is utilized as surface parking.

Increasing the maximum square footage by increasing the maximum building height and FAR would allow existing businesses to reasonably expand their operations or new businesses to locate at a site that allows greater flexibility in the building envelope. This supports the General Plan Framework goals, policies and objectives for business retention, business attraction and increasing the City's fiscal well-being while supporting the Framework's goal of providing residents educational and employment opportunities.

Land Use Element - West Adams-Baldwin Hills-Leimert Community Plan

The West Adams Community Plan anticipates that existing commercial, industrial and transitoriented opportunity areas will accommodate future growth in a manner that improves economic vitality as well as physical conditions in the West Adams CPA. The creation of diverse employment opportunities in all sectors is encouraged in the West Adams CPA so that jobs will be distributed more equitably and made more accessible to nearby families, thereby strengthening local economic self-sufficiency and overall community sustainability.

The proposed ordinances will promote the objectives, policies and goals of the West Adams-Community Plan by preserving land for industrial use and supporting increased employment and training opportunities in close proximity to transit in the Jefferson/La Cienega TOD Subarea. As businesses expand or new developments occur at the subject site, there will be increased economic development opportunities for local residents resulting in more sustainable and healthy neighborhoods.

The proposed ordinances are consistent with the following goals, objectives and policies of the West Adams Community Plan, including:

Transit-Oriented Community Centers

Goal LU40: A community where the economic vitality of commercial nodes, centers and transit-oriented development areas is increased by encouraging contextual new development that maximizes access to transit, jobs, goods and services, and conserves desirable community character.

Goal LU42: A community where neighborhood serving uses which strengthen and diversify the economic base are attracted by expanding market opportunities for both traditional existing businesses and emerging new businesses.

Goal LU46: A community that maintains and increases the commercial employment base for community residents whenever possible.

Industrial Areas

Policies LU65-1: Maintain Existing Industrial Land Where Appropriate. Maintain existing industrial land uses where appropriate as well as designate lands for new emerging industry including industrial parks, research and development facilities, light manufacturing, and other similar uses which provide employment opportunities.

Goal LU66: A community plan which retains industrial designations that are appropriate in order to maintain and increase the industrial employment for community residents.

Policy LU66-1: Link Jobs to Residents. To reconnect neighborhoods by linking residents to nearby jobs, training and needed services.

Policy LU66-2: Protect Large Industrially Planned Parcels. Strive to protect large industrial planned parcels located along the Expo Line and in the Hyde Park area from development by other uses which do not support the industrial base of the Community, and the City.

The proposed modification promotes the goals and policies of the West Adams Community Plan of supporting transit-oriented districts outside the City Center that attract "Hybrid Industrial" uses and encourage emerging commercial, office, and "clean-tech" uses. The West Adams Community Plan identifies the Jefferson/La Cienega TOD Subarea as a multimodal village that includes a mixture of uses and balances the need for jobs, housing, open space, goods and services while being sensitive to its surrounding neighborhood character.

The amendment to the West Adams CPIO, Jefferson/La Cienega TOD Subarea and the height district zone change to subject lots in the West Adams CPIO from MR1-1VL-CPIO to MR1-2D-CPIO increases the allowable light industrial square footage to be built out over time. The approval of these ordinances increases the potential of light industrial space by 231,750 square feet in the West Adams CPA resulting in an increase in potential industrial use on lots targeting growth adjacent to a medium to high intensity transit hub. The ordinances would support increased opportunities for job generation in the creation of a multimodal village within the subarea by furthering employment growth in the area.

West Adams Community Plan Implementation Overlay District (CPIO)

The proposed modification complies with the purposes of the West Adams CPIO which is an implementation tool of the West Adams Community Plan. The amendment to the West Adams CPIO will preserve viable industrial land for "clean-tech" and "high-tech" uses, support transit oriented businesses, and support the creation of high wage jobs and training for the West Adams CPA. As previously stated, the proposed amendment also will not change the General Plan land use designation of Light Industrial for the subject lots. Ensuring that industrial land in the Jefferson/La Cienega TOD Subarea is preserved and maximized, an important factor in retaining a strong industrial employment sector in the Plan Area. The approval of the CPIO amendment and accompanying zone change will support the economic development goals for the local area.

CEQA Findings

The City of Los Angeles as the lead agency has determined that the proposed ordinances would not have a significant impact on the environment. Since Environmental Impact Report ENV-2008-478-EIR analyzed the West Adams-Baldwin Hills-Leimert Community Plan and the West Adams CPIO, it was determined that an addendum to this EIR was appropriate for the purposes of satisfying the CEQA requirements.

As stated in the conclusion in the Addendum to the Environmental Impact Report, the Department of City Planning concludes that consistent with the Final EIR for the Community Plan, the Project will not result in any new significant environmental effects or substantial increase in severity of previously identified significant effects.

The implementation of the 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 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.

Implementation of the 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 remain the same or will be mitigated. 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.