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City of Los Angeles

Department of City Planning • Environmental Analysis Section City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



FINAL ENVIRONMENTAL IMPACT REPORT ADDENDUM

SOUTHEAST LOS ANGELES COMMUNITY PLAN AREA

Jordan Downs Urban Village Specific Plan

Case Number: ENV-2010-32-EIR State Clearinghouse Number: 2010021007

Project Location: The Specific Plan area has a total acreage of 118.5 and is generally bordered by 97th Street to

the north, 103rd Street to the south, Grape Street to the west and Alameda Street to the east.

Council District: 15 – Joe Buscaino

Project Description: The Housing Authority of the City of Los Angeles (HACLA) and Jordan Downs Community Partners, LLC propose amendments to the Jordan Downs Urban Village Specific Plan (JDUVSP). The amendments are necessary to 1) allow more land area for commercial development and 2) merge the Family Resource Center and Gymnasium and move both from their current proposed locations, BLOCK 7 and BLOCK 12, respectively, to BLOCK 10A. The larger commercial land area will require the westerly expansion of BLOCK 1. As a result of BLOCK 1 increasing in size, Laurel Street will be re-aligned to run perpendicular to the new Century Boulevard and the street will move slightly to the west. As a result of the Family Resource Center and Gymnasium relocation, open space will be redistributed to meet the Open Space requirements of the Specific Plan.

The increase in square footage for commercial uses is necessary for the commercial developer, Primestor Development, to build enough commercial retail to support not only Jordan Downs, but also the surrounding neighborhoods for current residents and future population grown. The new location of the Family Resource Center and Gymnasium will improve the functionality of the public facilities in Jordan Downs and create a centralized social hub of community activity. The proposed amendments will improve the JDUVSP site plan and allow development that will promote community cohesion and fellowship and stimulate and bolster much needed economic activity.

APPLICANT:

The Housing Authority of the City of Los Angeles (HACLA) and Jordan Downs Community Partners, LLC

PREPARED BY:

Terry A. Hayes Associates Inc.

ON BEHALF OF:

The City of Los Angeles Department of City Planning Environmental Analysis Section

JORDAN DOWNS URBAN VILLAGE SPECIFIC PLAN

FINAL ENVIRONMENTAL IMPACT REPORT ADDENDUM

Prepared for:

CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING

Prepared by:

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1.0 INTRODUCTION

This environmental document has been prepared under the requirements of California Environmental Quality Act (CEQA) Public Resources Code Section 21000 *et seq.*, including CEQA Section 21166, and the guidelines promulgated in connection therewith at 14 California Code of Regulations Section 150000 *et seq.* (the "CEQA Guidelines"). This Final Environmental Impact Report (EIR) Addendum (Addendum) discloses whether new or more severe environmental effects would occur as a result of the proposed changes to the Jordan Downs Urban Village Specific Plan (hereafter referred to as the Revised Specific Plan).

1.1 PROJECT BACKGROUND

The Housing Authority of the City of Los Angeles (HACLA), the state-chartered public agency tasked with administering U.S. Department of Housing and Urban Development (HUD) housing programs in the City of Los Angeles, plans to rebuild the Jordan Downs public housing complex in the Watts neighborhood of the City of Los Angeles and transform the area into a mixed-use, transit-oriented development with new homes, jobs, schools, parks, and social facilities. Towards this end, HACLA purchased approximately 21.08 acres of land adjacent to the existing public housing complex on April 1, 2008. HACLA and the City of Los Angeles Department of City Planning (DCP) have since engaged community stakeholders in both a Master Plan and a Specific Plan process for its redevelopment. The Jordan Downs Master Plan was adopted by the HACLA Board of Commissioners on January 15, 2010. Subsequently, DCP prepared the Jordan Downs Urban Village Specific Plan (hereafter referred to as the Approved Specific Plan) to serve as the implementation tool for the Master Plan and provide the land use framework for the redevelopment of the Specific Plan Area through land use and zoning designations. The Final EIR (hereafter referred to as the Certified EIR) prepared for the Approved Specific Plan was certified by the City of Los Angeles on April 17, 2013.

1.2 PURPOSE AND USE

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

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(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.

According to CEQA Guidelines Section 15162, once an EIR has been certified, a lead agency need not prepare a Subsequent EIR unless... on the basis of substantial evidence in light of the whole record... one or more of the following conditions occurs:

- (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.

As detailed in this Addendum, the proposed changes to the Approved Specific Plan would not fulfill any of the conditions outlined in CEQA Guidelines Section 15162(a). This Addendum provides the substantial evidence required by CEQA Guidelines Section 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 Revised Specific Plan, and with implementation of mitigation measures identified in this Addendum, the Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

1.3 CERTIFIED EIR

The Notice of Preparation (NOP) for the Draft EIR prepared for the Jordan Downs Specific Plan (SCH No. 2010021007) was received and circulated by the State Clearinghouse for a period of 30 days beginning February 2, 2010. The comment period was then extended through March 31, 2010 to provide additional opportunity for interested parties to comment on the scope of the Draft EIR. A public scoping meeting to solicit comments on the scope of the Draft EIR was also held on February 20, 2010. The Draft EIR was completed and circulated for a 45-day public review period from November 18, 2010 through

January 2, 2011. The Final EIR, which responded to all of the comments received on the Draft EIR, was prepared in September 2011. The Final EIR was certified by the City of Los Angeles on April 17, 2013.

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

- **Aesthetics** (**Shade and Shadow**). During the Winter Solstice, shadows cast by the proposed development would impact the single-family residences on 97th Street, north of the Specific Plan Area, for a period of more than three hours.
- Air Quality (Construction, Operational, and Greenhouse Gas [GHG] Emissions). During construction, NO_x and PM₁₀ regional emissions, as well as PM_{2.5} and PM₁₀ local concentrations, would exceed regional and local significance thresholds. Operational emissions would also exceed regional significance thresholds for VOC, NO_x, CO, and PM₁₀. Similarly, GHG emissions would exceed the 4.6 metric tons of CO₂e per year per service population significance threshold.
- **Noise** (**Construction**). During construction, noise levels would exceed the 5-dBA significance threshold at multiple sensitive receptors during all phases of construction.
- **Traffic and Transportation**. Implementation of the Approved Specific Plan would result in significant and unavoidable impacts at the following signalized intersections, and no feasible mitigation measures were identified:
 - o Alameda Street (W) and Firestone Boulevard (County of Los Angeles, PM peak hour)
 - o Alameda Street (W) and Century Boulevard/Martin Luther King Jr. Boulevard (City of Lynwood, AM and PM peak hours)
 - o Central Avenue and Century Boulevard (City of Los Angeles, AM and PM peak hours),
 - Long Beach Boulevard and Tweedy Boulevard (Cities of South Gate and Lynwood, AM and PM peak hours)

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.

2.0 PROJECT DESCRIPTION

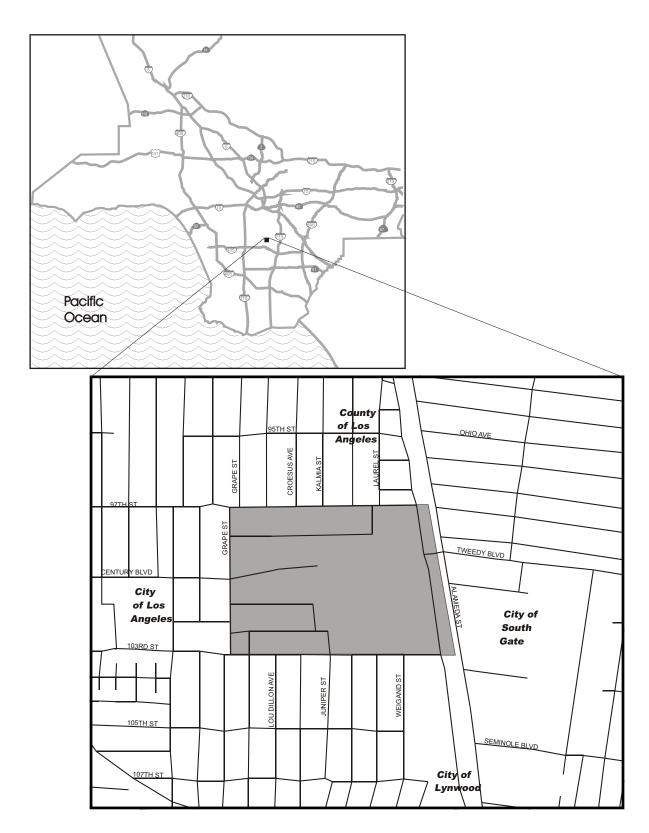
This section provides a description of the proposed changes and compares the Revised Specific Plan to the Approved Specific Plan. The project description describes the project site and provides an overview of the construction phases for the implementation of the Revised Specific Plan. The discretionary actions and approvals for the implementation of the Revised Specific Plan are also identified.

2.1 PROJECT LOCATION

The Specific Plan Area is located approximately eight miles south of Downtown Los Angeles, one mile north of the Glenn Anderson Freeway (I-105) in the Watts neighborhood of the City Los Angeles. As shown in Figure 2-1, the Specific Plan Area is generally bound by 97th Street to the north, Alameda Street to the east, 103rd Street to the south, and Grape Street to the west. In total, the Specific Plan Area encompasses approximately 118.5 acres, inclusive of streets, and includes the Jordan Downs Public Housing Complex and Recreation Center, Mudtown Farms (an approximately 2.5-acre community garden), David Starr Jordan High School, and an Annexation Area. The Annexation Area included approximately 41.74 acres of land that was located within unincorporated Los Angeles County. However, this area has since been annexed to the City of Los Angeles and is now located within the Southeast Los Angeles Community Plan Area (CPA) of the City of Los Angeles. The Specific Plan Area is surrounded by a residential neighborhood consisting primarily of one- or two-story single-family and multi-family residences with some one-way streets to the north, west, and south. To the east of the Specific Plan Area, facing Alameda Street, is mainly industrial, and separated from the adjoining communities by the ten-mile long Alameda Corridor railroad trench that allows the frequent passage of the 40 to 50 long-distance freight trains each day traveling from the Ports of Long Beach and Los Angeles. Tweedy Avenue located immediately to the east of the Specific Plan Area is one of the few nearby locations with a road crossing over the railroad trench. The project site and surrounding area is shown in **Figure 2-2**.

2.2 APPROVED SPECIFIC PLAN

Implementation of the Approved Specific Plan envisioned replacing the existing 700 Jordan Downs public housing units, one-for-one, and constructing up to 1,100 additional housing units to be built in a variety of residential building types for a total of 1,800 residential units. Community facilities were to include the Family Resource Center and a new gymnasium. In addition, up to 250,000 gross square feet (gsf) of employment uses were envisioned to be constructed on seven acres of existing industrial land along the Alameda Street corridor, plus up to 20,000 gsf of community-serving retail and services were to be located in mixed-use buildings along the Century Boulevard extension and at Croesus Avenue at 103rd Street. Two possible school sites were also identified in addition to Los Angeles Unified School District's (LAUSD) David Starr Jordan High School grounds. In addition to residential, commercial and educational uses, the Approved Specific Plan also included a network of parks and open space totaling approximately 8.9 acres center around a new central park.









SOURCE: TAHA, 2015.







SOURCE: TAHA, 2015.

2.3 REVISED SPECIFIC PLAN

Similar to the Approved Specific Plan, implementation of the Revised Specific Plan would consist of replacing the existing 700 public housing units one-for-one. The Revised Specific Plan does not increase the maximum allowable residential units above the 1,800 units analyzed in the EIR and adopted Jordan Downs Specific Plan, nor does it increase the commercial and employment uses analyzed in the EIR and adopted Specific Plan. The Revised Specific Plan may not ultimately achieve the maximum numbers analyzed previously, therefore the impacts from the Revised Specific Plan would be less than or equal to what was previously identified in the EIR and Adopted Specific Plan. The analysis in this Addendum, however, assumes for the purposes of a conservative analysis that the maximum number of units would be developed, and thus the maximum impact level would occur. The Family Resource Center and Gymnasium (approximately 60,000 gsf), as well as a new 4.83-acre central park would be constructed under the Revised Specific Plan.

As described in detail below, Block 1 of the Specific Plan Area would increase in size in order to accommodate larger commercial and retail spaces. This would require the re-alignment of Laurel Street. Laurel Street, which is currently parallel to Alameda Street, would become perpendicular to Century Boulevard. As a result, Block 3A and portions of Blocks 3 and 24 would become part of Block 1. A larger retail block would allow for a larger anchor store and greater variety in smaller shops. The Family Resource Center would also move from Block 7 to Block 10A. Placing the Family Resource Center adjacent to the new central park would make it safer for pedestrians, as pedestrians using the Family Resource Center would not have to cross Century Boulevard to get to the central park. In addition, the Gymnasium located on Block 12 would become part of the Family Resource Center, and all public facilities would be located in one central area. This would not only improve safety, but the concentration of open space and public facilities would encourage healthy social interaction among residents.

2.4 COMPARISON OF THE REVISED SPECIFIC PLAN TO THE APPROVED SPECIFIC PLAN

LAND USE REGULATIONS

The Revised Specific Plan provides the land use framework for the redevelopment of the Specific Plan Area through land use and zoning designations. By establishing new zones, the Revised Specific Plan provides the regulatory controls and guidelines to guide the physical development of the Specific Plan Area.

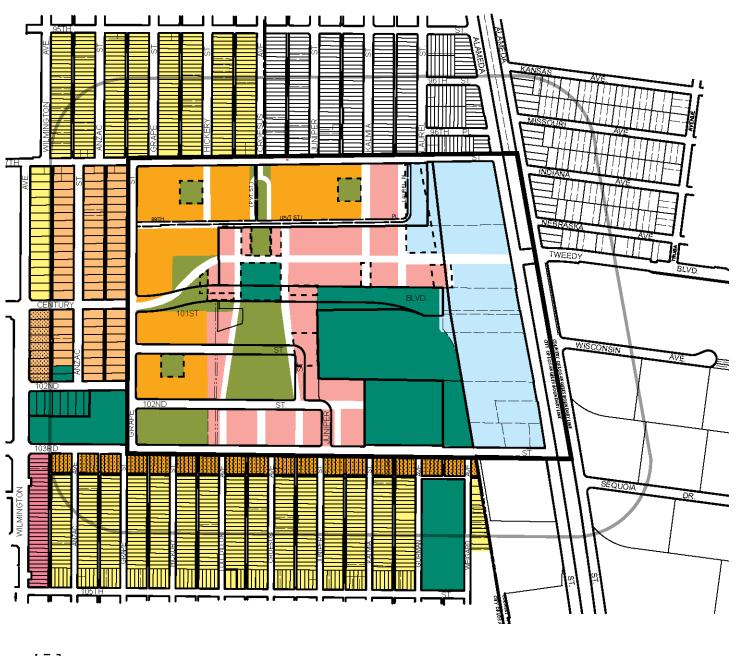
The Approved Specific Plan land use designations are shown in **Figure 2-3** and the Revised Specific Plan land use designations are shown in **Figure 2-4**. As shown, existing and proposed Southeast Los Angeles Community Plan land use designations within the Specific Plan Area include Low, Low Medium I, Low Medium II, Medium, and Neighborhood, General and Limited Commercial, Open Space and Public Facility. The existing and proposed zone changes are shown in **Figure 2-5** and include the Agricultural Zone (A1), Public Facilities Zone (PF), Open Space (OS), Residential/Accessory Zones (RAS3), Multiple Dwelling Zone (R3), and Commercial Manufacturing Zone (CM).

As mentioned above certain blocks within the Specific Plan Area have been reconfigured and various land uses within the Specific Plan Area have been relocated. The reconfigured blocks within the Specific Plan Area are shown in **Figure 2-6**. **Figure 2-7** depicts both the existing and the proposed block configurations with zoning.

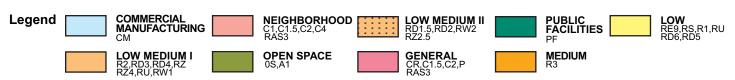






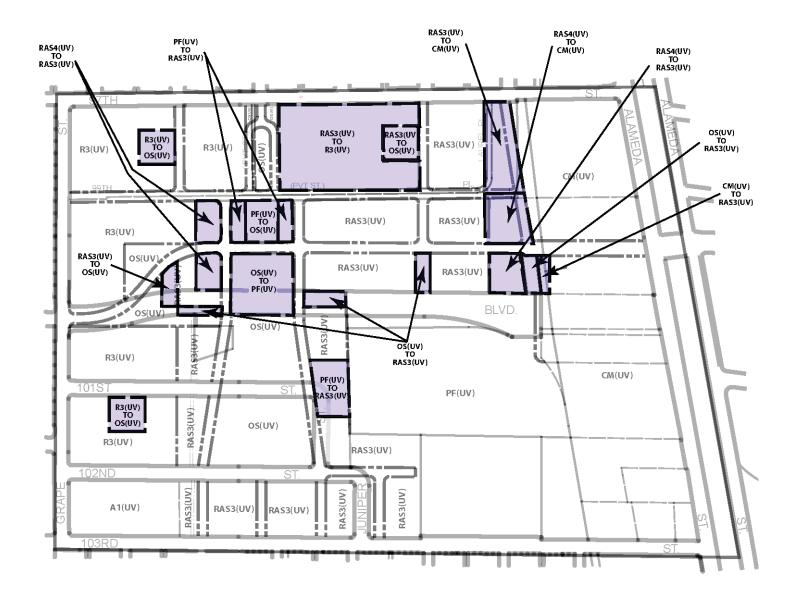






SOURCE: QMS, TAHA, 2015



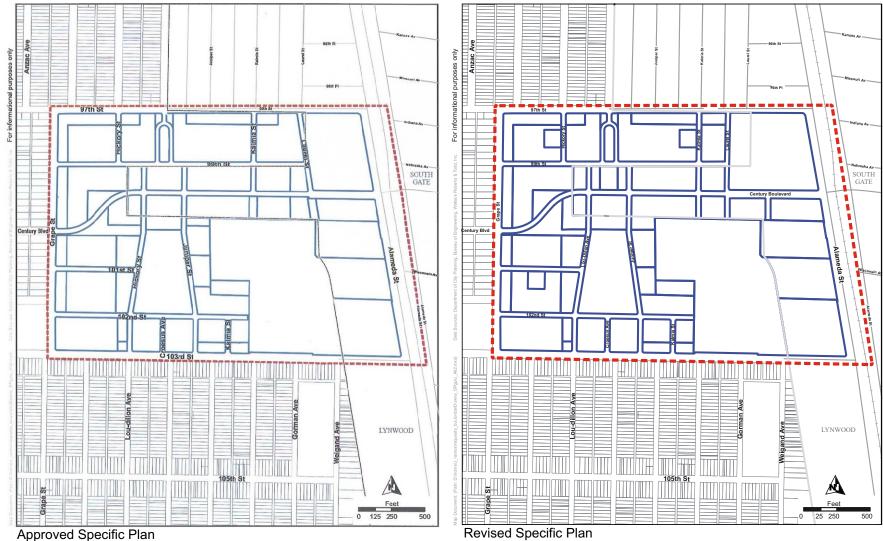






SOURCE: QMS, TAHA, 2015





Specific Plan Area







Revised Specific Plan

Approved epocine i lai

Legend:

PF-UV A1-UV

RAS4-UV

CM-UV

OS-UV RAS3-UV R3-UV



General Plan Amendments. Pursuant to procedures set forth in Section 11.5.6 of the Los Angeles Municipal Code (LAMC), **Table 2-1** identifies the required General Plan Amendments to the Southeast Los Angeles Community Plan.

TA	TABLE 2-1: GENERAL PLAN AMENDMENTS			
	CHANGE	BLOCKS		
1	Open Space to Neighborhood Commercial	X, Y, Z and 9E (portion)		
2	Medium Multi-Family to Open Space	19B (portion – New Block 19D, 20 (portion – New Block 20B) and 23 (portion – New Block 23B)		
3	Neighborhood Commercial to Commercial Manufacturing	3 (portion) and 3A		
4	Neighborhood Commercial to Commercial Manufacturing	3, 3A, and 7 (portion)		
5	Public Facilities to Neighborhood Commercial	7 (portion), and 12		
6	Open Space to Public Facilities	10A		
7	Medium Multi-Family to Commercial Manufacturing	24 (portion)		
8	Neighborhood Commercial to Open Space	9D (portion)		
SOU	SOURCE: Michaels Development Company, 2015.			

Specific Plan Amendments. Pursuant to procedures set forth in Section 11.5.7 of the LAMC, Specific Plan Amendments are required to modify the language on page 2 referencing the Tentative Tract Map (TTM) of Map 1 Recordation and to modify Laurel Street.

Zone Changes. Pursuant to Section 12.32 of the LAMC, **Table 2-2** identifies the required Zone changes.

TABLE 2-2: ZONE CHANGES			
	CHANGE	BLOCKS	
1	RAS3 to CM	3 (portion) and 24 (portion)	
2	RAS3 to R3	23 and 23A	
3	RAS4 to CM	3A	
4	CM to RAS3	2 (portion)	
5	OS to RAS3	X, Y, Z and 9D (portion)	
6	PF to OS	7 (portion)	
7	PF to RAS3	7 (east and west portions) and 12	
8	RAS3 to OS	9D (portion) and 23 (portion- New Block 23B	
9	OS to PF	10A	
10	R3 to OS	19B (portion – New Block 19D) and 20 (portion –	
		New Block 20B)	
11	RAS4 to RAS3	4A, 8A and 9A	
SOU	SOURCE: Michaels Development Company, 2015.		

Similar to the Approved Specific Plan, the residential building typologies proposed under the Revised Specific Plan would continue to include Townhouses, Stacked Flats, Mid Rise Stacked Flats, and Courtyard Houses. The Approved Specific Plan building typologies by block are shown in **Table 2-3**, and the Revised Specific Plan building typologies by block are shown in **Table 2-4**. **Figure 2-8** identifies the locations of both the existing and proposed building typologies by block.

Block	Size (Acres) /a/	Building Typology
1	5.62	Commercial Site
2	1.59	Commercial Site
3	1.00	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
3A	0.4	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
4	1.00	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
		, ,
4A	0.5	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
5	1.75	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
6	1.70	Townhouses, Mid rise Stacked Flats, or Mixed Use
7	0.91	Family Resource Center
A8	0.33	Courtyard Houses, Townhouses or Stacked Flats
8B	2.75	Courtyard Houses or Townhouses
8C	0.53	Open Space
8D	0.69	Courtyard Houses or Townhouses
X	0.69	Open Space
Υ	0.25	Open Space
Z	0.22	Open Space
9A	0.46	Courtyard Houses, Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
9B	0.81	Courtyard Houses, Townhouses or Stacked Flats
9C	1.81	Courtyard Houses, or Townhouses
9D	0.63	Courtyard Houses, Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
9E	0.95	Open Space, Los Angeles Department of Water and Power Switching Station
9F	0.55	Courtyard Houses, or Townhouses
10A	1.45	Open Space
10B	4.93	Open Space
11	0.84	M id rise Stacked Flats or Mixed use
12	0.73	Community Gymnasium
13	1.42	Townhouses, Stacked Flats or Mixed use
14	0.50	Courtyard Houses or Townhouses
14A	0.20	Courtyard Houses or Townhouses
15	0.73	Courtyard Houses, Townhouses, Stacked Flats or Mixed Use
15A	0.28	Courtyard Houses, Townhouses, Stacked Flats or Mixed Use
16	1.03	Stacked Flats or Mixed Use
17	1.03	Stacked Flats or Mixed Use
18A	0.34	Courtyard Houses or Townhouses
18B	2.48	Mudtown Farms Agricultural Education and Demonstration Center
18C	0.34	Courtyard Houses or Townhouses
19A	0.70	Stacked Flats or Mixed Use
19B	2.59	Courtyard Houses or Townhouses
19C	0.43	Courtyard Houses or Townhouses
20	2.23	Courtyard Houses or Townhouses
20A	1.10	Courtyard Houses or Townhouses
21	1.43	Townhouses, Stacked Flats or Mixed use
21A	0.28	Townhouses, Stacked Flats or Mixed use
22	0.28	Open Space
23	3.70	Courtyard Houses, Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
23A	0.69	Courtyard Houses, Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
24	2.22	Courtyard Houses, Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
24A		Courtyard Houses, Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use Courtyard Houses, Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
	0.30	Maintain Exiting Use /b/
30A	17.26	
30B	0.77	Community Use
30C	3.28	Maintain Exiting Use /b/
31	3.24	Maintain Exiting Use /b/
32	4.43	Maintain Exiting Use /b/
ROW	28.20	Not Applicable

/a/ All acreages of blocks were calculated without the use of precision tools such as CAD (Computer Aided Design), and are conceptual. All acreage will be established by a tract map to follow the Specific Plan, and to be prepared and verified by a licensed engineer and/or surveyor. /b/ Pro perties not owned by the HACLA.

Block	Size (Acres) /a/	Building Typology
1	8.21	Commercial Site
2	1.26	Commercial Site
3	0.62	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
4	0.54	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
4A	0.86	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
5	1.70	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
6	1.92	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
7	0.42	Open Space
7A	0.22	Townhouses, Stacked Flats
7B	0.23	Townhouses, Stacked Flats
8A	0.33	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
8B	2.48	Courtyard Houses, Townhouses or Stacked Flats
8C	0.71	Open Space
8D	0.72	Courtyard Houses, Townhouses, or Stacked Flats
Χ	0.69	Block X becomes part of Block 6 and has RAS3-UV zoning
Υ	0.25	Block Y is a street, No building typologies proposed
Z	0.22	Block Z becomes part of Block 4A and has RAS4-UV proposed zoning
9A	0.31	Courtyard Houses, Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
9B	0.75	Courtyard Houses, Townhouses, Stacked Flats, Mid -rise Stacked Flats
9C	1.93	Courtyard Houses, Townhouses, Stacked Flats, Mid -rise Stacked Flats
9D	0.61	Courtyard Houses, Townhouses, Stacked Flats—Mid -rise Stacked Flats
9E	1.12	Open Space
9F	0.35	Courtyard Houses, Townhouses or Stacked Flats
10A	1.42	Community Center, Gymnasium
10B	4.83	Open Space
11	1.00	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed use
12	0.48	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed use
13	1.45	Townhouses, Stacked Flats, Mid rise Stacked Flats
14	0.48	Courtyard Houses, Townhouses, or Stacked Flats
14A	0.21	Courtyard Houses, Townhouses or Stacked Flats
15	0.77	Courtyard Houses, Townhouses, Stacked Flats or Mixed Use
15A	0.33	Courtyard Houses, Townhouses, Stacked Flats or Mixed Use
16	1.03	Stacked Flats, Mid rise Stacked Flats or Mixed Use
17	1.03	Stacked Flats, Mid rise Stacked Flats or Mixed Use
18A	0.19	Townhouses or Stacked Flats
18B	2.55	Mudtown Farms Agricultural Education and Demonstration Center
18C	0.08	Courtyard Houses or Townhouses
19A	0.71	Townhouses, Stacked Flats, Mid rise Stacked Flats or Mixed Use
19B	2.05	Courtyard Houses, Townhouses or Stacked Flats
19C	0.47	Courtyard Houses, Townhouses or Stacked Flats
19D	0.49	Open Space
20	1.75	Courtyard Houses, Townhouses or Stacked Flats
20A	1.12	Courtyard Houses, Townhouses or Stacked Flats
20B	0.49	Open Space
21	1.66	Townhouses, Stacked Flats or Mixed use
21A	0.22	Townhouses, Stacked Flats or Mixed use
22	0.80	Open Space
23	3.34	Courtyard Houses, Townhouses, Stacked Flats or Mixed Use
23A	0.77	Courtyard Houses, Townhouses, Stacked Flats or Mixed Use
23B	0.49	Open Space
24	1.02	Courtyard Houses, Townhouses, Stacked Flats or Mixed Use
24A	0.26	Courtyard Houses, Townhouses, Stacked Flats or Mixed Use
30A	17.26	Maintain Exiting Use /b/
30B	0.77	Community Use
30C	3.32	Maintain Exiting Use /b/
31	3.26	Maintain Exiting Use /b/
32	4.44	Maintain Exiting Use /b/ Maintain Exiting Use /b/
ROW	28.82	Not Applicable
R()\//		

/a/ All acreages of blocks were calculated without the use of precision tools such as CAD (Computer Aided Design), and are conceptual. All acreage will be established by a tract map to follow the Specific Plan, and to be prepared and verified by a licensed engineer and/or surveyor. /b/ Properties not owned by the HACLA.





Height Districts. Total floor area and height limitations are regulated by Section 12.21.1 of the LAMC. Similar to the Approved Specific Plan, the properties within the Specific Plan Area are proposed for Height District No. 1. The total floor area of all buildings within Height District No. 1 shall not exceed three times the buildable area. Similar to the Approved Specific Plan, 50- to 60-foot tall buildings would be permitted on either side of the central park, while the typical residential streets would have three- to four-story buildings varying from 35 to 50 feet in height. Mid-block lanes have the lowest building heights, not exceeding 35 feet.

T	TABLE 2-5: HEIGHT DISTRICT CHANGES			
	Height District	BLOCKS		
1	1M (20-foot max) to 1L (32-foot min/75-foot max)	X, Y (east portion) and 9E (portion)		
2	1M (20-foot max) to 1VL (30-foot min/45-foot max)	Y (west portion), Z and 10A		
3	1VL (30-foot Min/45-max) to 1M (20-foot max)	7 (portion), 19B (portion – New Block19D), 20 (portion – New Block 20B), and 23 (portion - New Block 23B		
4	1L (32-foot min/75-foot max) to 1M (20-foot max)	9D (portion)		
5	1VL (30-foot Min/45-max) to 1L (32-foot min/75-foot max)	12		
SC	SOURCE: TAHA, 2015.			

In summary, there are generally three areas within the Specific Plan Area where changes are proposed which include:

- 1. Relocation of the Family Resource Center from its previous location on Block 7, north of Century Boulevard, to Block 10A, south of Century Boulevard. This would enable direct access to Central Park, and the Block would be able to accommodate the new Gymnasium, which would be incorporated into the Family Resource Center.
- 2. Expansion of the proposed retail site, Block 2, at Century Boulevard and Alameda Street. The new Laurel Street from Century Boulevard to 97th Street would move west, and instead of running parallel to Alameda Street, would now run perpendicular to Century Boulevard. **Figure 2-9** depicts the existing and proposed street classifications.
- 3. Reconfiguration of the Public Open Spaces to maintain the Specific Plan total of 9.35 acres. **Figure 2-10** depicts the existing and proposed community and open space areas.

Minor adjustments have also been made to the area calculations for most blocks to align with more accurate site survey information. An Illustrative Site Plan depicting the implementation of both the Approved and Revised Specific Plan is presented in **Figure 2-11**.



Pedestrian Paseos

Specific Plan Area



Typical Residential Lane

Streets Adjacent to Park Frontage





Approved Specific Plan

Legend:

Specific Plan Area

Parks and Greenways, Pedestrian Paseos

Residential Neighborhood Commercial/Retail

Mixed-Use Schools and Community Areas



2.5 CONSTRUCTION SCHEDULE

In the Approved Specific Plan, construction was assumed to occur in four phases, and build-out of all phases was anticipated to take seven years and be completed by 2020. Under the Revised Specific Plan, build-out of the Specific Plan Area would occur in six phases. These phases are described below, but it should be kept in mind that the numbers of units listed to be built in each phase are illustrative. Depending on future conditions, actual numbers of units built in each phase may differ somewhat from this, but in any case would at minimum provide a 1:1 replacement for any displaced Jordan Downs residents and at maximum would provide 1,800 total units, the total analyzed in the EIR.

- **Phase 1:** As shown in **Figure 2-12**, Phase 1A is anticipated to include the construction of 115 residential units and the retail center at the corner of 97th Street and Alameda. Phase 1b is anticipated to include the construction of the Family Resource Center and an additional 135 units. Thirty existing units would be demolished in Phase 1A and 104 existing households would be relocated in preparation for Phase 2a demolition.
- **Phase 2**: As shown in **Figure 2-13**, Phase 2A is anticipated to include the construction of 120 residential units and the demolition of 104 exiting units and the existing Community Center. Twenty-three existing households would be relocated for Phase 2B demolition. Phase 2B is anticipated to include the construction of 130 units and the demolition of the 23 existing units, the existing Maintenance Facility and the existing Grape Street Gymnasium. In addition, 169 units would be relocated in preparation of Phase 3A demolition.
- **Phase 3**: As shown in **Figure 2-15**, Phase 3A is anticipated to include the construction of 135 residential units and the demolition of 169 exiting units. Twenty-four existing households would be relocated for Phase 3B demolition. Phase 3B is anticipated to include the construction 125 units and the demolition of the 24 existing units. Ninety-five existing units would be relocated for Phase 4B demolition.
- **Phase 4**: As shown in **Figure 2-16**, Phase 4A is anticipated to include the construction of 85 residential units and the demolition of 95 exiting units. Phase 4B is anticipated to include the construction 125 units. One hundred and thirty-five existing households would be relocated for Phase 5A demolition.
- **Phase 5**: As shown in **Figure 2-17**, Phase 5A is anticipated to include the construction of 115 residential units and the demolition of 135 exiting units. Phase 5B is anticipated to include the construction 75 units. One hundred and twenty existing households would be relocated for Phase 6A demolition.
- **Phase 6**: As shown in **Figure 2-18**, Phase 6A is anticipated to include the construction of 107 residential units and the demolition of 120 exiting units. Phase 6B is anticipated to include the construction 108 units.



Approved Specific Plan

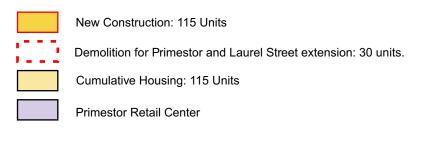


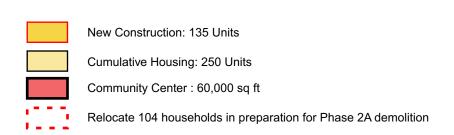
Revised Specific Plan





Phase 1A Phase 1B



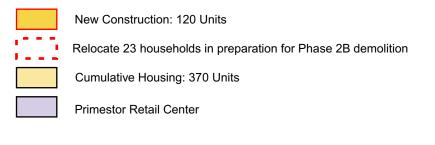


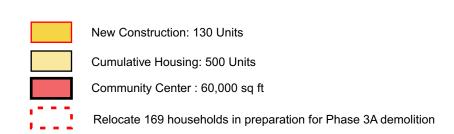






Phase 2A Phase 2B





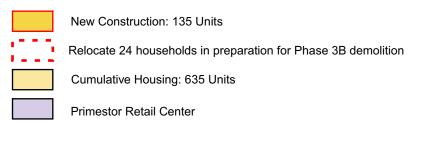


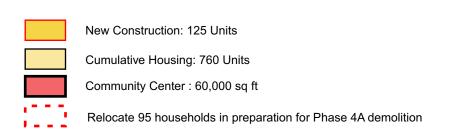




Phase 3A Phase 3B

Legend:











Phase 4A Phase 4B

New Construction: 85 Units Cumulative Housing: 845 Units Primestor Retail Center

New Construction: 125 Units Cumulative Housing: 970 Units Community Center: 60,000 sq ft

Relocate 135 households in preparation for Phase 5A demolition

SOURCE: Mithun Solomon, TAHA, 2015.

FIGURE 2-15





Phase 5A Phase 5B

New Construction: 115 Units

Cumulative Housing: 1,085 Units

Primestor Retail Center

New Construction: 75 Units

Cumulative Housing: 1,160 Units

Community Center: 60,000 sq ft

Relocate 120 households in preparation for Phase 6A demolition







Phase 6A Phase 6B

New Construction: 107 Units

Cumulative Housing: 1,267 Units

Primestor Retail Center

New Construction: 108 Units

Cumulative Housing: 1,375 Units

Community Center: 60,000 sq ft



3.0 IMPACT ANALYSIS

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

3.1 AESTHETICS

APPROVED SPECIFIC PLAN ANALYSIS

Construction. The Certified EIR stated that although temporary in nature, construction activities would generally cause a contrast to, and disruption in, the general order and aesthetic character area as the visual appearance of the Specific Plan Area would be altered due to the removal of existing buildings, site preparation, grading, staging of construction equipment and materials, and the construction new buildings and outdoor open space areas. However, the Certified EIR concluded that impacts related to aesthetics during construction would be less than significant with implementation of Mitigation Measures **AE1** through **AE2**.

Operation. The Certified EIR stated that implementation of the Approved Specific Plan would improve the aesthetic character of the Specific Plan Area given the architectural guidelines and the use of design elements such as landscaped corridors and walkways. However, despite incorporation of the architectural guidelines and new landscaping and open space areas, the Certified EIR concluded that implementation of the Approved Specific Plan would adversely alter the existing visual character of the Specific Plan Area and its surroundings because of the significant increase in building heights and massing compared to existing conditions and the surrounding uses. Nonetheless, the Certified EIR concluded that visual character impacts associated with the visual contrast between the taller buildings associated with the Approved Specific Plan and the existing single-family homes located along 97th and Grape Streets would be less than significant with implementation of Mitigation Measures AE3 and AE4. Similarly, the Certified EIR concluded that impacts related to light and glare would be reduced to a less-than-significant level with the implementation of Mitigation Measures AE5 through AE9. With regard to potential shade and shadow impacts, the Certified EIR concluded that while Implementation of Mitigation Measures AE3 and AE4 would reduce the length of the shadows cast on residences on the north side of 97th Street located to the east and west of Croesus Avenue, because shadows would be cast on these properties for a period of more than three hours, impacts related to shade and shadows would be significant and unavoidable.

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

- **AE1** Temporary fencing (e.g., chain link or wood) with screening material shall be used around the perimeter of a development site to buffer views of construction equipment and materials. In addition, the following fencing requirements shall be implemented:
 - The Applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: "POST NO BILLS"
 - Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier.
 - The Applicant shall be responsible for maintaining the visibility of required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.
 - A sign shall be posted with the contact number of the construction manager so that he/she may address safety and other issues related to construction.

- AE2 HACLA shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner, including the prompt removal of graffiti, throughout the construction period.
- **AE3** The proposed project shall incorporate design features to lessen the visual contrast with existing residences on 97th and Grape Streets. The design features to be implemented include, but are not limited to, varying building height, sloped roof design, and landscaping, all of which shall be consistent with the proposed project elevations.
- **AE4** The buildings constructed along 97th Street that exceed 30 feet in height shall be designed either with increased (greater than 10 feet) setbacks or with a sloped roof for the first level and a second level that is stepped back to create a more visually consistent street view.
- AE5 Lighting fixtures constructed as part of the proposed project shall be oriented and focused onto the specific onsite location intended for illumination (e.g., parking lots, driveways, and walkways) and shielded away from adjacent sensitive uses (e.g., schools, other residential properties) and public rights of way to minimize light spillover onto off-site areas
- **AE6** Where appropriate and feasible, incorporate project design features to shield light and/or glare form vehicles entering or existing parking lots and structures that face sensitive uses by providing barriers so that light from vehicle headlights would not illuminate off-site sensitive uses.
- **AE7** Where appropriate and feasible, incorporate project design features to provide landscaping, physical barriers, screening, or other buffers to minimize project-generated illumination from entering off-site areas and to prevent glare or interfere with vehicular traffic.
- **AE8** Where appropriate and feasible, locate and orient driveways into parking lots, parking structures, and semi-subterranean garages in a manner that will not result in headlights from vehicles entering or exiting the parking areas directly lighting any off-site sensitive uses.
- **AE9** Where appropriate and feasible, proposed new structures shall be designed to maximize the use of textured or other non-reflective exterior surfaces and non-reflective glass.

REVISED SPECIFIC PLAN ANALYSIS

Construction. Similar to the Approved Specific Plan, construction activities associated with the implementation of the Revised Specific Plan would be visible to pedestrians, motorists, and residents on adjacent streets and the aesthetic character of area would be disrupted. However, construction under the Revised Specific Plan would be similar to or less than the scale of the Approved Specific Plan, and the mitigation measures included in the Certified EIR to reduce impacts related to aesthetics during construction would also be applicable to the Revised Specific Plan. With implementation of Mitigation Measures AE1 and AE2, impacts related to aesthetics during construction would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Operations. Similar to the Approved Specific Plan, implementation of the Revised Specific Plan would improve the aesthetic character of the Specific Plan Area. Nonetheless, because of the significant increase in building heights and massing compared to existing conditions and the surrounding uses, implementation of the Revised Specific Plan would also adversely alter the existing visual character of the Specific Plan Area and its surroundings. However, similar to the Approved Specific Plan, the visual contrast between the taller buildings and the existing single-family homes located along 97th and Grape Streets would be reduced to a less-than-significant level with implementation of Mitigation Measures **AE3** and **AE4**. Likewise, impacts related to light and glare would also be reduced to a less-than-significant level with the implementation of Mitigation Measures **AE5** through **AE9** similar to the Approved Specific Plan. With regards to shade and shadow impacts, Implementation of Mitigation Measures **AE3** and **AE4** would reduce the length of the

shadows cast on residences on the north side of 97th Street east and west of Croesus Avenue. However, because shadows would be cast on these properties for a period of more than three hours, impacts related to shade and shadows would remain significant and unavoidable similar to the Approved Specific Plan. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures **AE1** through **AE9**. Similar to Approved Specific Plan, impacts related to shade and shadows would be significant and unavoidable.

3.2 AGRICULTURAL RESOUCES

APPROVED SPECIFIC PLAN ANALYSIS

The Certified EIR stated that the farmland maps compiled by the California Department of Conservation indicate that the Specific Plan Area is mapped as an "urbanized area", and no portion of the Specific Plan Area is designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Likewise, no portion of the Specific Plan Area is enrolled under a Williamson Act contract, nor does the Specific Plan Area include any forest land or timberland. In addition, the existing community garden (i.e., Mudtown Farms) located within the Specific Plan Area would be retained. Therefore, the Certified EIR concluded that impacts related to agricultural resources would be less than significant.

Certified EIR Mitigation Measures. Impacts related agricultural resources were determined to be less than significant without mitigation.

REVISED SPECIFIC PLAN ANALYSIS

Similar to the Approved Specific Plan, the existing community garden (i.e., Mudtown Farms) located within the Specific Plan Area would be retained under the Revised Specific Plan. Therefore, similar to the Approved Specific Plan, impacts related to agricultural resources would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. None required.

3.3 AIR QUALITY

Approved Specific Plan Analysis

Construction. The Certified EIR stated that construction activities have the potential to create air quality impacts through engine exhaust associated with construction equipment, haul trucks, and worker commute trips along with fugitive dust emissions. The analysis concluded that impacts related to air quality during construction would be less than significant for toxic air contaminants (TACs) and odors. However, the Certified EIR concluded that implementation of the Approved Specific Plan would result in significant impacts related to regional emissions and localized concentrations of criteria pollutants. Mitigation Measures AQ1 through AQ7 were adopted in the Certified EIR to ensure compliance with South Coast Air Quality Management District (SCAQMD) Rule 403. Mitigation Measures AQ8 through AQ10 were adopted to reduce VOC emissions. Mitigation Measures AQ11 through AQ17 were adopted to control exhaust emissions, and limit pollutant concentrations at educational facilities. Nonetheless, during construction, NO_x and PM₁₀ regional emissions, as well as PM_{2.5} and PM₁₀ local concentrations, would exceed regional and

local significance thresholds. Therefore, the Certified EIR concluded that impacts related to air quality during construction (i.e., regional and local emissions) would remain significant and unavoidable.

Operation. The operational air quality analysis assessed regional emissions, carbon monoxide hot-spots, odors, and consistency with regional air quality plans. The regional emissions analysis assessed mobile and area source emissions, and emissions were determined to exceed the SCAQMD daily significance thresholds for multiple pollutants. In addition, the Certified EIR concluded that new residences would be exposed to significant TACs from the Alameda Corridor and light industrial land uses. The Certified EIR identified less-than-significant impacts related to carbon monoxide hot-spots, odors, and consistency with regional air quality plans. Mitigation Measures **AQ18** through **AQ24** were adopted to reduce regional emissions and exposure to TACs. Nonetheless, operational emissions would exceed regional significance thresholds for VOC, NO_X , CO, and PM_{10} . Therefore, the Certified EIR concluded that impacts related to regional air quality emissions would remain significant and unavoidable.

GHG emissions were calculated for on-road mobile vehicle operations, general electricity consumption, electricity consumption associated with the use and transport of water, natural gas consumption, and solid waste decomposition. Based on SCAQMD guidance, the emissions summary also includes construction emissions amortized over a 30-year span. The Certified EIR stated that the Approved Specific Plan would result in 6.2 metric tons of GHG emissions per year per service population. GHG emissions would exceed the 4.6 metric tons of GHG emissions per service population significance threshold, and would result in a significant impact. Mitigation Measures AQ18 through AQ25 were adopted to reduce GHG emissions. Nonetheless, the Certified EIR concluded that impacts related to GHG emissions would remain significant and unavoidable.

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

- AQ1 The construction area and all accessible areas (public streets, sidewalks, etc.) within 100 feet of the Specific Plan area shall be swept (preferably with water sweepers) and watered at least twice daily.
- **AQ2** Construction contractors shall utilize at least one of the following measures at each vehicle egress from the Specific Plan area to a paved public road:
 - Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long;
 - Pave the surface extending at least 100 feet and at least 20 feet wide;
 - Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or
 - Install a wheel washing system to remove bulk material from tires and vehicle undercarriages.
- AQ3 Site access points shall be swept/washed within thirty minutes of visible dirt deposition. Street sweepers that comply with SCAQMD Rule 1186 and 1186.1 shall be used to sweep site access points or reclaimed water shall be used to wash site access points.
- AQ4 All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
- AQ5 Construction contractors activity on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.
- **AQ6** Heavy-duty equipment operations shall be suspended during first and second stage smog alerts.
- **AQ7** Ground cover in disturbed areas shall be replaced as quickly as possible.

- AQ8 Construction contractors shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than ten grams per liter¹).
- **AQ9** Construction contractors shall utilize materials that do not require painting, as feasible.
- AQ10 Construction contractors shall use pre-painted construction materials, as feasible.
- **AQ11** Contractors shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.
- **AQ12** All diesel-powered construction equipment shall meet USEPA Tier 2 or higher emissions standards according to the following schedule:
 - April 1, 2010, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 horsepower shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - **January 1, 2012, to December 31, 2014**: All offroad diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - **Post-January 1, 2015**: All offroad 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 BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- **AQ13** Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible.
- AQ14 Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site.
- **AQ15** Construction parking shall be configured to minimize traffic interference.
- AQ16 Construction activity that affects traffic flow on the arterial system shall be limited to off-peak hours.
- **AQ17** Construction contractors shall coordinate with administrators at David Starr Jordan High School, Florence Griffith Joyner Elementary School, and Weigand Elementary School and to minimize student exposure to air pollution during periods of heavy construction activity (e.g., grading and excavation).
- **AQ18** Informational signs shall be provided that locate nearby public transportation options.
- **AQ19** The surface parking area for the employment uses shall provide charging stations for electric vehicles.
- **AQ20** Equipment (e.g., forklifts and carts) used during operations of the employment uses shall use alternative power (e.g., electricity or propane) instead of diesel fuels.

¹SCAQMD, Super-Compliant Architectural Coatings Manufacturers and Industrial Maintenance Coatings List, http://www.aqmd.gov/prdas/Coatings/super-compliantlist.htm.

- **AQ21** Delivery trucks shall be prohibited from idling in excess of five minutes.
- AQ22 The Applicant shall require by contract specifications that electrical outlets are included in the building design of the loading docks to allow use by refrigerated delivery trucks. If loading and/or unloading of perishable goods would occur for more than five minutes, and continual refrigeration is required, all refrigerated delivery trucks shall use the electrical outlets to continue powering the truck refrigeration units when the delivery truck engine is turned off.
- AQ23 Automatic lighting on/off controls and energy-efficient lighting shall be installed at the employment uses.
- **AQ24** Residential units shall include Heating, Ventilation, and Air Conditioning Systems with a minimum efficiency reporting value of 13.
- AQ25 HACLA shall continue coordinating with responsible agencies to study ways to increase job opportunities and regional transit in the vicinity of the Specific Plan area.

Revised Specific Plan Analysis

Construction. The Revised Specific Plan includes similar overall construction activity to the Approved Specific Plan, though in a somewhat different configuration. Thus, daily construction intensity associated with implementation of the Revised Specific Plan would be similar to the level of intensity assessed for the Approved Specific Plan. In addition, construction activities would occur in the same general locations. There would be no substantial change to the typical daily construction air emissions identified in the Approved Specific Plan, and sensitive receptor exposure to construction emissions would be similar to that disclosed in the Certified EIR. Mitigation Measures AQ1 through AQ17 would reduce and control emissions. However, similar to the Approved Specific Plan, impacts related to air quality during construction emissions would remain significant and unavoidable. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Operation. Implementation of the Revised Specific Plan includes similar development and associated average daily traffic than the Approved Specific Plan. This would result in similar regional emissions than identified in the Certified EIR. The regional emissions for the implementation of the Approved Specific Plan were well above the daily SCAQMD significance thresholds for multiple pollutants (e.g., nitrogen oxide emissions were nearly double the significance threshold). Therefore, it is not anticipated that under the Revised Specific Plan regional emissions would be reduced below the SCAQMD significance thresholds, and the previously identified impact would remain significant and unavoidable. As total development and traffic would be similar under the Revised Specific Plan, there is no potential for the Revised Specific Plan to result in a new carbon monoxide hot-spot or inconsistency with the air quality plans. However, new residences would still have the potential to be exposed to significant TAC concentrations and from the Alameda Corridor and light industrial land uses. Mitigation Measures AQ18 through AQ23 would reduce and control regional emissions, and Mitigation Measure AQ24 would reduce residential exposure to TACs. However, similar to the Approved Specific Plan, impact related to regional emissions would be significant and unavoidable. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The GHG impact analysis was based on comparing total emissions to the predicted service population (i.e., residences and employees). As discussed above, the Revised Specific Plan includes similar development and associated average daily traffic to the Approved Specific Plan. There would also be similar emissions related to general electricity consumption, electricity consumption associated with the use and transport of water, natural gas consumption, and solid waste decomposition. Therefore, the emissions per service population would be similar, and GHG emissions would still exceed the SCAQMD significance threshold. Mitigation Measure AQ25 would ensure that efforts are continued to increase job opportunities and regional transit in the Specific Plan area. This would ultimately reduce regional vehicles miles traveled and associated GHG emissions.

Nonetheless, implementation of the Revised Specific Plan would still emit a substantial amount GHGs due to increased regional vehicle miles traveled. Therefore, similar to the Approved Specific Plan impacts related to GHG would remain significant and unavoidable. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures AQ1 through AQ25. However, a portion of Mitigation Measure AQ12 represented outdated regulations. The revised Mitigation Measure AQ12 is shown below and is equivalent to the original mitigation measure. Similar to Approved Specific Plan, after implementation of these mitigation measures, impacts related to air quality (i.e., regional and local construction emissions, regional operational emissions, and GHG emissions) would remain significant and unavoidable.

AQ12 All offroad 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 BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

3.4 BIOLOGICAL RESOURCES

APPROVED SPECIFIC PLAN ANALYSIS

The Certified EIR stated that if any tree removal or other construction-related activities were to occur during the nesting season, there would be the potential for violation of the federal Migratory Bird Treaty Act and other similar laws in the California Fish and Game Code protecting native birds. As there are several ornamental trees that would be removed from the Specific Plan Area, and some of which could serve as habitat for migratory birds, the Certified EIR concluded that this could conflict with federal and State laws protecting native birds and active nests. Nonetheless, the Certified EIR concluded that impacts related to biological resources would be less than significant with implementation of Mitigation Measure **BR1**.

Approved Specific Plan Mitigation Measures. The following mitigation measure was included in the EIR to reduce impacts related to biological resources to a less-than-significant level:

BR1 Ground-disturbing and vegetation removal activities associated with construction of the project shall be performed outside of the breeding season for birds, or between September 1 and January 31. If these project activities cannot be implemented during this time period, the City should retain a qualified biologist to perform preconstruction nest surveys to identify active nests within and adjacent to (up to 500 feet) the project area. If the preconstruction survey is conducted early in the nesting season (February 1-March 15) and nests are discovered, a qualified biologist may remove the nests only after it has been determined that the nest is not active (i.e., the nest does not contain eggs, nor is an adult actively brooding on the nest). Any active non-raptor nests identified within the project area or within 300 feet of the project area should be marked with a 300-foot buffer, and the buffer area would need to be avoided by construction activities until a qualified biologist determines that the chicks have fledged. Active raptor nests within the project area or within 500 feet of the project area should be marked with a 500-foot buffer and the buffer avoided until a qualified biologist determines that the chicks have fledged. If the 300-foot buffer for non-raptor nests or 500foot buffer for raptor nests cannot be avoided during construction of the project, the City should retain a qualified biologist to monitor the nests on a daily basis during construction to ensure that the nests do not fail as the result of noise generated by the construction. The biological monitor shall be authorized to halt construction if the construction activities cause negative effects, such as the adults abandoning the nest or chicks falling from the nest.

Similar to the Approved Specific Plan, any trees that would be removed as part of the implementation of the Revised Specific Plan could serve as habitat for migratory birds and may conflict with federal and State laws protecting native birds and active nests. Therefore, the mitigation measure included in the Certified EIR to reduce impacts related to biological resources would also be applicable to the Revised Specific Plan. Similar to the Approved Specific Plan, impacts related to biological resources would be less than significant with implementation of Mitigation Measure **BR1**. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measure BR1.

3.5 CULTURAL RESOURCES

APPROVED SPECIFIC PLAN ANALYSIS

The Certified EIR stated that David Starr Jordan High School is eligible for listing in the National Register of Historical Places and is, therefore, automatically listed in the California Register of Historical Resources. Due to the historic significance of certain school buildings (i.e., Administration Building, Auditorium, Gymnasium), any modifications to the campus would need to be completed in accordance with the Secretary of the Interior Standards. Implementation of the Approved Specific Plan would remove and replace the majority of the uses surrounding the high school. The area that would be most likely to affect the historic significance of the high school would be the area immediately west of the main high school building and the Auditorium located on 103rd Street. Nonetheless, the Certified EIR concluded that impacts related to historic resources would be less than significant with implementation of Mitigation Measures **CR1** and **CR2**. In addition, the Certified EIR stated that impacts related to archaeological and paleontological resources would be less than significant with implementation of Mitigation Measures **CR3** and **CR4**.

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

- CR1 To ensure that historic buildings are appropriately renovated and maintained, the preservation, rehabilitation, restoration, reconstruction or adaptive reuse of known historic resources shall meet the U.S. Secretary of the Interior's Standards for Rehabilitation (Secretary's Standards). Any proposal to preserve, rehabilitate, restore, reconstruct, or adaptively reuse a known historic resource in accordance with the Interior Secretary's Standards shall be deemed to not be a significant impact under CEQA and, in such cases, no additional mitigation measures will be required.
- CR2 The Applicant shall work with qualified preservation professionals to ensure Standards-compliant projects, including the design of rehabilitation project, compatibility of new construction with historic structures, and periodic site visits to monitor construction adjacent to historic structures to ensure that such activities comply with the Secretary of the Interior's Standards. Historic professionals shall meet the National Park Service standards.²
- CR3 If a unique archaeological resource is discovered during project construction activities, work in the area shall cease and deposits shall be treated in accordance with federal, State and local guidelines, including those set forth in California Public Resources Code Section 21083.2. In addition, if it is determined that an archaeological site is a historical resource, the provisions of Section 21084.1 of the Public Resources Code and CEQA Guidelines Section 15064.5 would be implemented.

²U.S. Department of the Interior, National Park Service, *Archeology and Historic Preservation: Secretary of the Interior's Professional Qualifications Standards*, http://www.nps.gov/history/local-law/arch_stnds_9.htm, Accessed July 8, 2010.

CR4 A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities where excavations of older soils may occur. The services of a qualified paleontologist shall be secured by contacting the Natural History Museum of Los Angeles County. The frequency of inspections will be based on consultation with the paleontologist and will depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains.

If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Any fossils collected should be donated to a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository. If fossils are found, following the completion of the above tasks, the paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

REVISED SPECIFIC PLAN ANALYSIS

Similar to the Approved Specific Plan, impacts related to historic resources would be reduced to a less-than-significant level with implementation of Mitigation Measures **CR1** and **CR2**. Likewise, while there is the potential to encountered archaeological and paleontological resources during excavation activities, with implementation of Mitigation Measures **CR3** and **CR4**, impacts related to archaeological and paleontological would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures CR1 through CR4.

3.6 ENERGY

APPROVED SPECIFIC PLAN ANALYSIS

Construction. The Certified EIR stated that while construction activities would cause an increase in demand for petroleum and electricity. However, petroleum usage during construction would not increase the need for additional petroleum supplies. Likewise, the increase in electricity usage associated with construction workers and activities would be temporary and nominal. Therefore, the Certified EIR concluded that impacts related to energy during construction would be less than significant.

Operation. The Certified EIR stated that the Specific Plan Area is centrally located within ten miles of major job centers at Downtown Los Angeles, Los Angeles Airport, and El Segundo. These jobs centers are accessible from the Specific Plan Area by rail (e.g. Los Angeles County Metropolitan Transportation Agency Blue and Green Lines), freeway (Interstates 105 and 110), and bus transit. Therefore, the Certified EIR concluded that the Approved Specific Plan would not result in the wasteful or inefficient use of petroleum, and impacts related to petroleum would be less than significant. The Certified EIR stated that implementation of the Approved Specific Plan may require an on-site transformation facility to supply

electricity to the Specific Plan Area and would intensify the use of existing natural gas connections and other offsite distribution facilities that would require improvements to existing natural gas connections and off-site distribution facilities. However, the Certified EIR concluded that with implementation of Mitigation Measures **E1** through **E7**, impacts on electricity and natural gas would be less than significant.

Approved Specific Plan Mitigation Measures. The following mitigation measures were included in the Certified EIR to reduce impacts related to energy to a less-than-significant level:

- E1 HACLA shall coordinate with LADWP to determine the specific on-site electricity transformation facility requirements for the proposed project.
- E2 HACLA shall coordinate with LADWP to determine if any required improvements to the LADWP electricity distribution system are needed to accommodate the proposed project. HACLA shall create a fund to finance the costs of infrastructure improvements to the electricity distribution system to accommodate the proposed project. The type, quantity, and costs of any required infrastructure improvements shall be set forth in a Memorandum of Understanding (MOU) that shall be agreed on by HACLA and LADWP.
- E3 HACLA shall incorporate into building and electrical plans any necessary on-site transformation facility infrastructure and be subject to review and approval by the LADWP prior to construction.
- **E4** HACLA shall incorporate into the guidelines of the Specific Plan electrical generating solar panels for streetscape pedestrian lighting, gateway lighting, and other passive outdoor lighting.
- E5 HACLA shall coordinate with SoCalGas to determine if any required improvements to the SoCalGas natural gas distribution system are needed to accommodate the proposed project. HACLA shall create a fund to finance the costs of infrastructure improvements to the SoCalGas natural gas distribution system to accommodate the proposed project. The type, quantity, and costs of the infrastructure improvements shall be in agreed on in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission at the time contractual agreements are made.
- **E6** Building and natural gas connection plans shall be subject to review and approval by the SoCalGas prior to construction.
- E7 HACLA shall set aside a percentage of roof floor area for installation of water-heating solar panels.

REVISED SPECIFIC PLAN ANALYSIS

Construction. Similar to the Approved Specific Plan, construction impacts related to energy would be temporary and nominal. The Revised Specific Plan would not increase the need for additional petroleum supplies, nor would the increase in electricity usage associated with construction workers and activities result in impacts related to electricity. Therefore, impacts related to energy during would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Operation. Implementation of the Revised Specific Plan would result in similar levels of residential and commercial development to implementation of the Approved Specific Plan. Similar to the Approved Specific Plan, implementation of the Revised Specific Plan would not result in the wasteful or inefficient use of petroleum, and because the Specific Plan Area is centrally located in close proximity to major job centers, and impacts related to petroleum would be less than significant. Likewise, with implementation of Mitigation Measures **E1** through **E7** impacts related to electricity and natural gas would be less than significant, similar to the Approved Specific Plan. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures E1 through E7.

3.7 GEOLOGY AND SOILS

APPROVED SPECIFIC PLAN ANALYSIS

Construction. The Certified EIR stated that construction activities would be subject to the approval of a site-specific geotechnical study and the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction Permit. In addition to the NPDES permit, the City Los Angeles Building Code also addresses grading, excavation, and requires a local Storm Water Pollution Prevention Plan (SWPPP) and a Wet Weather Erosion Control Plan (WWECP) to be developed. The SWPPP would require implementation of a WWECP to reduce the potential for wind or waterborne erosion during construction. Therefore, the Certified EIR concluded that with implementation of Mitigation Measures **GS3** through **GS6**, impacts related to geology and soils during construction would be less than significant.

Operation. The Certified EIR stated that no active faults traverse the Specific Plan Area; however, as with all properties in the seismically-active Southern California region, the Specific Plan Area is susceptible to strong seismic ground shaking. The Certified EIR concluded that implementation of the Approved Specific Plan would result in impacts related to seismicity (i.e., Fault Rupture, Ground Shaking, Liquefaction and Landslides). However, with implementation of Mitigation Measures **GS1** and **GS2**, impacts related to geology and soils were determined to be less than significant.

Approved Specific Plan Mitigation Measures. The following mitigation measures were included in the Certified EIR to reduce impacts related to geology and soils:

- **GS1** Seismic design for structures and foundations shall comply with the most current seismic building code standards for site-specific soil conditions.
- GS2 The proposed project shall demonstrate compliance with specific recommendations for grading guidelines, foundation design, retaining wall design, temporary excavations, slabs on grade, site drainage, design review, construction monitoring and geotechnical testing to the satisfaction of the City of Los Angeles Department of Building and Safety, as conditions to issuance of any grading and building permits.
- GS3 During inclement periods of the year, when rain is threatening (between November 1 and April 15 per the Los Angeles Building Code, Sec. 7002.), an erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Los Angeles Department of Building and Safety to minimize potential erosion during construction. The erosion control plan shall be a condition to issuance of any grading permit.
- GS4 To the extent feasible, grading shall be scheduled for completion prior to the start of the rainy season (between November 1 and April 15 per the Los Angeles Building Code, Sec. 7002), or detailed temporary erosion control plans shall be implemented in a manner satisfactory to the City of Los Angeles Department of Building and Safety.
- GS5 Appropriate erosion control and drainage devices shall be incorporated to the satisfaction of the City of Los Angeles Department of Building and Safety. Such measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures.
- **GS6** Provisions shall be made for adequate surface drainage away from the areas of excavation as well as protection of excavated areas from flooding. The grading contractor shall control surface water and the transportation of silt and sediment.

Construction. Similar to the Approved Specific Plan, construction activities would occur in accordance with Los Angeles Building Code requirements and require the preparation of a Grading Plan for review and approval by the City of Los Angeles Department of Building and Safety. In addition, a stormwater management plan would be prepared to control surface water runoff, and the contractor would supply, install, and maintain all erosion control items, including silt fences, straw wattle, sand bags, drain inlet filters, etc. Nonetheless, the mitigation measures included in the Certified EIR to reduce impacts related to geology and soils to a less-than-significant level during construction would be applicable to the Revised Specific Plan. With implementation of Certified EIR Mitigation Measures GS3 through GS6 impacts related to geology and soils during construction would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Operation. Similar to the Approved Specific Plan, the Specific Plan Area would continue to be susceptible to strong seismic ground shaking, and the Revised Specific Plan could result in impacts related to seismicity (e.g., Fault Rupture, Ground Shaking, Liquefaction and Landslides). However, similar to the Approved Specific Plan, with implementation of Mitigation Measures **GS1** and **GS2**, impacts related to geology and soils would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures GS1 through GS6.

3.8 HAZARDS AND HAZARDOUS MATERIALS

APPROVED SPECIFIC PLAN ANALYSIS

The Certified EIR stated that implementation of the Approved Specific Plan would involve the temporary use of potentially hazardous materials, including paints, adhesives, surface coatings, cleaning agents, fuels, and oils. In addition, the Certified EIR stated that based on the years of construction for some of the existing buildings within the Specific Plan Area, demolition of the buildings could have the potential to release asbestos fibers and lead into the atmosphere if they are not properly stabilized or removed prior to demolition. The Certified EIR also stated that a Remedial Action Plan (RAP) would need to be prepared and implemented for a portion of the Specific Plan Area prior to the construction. Nonetheless, the Certified EIR concluded that impacts related to hazards and hazardous materials would be less than significant with implementation of Mitigation Measures **HM1** and **HM17**.

Approved Specific Plan Mitigation Measures. The following mitigation measures were included in the Certified EIR to reduce impacts related to hazards and hazardous materials to a less-than-significant level:

- HM1 HACLA shall retain a Certified Asbestos Consultant to determine the presence of asbestos and asbestos containing materials (ACM) within buildings to be demolished. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove ACM in accordance with the 1994 Federal Occupational Exposure to Asbestos Standards. ACM removal will be monitored by a Certified Technician.
- **HM2** For all buildings to be demolished, lead-based paint testing shall be conducted. If lead-based paint is discovered, a licensed lead-based paint/materials abatement contractor shall be retained to safely remove lead-based paint in accordance with HUD Lead-Based Paint Guidelines.
- **HM3** HACLA shall not disturb the ground surface nor remove any foundations or other structures on the 9901 S. Alameda Street site without prior approval of the DTSC.

- **HM4** HACLA shall provide DTSC with all background information, sample analysis results, environmental assessment reports and any other information pertinent to the hazardous substance management and/or release, characterization, and cleanup of the site. DTSC will review the information to identify areas and media of concern, and to determine additional work, if any, required to complete the investigation/remediation of the site. Following DTSC's initial review a scoping meeting will be held to discuss whether further site characterization is necessary, and, if so, how the characterization will be conducted and implemented.
- **HM5** HACLA shall submit a Remedial Investigation Workplan that describes the activities to further characterize soil, soil gas, surface water, and/or groundwater. The Workplan shall include a site health and safety plan, quality assurance/quality control plan, sampling plan, and implementation schedule.
- **HM6** HACLA shall submit a Site Characterization Report that presents the data, summarizes the findings of the investigations, validates the data, and includes recommendations and conclusions.
- HM7 HACLA shall prepare a Feasibility Study to evaluate feasible remediation and response alternatives. Reasonable potential alternatives for the remediation of the site shall be evaluated, including the "no action" alternative. The evaluation shall (1) identify the goals for the cleanup based upon current and projected future land uses; (2) evaluate feasible alternatives to meet these goals, including their effectiveness, implement ability and cost; and (3) recommend a preferred alternative.
- HM8 DTSC shall determines the appropriate removal action for the site ,and HACLA shall prepare a Removal Action Workplan (RAW) in accordance with Health and Safety Code sections 25323.1 and 25356.1. If the proposed RAW does not meet the requirements of Health and Safety Code section 25356.1(h), HACLA shall prepare a Remedial Action Plan (RAP) in accordance with Health and Safety Code section 25356.1(c).
- **HM9** In order to meet its CEQA obligation, DTSC shall prepare the necessary CEQA documents. If required, HACLA shall submit the information necessary for DTSC to prepare these documents.
- **HM10** Upon DTSC approval of the final RAW or RAP, HACLA shall implement the removal action as approved.
- **HM11** Within 30 days of completion of field activities, HACLA shall submit an Implementation Report documenting the implementation of the final RAW or RAP and noticing any deviations from the approved plan. During implementation of the final RAW or RAP, DTSC may specify such addition, modifications and revisions to the RAW or RAP as deem necessary to protect human health and safety or the environment or to implement the RAW or RAP.
- **HM12** HACLA shall work with DTSC to ensure that the interested public and community are involved in the DTSC decision making process. Public Participation activities shall be conducted in accordance with Health and Safety Code Section 25358.7 and DTSC's Public Participation Policy and Procedures Manual.
- **HM13** A Land Use Covenant may be require in the final Raw by DTSC pursuant to California Code of Regulation, Title 22 Section 67391.1 to ensure full protection of the environment and human health.
- **HM14** HACLA shall comply with any and all operation and maintenance requirements in accordance with the final RAW or RAP or Operation and Maintenance Plan.
- **HM15** Any remedial technology employed in implementation of the final RAW or RAW shall be left in place and operated by HACLA until DTSC authorizes HACLA to discontinue.
- **HM16** HACLA shall retain a Certified Asbestos Consultant to determine the presence of asbestos and asbestos containing materials (ACM) within buildings to be demolished. If asbestos is discovered, a

Licensed Asbestos Abatement Contractor shall be retained to safely remove ACM from the site in accordance with the 1994 Federal Occupational Exposure to Asbestos Standards. ACM removal will be monitored by a Certified Technician.

HM17 For all buildings to be re-used or demolished, lead-based paint testing shall be conducted. If lead-based paint is discovered, a licensed lead-based paint/materials abatement contractor shall be retained to safely remove lead-based paint in accordance with HUD Lead-Based Paint Guidelines.

REVISED SPECIFIC PLAN ANALYSIS

Similar to the Approved Specific Plan, the demolition of the existing buildings within the Specific Plan Area could have the potential to release asbestos fibers and lead into the atmosphere if they are not properly stabilized or removed prior to demolition. Therefore, Mitigation Measures HM1 and HM2 would be also applicable to the Revised Specific Plan Area, similar to the Approved Specific Plan. However, subsequent to the approval of the Approved Specific Plan, the City of Los Angeles entered into a Voluntary Cleanup Agreement with the California Department of Toxic Substance Control (DTSC), and a remedial investigation (RI) was completed in 2011. The RI included geophysical exploration in targeted areas, identification of new areas of potential concern, extensive soil sampling, and soil gas sampling. The results from the RI were used to define the extent and magnitude of contamination of various contaminants across the property. This data was used to identify site-specific risks to human health in the Human Health Risk Assessment (HHRA). The HHRA designated remediation goals to minimize potential risks to human health considering the intended future use of the property. The potential threat to other receptors, such as groundwater, wildlife, and aquatic systems, was also considered and quantified in the HHRA.

Based on the findings of the HHRA, a Remediation Feasibility Study, which was used to prepare a RAP, was completed to explore remediation options that would satisfy the established risk based cleanup goals. The Remediation Feasibility Study concluded that excavation and off-site disposal of impacted material was the most feasible alternative for achieving cleanup of VOC-impacted soils to below the risk based cleanup goals.

Presently, remediation activities are on-going at the property consistent with the requirements established in the RAP. Upon the satisfactory completion of the required remediation activities and upon receipt of a "No Further Action" letter and/or a "Remedial Action Certification" from DTSC, the property would be deemed safe for unrestricted uses. Upon completion of the remediation activities, impacts related to hazards and hazardous materials due to the prior the site would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures HM1 and HM2. As discussed above, remediation activities are presently on-going at the property consistent with the requirements established in the RAP. Therefore, Certified EIR Mitigation Measures HM3 though HM17, which pertain to the implementation of the RAP, are currently being implemented. Upon the satisfactory completion of the required remediation activities and upon receipt of a "No Further Action" letter and/or a "Remedial Action Certification" from DTSC, the property would be deemed safe for unrestricted uses.

3.9 HYDROLOGY AND WATER QUALITY

APPROVED SPECIFIC PLAN ANALYSIS

Construction. The Certified EIR stated that construction activities such as earth moving, maintenance/operation of construction equipment and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. However, construction contractors would be required to obtain coverage under the NPDES General Construction Activity Permit. In accordance with the NPDES permit requirements, a site-specific Stormwater Pollution Prevention Plan (SWPPP) would be prepared which

would specify BMPs to be used during construction. With implementation of BMPs, the discharge of potential pollutants would be reduced or eliminated to the maximum extent practicable. In addition, construction activities would be required to comply with grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. Therefore, the Certified EIR concluded that with compliance with the aforementioned regulatory requirements, impacts related to hydrology and water quality during construction would be less than significant.

Operation. In accordance with NPDES requirements, the applicant would be required to prepare and implement Standard Urban Stormwater Management Plan (SUSMP) throughout the operational life of the project. Stormwater BMPs to address water quality in stormwater runoff would include source control and treatment control BMPs. Source control BMPs would be used to prevent pollutants from entering into the stormwater discharges and may include effective site design and landscape planning, storm drain signage, properly managed maintenance bays and docks, properly managed trash storage areas, proper design and maintenance of outdoor materials storage areas, and proper maintenance of structural/treatment control BMPs. Treatment BMPs remove pollutants from stormwater discharges and may include catch basins, infiltration/retention, cisterns for collection and reuse of rainwater, and pervious pavement. Moreover, a combination of BMPs would be implemented and designed to treat the first 0.75-inch storm event in compliance with SUSMP requirements. With implementation of source control and treatment BMPs such as those described above, the Approved Specific Plan would reduce or eliminate the discharge of potential pollutants from the stormwater runoff to the maximum extent practicable. Therefore, the Approved Specific Plan would not result in a violation of water quality standards or discharge requirements, and impacts related to hydrology and water quality would be less than significant.

Approved Specific Plan Mitigation Measures. Impacts related to hydrology and water quality were determined to be less than significant without mitigation.

REVISED SPECIFIC PLAN ANALYSIS

Construction. Similar to the Approved Specific Plan, a site-specific SWPPP in accordance with the NPDES permit requirements would be required for the implementation of the Revised Specific Plan. 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. Similar to the Approved Specific Plan, with implementation of these BMPs, impacts related to hydrology and water quality during construction would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Operation. Similar to the Approved Specific Plan, a SUSMP would be required to be implemented throughout the operational life of the project. With implementation of source control and treatment BMPs, the Revised Specific Plan would reduce or eliminate the discharge of potential pollutants from the stormwater runoff to the maximum extent practicable. Therefore, similar to the Approved Specific Plan impacts related to hydrology and water quality would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. None required.

3.10 LAND USE AND PLANNING

APPROVED SPECIFIC PLAN ANALYSIS

The Certified EIR stated that the implementation of the Approved Specific Plan would result in the redevelopment and revitalization of the Specific Plan Area, and the proposed land uses would not be incompatible with the surrounding residential land uses or result in the division of an established community. Likewise, implementation of the Approved Specific Plan was determined to be consistent with local and regional plans and policies. However, the Certified EIR stated that the Approved Specific Plan could result in the new residential uses being incompatible with the existing industrial uses along Alameda Street. However, the Certified EIR concluded that with implementation of Mitigation Measures AE5 through AE9, impacts related to the visual incompatibility of residential and industrial/commercial uses would be a less than significant. Likewise, with implementation of Mitigation Measures AQ19 through AQ24 to reduce residential exposure to contaminant emissions from the non-conforming industrial uses along the Alameda Corridor would also be reduced to a less-than-significant level. Mitigation Measure N11 was determined to ensure that truck activity does not disturb new residential land uses during early morning or late evening time periods. Mitigation Measures N12 and N13 were also determined to reduce truck activity and recycling facility equipment daytime noise levels at new residences to unacceptable noise levels. Mitigation Measure N14 was determined to ensure that the elementary school would not be exposed to unacceptable noise levels. The glass windows required in Mitigation Measure N15 was determined to ensure that residential land uses facing 103rd Street would not be exposed to unacceptable noise levels.

Approved Specific Plan Mitigation Measures. Mitigation Measures AE1 and AE2, AQ1 through AQ24, and N1 through N15.

REVISED SPECIFIC PLAN ANALYSIS

Implementation of the Revised Specific Plan would result in similar levels of residential and commercial development to implementation of the Approved Specific Plan, although it would be somewhat reconfigured. Therefore, similar to the Approved Specific Plan, the mitigation measures included in the Certified EIR to reduce impacts related to land use and planning to less-than-significant levels would be applicable to the Revised Specific Plan, and impacts related to land use and planning would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures AE1 through AQ1 through AQ17 and N1 through N15.

3.11 MINERAL RESOURCES

APPROVED SPECIFIC PLAN ANALYSIS

The Certified EIR stated that the Specific Plan Area is located within a highly urbanized area of Southeast Los Angeles that has been previously disturbed by development and is not located within a City- or County-designated Mineral Resource Zone where significant mineral deposits are known to be present or within a mineral producing area as classified by the State geologist. Furthermore, the Specific Plan Area is not located within a designated Oil Drilling/Surface Mining Supplemental Use District, or City-designated Oil Field/Drilling Area. No mineral or oil extraction operations occur within the Specific Plan Area or in the vicinity. Therefore, the Certified EIR concluded that impacts related to mineral resources would be less than significant.

Approved Specific Plan Mitigation Measures. Impacts related to mineral resources were determined to be less than significant without mitigation.

REVISED SPECIFIC PLAN ANALYSIS

Similar the Approved Specific Plan, no mineral or oil extraction operations occur or are known to occur within the Specific Plan Area. Therefore, similar the Approved Specific Plan impacts related to mineral resources would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. None required.

3.12 NOISE AND VIBRATION

APPROVED SPECIFIC PLAN ANALYSIS

Construction. The Certified EIR stated that construction of the proposed project would result in temporary increases in ambient noise and vibration levels in the project area 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 there would be a significant impact related to noise during construction. Mitigation Measures N1 through N10 were adopted to reduce construction noise levels; however, the Certified EIR concluded that impacts related to construction noise would remain significant and unavoidable. Regarding vibration, the Certified EIR concluded that construction impacts would be less than significant.

Operation. The operational noise analysis assessed mobile noise on the local roadway network associated with 14,150 average daily vehicle trips, employment use sources (i.e., mechanical equipment, truck activity, and parking areas, community facility activities, and the compatibility of new residences and the proposed elementary school with existing noise levels. Impacts were determined to be less than significant except for land use compatibility. Mitigation Measure N11 was adopted to ensure that truck activity would not disturb new residential land uses during early morning or late evening time periods. Mitigation Measures N12 and N13 were adopted to reduce truck activity and recycling facility equipment daytime noise levels at new residences. Mitigation Measure N14 was adopted to ensure that the new elementary school would not be exposed to unacceptable noise levels, and this impact would be less than significant. Mitigation Measure N15 was adopted to ensure that residential land uses facing 103rd Street would not be exposed to unacceptable noise levels. The Certified EIR concluded that operational noise would result in less-than-significant impacts after implementation of these mitigation measures. Regarding vibration, the Certified EIR concluded that operational impacts would be less than significant.

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

- N1 All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
- **N2** Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than metal-tracked equipment).
- N3 The construction contractor shall locate construction staging areas away from sensitive uses.
- **N4** Construction haul truck and materials delivery traffic shall avoided residential areas whenever feasible.

- N5 The construction contractor shall schedule high noise-producing activities between the hours of 8:00 a.m. and 5:00 p.m. to minimize disruption to sensitive uses.
- **N6** The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.
- N7 All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet, shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.
- N8 A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.
- N9 Prior to initiating construction for soil remediation and Phases 1, 2, and 4, the construction contractor shall coordinate with the site administrator for David Starr Jordan High School to discuss construction activities that generate high noise levels. Coordination between the site administrator and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to mitigate potential disruption of classroom activities.
- N10 Prior to initiating construction for Phases 3 and 4, the construction contractor shall coordinate with the site administrator for Florence Griffith Joyner Elementary School to discuss construction activities that generate high noise levels. Coordination between the site administrator and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to mitigate potential disruption of classroom activities.
- N11 Loading and unloading of trucks shall be prohibited between 10:00 p.m. and 7:00 a.m.
- N12 A ten-foot solid wall shall be constructed between the employment uses, including the recycling facility, and the residences and David Starr Jordan High School.
- **N13** Residential units adjacent to the employment uses, including the recycling facility, shall be constructed with materials capable of reducing exterior-to-interior noise levels by at least 19 dBA.
- N14 Prior to building approval, a site-specific noise study shall be completed for the elementary school based on the project design. The noise study shall ensure that noise levels at the school meet all relevant local and State guidelines.
- N15 Residential land uses facing 103rd Street shall be constructed with single-glazed windows that are at least 5/16 inches thick. Alternatively, double-glazed windows may be used if the glass is at least 3/32 inches thick with four inches of airspace.

Construction. The Revised Specific Plan would include similar overall construction activity than the Approved Specific Plan, albeit somewhat reconfigured. Thus, daily construction intensity associated with the Revised Specific Plan would be similar to the level of intensity assessed for the Approved Specific Plan. In addition, construction activities associated with both plans would occur in the same general locations. There would be no change to the typical daily construction noise and vibration levels assessed in the Approved Specific Plan, and sensitive receptor exposure to construction noise and vibration would be similar

as disclosed in the Certified EIR. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Operation. The Revised Specific Plan would include similar development and associated average daily traffic than the Approved Specific Plan. This would result in similar roadway noise to that identified in the Certified EIR, and, similar to the Certified EIR, roadway noise would result in less-than-significant impacts. The location of employment uses would be consistent between the Approved and Revised Specific Plans. The employment uses would still have the potential to generate incompatible noise at new residences. This potential impact was identified in the Final EIR. The Revised Specific Plan does not include a new elementary school, and the potential incompatibility of the proposed school with the existing noise setting is no longer relevant. Regarding vibration, the Revised Specific Plan does not include a new or different source of operational vibration. The Certified EIR concluded that operational vibration impacts would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures N1 through N15, although N14 is no longer applicable as the implementation on Revised Specific Plan would not include a new elementary school. Similar to the Approved Specific Plan, after implementation of these mitigation measures, impacts related to noise during construction would remain significant and unavoidable.

3.13 POULATION, HOUSING AND EMPLOYMENT

APPROVED SPECIFIC PLAN ANALYSIS

The Certified EIR stated that under that Approved Specific Plan, all of the existing 700 government-subsidized housing units would be demolished, and all the residents would be relocated. Replacement housing would be constructed within the Specific Plan Area and would continue to be government-subsidized. Accordingly, no net loss of affordable housing would occur. Furthermore, the Approved Specific Plan would also concentrate population growth in an infill development that already has existing infrastructure to handle population growth. Implementation of the Approved Specific Plan would also provide beneficial impacts to the Specific Plan area by providing a net increase in jobs, as well as diversification of jobs by introducing more commercial and retail jobs. Therefore, with implementation of Mitigation Measures **PHE1** and **PHE2**, impacts related to population housing and employment were determined to be less than significant.

Approved Specific Plan Mitigation Measures. The following mitigation measures were included in the Certified EIR to reduce impacts related to population, housing, and employment:

- **PHE1** HACLA shall prepare and implement an existing tenant relocation plan whereby all of the existing tenants of the Jordan Downs public housing complex would be relocated either on site or in the vicinity of the site to affordable housing equal to their existing conditions.
- PHE2 The HACLA shall coordinate with the Department of Building and Safety to designate the replacement public housing units per the new vesting tract map, in order to properly identify and process the new Certificates of Occupancy, and ensure the conservation of these public housing units.

REVISED SPECIFIC PLAN ANALYSIS

Similar to the Approved Specific Plan, implementation of the Revised Specific Plan would replace all of the existing 700 government-subsidized housing units one-for-one, and all the residents would be relocated. Replacement housing for all current residents would be provided before their units are demolished. Nonetheless, implementation of the Revised Specific Plan would create temporary construction-related jobs

and also provide beneficial impacts to the Specific Plan Area by providing a net increase in jobs by introducing commercial and retail jobs following implementation. Therefore, with implementation of Mitigation Measures **PHE1** and **PHE2**, impacts related to population housing and employment would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures PHE1 and PHE2.

3.14 PUBLIC SERVICES

APPROVED SPECIFIC PLAN ANALYSIS

The Certified EIR stated that with implementation of Mitigation Measures **PS1** and **PS2**, impacts related to fire protection services would be less than significant. Specifically, the Certified EIR stated that Mitigation Measure **PS3** would facilitate efficient and adequate movement of Los Angeles Fire Department (LAFD) equipment within the Specific Plan area, which could assist the LAFD in maintaining an adequate response time to the Specific Plan area. Similarly, the Certified EIR stated that with implementation of Mitigation Measures **PS4** through **PS7** (crime prevention measures) the demand for police protection services would also be reduced, and implementation of Mitigation Measure **PS8** would ensure that the Los Angeles Police Department (LAPD) has an adequate inventory of equipment to serve the Specific Plan Area.

With regard to impacts related to schools, Certified EIR stated that the developers of the Specific Plan Area are expected to comply with California Government Code 65995 and pay the school facility fees, as determined by the LAUSD, prior to construction. Per Section 65996 of the California Government Code, compliance with Section 65995 is "deemed to provide full and complete school facilities mitigation" and, for the purposes of CEQA would, therefore, ensure project-related impacts upon the available school capacity of elementary, middle, and high schools serving the Specific Plan Area would be less than significant.

With regard to impacts related to libraries, the Certified EIR stated that the Watts Branch Library currently does not meet the Los Angeles Public Library (LAPL) Branch Facilities Plan Branch building size standards and is deficient by 2,000 square feet. In addition, the Certified EIR stated that there are no planned expansions of the Watts Branch Library or plans to construct an additional library to serve the Watts community. Therefore, the additional population generated by implementation of Approved Specific Plan would further increase the demand for library services and could require the expansion of the Watts Branch Library to maintain an adequate level of service. Nonetheless, the Certified EIR concluded that with implementation of Mitigation Measure **PS9** impacts related to libraries would be less than significant.

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

- **PS1** Project plans shall be submitted to LAFD for review and approval to ensure that all new structures would comply with current fire codes and LAFD requirements.
- **PS2** HACLA shall consult with the LAFD and incorporate fire protection and suppression features that are appropriate for the design of the proposed project.
- **PS3** HACLA shall consult with the LAFD to ensure the proper emergency access points and routes are provided.
- **PS4** HACLA shall prepare, in consultation with the LAPD and the HACLA Public Safety Department a comprehensive safety and security plan for the Specific Plan area which would include, but would not be limited to:

- The preparation and implementation of a safety education material and training for residents of the Specific Plan area,
- A neighborhood watch program,
- Security plan for all buildings within the Specific Plan area,
- Periodic safety meetings between Specific Plan area residents and business owners and representatives of HACLA, LAPD, and the HACLA Public Safety Department to assess current level of safety of residents and visitors to Specific Plan area, as well as current crime rate
- PS5 HACLA shall submit building plans to the LAPD Crime Prevention Unit to identify appropriate crime prevention features for the proposed project. Any design features identified by the LAPD shall be incorporated into the proposed project's final design and to the satisfaction of the LAPD.
- PS6 HACLA and the HACLA Public Safety Department shall coordinate with the LAPD to develop a video monitoring system monitoring to supersede the existing video monitoring system at the existing Jordan Downs public housing project. The HACLA Public Safety Department shall have access to the on-site video monitoring system.
- **PS7** All parking garages, entrances, hallways, and parking facilities shall be well-illuminated and designed to eliminate areas of concealment.
- **PS8** HACLA shall consult with the LAPD to develop a plan to build a police station or sub-station on-site that will serve the Specific Plan area.
- **PS9** HACLA shall consult with the LAPL to develop plan to build a library sub-branch on-site that will serve the residents of the Specific Plan area.

Similar to the Approved Specific Plan, implementation of the Revised Specific Plan would result in an increase in residential and employment population within the Specific Plan Area. Similar to the Approved Specific Plan with implementation of Mitigation Measures **PS1** and **PS9**, impacts related to public services would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures PS1 through PS9.

3.15 RECREATION

APPROVED SPECIFIC PLAN ANALYSIS

The Certified EIR stated that the implementation of the Approved Specific Plan would result in substantial improvements to the 11.36 acres of land dedicated for parks and recreation, including landscaping, hardscaping, walking and jogging trails, benches and other amenities, as well as the construction of the Family Resource Center, Gymnasium and pool facilities. The total value of these park and recreation facilities improvements (land and construction costs) was approximately \$40 million. The Certified EIR further stated, that if used to purchase an equivalent value of land in Watts and surrounding area (assuming \$30 per square-foot), this investment in recreation improvements would equal approximately 30 acres of additional park space. Thus, the parks and open space area dedication plus the equivalent amount of land represented by park and recreation improvements would exceed the Los Angeles Department of Recreation Parks (LADRP's) local planning standard for park space and the anticipated population. As a result, the

³Davis Langdon, Master Plan Horizontal and Public Investments, Residential and Commercial Development – Draft Cost Study for Jordan Downs Development Los Angeles, California, March 31, 2010.

Certified EIR concluded that that implementation of the Approved Specific Plan would have a less than significant impact on recreation.

Approved Specific Plan Mitigation Measures. Impacts related to recreation were determined to be less than significant without mitigation.

REVISED SPECIFIC PLAN ANALYSIS

Similar to the Approved Specific Plan, implementation of the Revised Specific Plan would result in substantial improvements to land dedicated for parks and recreation as well as the construction of the Family Resource Center and Gymnasium and a total of 9.35-acres of open space including a 4.83 acre park. Therefore, impacts related to recreation would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. None required.

3.16 TRAFFIC AND TRANSPORTATION

APPROVED SPECIFIC PLAN ANALYSIS

A total of 41 intersections located within the jurisdictions of the City of Los Angeles, County of Los Angeles, City of Lynwood and City of South Gate were evaluated for potential significant impacts resulting from the implementation of the Approved Specific Plan. The Certified EIR concluded that impacts at two of the unsignalized study intersections (Intersection #36– Alameda Street (W)/97th Street and Intersection #41 – Wilmington Avenue/Century Boulevard) would be less than significant with implementation of Mitigation Measure **TT1**. However, the Certified EIR concluded that implementation of the Approved Specific Plan would result in significant and unavoidable project-level impacts at the following signalized intersections, and no feasible mitigation measures were identified:

- Alameda Street (W) and Firestone Boulevard (County of Los Angeles, PM peak hour)
- Alameda Street (W) and Century Boulevard/Martin Luther King Jr. Boulevard (City of Lynwood, AM and PM peak hours)
- Central Avenue and Century Boulevard (City of Los Angeles, AM and PM peak hours)
- Long Beach Boulevard and Tweedy Boulevard (Cities of South Gate and Lynwood, AM and PM peak hours)

Implementation of Mitigation Measure **TT2** would promote transit use and help reduce impacts to intersection LOS. However, significant and unavoidable impacts at the above signalized intersections would remain.

Approved Specific Plan Mitigation Measures. The following mitigation measures were included in the Certified EIR to reduce impacts related to traffic and transportation:

- An additional northbound left-turn lane shall be provided by restriping the existing painted roadway median to convert the Wilmington Avenue and I-105 EB Ramps intersection into a second northbound left-turn lane. Minor signal modifications may be required to align the northbound left-turn signal head.
- **TT2** The Applicant shall, under guidance from LADOT, design and construct signalization at the following intersections:
 - Intersection #36– Alameda Street (W)/97th Street

- Intersection #41 Wilmington Avenue/Century Boulevard
- TT3 The Applicant shall work with Metro to incorporate the B-TAP program for all residents and employees associated with the Specific Plan. The B-TAP program would provide Metro transit passes that can be renewed each calendar year. The program would apply to residents living in and employees working within the Specific Plan area.

Implementation of the Revised Specific Plan includes similar development and associated average daily traffic to implementation of the Approved Specific Plan. Therefore, similar to the Approved Specific Plan, the Revised Specific Plan would result in significant and unavoidable project-level impacts related to traffic and transportation at the unsignalized intersections identified above. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measures TT1 and TT2.

3.17 UTILITIES AND SERVICE SYSTEMS

APPROVED SPECIFIC PLAN

Construction. The Certified EIR stated the increase in water usage and wastewater generation associated with construction workers and activities would be temporary and nominal. Additionally, the Certified EIR stated that compliance with Section 66.32 of the LAMC would ensure that at least 50 percent of the demolition solid waste generated by the construction of the development envisioned in the Specific Plan Area would be diverted from the Sunshine Canyon Landfill. The Certified EIR concluded that impacts related to utilities and service systems during construction would be less than significant with the implementation of Mitigation Measure U1.

Operation. The Certified EIR stated that population, housing, and employment growth of the Specific Plan would not exceed Southeast Los Angeles Community Plan Area SCAG population, housing, and employment growth projections and, therefore, is not anticipated to require new water supply entitlements and/or require the expansion of existing or construction of new water treatment facilities. The Certified EIR concluded that the Approved Specific Plan would have a less-than-significant impact upon water supplies. However, the Certified EIR stated that the Approved Specific Plan could require construction of new or improvements to the existing water connections, and/or improvements to off-site water distribution infrastructure serving the proposed project. With the implementation of Mitigation Measure **U1**, the Certified EIR concluded the impacts related to utilities and services systems would be less than significant.

Approved Specific Plan Mitigation Measures. The following mitigation measures were included in the Certified EIR to reduce impacts related to utilities and service systems:

U1 Building plans and water connection plans developed during specific project design review shall be subject to review and approval by the LADWP. If additional water connections and/or improvements to off-site water distribution infrastructure are necessary to serve the proposed project, such improvements shall be implemented to the satisfaction of LADWP.

REVISED SPECIFIC PLAN ANALYSIS

Construction. Similar to the Approved Specific Plan, water usage and wastewater generation 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 Approved Specific Plan, impacts related to utilities and service systems

during construction would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Operation. Similar to the Approved Specific Plan, the population, housing, and employment growth within Specific Plan would not exceed SCAG's growth projections and, therefore, is not anticipated to require new water supply entitlements and/or require the expansion of existing or construction of new water treatment facilities. With the implementation of Mitigation Measure **U1**, the impacts related to utilities and services systems would be less than significant. The Revised Specific Plan would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Revised Specific Plan Mitigation Measures. Certified EIR Mitigation Measure U1.

3.18 CONCLUSION

As detailed above, the Revised Specific Plan 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 City of Los Angeles, acting as the Lead Agency under CEQA, in their consideration of the Revised Specific Plan because:

- 1. The implementation of the Revised Specific Plan 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 Approved Specific Plan and the implementation of the Revised Specific Plan do not constitute a "substantial change" to the project that would require "major revisions" to the EIR due to new or greater impacts not disclosed in the EIR.
- 2. The circumstances and existing conditions surrounding the project site have not changed from those depicted in the EIR. Existing conditions on and surrounding the project site remain as depicted in the EIR.
- 3. There is no substantial new information. The Revised Specific Plan does not constitute substantial new information as defined in the CEQA Guidelines. Implementation of the Revised Specific Plan 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.