

EXHIBIT G:

Draft Addendum to Certified EIR

Slauson Corridor Transit Neighborhood Plan

CPC-2019-4000-GPA-ZC-HD-CPIOA

Recommended by the City Planning Commission on October 13, 2022.

October 2022



ADDENDUM

SLAUSON CORRIDOR TRANSIT NEIGHBORHOOD PLAN

ADDENDUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE SOUTH LOS ANGELES AND SOUTHEAST LOS ANGELES COMMUNITY PLAN UPDATE

Case Numbers: ENV-2008-1780-EIR (South Los Angeles)
and ENV-2008-1781-EIR (Southeast Los Angeles)

State Clearinghouse Numbers: 2008101097 (Southeast Los Angeles)
2008101098 (South Los Angeles)

Project Location: The Slauson Corridor Transit Neighborhood Plan includes a 505-acre area consisting of parcels adjacent to and surrounding the right-of-way of Los Angeles County Metropolitan Transportation Authority (LA Metro) proposed Active Transportation Corridor bicycle/pedestrian path generally along Slauson Avenue, from Alameda Street to the Interstate-110 Freeway in the Southeast Los Angeles Community Plan Area (CPA), continuing to Van Ness Avenue in the South Los Angeles CPA, then along the LA Metro right-of-way that generally runs between and parallel to the streets of Southwest Drive and Hyde Park Boulevard, from Van Ness Avenue to West Boulevard in the West Adams-Baldwin Hills-Leimert CPA.

Community Plan Areas: South Los Angeles and Southeast Los Angeles, West Adams-Baldwin Hills-Leimert

Council District: 8 – Harris-Dawson and 9 – Price

Project Description: The Slauson Corridor Transit Neighborhood Plan (Modified Project) amends the General Plan Land Use Map and the Zoning Map for the South Los Angeles and Southeast Los Angeles Community Plans area. These amendments include amendments to the general plan land use designations, zone and height district changes, and changes to existing Community Plan Implementation Overlay (CPIO) boundaries. These changes would modify the allowable intensity, density, and/or types of uses on those properties and thus increase the capacity for housing and jobs in the South and Southeast Los Angeles CPAs around the proposed Active Transportation Corridor, as well as adding development standards to complement the proposed Active Transportation Corridor. The Modified Project would also amend a small portion of the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay (West Adams CPIO) for areas of the West Adams CPIO area that are adjacent and nearby to the proposed Active Transportation Corridor which extends into the West Adams-Baldwin Hills-Leimert Community Plan (West Adams Community Plan) area and adds CPIO design standards to the West Adams Community Plan to minorly modify the open space incentive and setback requirements adjacent to the Active Transportation Corridor or K Line.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Terry A. Hayes Associates Inc.
3535 Hayden Avenue, Suite 350
Culver City, CA 90232

TABLE OF CONTENTS

	<u>Page</u>
1 INTRODUCTION.....	1
1.1 Background.....	1
1.2 Purpose of this Addendum.....	5
1.3 CEQA Requirements	6
1.4 Revisions to the CEQA Guidelines	7
1.5 Required Mitigation Measures	10
1.6 Summary Comparison of Significant Impacts Approved Plans Compared to Modified Project	14
1.7 Summary of Effects.....	15
2 PROJECT DESCRIPTION.....	16
2.1 Project Location	16
2.2 Approved Plans and Components	16
2.3 Modified Project and Components.....	25
2.4 Plan Implementation and Changes to Growth Forecast	43
2.5 Other Addendums.....	45
3 ENVIRONMENTAL IMPACT ANALYSIS.....	46
3.1 Aesthetics	48
3.2 Agriculture and Forestry Resources.....	60
3.3 Air Quality	64
3.4 Biological Resources	75
3.5 Cultural Resources	86
3.6 Energy.....	92
3.7 Geology and Soils.....	94
3.8 Greenhouse Gas Emissions	109
3.9 Hazards and Hazardous Materials.....	117
3.10 Hydrology and Water Quality	133
3.11 Land Use and Planning.....	149
3.12 Mineral Resources	156
3.13 Noise.....	158
3.14 Population and Housing.....	168
3.15 Public Services	177
3.16 Recreation.....	192
3.17 Transportation.....	197
3.18 Tribal Cultural Resources	207
3.19 Utilities and Service Systems.....	210
3.20 Mandatory Findings of Significance	226
4 CONCLUSION.....	233

Appendices

- Appendix A Air Quality Calculations
- Appendix B Greenhouse Gas Emissions Calculations
- Appendix C Traffic Analysis

List of Figures

Figure 2-1	Overview.....	17
Figure 2-2a	Existing GPLU – West	18
Figure 2-2b	Existing GPLU – East	19
Figure 2-3a	Existing Zoning – West	20
Figure 2-3b	Existing Zoning – East	21
Figure 2-4a	Existing CPIO Subarea – West.....	23
Figure 2-4b	Existing CPIO Subarea – East.....	24
Figure 2-5a	Approved Plans' Change Areas and Modified Project's New or Modified Change Areas – West	26
Figure 2-5b	Approved Plans' Change Areas and Modified Project's New or Modified Change Areas – East	27
Figure 2-6a	Proposed GPLU – West	32
Figure 2-6b	Proposed GPLU – East	33
Figure 2-7a	Proposed Zoning – West	34
Figure 2-7b	Proposed Zoning – East	35
Figure 2-8a	Proposed CPIO Subareas – West	40
Figure 2-8b	Proposed CPIO Subareas – East	38
Figure 2-9a	Proposed Path-Abutting Design Standards Sites – West	41
Figure 2-9b	Proposed Path-Abutting Design Standards Sites – East	42

List of Tables

Table 1-1	Mitigation Measures.....	11
Table 1-2	Comparison of Unavoidable Significant Impacts - Approved Plans Compared to Modified Project.....	14
Table 2-1	Existing Land Use and Zoning within TNP Areas of Proposed Change.....	29
Table 2-2	Proposed Land Use and Zoning within TNP Areas of Proposed Change.....	30
Table 2-3	Summary of Proposed CPIO Subarea Provisions	39
Table 2-4	Change in Growth – Modified Project vs. Approved Plans	44
Table 2-5	Change in Growth – Census vs. Approved Plans.....	44
Table 3-1	Comparison of Air Quality Emissions - Modified Project vs. Approved Plans	69
Table 3-2	Comparison of GHG Emissions – Modified Project vs. Approved Plans.....	111
Table 3-3	Change in Growth – Modified Project vs. Approved Plans	171
Table 3-4	Change in Growth – Census vs. Approved Plans.....	173
Table 3-5	Change in Growth – 2020-2045 RTP/SCS vs. Approved Plans	173
Table 3-6	Anticipated Student Generation in the CPAs	185
Table 3-7	Future VMT – Approved Plans and Modified Project Compared to Thresholds	201
Table 3-8	Summary of Utilities 2017 EIR vs. Modified Project.....	213
Table 3-9	Solid Waste Facilities Serving the City of Los Angeles.....	222

1 INTRODUCTION

1.1 BACKGROUND

On November 22, 2017, the Los Angeles City Council (Council) adopted the South Los Angeles and Southeast Los Angeles Community Plans (Original Project or Approved Plans) and certified its Final Environmental Impact Report (2017 FEIR or Certified EIR). The Community Plan update involved several legislative actions including the adoption of two respective implementing ordinances (Community Plan Implementation Ordinance or CPIO) for the South Los Angeles and Southeast Los Angeles Community Plans. This document is an Addendum to the 2017 FEIR (SCH Nos. 2008101097 and 2008101098) and has been prepared to evaluate potential environmental effects that may be associated with proposed changes in the previously approved South Los Angeles Community Plan and Southeast Los Angeles Community Plan.

The proposed project is the Slauson Corridor Transit Neighborhood Plan (Modified Project or TNP), which includes targeted zone changes, general plan amendments, and additional land use regulations in the South and Southeast Los Angeles Community Plan Areas to modify the allowable intensity, density, and/or types of uses on those properties and thus increase the capacity for housing and jobs in the South and Southeast Los Angeles Community Plan Areas (CPAs) around the proposed Active Transportation Corridor. The Modified Project seeks to further implement the policy vision of the Approved Plans with added components intended to complement Los Angeles County Metropolitan Transportation Authority (LA Metro) planned Active Transportation Corridor bicycle/pedestrian path.

In addition, the Slauson Corridor TNP amends the West Adams CPIO to modify the existing publicly accessible open space incentive for those parcels adjacent to the proposed Active Transportation Corridor right-of-way where it extends into the West Adams CPA.

CEQA Findings of Fact

The 2017 Council approval included the Findings of Fact, pursuant to Public Resources Code Section 21081 and State CEQA Guidelines Section 15091. This document provided specific information regarding the significant environmental effects associated with the Approved Plans. For each significant impact, the document identified one or more of three possible findings, as follows, and rationale for each finding:

1. Changes or alterations were required in, or incorporated into, the project that avoided or substantially lessened the significant environmental effect as identified in the 2017 FEIR.
2. Such changes or alterations were within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes were adopted by such other agency or could and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision for employment opportunities for highly trained workers, made infeasible the mitigation measures or project alternatives identified in the 2017 FEIR.

The Findings of Fact also provided findings for each of the alternatives considered in the EIR. The Findings of Fact identified potentially significant impacts on Aesthetics (shade and shadow for Southeast Los Angeles),¹ Air Quality (regional and localized construction emissions -- violating an air quality standard, cumulatively considerable regional and localized construction emissions, localized emissions exposing sensitive receptors to substantial pollutant concentrations), Cultural Resources (Historical Resources), Hazards and Hazardous Materials (accident conditions involving release of hazardous materials, handling of hazardous materials within ¼ mile of a school), Noise (Construction Noise and Vibration and Temporary Increase in Ambient Noise from construction), Public Services (Existing Public Parks and Recreational Facilities), and Transportation and Traffic (Congestion Management Program (CMP) for South Los Angeles).²

Feasible mitigation was identified for impacts to hazardous materials that would reduce these effects to levels considered less than significant. All other impacts identified as potentially significant remain significant and unavoidable.

Statement of Overriding Considerations

Effects that could not be reduced to less-than-significant levels were addressed in the Statement of Overriding Considerations. After balancing the specific economic, legal, social, technological, and other benefits of the proposed project, the Council determined that the unavoidable adverse environmental impacts identified above may be considered “acceptable” due to the following specific considerations, which outweigh the unavoidable adverse environmental impacts of the Approved Plans. The Council found that each one of the following overriding considerations independently, grouped by overarching theme, or taken collectively, is/are sufficient to outweigh the significant and unavoidable impacts of the Approved Plans:

1. The Approved Plans promote development in a manner that would accommodate anticipated population growth for the City, as projected by the Southern California Association of Governments (SCAG), the region’s agency responsible for growth projections used by the City of Los Angeles and other cities and agencies in planning for growth and infrastructure. The Approved Plans direct anticipated growth in close proximity to public transit and along major corridors, thereby guiding physical development towards a desired image that is consistent with the social, economic and aesthetic values of the community and the City as a whole.
2. The Approved Plans support the policies and goals of the General Plan Framework Element - specifically the guiding policy to focus growth in higher-intensity commercial centers close to transportation and services by creating concentrated, mixed-use development in proximity to transportation corridors and transit stations. The Approved Plans enhance mobility by focusing future growth in areas well-served by transit and by establishing pedestrian-oriented development standards for new development in order to encourage transit ridership, walking, and bicycling. The Approved Plans would preserve the character of lower density neighborhoods by directing growth to transit centers and away from residential neighborhoods, and through the implementation of design regulations that would protect the scale and character of selected lower density and historic neighborhoods of the CPAs.

¹ The City has updated their approach to thresholds and some impacts that were identified as significant in the EIR, would no longer be considered significant under current thresholds and methodologies. Where it is relevant to the analysis, it is discussed in the analysis below.

² The 2017 FEIR found significant impacts related to automobile delay (CMP roadway and freeway segments). In response to SB 743 and the 2018 CEQA Guidelines updates, impacts related to the CMP and roadways associated with automobile delay are no longer considered impacts under CEQA, to the extent they do not result in other secondary impacts, such as noise or safety. Information related to automobile delay is taken into consideration as part of the emergency access analysis.

3. The Approved Plans would protect the quality of life for existing and future residents and confer citywide benefits through goals and policies designed to incorporate smart growth principles. The Approved Plans provide for concentrated, mixed-use development adjacent to transit corridors in order to conserve resources, protect existing residential neighborhoods, and improve air quality by reducing vehicle miles traveled. The Approved Plans would foster thriving transit centers by focusing growth in major transit and commercial areas and by creating walkable, attractive and complete transit areas that provide a greater mix of jobs, goods and services, and housing for a range of income levels, especially affordable housing, thereby reducing new vehicle trip generation and emissions regionally, as well as vehicle miles traveled relating to new development, and promoting sustainable development in support of Assembly Bill 32 and Senate Bill 375. The overall reduction in regional vehicle miles traveled and trip generation would contribute to lowered greenhouse gas emissions in the region.
4. The Approved Plans are consistent with Senate Bill (SB) 375. While potentially increasing vehicle miles traveled and greenhouse gases in the immediate area where new infill development will be focused, the Approved Plans implement a condensed development pattern within close proximity to public transit and along major corridors, consistent with SB 375 and the Sustainable Communities Strategy, adopted by SCAG, and therefore would be expected to contribute to decreasing regional vehicle miles traveled and greenhouse gas emissions in the region.
5. The Approved Plans are consistent with the Sustainable Communities Strategy and contribute to increasing mobility and sustainability. The Approved Plans would achieve a greater jobs-housing balance and reduce traffic and commute times by focusing capacity in close proximity to Downtown Los Angeles and other employment destinations. The Approved Plan for South Los Angeles in particular focuses additional capacity for both employees and students in close proximity to the University of Southern California, the largest private employer in Los Angeles, and thereby promotes mobility and sustainability.
6. The Approved Plans support policies and goals of the General Plan Framework Element by allowing the City to grow strategically, and by allowing for the conservation of existing low-scale residential neighborhoods. The benefits conferred by orderly, well-designed development that is served by existing infrastructure and services, as well as connected by transit, bicycle and pedestrian networks, outweigh the impacts anticipated with development allowed by the Approved Plans. These benefits are not only consistent with the long-term vision of sustainable growth stipulated in the Framework, they help ensure the continued economic viability of the commercial and industrial districts of the CPAs.
7. The Approved Plans would address incompatible land use patterns in the CPAs by minimizing industrial-residential conflicts and preserving stable industrial districts. The Approved Plans establish compatibility standards for new development to provide better transitions and screening between industrial and residential uses and to prohibit new noxious uses in order to protect nearby residents. Industrially-zoned properties currently developed with commercial and residential uses would be re-designated to a zone more consistent with what's built, where appropriate. New regulations would also protect viable industrial districts from retail / residential encroachment to prevent land use conflicts and maintain a strong local employment base.

8. The Approved Plans would ensure that where new growth is anticipated, project features are incorporated to help minimize the impacts of new development. Through implementation of the CPIO District subareas new infill development will be regulated through varying levels of design regulations, ranging from basic to more robust design standards. The proposed CPIOs will also regulate permitted uses to encourage a more diversified range of retail and neighborhood services while addressing the over-concentration of certain uses, such as liquor stores and auto-related uses.
9. The Approved Plans would respond to the regional housing crisis, and the corresponding increasing cost of housing and increasing incidence of homelessness in the City of Los Angeles, by re-zoning targeted land along the corridors to allow for additional density, thereby increasing housing opportunities within the CPAs. In particular, the Approved Plans attempt to address the housing crisis and existing overcrowded conditions in the CPAs by increasing opportunities for new affordable and mixed-income housing through incentives offered in the CPIO Districts' TOD subareas. The Approved Plans would provide adequate capacity to allow an increase in the housing supply to address the housing shortage in the CPAs.
10. The Approved Plans would preserve the character of existing lower-density neighborhoods by maintaining lower density land use designations, limiting the allowed residential density of some neighborhood commercial areas, and establishing design guidelines. New development capacity would be directed towards transit-oriented areas and commercial corridors, and away from existing residential neighborhoods. The commercial areas of the CPAs would support new development that accommodates a variety of uses and encourages pedestrian activity, creating focal points and activity centers for surrounding neighborhoods.
11. The Approved Plans would seek to preserve both designated and eligible historic resources located in the proposed CPIO District Subareas. Implementation of the CPIO regulations would protect potential historic resources currently not afforded protections by requiring special review of identified eligible historic properties and by preserving the historic character of certain residential neighborhoods.
12. The Approved Plans would protect the quality of life for existing and future residents and confer citywide benefits through goals, policies and programs designed to facilitate smart growth principles, including promoting pedestrian-oriented commercial districts that encourage walkability and non-motorized transportation, thereby reducing new vehicle trip generation and emissions regionally, as well as vehicle miles traveled relating to new development, and promoting sustainable development in support of Assembly Bill 32 and SB 375.
13. The Approved Plans are consistent with the Sustainable City pLAn by accommodating growth while providing transportation options. The Approved Plans would concentrate development around transit, allow for and encourage a wide mix of uses, and better accommodate pedestrians and bicyclists. This strategy would result in lower per capita emissions than would a less dense growth strategy and would contribute to the City reaching the 2025 Sustainable City pLAn reduction target of 45 percent. Therefore, the Approved Plans would be expected to contribute to decreasing regional vehicle miles traveled and greenhouse gas emissions in the region over time.
14. The Approved Plans improve local mobility through the development of a balanced, multi-modal transportation network, focusing new development near existing services and infrastructure. They emphasize a multi-modal approach to mobility that recognizes the

benefits (including health and traffic-alleviating benefits) of providing options that encourage walking, cycling, and transit use. These linkages will also enhance access to both passive and active open and green space amenities, thereby encouraging physical activity by all segments of the community, particularly youth and the elderly. All together these enhanced mobility options provide a better-connected, user-friendly network representing a more diverse, sustainable transportation network.

1.2 PURPOSE OF THIS ADDENDUM

The purpose of this Addendum is to provide analysis and show based upon substantial evidence that the Modified Project would not require a subsequent EIR to the 2017 FEIR due to the involvement of new significant environmental impacts or a substantial increase in the severity of those impacts identified in the 2017 FEIR or due to 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 2017 FEIR was certified. This document has been prepared in accordance with Public Resources Code Section 21166, and State CEQA Guidelines (Title 14, California Code Regulations, 15000 et seq.), Sections 15162 and 15164 (see discussion below).

Because the proposed changes to the Approved Plans included in the Modified Project do not meet the conditions described in Section 15162 of the CEQA Guidelines, the City determined that an Addendum to the previously adopted 2017 FEIR is the appropriate documentation to address the proposed revisions. CEQA Guidelines Section 15164 establishes an addendum process that is consistent with the CEQA statute. The environmental analysis presented below for the Modified Project demonstrates that the proposed changes will not create new or increased significant environmental impacts beyond those already identified in the previously adopted 2017 FEIR.

This Addendum documents, for each technical issue, that the Modified Project would not:

- 1) Involve substantial changes that would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the 2017 FEIR;

And the following has not occurred:

- 1) Substantial changes with respect to the circumstances under which the Original Project including as modified by the Modified Project would be undertaken that would result in new significant environmental effects or the substantial increase in the severity of previously identified significant effects in the 2017 FEIR; or
- 2) 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.

This analysis has determined that with implementation of the Modified Project, there would be no new significant environmental effects and no substantial increase in the severity of previously identified significant effects. Furthermore, there is no new information of substantial importance, including, known mitigation measures or alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment previously identified in the EIR. Therefore, neither a subsequent EIR nor a supplemental EIR, pursuant to CEQA Guidelines Sections 15162 and 15163, respectively, is required. An Addendum to the adopted EIR, as permitted under Section 15164, is appropriate.

1.3 CEQA REQUIREMENTS

An Addendum to an EIR is the appropriate tool to evaluate the environmental effects associated with changes or additions consisting of minor modifications to previously approved projects. It is appropriate when modifications would not result in new or increased significant adverse impacts.

Section 15164 of the CEQA Guidelines provides the authority for preparing an addendum to a previously certified EIR. Specifically, Section 15164 states the following:

- (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.
- (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.

Under Public Resources Code Section 21166 and CEQA Guidelines Sections 15612 and 15164, an addendum to a certified EIR shall be used in connection with subsequent project review and approval unless one of the following findings is made based on substantial evidence:

- (1) Substantial changes are proposed in the project which will require major revisions of the Certified EIR 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 Certified EIR 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 Certified EIR was certified as complete, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the Certified EIR;
 - (B) Significant effects previously examined will be substantially more severe than shown in the Certified 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 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 Certified EIR would substantially reduce one or more significant effects on the environment, but project proponents decline to adopt the mitigation measure or alternative.

The Modified Project is described in Chapter 2, Project Description, of this Addendum and has been reviewed by the City of Los Angeles pursuant to Public Resources Code Section 21166 and Sections 15162 through 15164 of the CEQA Guidelines. As the Lead Agency, the City of Los Angeles finds, based on the analysis presented herein, the 2017 FEIR, and the whole of the record, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the 2017 FEIR is the appropriate environmental documentation under CEQA for the Modified Project. Chapter 3, Environmental Impact Analysis discusses issue-by-issue how the impacts anticipated for the Modified Project would be consistent with and not different from those previously identified in the 2017 FEIR. The Mitigation Monitoring and Reporting Program (MMRP) adopted with the 2017 FEIR would apply to the Modified Project to reduce impacts to the extent feasible.

1.4 REVISIONS TO THE CEQA GUIDELINES

The California Natural Resources Agency adopted revisions to the CEQA Guidelines that became effective on December 28, 2018, which was adopted after preparation of the 2017 FEIR. These revisions are reflected in the discussion of each topic in this Addendum (see Chapter 3) and are summarized below. The revisions to the CEQA Guidelines were adopted largely to create efficiencies and to align the CEQA Guidelines with California appellate court and Supreme Court decisions. The revisions that are most applicable to the 2017 FEIR are those associated with changes to Appendix G.

Appendix G of the CEQA Guidelines contains a sample initial study format. The purpose of an initial study is to assist lead agencies in determining whether a project may cause a significant impact on the environment. To help guide that determination, Appendix G asks a series of questions in the form of a checklist regarding a range of environmental resources and potential impacts. The Planning Department in preparing CEQA clearances as a general matter uses Appendix G as the initial threshold of significance, unless indicated otherwise, and supplements the threshold question as necessary or desirable to comply with CEQA to analyze significant impacts to the environment, such as the use of South Coast Air Quality Management District (SCAQMD) thresholds for air quality impacts.

When the Appendix G checklist was originally developed, it contained only a handful of questions. Over time, the list of questions has grown in response to increasing awareness of the effects of development on the environment. Currently, the sample checklist contains 89 questions divided into 20 categories of potential impacts.

The revisions to Appendix G were adopted largely to reduce redundancy, provide additional clarity, and to align Appendix G with California appellate court and Supreme Court decisions and changes to the Public Resources Code. An overview of the modifications to the Appendix G is provided below by environmental topic. Below the changes to Appendix G, and other updates to CEQA and the CEQA Guidelines, since the preparation and/or certification of the 2017 Final EIR are summarized. Where relevant, the changes to Appendix G and other updates to the Guidelines will be addressed in the analysis in Chapter 3.

Aesthetics

Consistent with SB 743, aesthetics do not apply to projects that are located in a transit priority area and are defined as set forth in Public Resources Code Section 21099. Per SB 743, aesthetic impacts for such projects are less than significant. For those projects that are not in a transit priority area, the modifications to Appendix G for impacts to visual character were changed for urbanized areas, such as the CPA, to identify significant impacts as those which result from projects that are in conflict with adopted zoning and plans intended to protect visual character. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 3.1, Aesthetics.

Agriculture and Forestry Resources

These checklist questions were not updated as part of the modifications. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 3.2, Agriculture and Forestry Resources.

Air Quality

These checklist questions were modified to delete a question regarding violation of air quality standards and to modify the question regarding odors. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 3.3, Air Quality.

Biological Resources

A checklist question was modified to remove the reference to Section 404 of the Clean Water Act. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 3.4, Biological Resources.

Cultural Resources

These modifications consist of a minor word change and moving a checklist question for paleontological resources and unique geologic formations from the cultural resources subsection to the geology subsection of Appendix G. Impacts to cultural resources are addressed in Section 3.5, Cultural Resources.

Energy

The modifications include creating a separate subsection for energy and incorporating language from Appendix F of the CEQA Guidelines. These added checklist questions are addressed in Section 3.6, Energy.

Geology and Soils

These checklist questions have been modified to focus on both the direct and indirect impacts associated with geology and soils and to move the analysis of paleontological resources to this topic (from the cultural resources section). Impacts to geology and soils are fully addressed in Section 3.7, Geology and Soils.

Greenhouse Gas Emissions

These checklist questions were not changed as part of the modifications and are addressed in Section 3.8, Greenhouse Gas Emissions.

Hazards and Hazardous Materials

These checklist questions were revised to delete the question regarding safety hazards associated with proximity to a private airstrip and to clarify that a checklist question include both direct and indirect impacts associated with wildland fires. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 3.9, Hazards and Hazardous Materials.

Hydrology and Water Quality

These checklist questions were revised to provide clarification and eliminate redundancy. All of the topics in these checklist questions, including those related to water quality, groundwater, flooding, and flood hazards, are thoroughly addressed in Section 3.10, Hydrology and Water Quality.

Land Use and Planning

A checklist question was revised to focus on conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. A checklist question was also deleted, as it addressed habitat conservation plans, which are already addressed under the biological resources checklist questions. An analysis of the Project's consistency with land use plans, policies, and regulations is provided in Section 3.11, Land Use and Planning.

Mineral Resources

These questions were not updated as part of the modifications. Impacts to mineral resources are fully addressed in Section 3.12, Mineral Resources.

Noise

Checklist questions were revised to focus on impacts associated with the generation of noise and vibration noise levels. In addition, checklist questions were deleted and revised, as they were redundant. The topics associated with these modified questions are fully addressed in Section 3.13, Noise.

Population and Housing

Checklist questions were combined and clarified to focus on potential impacts associated with unplanned growth. The topics in these modified questions are fully addressed in Section 3.14, Population, Housing, and Employment.

Public Services

These checklist questions were not updated as part of the modifications and are responded to in Section 3.15, Public Services.

Recreation

These questions were not updated as part of the modifications and are responded to in Section 3.16, Recreation.

Transportation

Checklist questions were combined and clarified to focus on conflicts with a program, plan, ordinance, or policy addressing the circulation system. A checklist question regarding airport traffic safety was eliminated, as airport traffic safety is already addressed under the hazards

questions. A checklist question was revised to add “geometric” for clarity. All of the topics in these questions are addressed in Section 3.17, Transportation. In addition, a checklist question was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The City adopted a VMT methodology on July 30, 2019. The traffic analysis prepared for the Modified Project, and included herein, has therefore been prepared using the City’s adopted VMT methodology.

Tribal Cultural Resources

Assembly Bill (AB) 52 went into effect on July 1, 2015, and requires that for a project for which a Notice of Preparation (NOP) for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project. The Notice of Preparation (NOP) for the South Los Angeles and Southeast Los Angeles Community Plan Update EIR was released on October 20, 2008, and therefore, the lead agency was not required to comply with the requirements of AB 52. AB 52 also required an update to Appendix G of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. The issues related to tribal cultural resources are addressed within Section 3.18, Tribal Cultural Resources.

Utilities and Service Systems

These checklist questions were revised to reduce redundancy. Specifically, a checklist question was eliminated, as wastewater treatment was already addressed in a former question. In addition, checklist questions were combined to address all infrastructure types in one question and to include the addition of telecommunications. A checklist question regarding water supply was also updated to clarify that the analysis of water supply should include reasonably foreseeable future development during normal, dry and multiple dry years. Checklist questions regarding solid waste impacts were also clarified. All of the topics in these questions are addressed in Section 3.19, Utilities and Service Systems.

Wildfire

New Wildfire Appendix G checklist questions were added in 2018 that pertain to projects that are located in, or near, state responsibility areas or lands classified as very high fire hazard severity zones. However, these new Wildfire Appendix G questions are not applicable to the Modified Project because the CPAs are located in a highly urbanized portion of the City of Los Angeles, and there are no Very High Fire Hazard Severity Zones or Brush Clearance Zones located within the CPAs, therefore no further analysis is required.

1.5 REQUIRED MITIGATION MEASURES

The 2017 FEIR identifies mitigation measures that would reduce the potentially significant impacts of the Approved Plans. These mitigation measures were required as part of the approval process and are listed in **Table 1-1**. These mitigation measures will continue to be implemented as applicable and appropriate with respect to the Modified Project.

TABLE 1-1: MITIGATION MEASURES

No.	Mitigation Measure
AIR QUALITY	
AQ1	<p>Any approval of a project located within a CPIO Subarea (except for Residential Subareas M, N, and O) shall ensure that all contractors include the following best management practices in contract specifications:</p> <ul style="list-style-type: none"> • Restrict idling of construction equipment³ and on-road heavy duty trucks⁴ to a maximum of 5 minutes when not in use. • Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g., engine catalysts) to the extent they are readily available and feasible. • Use heavy duty diesel-fueled equipment that uses low NO_x diesel fuel to the extent it is readily available and feasible. • Use construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible. • All on-road heavy-duty diesel trucks or equipment with a gross-vehicle weight rating (GVWR) of 19,500 pounds or greater shall comply with EPA 2007 on-road emission standards for PM and NO_x: <ul style="list-style-type: none"> ○ PM – 0.01 g/bhp-hr ○ NO_x – at least 1.2 g/bhp-hr • Use zero-emission trucks and equipment where available, or cleanest available technology. • Every effort should be made by the Contractor to utilize grid-based electric power at any construction site, where feasible. • Where access to the power grid is not available, on-site generators are required to meet 0.01 g/bhp-hr standard for PM, or be equipped with Best Available Control Technology (BACT) for PM emissions reductions. • Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic. • Construction contractors shall use pre-painted construction materials, as feasible. • Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow. • Prepare haul routes, when required by the LAMC, that conform to local requirements to minimize traversing through congested streets or near sensitive receptor areas. • Maintain a buffer zone that is a minimum of 1,000 feet between truck traffic and sensitive receptors, where feasible. • When required by LADOT, upgrade signal synchronization to improve traffic flow. • Configure construction parking to minimize traffic interference. • When required by LADOT, provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site. • Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable. • Traffic speeds on all unpaved roads shall be 15 mph or less. • Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible. • Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation. The name and contact information of the construction relations officer shall be posted at a location on the project site that is accessible and visible from the public right-of-way. • Identify sensitive uses within 500 feet of a project that involves ground-disturbing activities and notify sensitive uses before construction projects occur, including disclosure of the name and contact information for the construction relations officer acting as the community liaison. • Implement the fugitive dust control measures as required in the South Coast Air Quality Management District's Rule 403 Fugitive Dust. • Require installation of high efficiency filtration systems (MERV 13) for housing projects within 500 feet of freeways and oil drilling sites.

³ Required by Title 13, CCR, Section 2449, *General Requirements for In-Use Off-Road Diesel-Fueled Fleets*.

⁴ Required by Title 13, CCR, Section 2485, *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling*.

TABLE 1-1: MITIGATION MEASURES

No.	Mitigation Measure
CULTURAL RESOURCES	
CR1	Any approval of a project within a CPIO Subarea (excluding Residential Subareas M, N, and O) that involves construction-related soil disturbance shall require that if during construction activities any cultural materials are encountered, construction activities within a 50-meter radius shall be halted immediately and the project applicant shall notify the City. A qualified archeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to conduct a more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the project site. If the find were determined to be significant by the archeologist, the City and the archeologist would meet to determine the appropriate course of action. All cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.
CR2	Any approval of a project within a CPIO Subarea (excluding Residential Subareas M, N, and O) that involves construction-related soil disturbance shall require that during excavation and grading, if paleontological resources are uncovered, all work in that area shall be halted immediately and the project applicant shall notify the City. The project applicant shall retain a paleontologist to assess the nature, extent, and significance of any cultural materials that are encountered and to recommend appropriate methods to preserve any such resources. Said paleontologist will have the authority to put a hold on grading operations and mark, collect and evaluate any paleontological resources found on the site where it is discovered during construction. Said paleontologist shall be provided a reasonable amount of time to prepare and implement protection measures coordinating with the City of Los Angeles Building and Safety Department. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.
HAZARDS AND HAZARDOUS MATERIALS	
HM1	<p>Any approval of a project within a CPIO Subarea that involves construction-related soil disturbance located on land that is currently or was historically zoned as industrial shall conduct a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code, section 65962.5. A report setting forth the results of this database search shall be provided to the City and shall be made publicly available (e.g. historical environmental reports prepared by Enviroscan, EDR or similar firms). If the report indicates the project site or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, a Phase I Environmental Site Assessment (ESA) shall be prepared.</p> <p>The Phase 1 ESA shall identify any hazardous materials/wastes that could be present on the project site. The Phase 1 shall also include recommendations and measures for further site assessment to address any hazardous materials/wastes potentially present on the project site. The Phase 1 assessment shall be prepared by an Environmental Professional (as defined in Title 40 Code of Federal Regulations § 312.10 Definitions) to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses. The ESA shall be made publicly available. Depending on the results of the Phase 1 ESA, further investigation and remediation may be required in accordance with local, state, and federal regulations and policies and shall be clearly indicated in the ESA. If the Phase 1 ESA finds that there is no contamination on the site, a letter of No Further Action shall be provided to the City.</p> <p>The City shall require that a Phase 2 Site Assessment be conducted as may be indicated by the site-specific Phase 1 Environmental Site Assessment. If a Phase 2 is found necessary it shall be performed prior to project approval or made a condition on the project if that is found to be adequate for remediation by the Environmental Professional and the relevant federal, state, or local agency.</p> <p>Should the Phase 2 Site Assessment indicate soil and/or groundwater contamination is present, a detailed Soil Management Plan (SMP) for the treatment of contaminated soils and materials shall be developed and implemented in accordance with applicable laws and regulations. The SMP shall be prepared prior to the Department of Building and Safety's issuance of a grading permit to review and address any impacted soil that may be encountered during excavation and grading. The SMP shall</p>

TABLE 1-1: MITIGATION MEASURES

No.	Mitigation Measure
	provide for the sampling, testing, and timely disposal of such soil and shall specify the testing parameters and sampling frequency. Any impacted soils shall be properly treated and disposed of in accordance with applicable SCAQMD, DTSC, and LARWQCB requirements. An Environmental Professional shall be on-site during excavation and grading of the project site to monitor environmental conditions pertaining to soil. Written confirmation by the Environmental Professional stating that required site remediation was completed consistent with the relevant federal, state or local requirements shall be provided to the City prior to issuance of certificates of occupancy.
NOISE AND VIBRATION	
N1	<p>Any approval of a project located within a CPIO Subarea (except for Residential Subareas M, N, and O) shall ensure that all contractors include the following best management practices in contract specifications, where applicable:</p> <ul style="list-style-type: none"> • Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences. • The construction contractor shall locate construction staging areas away from sensitive uses. • When construction activities are located in close proximity to noise-sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses. • Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving. • Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements. • The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible. • Use electric or solar generators, when available.
N2	<p>The following conditions shall apply to future development within the CPIO Subareas (except Residential Subareas M, N, and O):</p> <ul style="list-style-type: none"> • Industrial activity yards that include the operation of heavy equipment shall be shielded by sound barriers that block line-of-sight to sensitive receptors. • Mechanical equipment (e.g., heating, ventilation and air conditioning (HVAC) Systems) shall be enclosed with sound buffering materials. • Truck loading/unloading activity shall be prohibited between the hours of 10:00 p.m. and 7:00 a.m. when located within 200 feet of a residential land use. • Parking structures located within 200 feet of any residential use shall be constructed with a solid wall abutting the residences and utilize textured surfaces on garage floors and ramps to minimize tire squeal.
N3	<p>Any approval of a project located within a CPIO Subarea (except for Residential Subareas M, N, and O) that is adjacent to buildings listed or determined eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, designated as a Historic-Cultural Monument by the City of Los Angeles, within a Historic Preservation Overlay Zone ("historic buildings"), or determined to be historically significant in SurveyLA or other historic resource survey meeting all of the requirements of Public Resources Code, section 5024.1(g), shall ensure all of the following requirements are or will be met:</p> <ul style="list-style-type: none"> • Historic buildings adjacent to the project's construction zones are identified. • A Vibration Control Plan is prepared and approved by the City. • The Vibration Control Plan shall be completed by a qualified structural engineer. • The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected buildings. The survey letter shall provide a shoring design to protect the identified land uses from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels such as sonic pile driving or caisson drilling instead of impact pile driving. <p>At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any</p>

TABLE 1-1: MITIGATION MEASURES

No.	Mitigation Measure
	repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).
N4	<p>Any approval of a project located within a CPIO Subarea (except for Residential Subareas M, N, and O) shall ensure that all contractors include the following best management practices in contract specifications, where applicable:</p> <ul style="list-style-type: none"> • Impact pile drivers shall be avoided where possible in vibration-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are alternatives that shall be utilized where geological conditions permit their use. • The construction activities shall involve rubber-tired equipment rather than metal-tracked equipment. • The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment where possible to avoid construction vibration impacts.

1.6 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS APPROVED PLANS COMPARED TO MODIFIED PROJECT

As shown in Chapter 3, there were no new significant impacts or substantial increase in the severity of the significant impacts identified in the 2017 FEIR resulting from the Modified Project, or based on changed circumstances or new information. Unavoidable significant adverse environmental impacts identified for the 2017 FEIR as compared to impacts of the Modified Project are summarized in **Table 1-2** below and were not made more severe:

TABLE 1-2 COMPARISON OF UNAVOIDABLE SIGNIFICANT IMPACTS - APPROVED PLANS COMPARED TO MODIFIED PROJECT

Issue Area	Approved Plans	Modified Project
Aesthetics (Shade and Shadow for Southeast Los Angeles)	Shade/shadow is not specifically identified within the CEQA Guidelines and is addressed on a case-by-case basis as appropriate in the City of Los Angeles. The 2017 FEIR indicated that shadows generated from future development could impact shadow-sensitive land uses located within and around Active Change Areas along Central Avenue (south of 103 rd Street), and other identified locations in the Southeast Los Angeles CPA.	Less Severe. Shade and Shadow would be similar to under the Approved Plans. The City has updated their approach to thresholds and shade and shadow analyses; such impacts are addressed on a case-by case basis and generally no longer considered significant.
Air Quality (Temporary Construction Emissions, Regional Emissions, and Sensitive Receptors)	The 2017 FEIR identified significant and unavoidable regional and localized construction impacts related to violating an air quality standard and/or contributing substantially to an existing or projected air quality violation and that these emissions would be cumulatively considerable and that the localized emissions would expose sensitive receptors to substantial pollutant concentrations.	Same. Impacts related to construction emissions are considered to remain significant, even though recent studies of development projects are not finding significant impacts.
Cultural Resources (Historical Resources)	Although the Approved Plans incorporate changes that will assist in further protecting designated or eligible historical resources, it is foreseeable that demolition and/or significant alteration to historic resources as defined in CEQA Guidelines Section 15064.5 could occur to at least one or more historical resources during the twenty-year life of the project. Therefore,	Same. Impacts related to historical resources would continue to be significant and unavoidable.

TABLE 1-2 COMPARISON OF UNAVOIDABLE SIGNIFICANT IMPACTS - APPROVED PLANS COMPARED TO MODIFIED PROJECT		
Issue Area	Approved Plans	Modified Project
	as a conservative assessment it was concluded that the Approved Plans would result in a significant and unavoidable impact related to historical resources and would be cumulatively considerable.	
Noise (Construction Noise, Vibration, and Temporary Increase in Ambient Noise)	In the absence of detailed noise and vibration analyses associated with specific development projects, it is anticipated that construction noise and vibration levels at various sensitive land uses would exceed the City's thresholds of significance. The Approved Plans would also result in a significant and unavoidable cumulative impact related to construction noise and vibration. Construction noise would result in a significant impact as a result of temporarily increasing ambient noise levels above existing levels.	Same. Impacts related to noise and vibration during construction activities would continue to be significant and unavoidable.
Public Services (Existing Public Parks and Recreational Facilities)	Due to the existing deficit in parks and open space and limited availability of land that could be used for parks within the CPAs, no feasible mitigation measures were identified to reduce the significant impact related to the deterioration of existing public parks to less than significant. Therefore, impacts related to the substantial physical deterioration of existing parks and recreational facilities under the Approved Plans would be significant and unavoidable and would be cumulatively considerable.	Same. Impacts related to public parks and recreational facilities would continue to be significant and unavoidable.
Transportation and Traffic (CMP for South Los Angeles).	CEQA has been amended to focus on VMT as a metric rather than delay. The EIR found significant impacts related to delay: The CMP roadway segment of Manchester Avenue between Hoover Street and Figueroa Street and the freeway monitoring station at I-10 at Budlong Avenue located in the South Los Angeles CPA currently operate at LOS E and F under the Prior Land Use Plan and worsen to LOS F and F under the Approved Plan, and would cause an increase in V/C ratio of 0.02 or more, resulting in an impact on these CMP roadway and freeway segments. By its nature, the CMP is a cumulative scenario that considers the impact of single projects in the context of cumulative traffic demand on CMP roadways. Thus, the Approved Plan for South Los Angeles would result in a significant and unavoidable cumulative impact.	Less. The VMT analysis shows impacts to VMT would be less than significant. Impacts related to the CMP and roadways were associated with delay and are no longer considered impacts under CEQA. However, information related to delay is taken into consideration as part of the emergency access analysis. Impacts to emergency access would be less than significant.

1.7 SUMMARY OF EFFECTS

Chapter 3, Environmental Impact Analysis of this Addendum includes a detailed evaluation of any potential change in effects associated with implementation of the Modified Project for each CEQA environmental issue area, organized consistent with the Appendix G of the State CEQA Guidelines. As set forth in **Table 1-2**, the significant unavoidable impacts identified in the 2017 FEIR would either be comparable or reduced as compared to those identified in the 2017 FEIR. In addition, the Modified Project created no new impacts, nor did it increase the severity of any previously studied impacts considered in the 2017 FEIR. Therefore, as discussed in this Addendum, the Modified Project would not trigger any of the conditions that require the preparation of a Subsequent or Supplemental EIR in Sections 15162 and 15163 of the CEQA Guidelines, and therefore an Addendum to the 2017 FEIR is the appropriate CEQA document to address these changes.

2 PROJECT DESCRIPTION

The Approved Plans (Original Project) involved the update to the South Los Angeles and Southeast Los Angeles Community Plans -- two of the City's 35 Community Plans, which comprise the Land Use Element of the City's General Plan. The Community Plans are meant to guide growth and development to the year 2035 in a manner consistent with the General Plan Framework, the citywide growth strategy.

2.1 PROJECT LOCATION

The Approved Plans are located generally south of Downtown Los Angeles. The Community Plan Areas that comprise the Original Project are geographically contiguous, sharing a common boundary along the Harbor Freeway (I-110) and Van Ness Avenue. Combined, South Los Angeles and Southeast Los Angeles cover over 30 square miles. South Los Angeles is generally bounded by Pico Boulevard to the north, Figueroa Street and Broadway to the east, 120th Street to the south, and Arlington Avenue and Van Ness Avenue to the west.

The South Los Angeles CPA is bordered by the Wilshire and Westlake CPAs to the north, the Harbor Gateway CPA and the County of Los Angeles community of West Athens-Westmont to the south, the West Adams-Baldwin Hills-Leimert CPA and the City of Inglewood to the west, and the Southeast Los Angeles CPA to the east. The Southeast Los Angeles CPA is generally bounded by the Santa Monica Freeway (I-10) to the north; the Alameda Corridor (from the I-10 to Slauson Avenue and from 92nd Street to Imperial Highway) and Central Avenue (from Slauson Avenue to 103rd Street) to the east; 120th Street and Imperial Highway to the south; and Figueroa Street and Broadway to the west. The CPA is bordered by the Central City CPA (Downtown) to the north, the cities of Vernon and Lynwood and the County of Los Angeles community of Florence-Firestone to the east, the County of Los Angeles community of Willowbrook to the south, and the South Los Angeles CPA to the west.

The Modified Project would affect a 505-acre area consisting of parcels adjacent to and surrounding the right-of-way of LA Metro's proposed Active Transportation Corridor bicycle/pedestrian path generally along Slauson Avenue, from Alameda Street to the I-110 Freeway in the Southeast Los Angeles CPA, continuing to Van Ness Avenue in the South Los Angeles CPA, then along the LA Metro right-of-way that generally runs between and parallel to the streets of Southwest Drive and Hyde Park Boulevard, from Van Ness Avenue to West Boulevard in the West Adams-Baldwin Hills-Leimert CPA (**Figure 2-1**).

2.2 APPROVED PLANS AND COMPONENTS

The Approved Plans involved amending both the policy documents and the land use maps of the South Los Angeles and Southeast Los Angeles Community Plans. The Original Project also adopted several zoning ordinances to implement the updates to the two Community Plans, including changes for certain portions of the Community Plan Areas to allow specific uses, development standards (including height, Floor Area Ratio (FAR), and massing) and design standards. These zoning ordinances involved a number of different forms, including amendments to the Zoning Map for zone and height district changes under LAMC Section 12.32 and the adoption of two Community Plan Implementation Overlay (CPIO) Districts under LAMC Section 13.14. Also, to ensure consistency between the updated community plans and the other City plans and ordinances, the Original Project included amendments to the Framework and Circulation (Mobility Plan 2035) Elements of the General Plan, and others as necessary. The existing General Plan Land Use and Zoning are shown in **Figures 2-2a** and **2-2b** and **Figures 2-3a** and **2-3b**, respectively.

Figure 2-1: Overview



Figure 2-2b: Existing GPLU – East

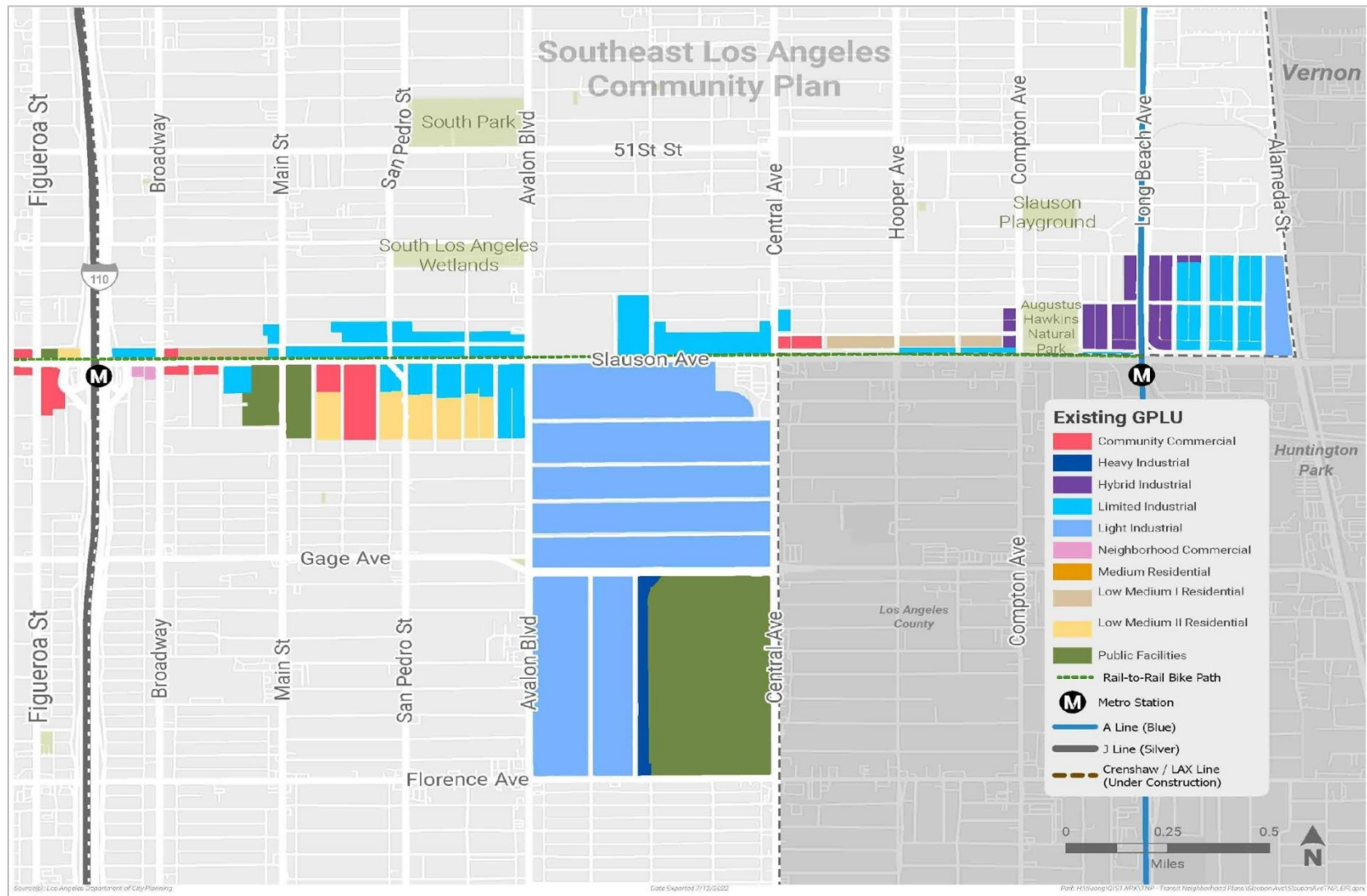


Figure 2-3a: Existing Zoning – West

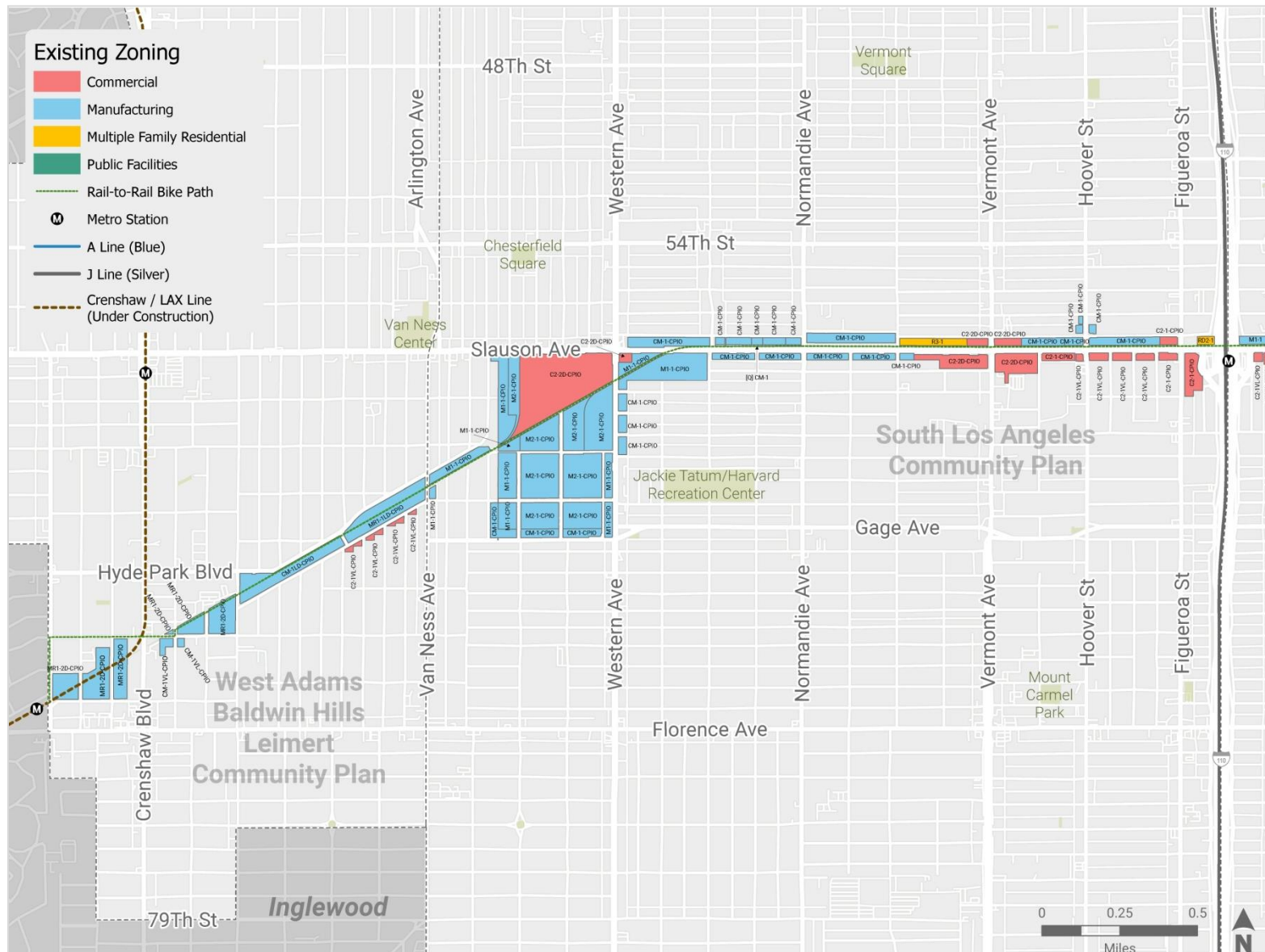
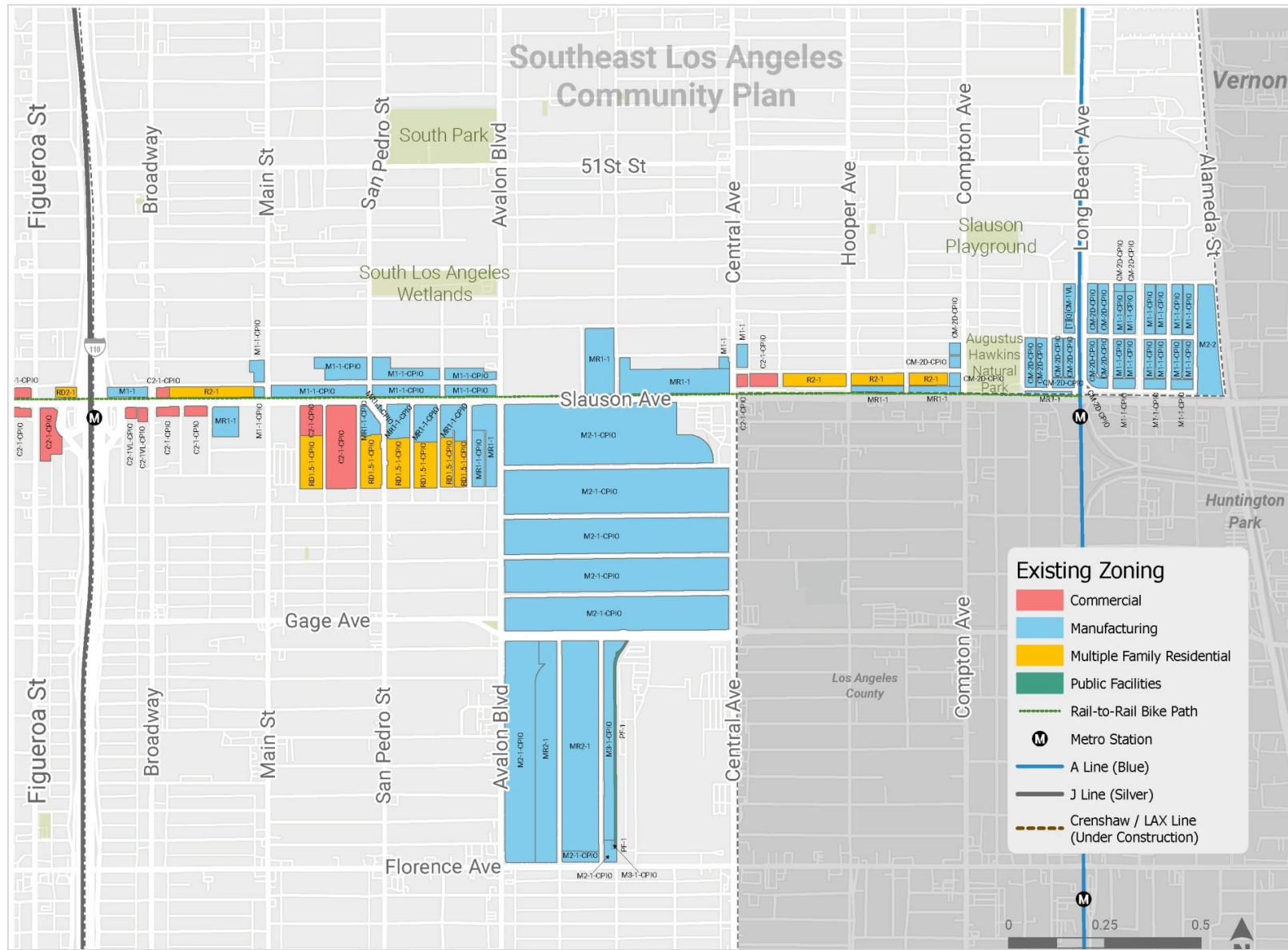


Figure 2-3b: Existing Zoning – East



South Los Angeles and Southeast Los Angeles Community Planning Implementation Overlay District (CPIO)

The South Los Angeles and Southeast Los Angeles CPIOs were established as part of the Original Project. A CPIO is a zoning tool meant to implement the policy vision of the applicable community plan. The CPIO Districts establish subareas with varying levels of development regulations, ranging from basic design standards to more robust development standards. CPIO Districts also regulate permitted uses to encourage a more diversified range of retail and neighborhood services while addressing the over-concentration of certain uses, such as liquor stores and auto-related uses. Regulations and incentives are tailored to the specific needs of each area throughout the CPIO. Each CPIO District identifies specific subareas also known as change areas in the 2017 FEIR. **Figures 2-4a and 2-4b** show the existing CPIO Subareas. The South Los Angeles and Southeast Los Angeles CPIO Subareas each consist of the Corridors Subareas, TOD Subareas, Industrial Subareas and Residential Subareas as described below.

Corridors Subareas. The Corridors Subareas foster continued commercial revitalization along the various commercial corridors throughout South and Southeast Los Angeles and provide for a diversity of commercial goods and services by offering parking reduction incentives for targeted commercial uses (such as banks, grocery stores, health centers, and childcare), and by restricting over-concentrated uses. Basic development standards ensure that new development is compatible with each corridor's urban form. The Corridors Subareas are comprised of Neighborhood-Serving Corridor, Parkway Corridor, General Corridor, and Commercial Corridor.

Transit-Oriented Development (TOD) Subareas. The TOD Subareas promote jobs, housing and services located in proximity to transit in order to reduce reliance on the automobile. TOD Subareas encourage the creation of pedestrian-friendly, multi-modal villages around transit. They promote a mix of uses including residential, employment and shopping opportunities within walking distance of transit stations and major bus stations. TOD Subareas were upzoned to Height District 2D to allow for greater height, square footage and density in order to attract desired uses; however, the TOD Subareas have different levels of intensity, heights and floor area ratios (FARs) tailored to the context of each station area. TOD Subareas have a tiered zoning with lower base FAR and height for by-right projects and greater FAR (ranging from 3:1 to 6:1) and height for projects that provide certain uses such as affordable housing and/or grocery stores among other targeted commercial uses. These regulations improve the built environment through use restrictions and development standards for all new development. These development standards ensure that new development is appropriate to the scale and context of each transit neighborhood and include pedestrian-oriented development standards. The TOD Subareas are comprised of TOD Low, TOD Medium, TOD High, and TOD Regional.

The CPIO's tiered incentive structure prioritizes mixed-income and 100 percent affordable housing in transit-rich areas and requires that projects utilizing the incentive replace previously existing affordable units on the project site in order to ensure that low-income, transit dependent residents are able to continue to live in these transit centers. With the one-for-one replacement of affordable units, the affordability period of the existing Rent Stabilization Ordinance (RSO) units or other affordable units would be extended up to 55 years, significantly extending the life of their affordability and preserving the existing affordable units. The TOD Subarea incentives for affordable housing meet or exceed the affordable housing incentives provided in the State Density Bonus Law, the City's Density Bonus Ordinance, and the affordable housing provisions of Measure JJJ codified as Los Angeles Municipal Code (LAMC) Section 11.5.11.

Figure 2-4a: Existing CPIO Subarea – West

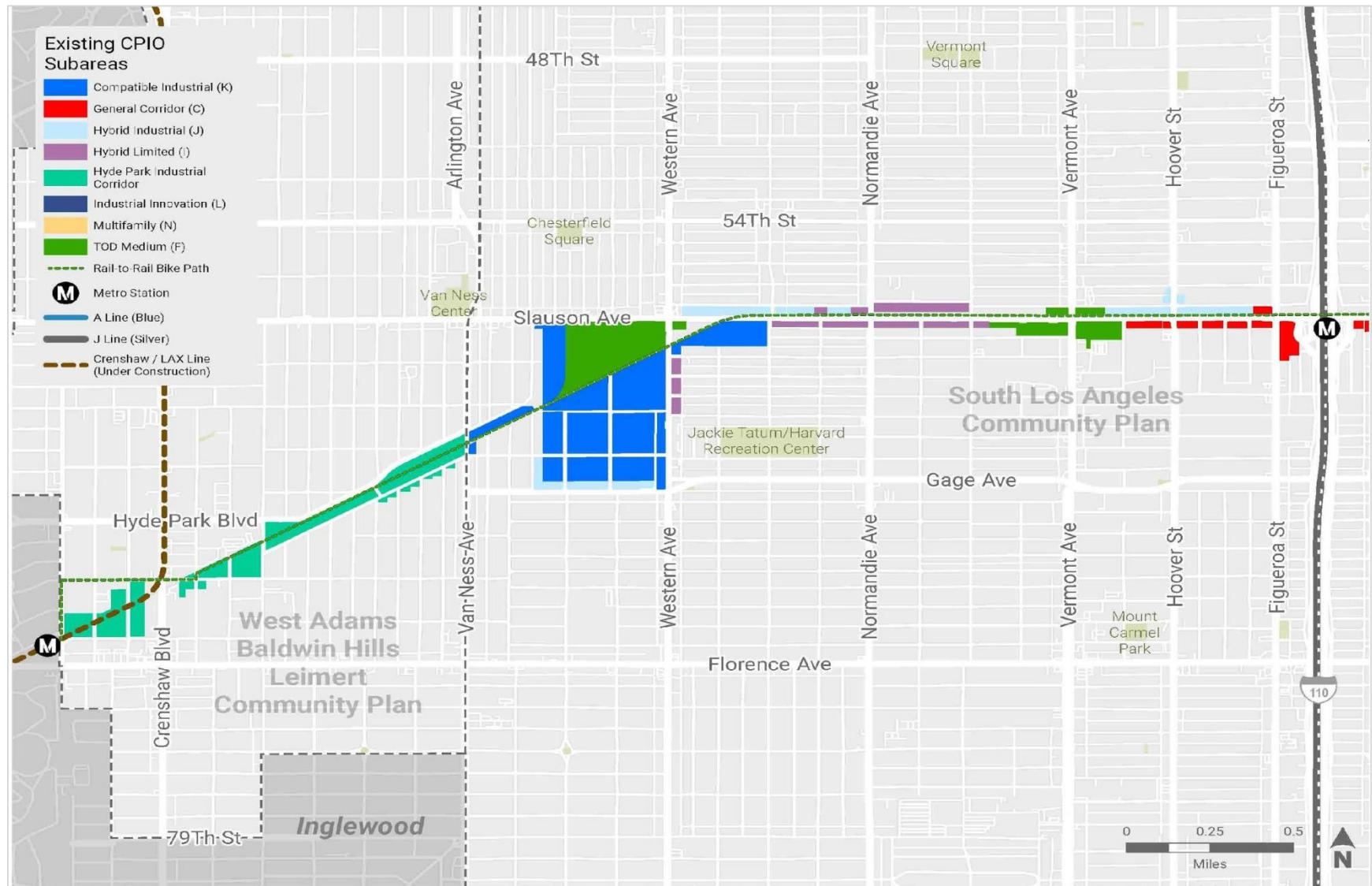
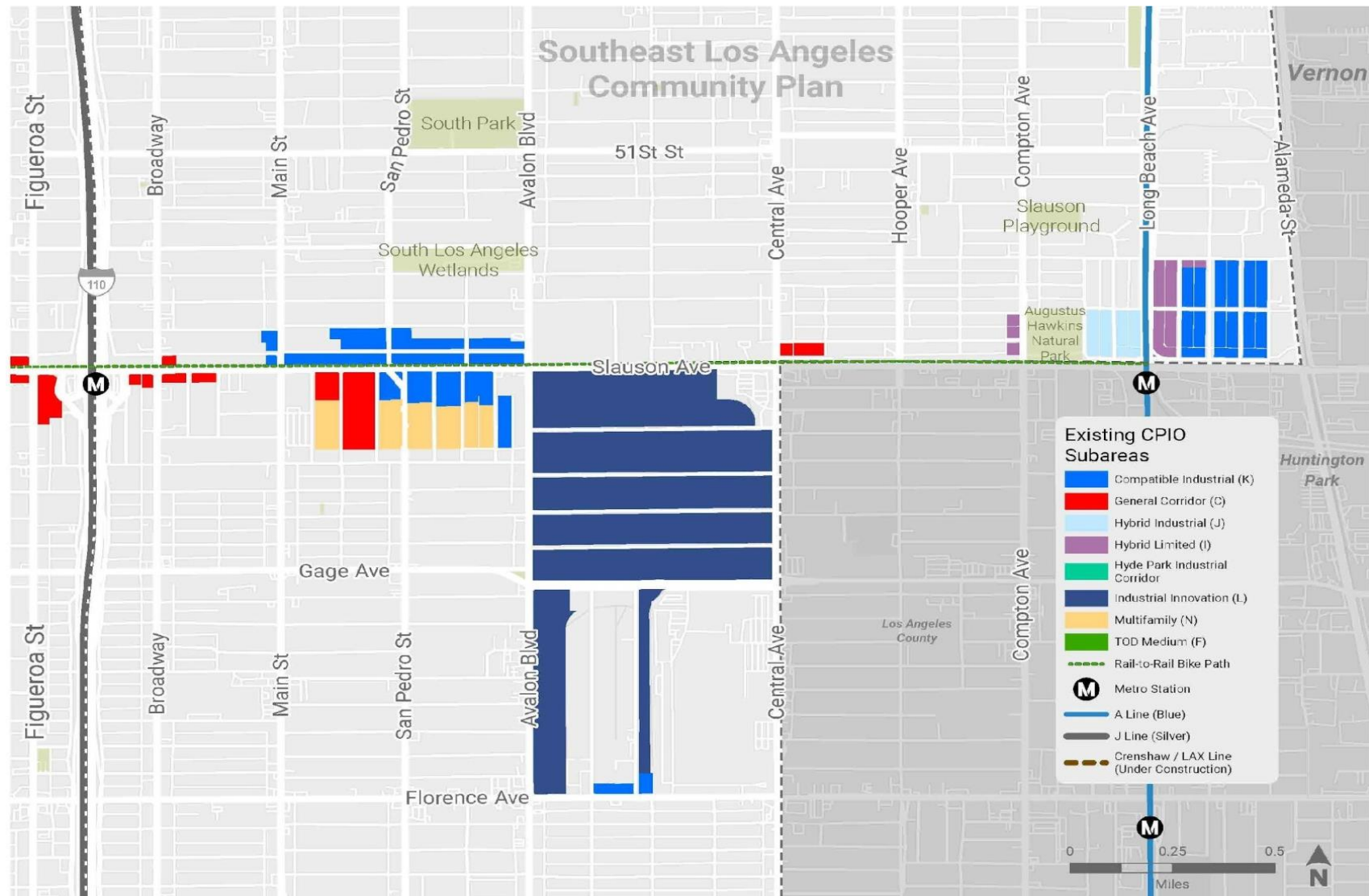


Figure 2-4b: Existing CPIO Subarea – East



Industrial Subareas. The Industrial Subareas address many of the challenges facing existing industrial land. They distinguish between areas that need to be preserved exclusively for industrial uses, areas where increased design sensitivity is needed near residential neighborhoods, and areas where greater flexibility is needed in the range of land uses allowed. The Industrial Subareas aim to ensure the industrial land reserve is protected for future growth in new technologies, and that viable industrial areas are preserved for light industrial uses by limiting unrelated, non-industrial uses and providing for non-retail businesses which enhance the City's employment base. In addition, the Subareas protect residential and other sensitive uses located adjacent to industrially zoned land from impacts associated with incompatibility of uses. By improving the design of new development, these Industrial Subareas strive to improve the aesthetics of industrial buildings and quality of life for neighborhoods next to industrial uses.

The Industrial Subareas also include a subarea that encourages a complementary mix of light manufacturing and commercial activity along certain industrial corridors in order to support economic development and jobs generation. The Industrial Subareas upgrade industrial development and design standards in order to: encourage industry as a better neighbor to residences and other surrounding uses; protect industrial investment against incompatible residential, retail, and commercial uses; prevent future industrial blight; and improve aesthetic character and quality as seen from public views. The Industrial Subareas are comprised of Industrial Innovation, Compatible Industrial, Hybrid, and Hybrid Limited Subareas.

Residential Subareas. The Residential Subareas focus solely on encouraging well-designed projects that are compatible with the surrounding neighborhood scale and character. The Residential Subareas strengthen residential neighborhood stability, and guide new infill residential development to be consistent with the strongest assets of existing residential neighborhoods and in some cases incorporate design standards to preserve the architectural and/or historic character of select neighborhoods. For all Residential Subareas, Projects must meet basic design standards for front façades, front yards, roof forms, and building materials. The Residential Subareas are comprised of Legacy Single-Family Residential, Multi-Family Residential, and Character Residential.

2.3 MODIFIED PROJECT AND COMPONENTS

The Modified Project is the Slauson Corridor Transit Neighborhood Plan, which includes zone changes and general plan amendments with the goals of planning for building designs next to the Active Transportation Corridor bicycle/pedestrian path, planning for green jobs, and planning around transit.

The Modified Project would affect the change areas identified in the Approved Plans. These change areas that would be affected by the Modified Project are located directly around the Active Transportation Corridor and transit stations within the project area. **Figures 2-5a** and **2-5b** show the Approved Plans' change areas and the Modified Project's new or modified change areas.

Figure 2-5a: Approved Plans' Change Areas and Modified Project's New or Modified Change Areas – West

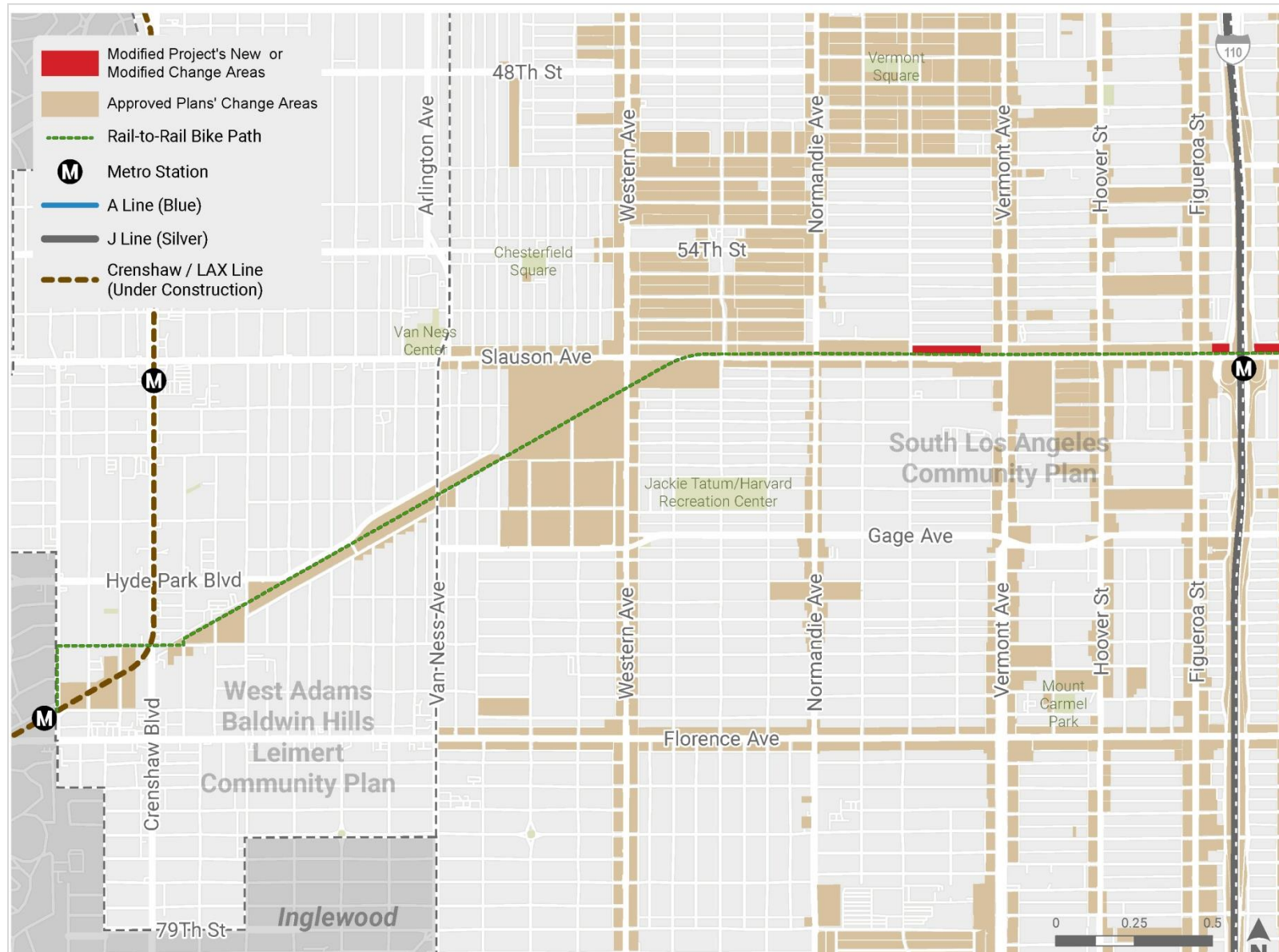
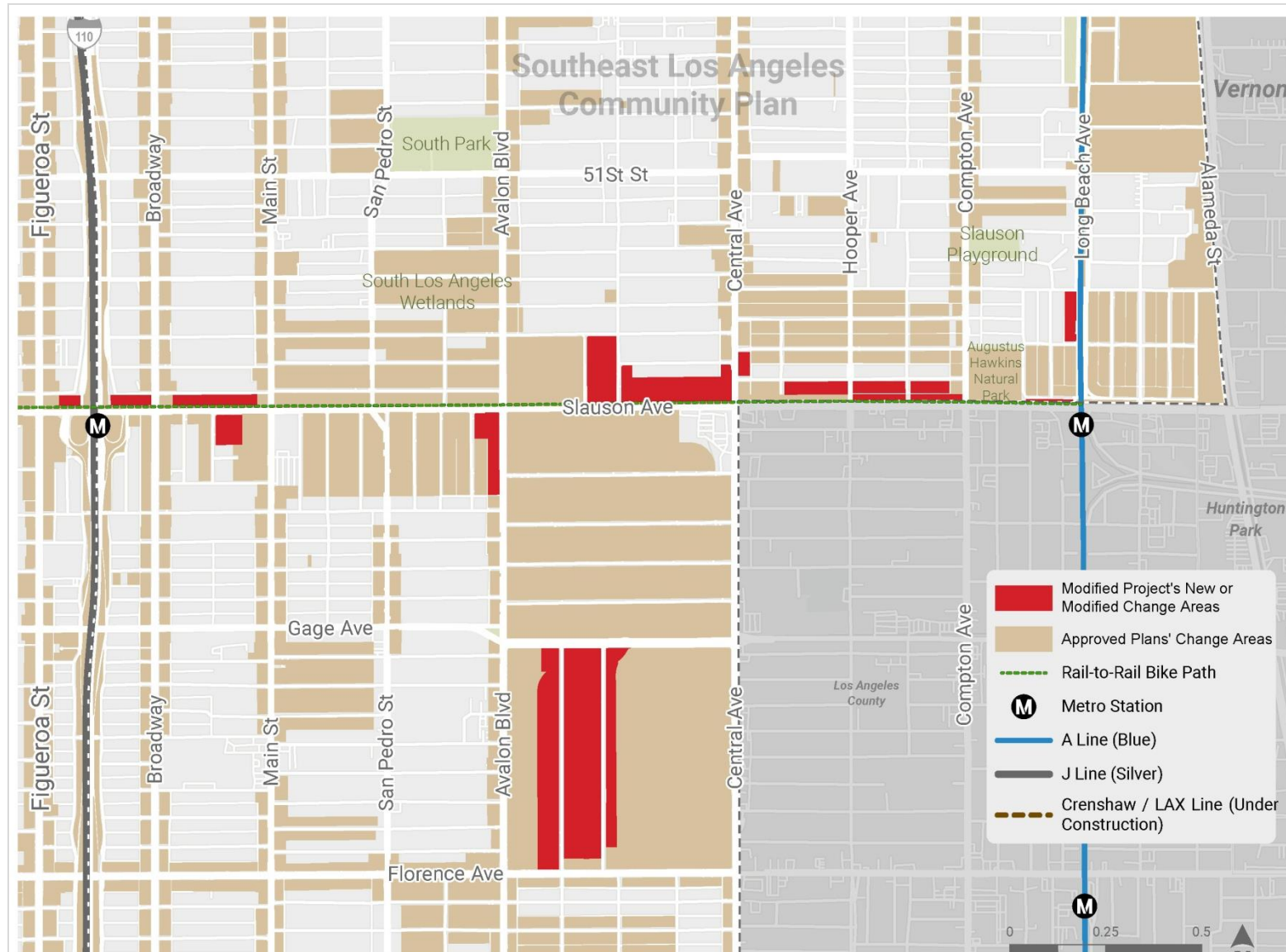


Figure 2-5b: Approved Plans' Change Areas and Modified Project's New or Modified Change Areas – East



South Los Angeles and Southeast Los Angeles Community Plan Components

The Modified Project amends the South Los Angeles and Southeast Los Angeles Community Plan Land Use Map and the City's Zoning. These amendments include general plan land use designations; zone and height district changes; changes to existing CPIO boundaries. The Modified Project also revises the South Los Angeles and Southeast Los Angeles Community Plan Text to include new Implementation Programs in Chapter 6 "Implementation." Implementation programs are an action, procedure, program or technique that carries out goals and policies of the community plan.

West Adams-Baldwin Hills-Leimert Community Plan Components

The Modified Project involves CPIO design standards that incentivize publicly accessible open space and further facilitates a direct extension of the future Active Transportation Corridor to the Metro K Line Fairview Heights station. This does not involve changes to General Plan Land Use designations; nor underlying Zone and Height District changes; nor changes to CPIO boundaries and related plans and guidelines. In addition, the Modified Project also revises the West Adams-Baldwin Hills Leimert Community Plan text to include new implementation programs in Chapter 6 "Implementation." Implementation programs are an action, procedure, program or technique that carries out goals and policies of the community plan.

TNP Areas of Proposed Change

The Modified Project would affect approximately 505 acres, of which 410 acres are proposed for general plan land use and/or zone changes that would modify the allowable intensity, density, and/or types of uses on those properties and thus increase the capacity for housing and jobs.

Table 2-1 shows the existing land use and zoning within the TNP areas of proposed change, and **Table 2-2** shows the proposed land use and zoning within the TNP areas of proposed change.

The TNP's proposed changes that involve land use designations and zoning are generally described below by theme:

Overall changes related to the TNP's new CPIO incentives

- Overall, approximately 98 percent (403 acres) of the changes involve rezoning properties that would make sites eligible for development incentives related to either promoting green employment uses or CPIO Affordable Housing Projects, which would increase jobs and residential intensity, respectively.

TABLE 2-1: EXISTING LAND USE AND ZONING WITHIN TNP AREAS OF PROPOSED CHANGE

General Plan Land Use	Acres	Acres (Subtotal)	Zoning	Max FAR ¹	Max Height (Stories) ¹	Max Height (Feet) ¹
Neighborhood Commercial	4.0	4.0 ²	C2-1VL-CPIO	1.5:1	n/a	30
Community Commercial	50.5	17.9	C2-1-CPIO	1.5:1	n/a	n/a
		32.6	C2-2D-CPIO	3.0:1 to 3.5:1	5	75
Hybrid Industrial	52.0	27.9	CM-1-CPIO	1.5:1	n/a	n/a
		7.1 ³	CM-1LD-CPIO	1.5:1	n/a	60
		1.0 ³	CM-1VL-CPIO	1.5:1	n/a	45
		13.8	CM-2D-CPIO	2.5:1 to 3.0:1	5-6	n/a
		1.6	[T][Q]CM-1VL	1.5:1	3	45
		0.5	[Q]CM-1	1.5:1 to 2.0:1	n/a	n/a
Limited Industrial	122.3	2.3	M1-1	1.5:1	n/a	n/a
		61.8	M1-1-CPIO	1.5:1	n/a	n/a
		22.3	MR1-1	1.5:1	n/a	n/a
		11.0	MR1-1-CPIO	1.5:1	n/a	n/a
		7.7 ³	MR1-1LD-CPIO	1.5:1	n/a	60
		17.2 ³	MR1-2D-CPIO	2.0:1	n/a	75
Light Industrial	240.0	196.7	M2-1-CPIO	1.5:1	n/a	n/a
		6.7	M2-2	6.0:1	n/a	n/a
		36.6	MR2-1	1.5:1	n/a	n/a
Heavy Industrial	6.3	6.3	M3-1-CPIO	1.5:1	n/a	n/a
Low Medium I Residential	8.3	8.3	R2-1	3.0:1	n/a	33
Low Medium II Residential	17.5	16.8	RD1.5-1-CPIO	3.0:1	n/a	45
		0.6	RD2-1	3.0:1	n/a	45
Medium Residential	2.2	2.2	R3-1	3.0:1	n/a	45

Note: n/a = Not Applicable

1. Max FAR, Max Height (Stories), and Max Height (Feet) values may include eligible bonus incentives per the South Los Angeles, Southeast Los Angeles, and West Adams-Baldwin Hills-Leimert CPIOs.

2. 1.1 acres of this zone acreage are in the West Adams-Baldwin Hills-Leimert Community Plan Area.

3. This zone acreage is in the West Adams-Baldwin Hills-Leimert Community Plan Area.

SOURCE: City of Los Angeles, 2022

TABLE 2-2: PROPOSED LAND USE AND ZONING WITHIN TNP AREAS OF PROPOSED CHANGE

General Plan Land Use	Acres	Acres (Subtotal)	Zoning	Max FAR ¹	Max Height (Stories) ¹	Max Height (Feet) ¹
Neighborhood Commercial	3.2	3.2 ³	C2-1VL-CPIO	1.5:1	n/a	30
Community Commercial	56.8	15.8	C2-1-CPIO	1.5:1	n/a	n/a
		23.3 ⁵	C2-2D-CPIO	3.0:1 to 3.5:1	5	75
		17.6 ⁶	C2-2D-CPIO	3.5:1 to 4.0:1	8	120
Hybrid Industrial	83.9	7.1 ⁴	CM-1LD-CPIO	1.5:1	n/a	60
		1.0 ⁴	CM-1VL-CPIO	1.5:1	n/a	45
		75.8	CM-2D-CPIO	3.0:1	6	n/a
Limited Industrial	94.7	36.5	M1-2D-CPIO	2.5:1 to 3.0:1	n/a	n/a
		7.7 ⁴	MR1-1LD-CPIO	1.5:1	n/a	60
		50.5 ⁴	MR1-2D-CPIO	2.0:1	n/a	75
Light Industrial	232.6	196.0	M2-2D-CPIO	3.0:1	n/a	n/a
		36.6	MR2-2D-CPIO	3.0:1	n/a	n/a
Heavy Industrial	7.7	7.7	M3-2D-CPIO	3.0:1	n/a	n/a
Medium Residential	24.6	24.9	R3-1-CPIO	3.0:1	n/a	56
Public Facilities	0.5	0.5	PF-1 ²	3.0:1	n/a	n/a

Note: n/a = Not Applicable

1. Max FAR, Max Height (Stories), and Max Height (Feet) values may include eligible bonus incentives per the South Los Angeles, Southeast Los Angeles, and West Adams-Baldwin Hills-Leimert CPIOs.

2. Includes correction of 0.5 acres of Metro owned property from previously zoned [Q] CM-1 to PF-1

3. 1.1 acres of this zone acreage are in the West Adams-Baldwin Hills-Leimert Community Plan Area.

4. This zone acreage is in the West Adams-Baldwin Hills-Leimert Community Plan Area.

5. This zone acreage refers to the proposed Slauson – TOD Medium CPIO Subarea

6. This zone acreage refers to the proposed Slauson – TOD High CPIO Subarea

SOURCE: City of Los Angeles, 2022

Changes within or to Industrial and Hybrid Industrial land use designations

- Approximately nine percent (35 acres) of the changes would rezone properties from Light Manufacturing (zoned M1 and M2) to Hybrid Industrial (zoned CM-2D-CPIO) as part of the Slauson-Hybrid Limited (SI) and Slauson-Hybrid (SJ) CPIO Subareas, which would provide flexibility for commercial manufacturing uses (including offices) and/or CPIO Affordable Housing Projects, increasing residential intensity in the latter case.
- Approximately 17 percent (71 acres) of changes involve rezoning Light Industrial properties from M2-1-CPIO to M2-2D-CPIO as part of the Slauson-Compatible Industrial Hub (SK1) CPIO Subarea, as well as Limited Industrial properties from MR1-1 and MR1-1-CPIO to MR1-2D-CPIO as part of the Slauson-Compatible Industrial (SK2) CPIO Subarea, in order to preserve existing industrial zoning, while also incentivizing green employment uses that would increase employment intensity through bonus floor area.
- Approximately 38 percent (157 acres) of changes involve rezoning properties from Light Industrial (zoned M2-1-CPIO and M2-2) to Light Industrial (zoned M2-2D-CPIO) as part of the Slauson-Compatible Industrial Innovation (SL) CPIO Subarea, in order to incentivize green employment uses that would increase employment intensity through bonus floor area.
- Approximately less than one percent (two acres) of changes involve rezoning properties from Low Medium I Residential (zoned R2-1) to Limited Industrial (zoned M1-2D-CPIO) as part of

the Slauson-Compatible Industrial (SK2) CPIO Subarea, in order to make the nature of the existing industrial land use consistent with its surrounding blocks while also incentivizing green employment uses that would increase employment intensity through bonus floor area of changes that involve rezoning properties around the I-110 and Slauson Avenue, from a variety of land use designations (Neighborhood Commercial, zoned C2-1VL-CPIO; Community Commercial, zoned C2-1-CPIO; Low Medium II Residential, zoned RD2-1; and Limited Industrial, zoned M1-1) to Community Commercial (zoned C2-2D-CPIO) as part of the Slauson-TOD High (SG) CPIO Subarea, in order to provide opportunities for mixed-use development around transit.

- Approximately less than one percent (0.8 acres) of changes involve rezoning properties from Limited Industrial (zoned M1-1) to Community Commercial (zoned C2-1-CPIO) as part of the Slauson-General Corridor (SC) CPIO Subarea, in order to make the nature of the existing commercial land use consistent with its surrounding blocks while also encouraging commercial and/or residential uses that would increase employment and residential intensity.

Changes within or to Residential land use designations

- Approximately one percent (six acres) of changes involve rezoning a small number of properties from Low Medium I Residential (zoned R2-1) to Medium Residential (zoned R3-2D-CPIO) specifically along Slauson Avenue as part of the Slauson-Multifamily (SN2) CPIO Subarea, requiring any desired redevelopment on these sites to provide Affordable Housing units in order to utilize development incentives that would increase residential intensity.
- Approximately less than one percent (two acres) of changes involve rezoning a small number of properties along Slauson Avenue from Multifamily Residential (zoned R3-1) to Medium Residential (zoned R3-1-CPIO); Additionally, approximately four percent (17 acres) of changes involve rezoning properties from Low Medium II Residential (zoned RD1.5-1-CPIO) to Medium Residential (zoned R3-1-CPIO), as part of the Slauson-Multifamily (SN1) CPIO Subarea, requiring any desired redevelopment on these sites to provide Affordable Housing units in order to utilize development incentives that would increase residential intensity.

Technical correction to Public Facilities

- Approximately less than one percent (0.6 acres) of the changes, which represent an administrative correction, involve rezoning a strip of contiguous properties that belong to the LA Metro from Hybrid Industrial (zoned [Q]CM-1) to Public Facilities (zoned PF-1) to make them consistent with existing plans by LA Metro to develop this grouping sites as part of their Active Transportation Corridor project.

The proposed General Plan Land Use and Zoning are shown in **Figures 2-6a** and **2-6b** and **Figures 2-7a** and **2-7b**, respectively.

Figure 2-6a: Proposed GPLU – West

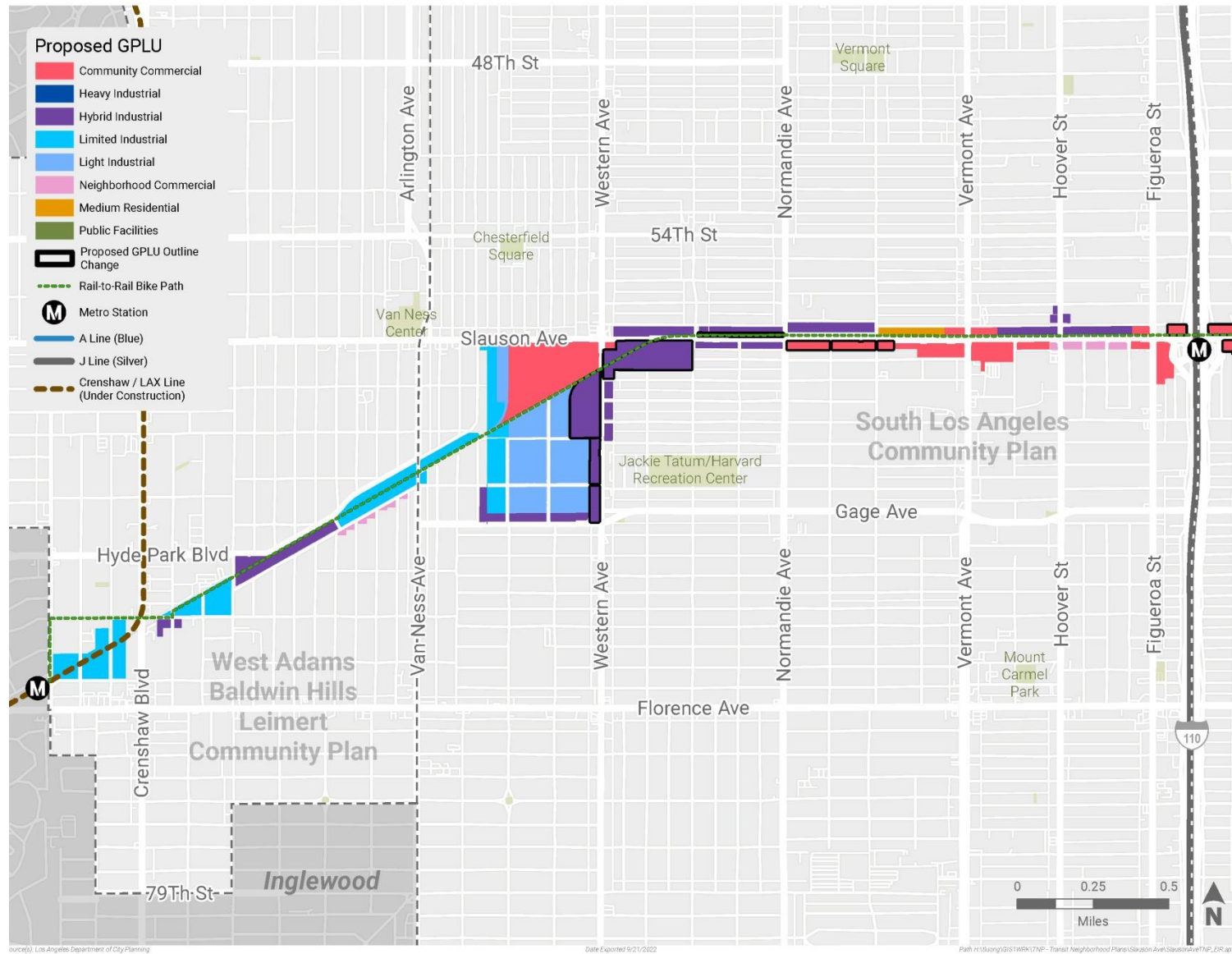


Figure 2-6b: Proposed GPLU – East

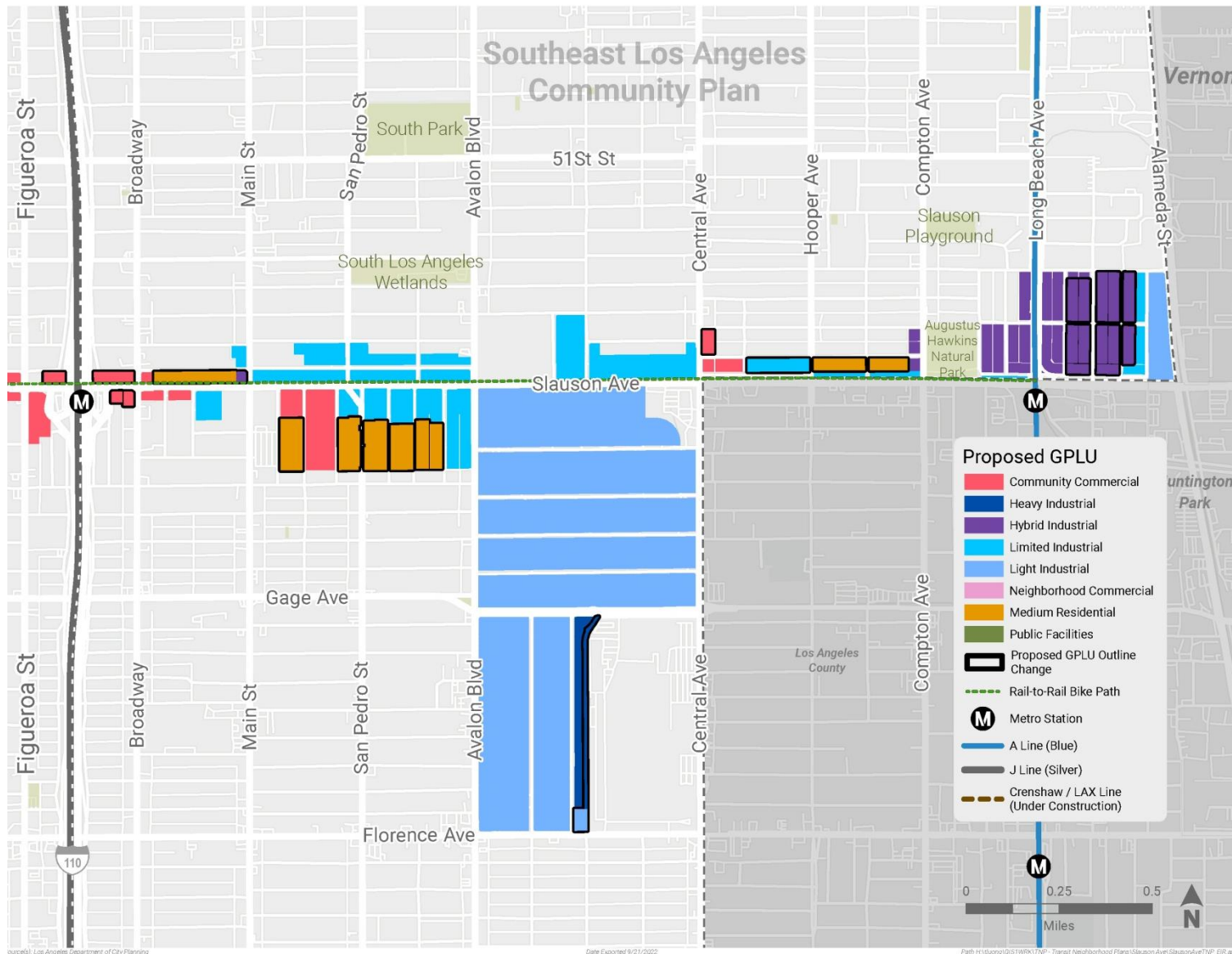


Figure 2-7a: Proposed Zoning – West

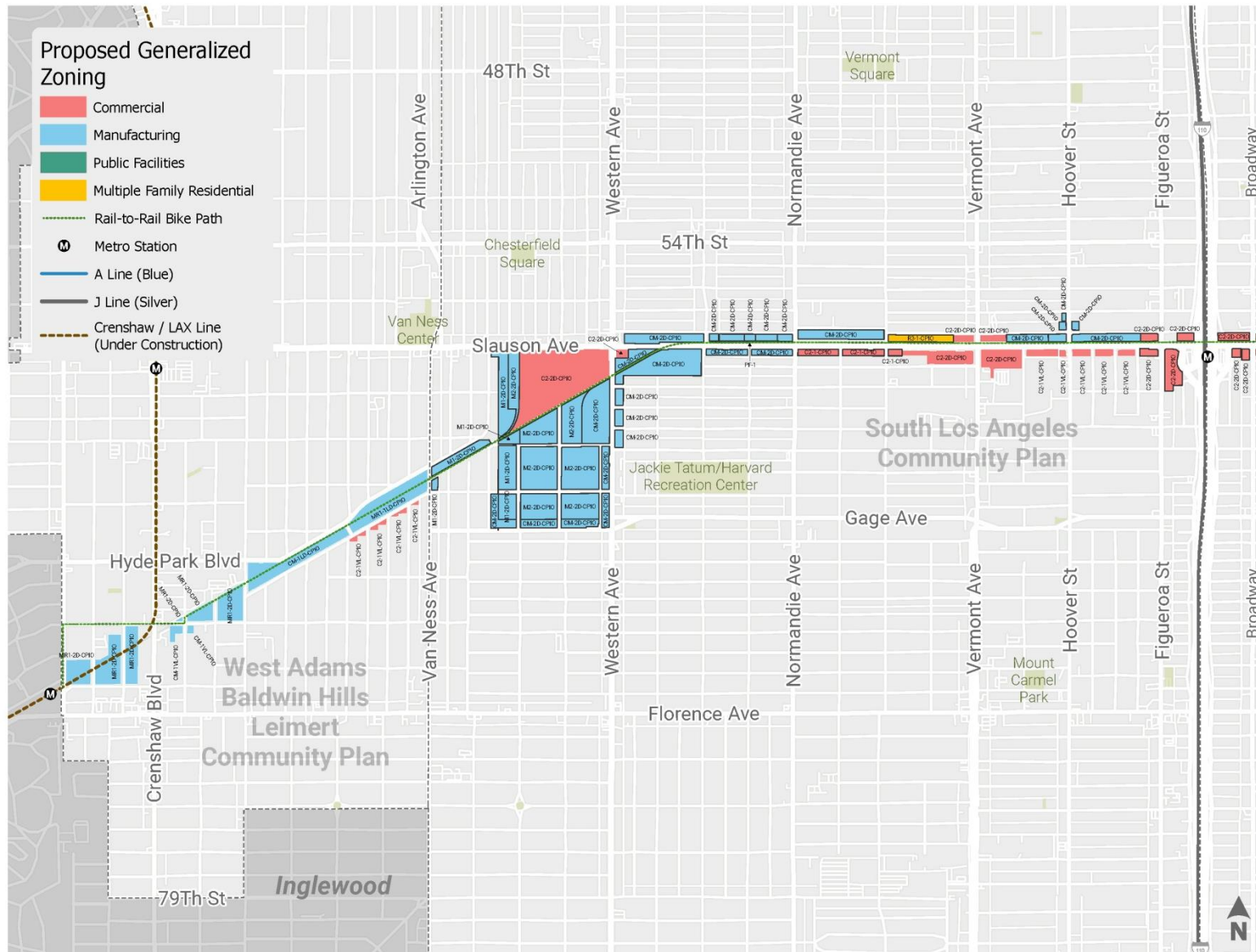
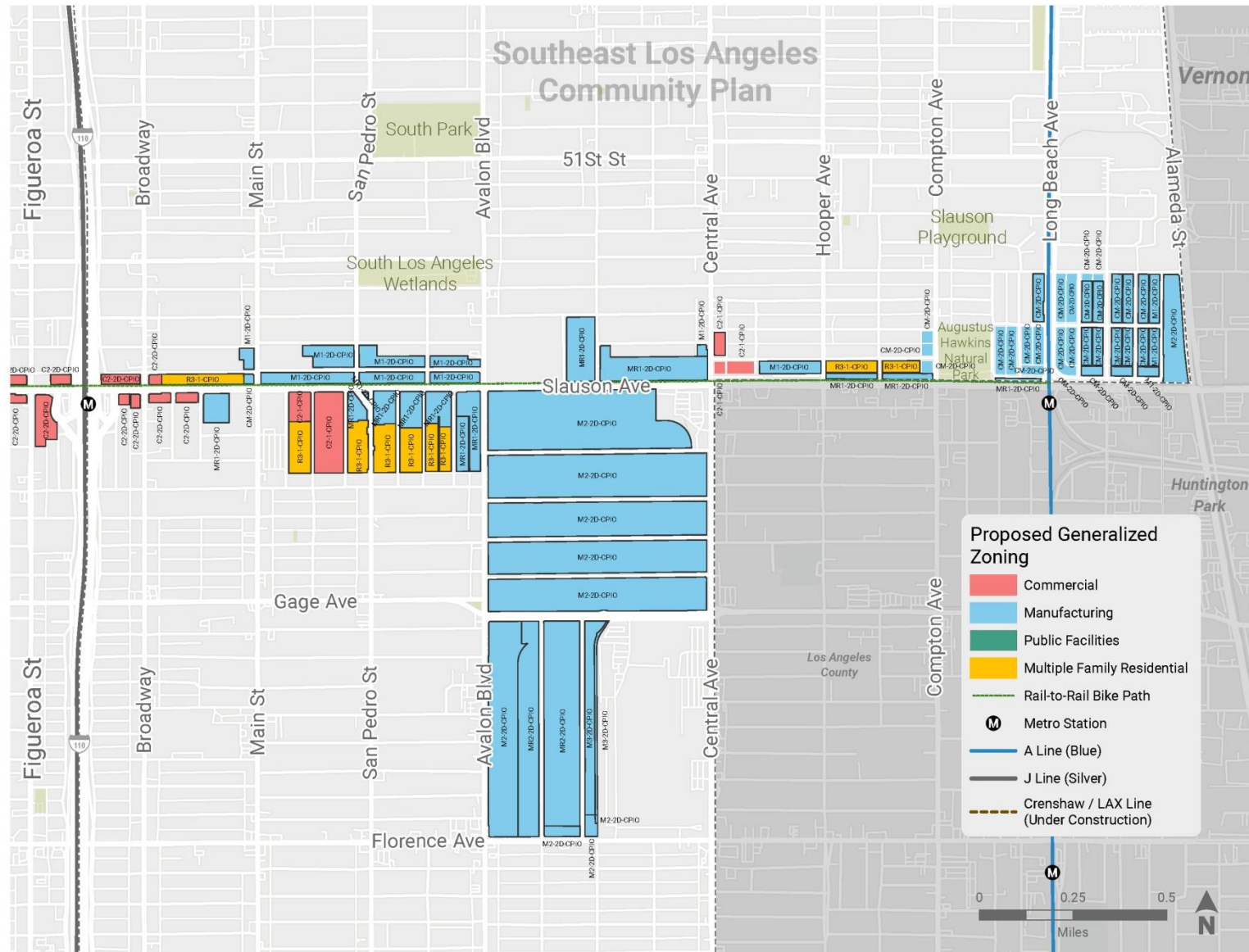


Figure 2-7b: Proposed Zoning – East



South Los Angeles and Southeast Los Angeles CPIO Amendments

The Modified Project amends the existing South Los Angeles and Southeast Los Angeles CPIOs by creating a new CPIO chapter, “Chapter VI - Slauson Subareas,” to set forth zoning regulations and development standards for sites that are a part of the TNP.

For the South Los Angeles and Southeast Los Angeles CPIOs, the new Chapter VI “Slauson Subareas” will establish new CPIO subareas that offer incentives for Green Employment Uses and CPIO Affordable Housing Projects, as well as set forth Path-Abutting Building Design Standards for sites that abut the Active Transportation Corridor. The Slauson Subareas chapter also carryovers regulations from existing CPIO subarea chapters that regulate allowable uses and development standards.

Within the TNP, the Modified Project also includes incorporating previously undesignated sites into the CPIOs (see areas in red in **Figure 2-5a** and **Figures 2-5b**).

Figures 2-8a and **2-8b** show the proposed CPIO Subareas.

West Adams-Baldwin Hills-Leimert Community Planning Implementation Overlay District (West Adams CPIO) Amendments

The Modified Project amends the existing West Adams CPIO for select sites that fall within the Hyde Park Industrial Corridor Subarea.

The Hyde Park Industrial Corridor Subarea contains specific use limitations, development standards and streetscape guidelines for new industrial construction along a segment of Hyde Park Boulevard from West Boulevard to Van Ness Avenue. The focus of the Modified Project in the Hyde Park Industrial Corridor Subarea will be to further promote “clean-tech” and “green-tech” uses in a manner that responds to the emerging open space and recreational opportunities afforded by their direct adjacency to the LA Metro right-of-way.

For the Hyde Park Industrial Corridor CPIO Subarea amendments, the Modified Project will simplify the publicly accessible open space incentive for properties fronting the LA Metro right-of way. Instead of a ratio-based incentive for providing publicly accessible open space in exchange for additional floor area, the proposed modified incentive directly links the existing bonuses for FAR and/or height to a fixed setback dimension made accessible for public use (10-feet, east of Crenshaw Boulevard, or 20-feet, west of Crenshaw Boulevard).

Modified Project’s Summary of CPIO Regulations and Incentives

The Modified Project includes a new chapter in the South Los Angeles and Southeast Los Angeles CPIOs and an amendment to the West Adams CPIO to incorporate new regulations and incentives, as outlined below in **Table 2-3**.

Figure 2-8a: Proposed CPIO Subareas – West

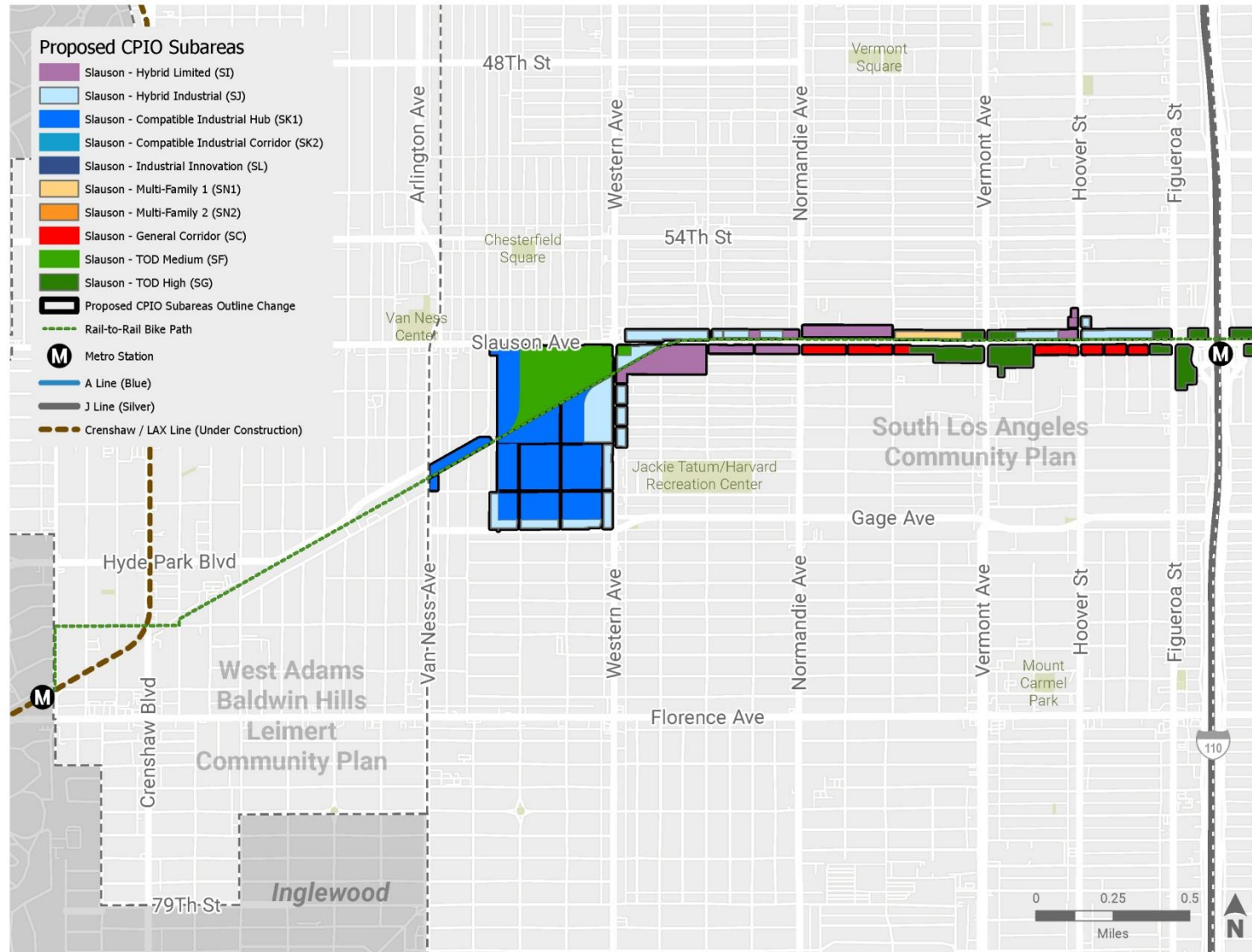


Figure 2-8b: Proposed CPIO Subareas – East

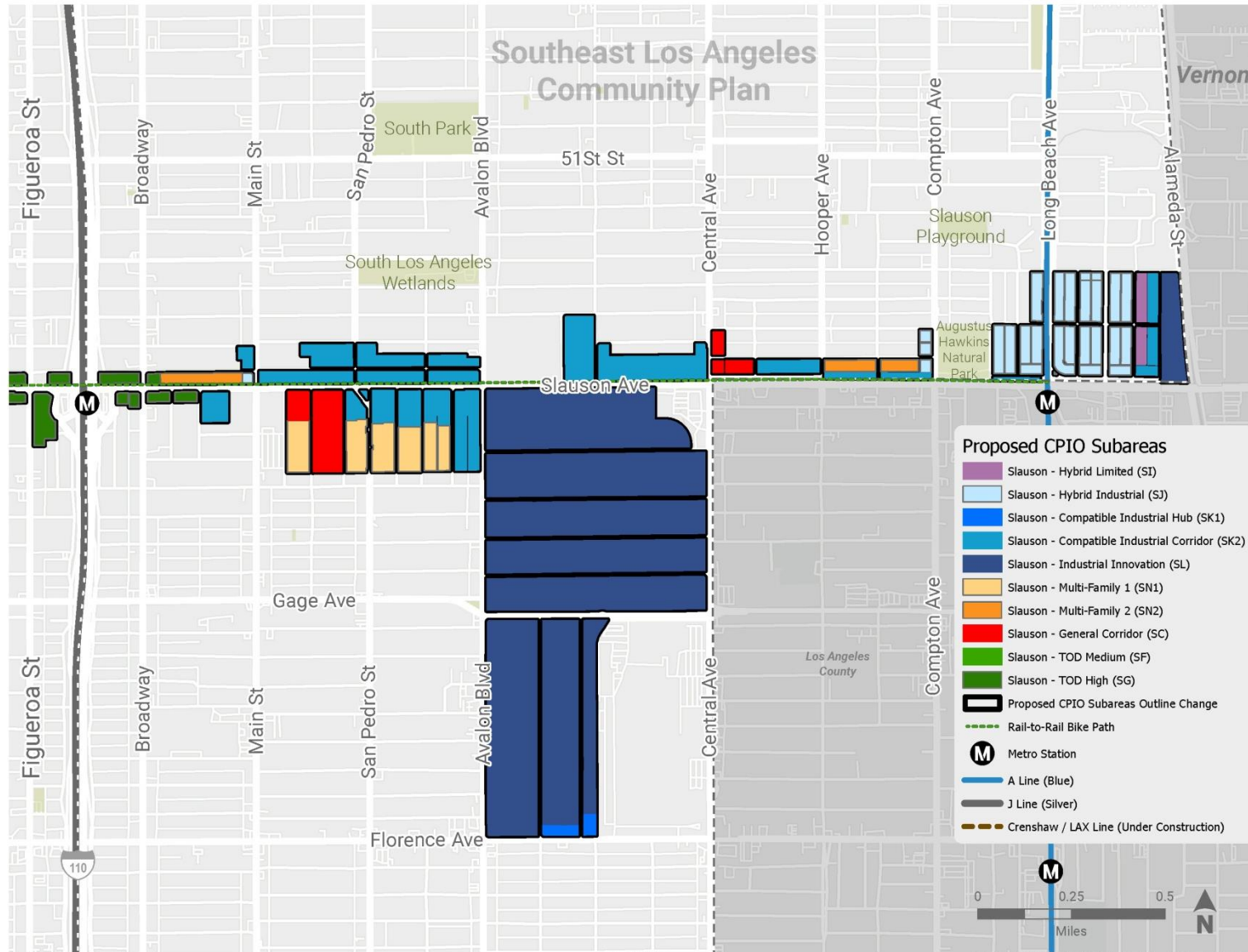


TABLE 2-3: SUMMARY OF PROPOSED CPIO SUBAREA PROVISIONS

Applicable CPIO Subarea	Proposed Regulations/Incentives
All CPIO Subareas in the TNP	New Path-Abutting Building Design Standards (see Figures 2-9a and 2-9b) will apply to sites that abut the future Active Transportation Corridor to promote building design that complements the multi-use bicycle and pedestrian path. The proposed standards include the provision of: a path-oriented building entrance; a minimum 10-foot setback from the Active Transportation Corridor; a minimum 30% window transparency on the ground floor path-facing frontage; and placement guidance for murals if they are a desired component of a project.
Slauson - Hybrid Limited (SI)	Residential uses may be developed up to 50% of the total building floor area, which represents an increase from the existing Hybrid Limited Subarea's residential floor area cap of 30%. A bonus of up to 3:1 Floor Area Ratio (FAR), increased residential density of 1 unit for every 400 square feet of lot area, and a reduction of up to 25% of required parking is provided if a Project sets aside Affordable Housing. If a Project opts not to utilize the Affordable Housing bonus(es), the allowable FAR remains 1.5:1 and residential density remains 1 unit for 800 square feet of lot area, as provided by the underlying zone's base density.
Slauson - Hybrid Industrial (SJ)	A bonus of up to 3:1 Floor Area Ratio (FAR), increased residential density of 1 unit for every 400 square feet of lot area, and a reduction of up to 25% of required parking is provided if a Project sets aside Affordable Housing. If a Project opts not to utilize the Affordable Housing bonus(es), the allowable FAR remains at 1.5:1 and residential density remains at 1 unit for every 800 square feet of lot area, as provided by the underlying zone's base density.
Slauson - Compatible Industrial Hub (SK1)	A bonus of up to 3:1 FAR and a reduction of up to 25% of required parking is allowed if a Project with new development includes a Green Employment Use.
Slauson - Compatible Industrial Corridor (SK2)	A bonus of up to 2.5:1 FAR and a reduction of up to 25% of required parking is allowed if a Project with new development includes a Green Employment Use.
Slauson - Industrial Innovation (SL)	A bonus of up to 3:1 FAR and a reduction of up to 25% of required parking is allowed if a Project with new development includes a Green Employment Use. For lots fronting Slauson, an exemption to allow for standalone restaurants, as well as Joint Live/Work Quarters with Zoning Administrator approval per the LAMC.
Slauson – Multi-Family 1 (SN1)	A bonus of up to an additional 11 feet in height, an increased residential density to 1 unit for every 400 square feet of lot area, and a reduction of up to 25% of required parking is provided if a Project sets aside Affordable Housing. If a Project opts not to utilize the Affordable Housing bonus(es), the allowable base FAR remains at 3:1 and the base density remains at 1 unit for every 800 square feet of lot area.
Slauson – Multi-Family 2 (SN2)	A bonus of up to an additional 11 feet in height, an increased residential density to 1 unit for every 400 square feet of lot area, and a reduction of up to 25% of required parking is provided if a Project sets aside Affordable Housing. If a Project opts not to utilize the Affordable Housing bonus(es), the allowable base FAR remains at 3:1 and the base density remains at 1 unit for every 600 square feet of lot area.
Slauson – General Corridor (SC)	The existing General Corridor Subarea regulations will apply to “Slauson - General Corridor” areas. New Path-Abutting Building Design Standards will also apply to sites with new development that abut the Active Transportation Corridor. Additional development standards for parking design will be enumerated in the Slauson chapter of the CPIO.

TABLE 2-3: SUMMARY OF PROPOSED CPIO SUBAREA PROVISIONS

Applicable CPIO Subarea	Proposed Regulations/Incentives
Slauson – TOD Medium (SF)	The existing TOD Medium Subarea regulations will apply to “Slauson – TOD Medium” areas. New Path-Abutting Building Design Standards will also apply to sites with new development that abut the Active Transportation Corridor. Additional development standards for parking design will be enumerated in the Slauson chapter of the CPIO.
Slauson – TOD High (SG)	The existing TOD High Subarea regulations will apply to “Slauson – TOD High” areas. New Path-Abutting Building Design Standards will also apply to sites with new development that abut the Active Transportation Corridor. Additional development standards for parking design will be enumerated in the Slauson chapter of the CPIO.
Hyde Park Industrial Corridor	For Projects that abut the Active Transportation Corridor, a minimum 10-foot setback is required for new development to facilitate additional open space and opportunities to orient building entrances and walkways to provide access to the path. If a Project covenants a proposed use as a Green Employment Use and agrees to maintain the 10-foot setback area for public use, bonus FAR and/or height may be provided.
	For Projects that abut the Metro K Line (Crenshaw/LAX Line) right-of-way, a 20-foot setback is required for new development to facilitate additional open space and future opportunities to extend the bike path along the diagonal right-of-way to directly connect to the Fairview Heights Crenshaw Line station. If a Project covenants a proposed use as a Green Employment Use and agrees to maintain the minimum 20-foot setback area for public use, bonus FAR and/or height may be provided.

Technical Corrections

The Modified Project also involves technical corrections. Existing inconsistencies between land use and zoning not addressed by the Original Project will be addressed through the Modified Project to ensure compatibility between land uses and zones as required by State law. Properties with inconsistent land uses and zones will undergo either a zone change or general plan amendment to create consistency between proposed land use and zoning. The Modified Project also involves changes to the Plan Maps.

The following technical correction is proposed:

- A grouping of sites between Denker Avenue and Normandie Avenue to apply a zone change from [Q]CM-1 to PF-1, with a General Plan Land Use designation change from Hybrid Industrial to Public Facilities. This sliver of sites is owned by LA Metro and is now envisioned for public improvements for the Active Transportation Corridor.

Figure 2-9a: Proposed Path-Abutting Design Standards Sites – West

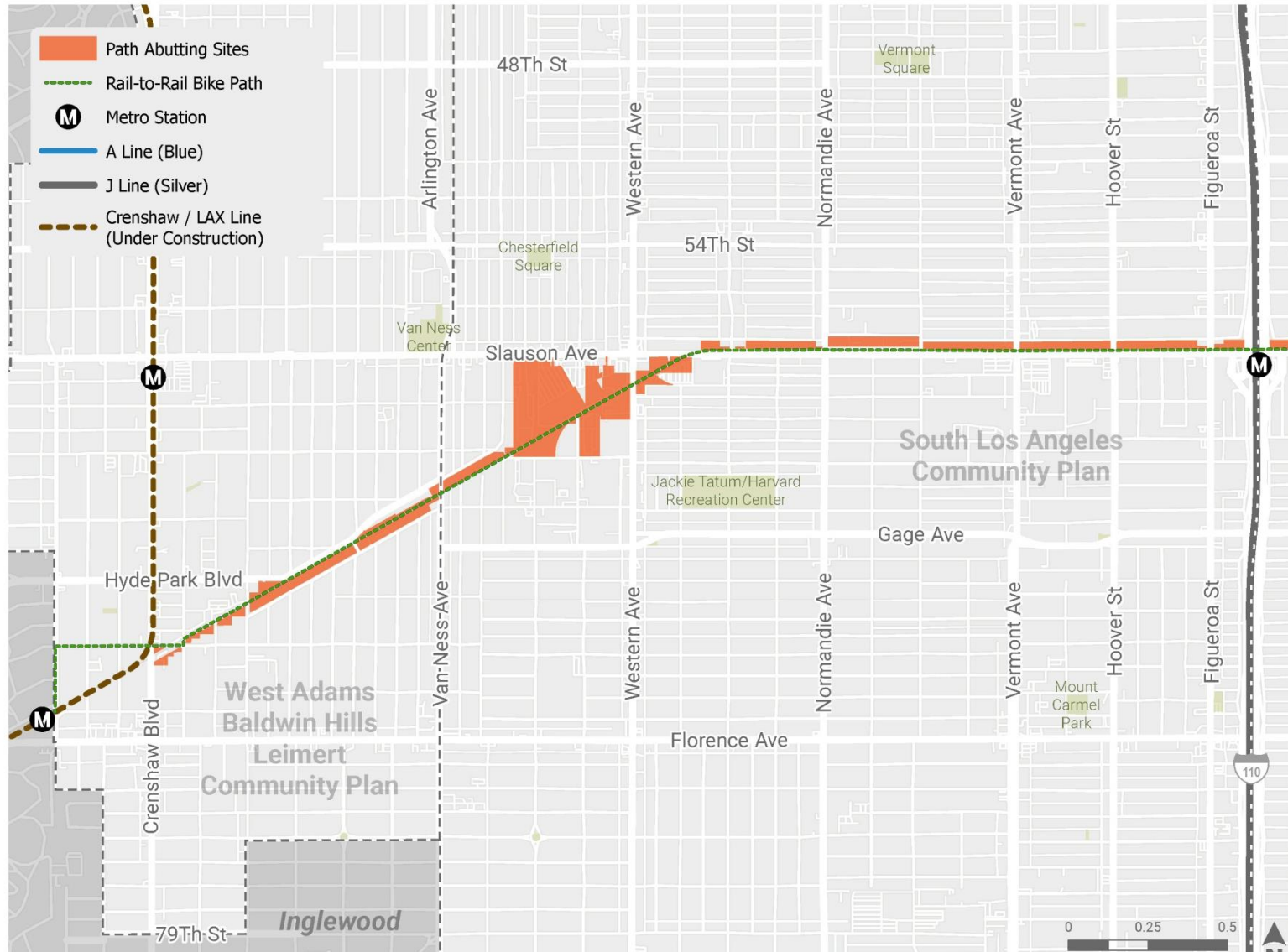
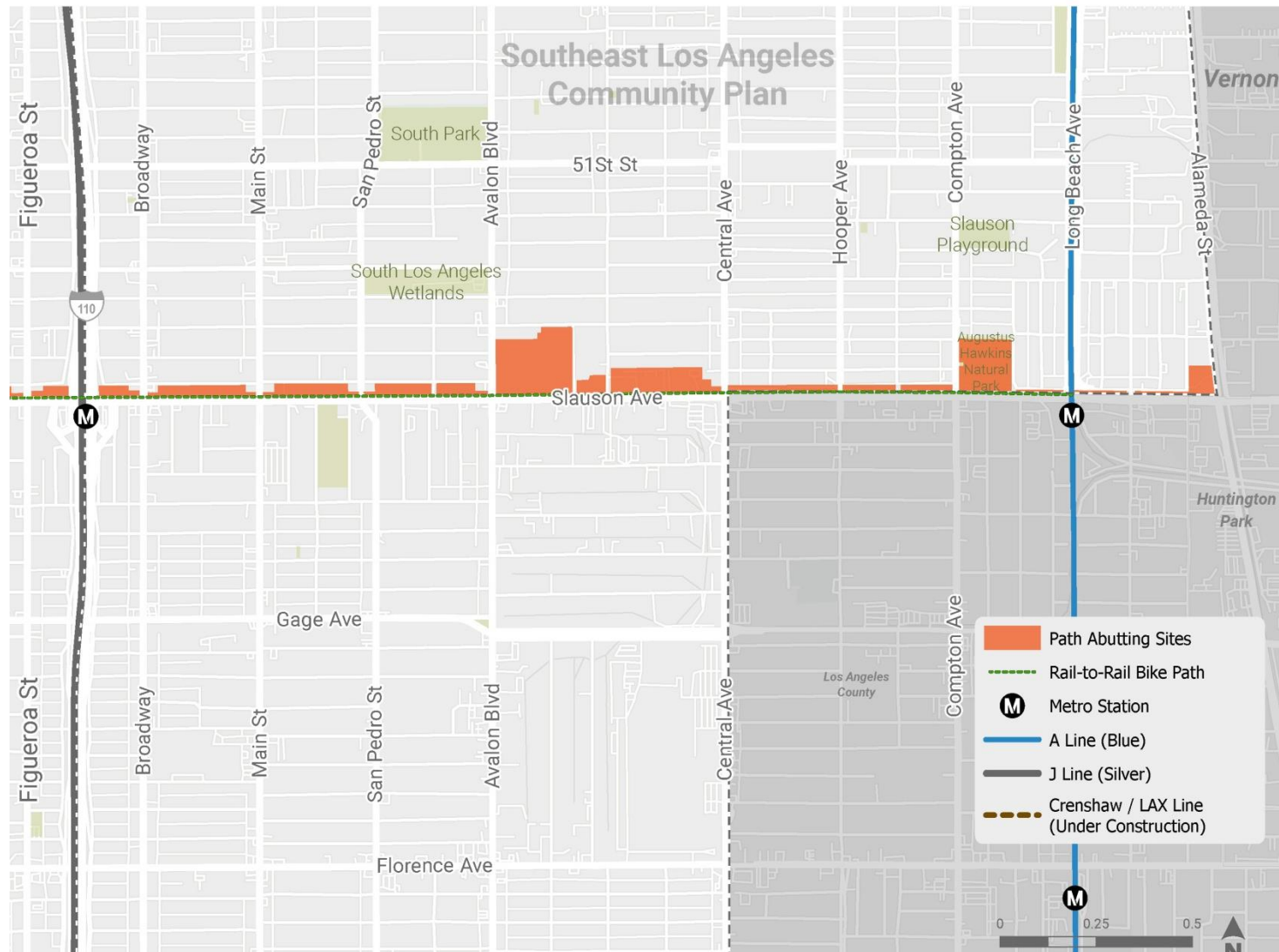


Figure 2-9b: Proposed Path-Abutting Design Standards Sites – East



2.4 PLAN IMPLEMENTATION AND CHANGES TO GROWTH FORECAST

South Los Angeles and Southeast Los Angeles Changes

Due to the proposed zoning changes in the Slauson Subareas, the Modified Project would accommodate incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. **Table 2-4** below compares the change in reasonably foreseeable growth projections for the Modified Project as compared to those for the Approved Plans.⁵ Stated differently, the Modified Project would have a negligible impact on forecast population, housing and employment as compared to the Approved Plans in the South and Southeast Los Angeles CPAs (within the error margin of the models used to forecast growth).

As discussed further in Section 3.14, Population and Housing, and shown in **Table 2-5** below, growth (as indicated by recent Census data) has not been occurring, assuming linear growth, at a rate that would result in the population and employment forecasts (and associated impacts) identified in the 2017 FEIR. These changes would direct growth to targeted areas near public transit infrastructure and would not induce substantial growth through employment-generating uses, nor introduce new infrastructure or the extension of roads.

The 2017 FEIR evaluated significantly greater number of jobs than appears to be occurring as indicated by the recent Census data. The decline in jobs in the project area may be due to lower density uses than in the past and those assumed in the 2017 FEIR (e.g., warehouse space typically employs far fewer people in the same space as compared to commercial uses). The 2017 FEIR analysis uses gross average assumptions regarding square feet of non-residential space per employee in order to estimate employment. Based on these recent data the Department of City Planning believes that the employment forecasts in the 2017 FEIR and those identified above for the Modified Project are high for the year 2035, in part because of over-estimates of employment density and therefore, extremely conservative for purposes of identifying foreseeable impacts to the environment.

West Adams Changes

Approximately 34 acres in West Adams would be affected by minor changes to regulations in the Slauson TNP primarily related to design regulations. The Modified Project involves amendments to CPIO design standards that creates a minor incentive to create more publicly accessible open space as a mandated setback but does not involve changes to General Plan Land Use designations nor underlying Zone and Height District changes. The Modified Project also encourages “clean-tech” and “green-tech” in the Hyde Park Industrial Corridor Subarea but does not facilitate increased growth. These modifications do not increase or decrease the allowed FAR or density allowed. Additionally, they are not anticipated to incentivize or disincentivize development activity. They would potentially change the footprint of the building on the site to allow open space along the Active Transportation Corridor and potentially change the type of uses

⁵ As part of the adoption process the boundary between the South Los Angeles and Southeast Los Angeles Community Plan areas was adjusted to become the centerline of the I-110 Freeway rather than Figueroa Street to the west of the I-110 Freeway (north of Slauson Avenue) and Broadway east of the I-110 Freeway (south of Slauson Avenue). The 2017 FEIR and this Addendum analyze socioeconomic data and associated impacts based on these original boundaries rather than the adjusted boundary as adopted by City Council. While this means that totals attributed to each Plan may vary slightly the totals for the combined Plans would not be affected.

TABLE 2-4: CHANGE IN GROWTH – MODIFIED PROJECT VS. APPROVED PLANS

	EIR Existing Conditions (2010)	Approved Plans 2035*	Modified Project 2035**	Approved Plans 2035 vs. Existing	Modified Project 2035 vs. Existing	Approved Plans 2035 Percentage Change vs. Existing	Modified Project 2035 Percentage Change vs. Existing	Percentage Point Change 2035 Modified Project vs. Approved Plans
SOUTH LOS ANGELES CPA								
Population (persons)	270,354	313,836	316,045	43,482	45,691	16.1%	16.9%	0.8
Dwelling Units	82,186	97,897	98,915	15,711	16,729	19.1%	20.4%	1.2
Employment (jobs)	51,078	69,470	72,792	18,392	21,714	36.0%	42.5%	6.5
SOUTHEAST LOS ANGELES CPA								
Population (persons)	278,337	320,337	322,351	42,000	43,014	15.1%	15.8%	0.7
Dwelling Units	68,651	80,487	80,931	11,836	12,280	17.2%	17.9%	0.6
Employment (jobs)	74,694	95,655	101,618	21,261	26,924	28.1%	36.0%	8.0
* Reasonably expected growth from 2017 FEIR.								
** Reasonably expected growth estimated by City Planning using the same methodology as used in the 2017 FEIR.								
SOURCE: City of Los Angeles, Department of City Planning; 2016, 2022								

TABLE 2-5: CHANGE IN GROWTH – CENSUS VS. APPROVED PLANS

	EIR Existing Conditions (2010)	2020 Census	2020 Reasonably Expected Growth Approved Plans*	2020 Census Change vs. EIR Existing	2020 Approved Plans* vs. EIR Existing	2020 Census Percentage Change vs. EIR Existing (%)	2020 Approved Plans* Percentage vs. EIR Existing (%)	Percentage Point Change 2020 Census vs. 2020 Approved Plans*
SOUTH LOS ANGELES CPA								
Population (persons)	270,354	277,921	288,472	7,567	18,118	2.8	6.7	-3.9
Dwelling Units	82,186	86,832	88,732	4,646	6,546	5.7	8.0	-2.3
Employment (jobs)**	51,078	39,584	58,741	-11,494	7,663	-22.5	15.0	-37.5
SOUTHEAST LOS ANGELES CPA								
Population (persons)	278,337	285,585	295,837	7,248	17,500	2.6	6.3	-3.7
Dwelling Units	68,651	70,986	73,574	2,335	4,923	3.4	7.2	-3.8
Employment (jobs)**	74,694	45,835	83,553	-28,859	8,859	-38.6	11.9	-50.5
* Reasonably expected growth interpolated from 2017 FEIR assuming linear growth from EIR Existing (2010) to the 2017 FEIR horizon year (2035)								
**US Census employment data sourced from On the Map, which was most recently updated in 2019.								
SOURCE: City of Los Angeles, Department of City Planning, 2016, 2022; US Census Bureau, 2020								

on the site. Based on this, the West Adams modifications are not expected to result in additional population, housing or employment.

With that said, assumptions regarding growth in West Adams were included in the analyses in the 2017 FEIR. For example, the traffic model requires assumptions regarding surrounding development/growth in order to be able to calculate trips and trip lengths since community plans are not self-contained.

SB 8, SB 9 and SB 10 Overview

On September 16, 2021, Governor Gavin Newsom signed three legislative bills intended to expand housing production (SB 8), streamline zoning processes for multi-family housing (SB 9), and increase residential density (SB 10).

SB 8 reduces the ability of local jurisdictions to decrease the intensity of land uses, including reductions to height, density, or floor area ratio (FAR).

SB 9 (California Housing Opportunity & More Efficiency (HOME) Act) provides for a streamlined ministerial process to approve Two-Unit Developments as well as Urban Lot Splits meeting certain criteria on lots zoned for single-family residential uses, including the following Zones: A1, A2, RA, RE, RS, R1, RU, RZ, and RW Zones. SB 9 allows for the adoption of “objective design standards” provided those standards do not preclude the construction of up to two units each being at least 800 square feet in floor area. The units created pursuant to SB 9 are considered a main use and not an accessory building. Therefore, two additional units may be permitted on a single-family zoned site when SB 9 is paired with Accessory Dwelling Units (ADU) legislation (Ordinance No. 186481) which allows ADUs or being Junior Accessory Dwelling Units (JADUs) on lots that use the Two-Unit Development allowance.

SB 10 allows local governments to pass ordinances to zone any parcel for up to 10 residential units if located within one-half mile of a major transit stop and urban infill sites.

While these new state-level regulations would generally result in added development capacity, with respect to reasonably anticipated development within the two community plan areas (see discussion above), the growth assumptions evaluated in the 2017 FEIR and refined above, are considered sufficient to include growth associated with these regulations. This is because existing City regulations (including the CPIO, density bonus and accessory dwelling unit regulations) already allow for and encourage the same type of development as addressed in the new state regulations and/or assumptions in the 2017 FEIR were already sufficiently generous to include anticipated development under these new state regulations through the horizon year. Therefore, the reasonably anticipated development for the year 2035 (the horizon year of the 2017 FEIR) does not change.

2.5 OTHER ADDENDUMS

There have been no prior addendums to the 2017 FEIR. The City is currently processing another addendum to the 2017 FEIR that addresses changes to the South Los Angeles CPIO, which have not been adopted. The proposed changes to the South Los Angeles CPIO would impact only the South Community Plan Area and are primarily intended to implement additional residential neighborhood protection and would not affect the land use assumptions evaluated in this Addendum.

3 ENVIRONMENTAL IMPACT ANALYSIS

This section provides an impact assessment of the Modified Project. The information below addresses each of the environmental issues that were previously analyzed within the scope of the 2017 FEIR and the most current Appendix G of the CEQA Guidelines. The conclusions of the previously adopted EIR are provided as a reference for each environmental issue area for purpose of describing how the proposed changes would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the 2017 FEIR.

A Modified Environmental Checklist Form was used to compare the anticipated environmental effects of the Modified Project with those disclosed in the 2017 FEIR and to review whether any of the conditions set forth in CEQA Guidelines Section 15162 and Public Resources Code Section 21166, requiring preparation of a Supplemental or Subsequent EIR, have been triggered. The checklist and evaluation below provides the following information for each of these environmental impact categories:

A. Impact Determination in the Certified EIR

This section lists the impact determination made in the 2017 FEIR for each impact category. Unless noted otherwise, in general these analyses continue to apply to the plan areas. As discussed above, Appendix G questions were amended in 2018. The new appendix G questions are used throughout Chapter 3. To the extent that an Appendix G question was not included in the 2017 Final EIR, any relevant analysis and impact conclusion from the 2017 Final EIR will be discussed and provided (e.g., Energy threshold questions). If no analysis related to a particular Appendix G question was done in the 2017 Final EIR (e.g., Wildfire impacts), that analysis for the Original Project will be discussed in this Addendum or it will be explained why no such analysis is necessary to comply with CEQA.

B. Are Substantial Changes Proposed In the Modified Project Which Will Require Major Revisions of the 2017 FEIR Due to New Significant Impacts or Substantially More Severe Impacts?

Pursuant to CEQA Guidelines Section 15162(a)(1), this section indicates whether the Modified Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or would result in a substantial increase in the severity of a previously identified impact.

C. Any Change in Circumstances Regarding the Project Which Will Require Major Revisions of the 2017 FEIR Due to New Significant Impacts or Substantially More Severe Impacts?

Pursuant to CEQA Guidelines Section 15162(a)(2), this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

D. Any New Information of Substantial Importance, Not Known and Could Not Have Been Known with the Exercise of Reasonable Diligence at the Time the 2017 FEIR was Certified?

Pursuant to CEQA Guidelines Section 15162(a)(3)(A-D), this section indicates whether 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 environmental documents were certified as complete shows that: (A) The project will have one or more significant effects not discussed in the prior environmental documents; (B) Significant effects previously examined will be substantially more severe than shown in the prior environmental documents; (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 prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. New studies completed as part of this environmental review are attached to this Addendum or are on file with the Planning Department.

E. Mitigation Measures Addressing Impacts

Pursuant to CEQA Guidelines Section 15162(a)(3), this section indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. If so, the number of the applicable measure is provided. In some cases, the previously adopted mitigation measures have already been implemented or are not applicable to the Modified Project, or a significant impact was not identified, and mitigation was not required. In either instance, a “No” response will be indicated. This section will also discuss whether the 2017 FEIR mitigation measures need to be modified or whether other mitigation measures need to be considered.

F. Conclusion

For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

3.1 AESTHETICS

As part of the 2018 CEQA Guidelines update, Appendix G Checklist questions for Aesthetics were clarified; however, the analysis required to address the questions remains the same as presented in the 2017 FEIR. Consistent with SB 743, the modifications clarify that the checklist questions regarding aesthetics do not apply to projects located within transit priority areas (TPAs). Per SB 743, aesthetics impacts for such projects shall not be considered significant. For those projects that do not meet the definition provided in Public Resources Code Section 21099, the modifications provide distinct checklist questions for public views and consistency with zoning regulations governing scenic views, depending upon whether the project is within a non-urbanized or urbanized area. The analysis presented in the 2017 FEIR remains relevant to the modified checklist and is summarized as appropriate for each question below.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(a) Have a substantial adverse effect on a scenic vista?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

As shown in Figure 4.1-1 in the 2017 FEIR, the majority of the South and Southeast Los Angeles CPAs are considered TPAs. Future development under the Approved Plans is expected to occur principally within the TPAs and involve residential, mixed use or employment center development. Scenic vistas in the CPAs are limited to views of the San Gabriel Mountains, the Santa Monica Mountains, the Hollywood Hills, views of Downtown Los Angeles, and the Hollywood sign. Due to the built-out urban nature of the CPAs, and the characteristically flat terrain, views of these scenic vistas are not widely available from points within or adjacent to the CPAs. Public views are generally only available from view corridors within the east-west and north-south street alignments, or public parks or plazas. As the Approved Plans are not planned to alter the existing street alignments, these views would not be affected. Additionally, the proposed CPIO Districts include regulations consistent with the Conservation Element and Framework Element policies that are intended to protect scenic vistas.

Views of recognized scenic resources outside of the CPAs are available from the Kenneth Hahn State Recreation Area (SRA), and from this vantage, onlookers are able to look beyond the CPAs to see scenic resources (such as the downtown skyline). While the Approved Plans would allow greater building heights than what currently exists, the scenic vistas available from the Kenneth Hahn SRA would not be obstructed by structures built to maximum permitted height within the CPAs because the CPAs are not visible from the viewshed.

The existing building heights in the commercial corridors of the CPAs are generally below 45 feet. The permitted building heights in Active Change Areas within Height District 2D (i.e., AC-2Ds)

under the Approved Plans would range from four to eight stories, with the exception of the CPIO TOD Regional Center which would allow a maximum height of 225 feet. The permitted heights and densities in ACs and Non-Change Areas within Height District 1 would remain either three stories/45 feet or remain limited by a 1.5:1 FAR which effectively limits feasible heights to approximately 45 feet. As such, future development is not anticipated to exceed three stories in the ACs and Non-Change Areas of the CPAs.

While the Approved Plans allowed future development to be built at heights and densities greater than what currently exists, this would occur in the AC-2Ds, most of which are in TPAs. Most of the areas outside of the TPAs are developed with industrial, residential, and/or low-intensity commercial land uses where no changes to land use or zoning are proposed, and future development is not anticipated. The only Active Change Areas not located within a TPA include Central Avenue south of 103rd Street and a few nodes located at Martin Luther King Jr. Boulevard at San Pedro Street, Wilmington Avenue at Santa Ana Boulevard, and Main Street at 110th Street in the Southeast Los Angeles CPA. Future development in these areas could be built at four to five stories. However, the CPIOs include development standards which establish building massing, articulation, setback, and step-back standards which would serve to limit the height, width, and size of structures.

Conformance with existing City Ordinances and the CPIO Ordinances, coupled with review and approval would ensure that impacts to scenic resources resulting from future development is avoided. The CPIO applies to all commercial corridors and industrial areas of the CPAs and requires design standards for new development within the CPIO subareas. These design standards, which apply in addition to regulations set forth by the zoning and height district of a project site, would serve to limit the encroachment of any existing views available within the CPAs from future development.

Conclusion. The Approved Plans were not expected to result in significant impacts to scenic vistas. Future development under the Approved Plans is expected to occur primarily within the TPAs. Any development that would occur under the Approved Plans that does not fall into SB 743, either because it is not in a TPA or not an eligible development type, would not be expected to result in an impact to scenic vistas. Therefore, impacts related to scenic vistas under the Approved Plans were determined to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, including Table 2-4, the Modified Project would incrementally increase allowable intensity, density, and/or type of land uses in the South and Southeast CPAs beyond what was evaluated in the 2017 FEIR. The zoning changes under the Modified Project would include height and/or FAR bonuses for residential, commercial, industrial, and TOD land uses. The CPAs are not visible from the viewshed of scenic vistas available from the Kenneth Hahn SRA, and the zoning changes proposed under the Modified Project would not obstruct any scenic vistas. Development under the Modified Project would conform to existing City Ordinances and the CPIO Ordinance to avoid impacts to scenic

vistas. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not have the potential to substantially impact scenic vistas.

Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the CPA or the vicinity or circumstances under which the Modified Project is being undertaken which have occurred subsequent to the 2017 Final EIR that would require major revisions to the 2017 FEIR due to new or substantially more severe significant impacts to scenic vistas beyond what was previously analyzed. No substantial changes to scenic vistas have occurred since certification of the 2017 FEIR, and no substantial new changes related to scenic vistas have been identified within the CPAs that would result in new or more severe significant environmental impacts.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. There is no 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 2017 FEIR was certified that shows the new significant or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Scenic Highways. There are no state scenic highways within the CPAs, or in proximity to the CPAs. However, Vermont Avenue and Adams Boulevard in the South Los Angeles CPA and a portion of the Broadway corridor from just north of Century Boulevard to Imperial Highway within the Southeast Los Angeles CPA are city-designated scenic highways according to the City's Mobility Plan 2035. The segment of Vermont Avenue designated as a local scenic highway features a wide landscaped median with mature trees. Broadway, where designated as a scenic highway, also features a wide landscaped median planted with grass and a variety of mature trees. No changes to the landscaped medians are proposed nor would future development occurring under the Approved Plans along these city-designated scenic highways result in the removal of the landscaped median or trees within the median.

Scenic Resources. Scenic resources in the CPAs include resources such as, the Watts Towers, exhibits and installations around the Exposition Park, the Los Angeles Memorial Coliseum, and the Saint Vincent Church. Due to the presence of development coupled with the flat terrain of the area, none of the scenic resources in the CPAs are tall enough to be distinguishable from distant vantage points and expansive and/or unobstructed views are unavailable. Views of these scenic resources are typically constrained and limited to foreground views from adjacent streets and sidewalks in the immediate vicinity. The design standards of the CPIO and existing zoning standards that control building height, massing, setback, and landscaping would be expected to prevent impacts to views of scenic resources in the CPAs.

Historic Resources. The South Los Angeles CPA contains five Historic Preservation Overlay Zones (HPOZs) and 110 Historic Cultural Monuments (HCMs). South Los Angeles HPOZs are University Park, Adams-Normandie, Harvard Heights, Western Heights, and West Adams Terrace. The Southeast Los Angeles CPA contains one HPOZ, the Tifal Brothers East 52nd Place HPOZ, and 24 HCMs. Historic resources located within the CPAs are protected through existing City regulations, including the Cultural Heritage and HPOZ Ordinances. Views of these resources are accessible primarily from adjacent public rights-of-ways. As the Approved Plans do not alter the existing street alignments, future development under the Approved Plans is not anticipated to obstruct views of historic resources.

Protected Trees. The City's Tree Preservation Ordinance requires that a protected tree shall not be removed or relocated without the issuance of a removal permit by the City of Los Angeles Department of Public Works. Trees protected under this Ordinance include all native oak species, California Sycamore, California Bay, and California Black Walnut trees that are four inches or greater in diameter at 4.5 feet above ground. There are 408 Heritage and Ordinance Protected trees.⁶ The vast majority of these trees in the CPAs are located within community parks and on the grounds of recreation centers, which would not be impacted under the Approved Plans.

Conclusion. There are no state scenic highways within the CPAs, or in proximity to the CPAs, and future development occurring under the Approved Plans would not result in the substantial damage of a scenic resource. Therefore, the Approved Plans were determined to result in *no impact* related to scenic resources.

⁶ City of Los Angeles. NavigateLA, <http://navigateLA.lacity.org/index01.cfm>, accessed September 10, 2014.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As previously discussed, there are no state scenic highways within the viewshed of the CPAs, none of the scenic resources in the CPAs are distinguishable from distant vantage points and expansive and/or unobstructed views are unavailable. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to CPA or the vicinity or circumstances under which the Modified Project is being undertaken which have occurred subsequent to the 2017 Final EIR that would require major revisions to the 2017 FEIR due to the involvement of new or substantially more severe significant impacts to scenic resources in state scenic highway beyond what was previously analyzed. No new scenic highways have been designated within the vicinity of the CPAs since the certification of the 2017 FEIR. No substantial changes to scenic vistas have occurred since certification of the 2017 FEIR, and no substantial new changes in scenic vistas have been identified within the CPAs that would result in new or more severe significant environmental impacts.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. There is no 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 2017 FEIR was certified that shows there will be new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

As discussed above, impacts to aesthetics in areas within TPAs are not considered significant impacts to the environment when they involve residential, mixed use, or employment center development. Future development under the Approved Plans is expected to occur principally within the TPAs. The following analysis addresses impacts for those limited areas that fall outside the TPAs or the limited development that does not involve residential, mixed-use, or employment center development.

The Approved Plans could alter the visual character of the CPAs, particularly where future development has increased density, intensity and heights, or mix of uses than what currently exists. As the Active Change Areas allow more density, intensity, increased heights and new mixes of uses around transit, from what is currently planned and what is existing, it is reasonably expected that the development in the Active Change Areas could alter the visual character of the CPAs. In the Non-Change Areas, while there may be increased development to individual lots here or there as sites get developed or redeveloped over time (e.g., a vacant lot getting developed with a two-story, multi-family building, or a single-family home being replaced with a low-rise office building), it is not foreseeable that there will be a significant increase to density, intensity, heights or mix of uses that would affect the visual character from the existing environment. Any development or redevelopment in the Non-Change Areas would be consistent in size and scale to the surrounding area and consistent with the visual character of the area. Based on this, significant changes to the visual character in Non-Change Areas are not foreseeable as a result of the Approved Plans.

The Active Change Areas are located primarily within the proposed Transit Oriented Development (TOD) Subareas of the CPIO Districts. The Approved Plans would have a positive influence on the aesthetics of the CPAs as they aim to improve the visual quality of the built environment, protect the existing character of neighborhoods, and ensure compatibility between land uses. This is accomplished through development and use regulations of the CPIO Districts that are intended to influence and enhance the aesthetics of the CPAs. The CPIO Districts are applied to all commercial and industrial areas establishing additional development and design standards. The CPIO development regulations include building massing, setback, stepback, frontage, façade, design, parking, landscaping, and other standards. These development regulations also

include provisions that require that buildings located adjacent to certain residential zones incorporate transitional height elements. Conformance to these development regulations would ensure that future development is visually compatible and attractive within the CPAs because the development regulations implement plan policies for new development to be in conformance with existing neighborhood character.

Transit Oriented Development (TODs). The most evident change in visual character would occur within the TOD subareas of the CPIO Districts where AC-2Ds (which would permit greater FARs) are proposed. In these subareas, the proposed maximum height of development would generally be up to six stories; however, height limits vary from two to eight stories depending on the TOD subarea. The greatest building heights are focused at major intersections and in close proximity to transit stations. The exception is Washington Boulevard in the Southeast Los Angeles CPA, which allows up to 15 stories and 225 feet of height. The average height of development in AC areas zoned Height District 1 (height limited by FAR) is typically 45 feet. Proposed increases in permitted development density, intensity and heights, and incentives to provide for mixed-use development in the AC-2D areas, as well as the requirement to comply with design and pedestrian-orientation standards foster the creation of an active pedestrian-oriented environment that will upgrade the visual character of the CPAs under the Approved Plans. Table 4.1-6 in the EIR provides a comparison of the existing and proposed visual character components along the major corridors within the CPAs.

Commercial. Proposed development in commercial areas, including neighborhood districts, community centers, TODs, and regional centers is required to comply with mandatory CPIO regulations which seek to implement the goals and policies of the Approved Plans specific to the visual character and quality of commercial areas. The policies of the Approved Plans are aimed at reducing conflicts and creating compatibility between commercial and residential uses, providing adequate transitions between commercial uses and adjacent residential neighborhoods, creating pedestrian-oriented and active streets and neighborhoods, improving existing uses, enhancing the public realm, limiting incompatible uses, and requiring conformance to design standards.

Industrial. Use standards and development regulations applicable to future development in the proposed Industrial subareas of the CPIO Districts are intended to protect against incompatibility, prevent future industrial blight, and improve aesthetic character and quality. In the Industrial subareas, future projects located either directly adjacent to or across from a property in the R3 or more restrictive zone are subject to compatibility standards that address building heights, setbacks, fences, and walls. Additionally, future development in the Industrial subareas is subject to mandatory standards that require landscaping be provided and buildings be sited and oriented to reduce visual conflicts.

Residential. Within the Residential Subareas of the CPIO, dependent on the subarea in which it is located, future development is subject to either design standards that preserve the character of lower-density neighborhoods, multi-family design standards that ensure that new development projects are of high-quality design, or design and development standards that preserve and protect the historic character in certain historic neighborhoods. The Approved Plans include goals and policies that call for the preservation, conservation, and enhancement of all residential neighborhoods in the CPAs. Many of these goals and policies will be achieved through implementation of the mandatory development standards applicable to the Residential Subareas (and applicable subarea and policies specific to residential areas related to visual character and quality within the LAMC).

Conclusion. All future projects within the CPIO Districts of the CPAs are required to conform to the mandatory development regulations and design standards of the CPIO, including discretionary projects such as Site Plan Review. The CPIO's use restrictions and development standards ensure that future development will improve the visual character and quality of the CPAs because the standards require that visual character is enhanced through transitional height requirements, massing restrictions, requirements for use of high-quality materials, and requirements for façade articulation. Significant changes to the visual character in Non-Change Areas are not foreseeable as a result of the Approved Plans and those that do occur are expected to be beneficial. Based on this, the Approved Plans would not substantially degrade the existing visual character and quality of the CPAs and their surroundings, and impacts related to visual character were determined to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The increase in allowable intensity, density, and/or types of land use development resulting from the Modified Project would alter the visual character of the CPAs beyond what was evaluated in the 2017 FEIR. Refer to Chapter 2, Project Description of this Addendum for a complete description of the zoning changes to residential, commercial, and industrial, and TOD land uses that would occur under the Modified Project. However, as with the 2017 FEIR, all development under the Modified Project would comply with mandatory City development regulations and design standards. The proposed zoning changes under the Modified Project in the South and Southeast Los Angeles CPAs are primarily intended to increase residential land use intensity, increase flexibility for commercial manufacturing land uses, increasing employment intensity through bonus floor area, improve opportunities for TOD land uses, and improve land use consistency with applicable plans and surrounding visual characteristics. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not lead to land use conflicts in this CPA.

Overall, the proposed zoning changes would be compatible with the existing urban uses that set the aesthetic character of the CPAs. The Modified Project would not substantially degrade the existing visual character or quality of the CPAs. Therefore, there are no proposed changes under the Modified Project involving new significant impact or substantially more severe impacts beyond what was disclosed in the 2017 FEIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would result in new or more severe significant impacts related to zoning conflicts or impacts to scenic character. No substantial changes to visual character have occurred since certification of the 2017 FEIR, and no substantial new changes in visual character have been identified within the CPAs that would result in new or more severe significant environmental impacts.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. There is no 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 2017 FEIR was certified that shows the new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than Significant ⁷	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Most of the CPAs are considered TPAs. Pursuant to SB 743, impacts to aesthetics in areas within TPAs shall not be considered significant impacts to the environment when they involve residential, mixed use, or employment center development. Future development under the Approved Plans is expected to occur principally within the TPAs and involve residential, mixed use or employment center development. The following analysis is provided to analyze impacts for those limited areas that fall outside the TPAs or the limited development that does not involve residential, mixed-use, or “employment center” development.

A high level of ambient nighttime light and daytime glare is common to urbanized areas of the City of Los Angeles. Existing sources of nighttime lighting include street, security, and way finding

⁷ The 2017 FEIR also analyzed impacts to shade and shadows which was a topic identified in the 2006 L.A. CEQA Thresholds Guide (see discussion) and found impacts to be less than significant in South Los Angeles and significant in Southeast Los Angeles CPAs; this topic is not specifically identified within the CEQA Guidelines. The City has updated their approach to thresholds of significance including the evaluation of shade and shadow impacts; such are addressed on a case-by-case basis as appropriate but are generally no longer considered significant.

outdoor lighting, vehicle headlights, and interior building illumination. This high level of ambient light currently reduces the visibility of the nighttime sky. Additionally, glare is a common phenomenon in the CPAs primarily due to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region.

The Approved Plans promote commercial centers and transit centers that are pedestrian-oriented, attractively designed, with adequate visibility, and security, and characterized by moderate to higher density with active ground floor frontages and vibrant nighttime environments. It is anticipated that future development under the Approved Plans, particularly projects of substantial scale, would result in the creation of pedestrian-scale lighting in areas where currently lighting levels are low or where lighting levels along sidewalks is interrupted by darkened or shadowed areas. The Approved Plans are anticipated to result in additional sources of nighttime lighting associated with increased expected development within areas of proposed change, streetscape improvements, crime prevention, and increased vehicle traffic. The majority of existing structures within the CPAs are comprised of non-reflective materials such as concrete, wood, stucco and plaster. New development is anticipated to be consistent with the building materials commonly used in the CPAs, which consist of non-reflective materials, and would not be expected to be a significant new source of glare in the CPAs.

Within the commercial corridors of the CPAs, the intersection portions of the streets are typically lit to City standards, but in many cases, there is less light in mid-block areas along the corridors than at intersections, largely because of the spacing and placement of streetlights as well as because the land use is less intense, vacant or significantly setback from the street in these areas. Existing street trees with large canopies also influence light levels in mid-block areas.

The Approved Plans allow for increased development density, intensity, building heights and new land use designations at commercial nodes within the Active Change Areas of the CPAs. With these increases, it could be reasonably anticipated that illumination from new development (security lighting, parking lot lighting, ornamental lighting, pedestrian scale lights, lighting from ground floor storefronts and signs) would increase illumination at intersection nodes and adjacent sidewalk areas in the commercial corridors. The Approved Plans also seek to create compatibility between existing land uses and to promote active commercial and mixed uses at the ground level, as well as an active pedestrian environment within Active Change Areas. Where increased development is expected to occur as the result of implementation of the Approved Plans, lighting could be increased at mid-block for pedestrian safety, security, and ornamental lighting. Development in Non-Change Areas is anticipated to result in a smaller increase to illumination levels than those in the Active Change Areas.

The LAMC contains specific regulations with respect to light and glare. LAMC Section 12.21 A.5 (k) (amended by Ordinance No. 171,858) states that all lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any street and any adjacent premises. Additionally, any new lighting would be designed to conform to applicable standards including LAMC Section 93.0117 which pertains to outdoor lighting affecting residential property (no more than two foot-candles of lighting intensity from a light source is allowed on adjacent residential property). All new development would be required to be consistent with the LAMC regulations to reduce impacts from light and glare. In addition, Framework Policies 5.5.3, 5.5.4, and 5.8.1 call for the formulation of building and site design standards, determination of appropriate urban design elements, and lighting commensurate with intended nighttime use. Furthermore, the mandatory CPIO development standards of the Approved Plans include requirements to screen parking lots for light and glare and also require the use of high-quality materials such as brick, which is a non-reflective material. Specifically, parking areas would be required to be screened by landscaping and low walls in order to avoid light and glare from parked

vehicle headlights. Additionally, the development standards for the Industrial CPIO Subareas include the provision of landscaping in conjunction with other features, and the siting and orientation of buildings to reduce light and glare conflicts. Future development occurring within the CPIO would be subject to the mandatory development standards provided therein to reduce light and glare. Therefore, the Approved Plans with CPIO development standards in place would help to reduce light and glare impacts in the CPAs and impacts would be *less than significant*.

Shade and Shadows. The 2006 L.A. CEQA Thresholds Guide recognized shade and shadow impacts as an environmental impact and required that analyses be undertaken when there was potential for shade-sensitive uses to be placed in shadow by a proposed project for three or more hours, at which point shading may be considered to interfere with the activities on that off-site property. Land uses in proximity to a proposed development for which sunlight is important to function, physical comfort, or commerce are considered shade sensitive. Table 4.1-4 in the EIR, provides an overview of the maximum shadow lengths for the latitude and longitude within the CPAs.

Pursuant to SB 743, impacts to aesthetics in areas within TPAs are not considered significant impacts to the environment. Future development that could create shade and shadow impacts (e.g., over three stories or 45 feet) under the Approved Plans is expected to occur primarily within the Active Change Areas, most of which are within the TPAs and would not result in significant aesthetic impacts. Areas outside of the TPAs are not expected to change significantly as a result of the Approved Plans. Most of the areas outside of the TPAs are developed with residential or low-intensity industrial or commercial land uses where no changes to land use or zoning are proposed and future development is not anticipated to exceed 45 feet. As shown in Figure 4.1-14 in the South Los Angeles and Southeast Los Angeles EIR, the Active Change Areas are all located within a TPA except for the Active Changes proposed along Central Avenue south of 103rd Street and along 103rd Street east of Lou-Dillon Avenue, as well as nodes located at Martin Luther King Jr. Boulevard at San Pedro Street; Slauson Avenue at Long Beach Avenue; Main Street and 110th Street; and Wilmington Avenue at Santa Ana Boulevard in the Southeast Los Angeles CPA. The Active Change Areas of the Approved Plans allow for increased development density, intensity, and heights in targeted areas of the CPAs, including the areas mentioned above. Future development along the Central Avenue corridor, for example, could be built at four to five stories. This development of taller buildings than the existing environment could create shadows that would extend onto shadow-sensitive uses such as residences, schools, open space, parks, and public facilities.

The Approved Plans include CPIO Districts with development standards which establish building massing, articulation, setback, and step-back standards which would serve to limit the height, width and size of structures. The Central Avenue corridor and other areas identified above are located within the CPIO's TOD Subareas and would be subject to these mandatory development standards, which help reduce impacts related to shade-shadow.

For future development outside the TPAs, which is not anticipated to be significant, the proposed CPIOs include development requirements related to massing, setbacks, and step-back requirements to help reduce the length of shadows cast by future development within CPIO Subareas. Proposed structures would step-back heights and be set back to minimize casting shadows on residential uses. This feature would reduce the impact related to shade and shadows throughout the CPAs, including the areas outside the TPAs. In the South Los Angeles CPA, no Active Change Areas occur outside of the TPAs, therefore, impacts related to shade and shadow under the Approved Plan in the South Los Angeles CPA are not expected and were found to be less than significant. However, in the Southeast Los Angeles CPA future development that exceeds 45 feet in height could result in shade and shadow impacts despite the application of the

mandatory CPIO standards in the Active Change Areas outside of TPAs previously identified. Therefore, impacts related to shade and shadows under the Approved Plan for the Southeast Los Angeles CPA were found to be significant and unavoidable.

Conclusion. The Approved Plans would not result in impacts to light and glare. Additionally, pursuant to SB 743, impacts to aesthetic resources in areas within TPAs from residential, mixed use, or employment center projects, shall not be considered significant impacts to the environment. Therefore, impacts related to creating a new source of substantial light or glare that could adversely affect day- or nighttime views in the CPAs under the Approved Plans were determined be *less than significant*.

Shade and Shadows. Impacts related to shade and shadows under the Approved Plans and were found to be *less than significant* in the South Los Angeles CPA but *significant and unavoidable* in the Southeast Los Angeles CPA.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project in the South and Southeast Los Angeles CPAs would increase allowable intensity, density, and/or type of land uses in the CPAs, resulting in additional sources of nighttime lighting beyond what was analyzed in the 2017 FEIR. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not lead to substantial additional nighttime lighting.

Proposed changes are not substantial and would not result in new significant impacts or substantially more severe impacts because development under the Modified Project would be consistent with the surrounding areas and would be constructed using non-reflective materials. As previously discussed, the proposed zoning changes under the Modified Project are primarily intended to increase land use intensity, flexibility, and consistency with surrounding areas. Development under the Modified Project would not be expected to introduce significant new sources of glare in the CPAs as under the Approved Plans. To the extent that impacts related to shade and shadow are considered, such impacts will not result in new significant impacts or substantially more severe impacts beyond what was previously analyzed. The City has updated its approach to thresholds and shade and shadow impacts are addressed on a case-by-case basis and generally are no longer considered significant absent the shadow affecting public spaces where sun is usually enjoyed, such as public parks. Generally, shade on public rights of way, including sidewalks is a beneficial impact. Additionally, shadows on private property are not impacts to the environment as an impact affecting the public. The Modified Project would not be anticipated to increase adverse shade or shadow impacts on the general public. Therefore, there are no proposed changes under the Modified Project involving a new significant impact or substantially more severe impacts beyond what was disclosed in the 2017 FEIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to glare, light, and shade beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. Therefore, there is no new information requiring new analysis or verification.

Shade and shadows are not topics specifically identified in the CEQA Appendix G checklist, and as noted above, the City has updated their approach to thresholds and the shade and shadow impacts are addressed on a case-by-case basis and generally are no longer considered significant. The Modified Project would not substantially affect shade and shadows as compared to what was evaluated in the 2017 FEIR. Development under the Modified Project would be required to follow setback regulations to minimize casting shadows on shadow-sensitive uses. Additionally, the zoning changes under these recent state housing laws would increase glass window and building surface areas beyond the changes proposed under the Original Project. Development constructed using non-reflective materials would reduce the potential for light and glare impacts to the CPAs.

There is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AGRICULTURE AND FORESTRY RESOURCES: Would the project:					
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	No	No	No	No
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	No	No
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact	No	No	No	No
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No	No	No	No
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Prime Farmland. According to the California Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program (FMMP), the South Los Angeles and Southeast Los Angeles CPAs are "urbanized areas" and do not contain Prime Farmland, Unique Farmland, Farmland of Statewide Importance or important farmlands. Although no such farmlands exist within the CPAs, there are two properties with the A1 zoning, Rosedale Cemetery in the South Los Angeles CPA and MudTown Farms in the Southeast Los Angeles CPA. Rosedale Cemetery is located at Normandie Avenue and Washington Boulevard in the South Los Angeles CPA. Rosedale Cemetery is a local Historic-Cultural Monument (HCM No. LA-330). Because of the type of use, and because of its historic designation it would be highly unlikely that any agricultural uses would ever be introduced to this property. MudTown Farms is located in the Southeast Los Angeles CPA at 103rd Street and Grape Street and is used as a community garden. While the zoning of MudTown Farms properties was recently changed to agricultural (A1(UV)) as part of the Jordan Downs Specific Plan adopted March 2013, MudTown Farms is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses by the state. As such, future development occurring over the lifetime of the Approved Plans does not have the

potential to impact Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. *No impact* was found to occur.

Williamson Act Contract. There are no properties in the CPAs under a Williamson Act contract, nor any other properties zoned or used for agricultural purposes, including the Rosedale Cemetery and the MudTown Farms. Future development occurring over the lifetime of the Approved Plans does not have the potential to impact agricultural uses or conflict with the zoning for agricultural uses or a Williamson Act contact. Therefore, *no impact* was found to occur.

Conflict with Forestland and Timberland Zoning. The CPAs and surrounding area are fully developed and urbanized. There is no land defined as forest land, timberland or timberland zoned Timberland Production within the CPAs. Implementation of the Approved Plans would not conflict with zoning or create a rezone of land designated as forest land, timberland, or timberland zoned as Timberland Production. Therefore, *no impact* was found to occur.

Loss or Conversion of Forestland. The CPAs and surrounding area are fully developed and urbanized. There is no forest land in the CPAs. The Approved Plans include no plans to convert forest land to non-forest use. Therefore, *no impact* was found to occur related to the conversion of forest land to non-forest use.

Conclusion. The CPAs and surrounding area are fully developed and urbanized. There is no farmland or forestland in the CPAs. The Approved Plans include no plans to change the existing environment in a manner that would result in the conversion of farmland or forestland to other kinds of land uses. Therefore, *no impact* was found to occur related to other changes in the existing environment.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, none of the properties impacted by the Modified Project contain Prime Farmland, Unique Farmland, Farmland of Statewide Importance, important farmlands. There are no properties under the Modified Project under a Williamson Act contract, nor any other properties zoned for agricultural uses. There is no forest land or land zoned for timberland production in the project area. The Modified Project would not result in the conversion of farmland. Therefore, there are no proposed changes under the Modified Project involving new significant impact or substantially more severe impacts beyond what was disclosed in the 2017 FEIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to agriculture and forestry resources beyond what was previously analyzed. No substantial new changes to existing regulations governing agriculture and forestry resources have been adopted that are applicable to the CPAs that would result in new or more severe significant environmental impacts.

D. Any New Information Requiring New Analysis or Verification?

Since the certification of the 2017 FEIR, no new information of substantial importance has become available relative to agricultural or forestry resources, nor have substantial changes occurred to agricultural or forestry resources, nor have any new agricultural or forestry resources been identified within the CPAs that would result in new or more severe significant environmental impacts. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.3 AIR QUALITY

As part of the 2018 CEQA Guidelines update, Appendix G Checklist questions for Air Quality were modified to delete the question regarding violation of air quality standards and to modify the question regarding odors. The analysis presented in the EIR remains relevant to the modified checklist questions and is summarized as appropriate for each question below.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
(a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The air quality plans applicable to the Approved Plans are the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2012 Air Quality Management Plan (AQMP).⁸ The primary objectives of the RTP/SCS that are aimed at reducing air pollution consist of adding density in proximity to transit stations and encouraging mixed-use development and active transportation.

Consistency with the AQMP can be assessed by determining how a project accommodates increases in population or employment. The population and employment assumptions used by the South Coast Air Quality Management District (SCAQMD) to estimate regional emissions in the AQMP are obtained from SCAG projections for cities and unincorporated areas within the SCAQMD's jurisdiction. The Approved Plans are consistent with the SCAG 2035 projections and would not exceed population or employment projections for the City as a whole. Therefore, the Approved Plans would not exceed the assumptions in the AQMP.

Conclusion. The Approved Plans incentivize new development near transit, while respecting surrounding residential communities. The Approved Plans focus on mobility, urban design, public safety, and healthy, sustainable communities. A vision of concentrated, mixed-use development adjacent to transit corridors is promoted in order to conserve resources, protect existing residential neighborhoods, and improve air quality by reducing the use of cars. The Approved Plans establish TOD provisions in areas located adjacent to transit. The Approved Plans encourage transit use and the use of non-motorized transportation, such as bicycling and walking. Therefore, impacts related to conflicting with or obstructing implementation of the applicable air quality plans under the Approved Plans were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

⁸ The 2012 AQMP relied upon growth projections presented in the superseded 2012-2035 RTP.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the Approved Plans, the Modified Project would incentivize new development near transit, while respecting surrounding residential communities. The Modified Project would increase the focus on mobility, urban design, public safety, and healthy, sustainable communities. A vision of concentrated, mixed-use development adjacent to transit corridors would be further promoted to conserve resources, protect existing residential neighborhoods, and improve air quality by reducing the use of cars. The Modified Project would continue to include and promote TOD provisions in areas located adjacent to transit. The Modified Project would further encourage transit use and the use of non-motorized transportation, such as bicycling and walking. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to conflicting with or obstructing implementation of the applicable air quality plans beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts relative to the applicable air quality plan beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

The 2016 AQMP was adopted in 2017, as with the 2012 AQMP it relied on the most recent RTP/SCS land use assumptions and growth forecasts (the most recent RTP/SCS for the 2016 AQMP was the 2012 RTP/SCS). Refer to Chapter 2, Project Description (Section 2.4, Plan Implementation and Changes to Growth Forecast), for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. As the Modified Project would continue to be consistent with the RTP/SCS, there is no 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 2017 FEIR was certified that shows the project Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Construction: Significant Operation: Less than Significant with Mitigation	No	No	No	AQ1

A. Impact Determination in the EIR

Analysis

The South Coast Air Basin (Basin) is currently designated nonattainment for multiple criteria pollutants. Emissions generated by the combined with past, present, and reasonably probable future projects could impede attainment efforts or result in locally significant pollutant concentrations. Therefore, the Original Project combined with past, present, and reasonably probable future projects could result in a cumulative impact. For both construction and operational activities, if a project exceeds the identified project-level significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Construction. Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site.

It is mandatory for all construction projects in the Basin to comply with Rule 403 or face violations that would incur fines. Compliance with Rule 403 would reduce PM_{2.5} and PM₁₀ emissions associated with construction activities by approximately 61 percent.⁹ New construction is subject to VOC emission limits for architectural coatings, adhesives and sealants in the City's 2014 Los Angeles Green Building Code. In addition, SCAQMD Rules 1113 and 1168 establish VOC limits to control emissions from the application of architectural coatings, adhesives, and sealants.

Table 4.3-7 in the EIR compares the estimated construction emissions to the applicable SCAQMD regional thresholds of significance. Daily emissions of NO_x from heavy-duty diesel equipment and trucks during construction activities could exceed the SCAQMD regional thresholds under reasonably expected circumstances for large projects. It is possible that future development projects could generate unmitigated emissions that would exceed the regional threshold for VOC due to the application of architectural coatings. Therefore, without mitigation, implementation of the Approved Plans would result in a significant impact related to regional construction emissions.

The significant construction emissions identified above could result in degradation of air quality and adverse health effects to sensitive receptors.

⁹ SCAQMD, *Overview – Fugitive Dust Mitigation Measure Tables*, April 2007.

In addition to regional thresholds, the SCAQMD has developed specific CEQA LSTs to assess construction and operational air quality impacts associated with individual development projects. As shown in Table 4.3-8 in the EIR, under certain circumstances, unmitigated equipment emissions combined with fugitive dust emissions associated with the construction of future development occurring under the Approved Plans could potentially exceed the LSTs for NO_x, PM_{2.5}, and PM₁₀. Fugitive dust emissions would be reduced by compliance with SCAQMD Rule 403 for activities requiring earthwork and material movement, such as demolition, grading, and excavation. Nonetheless, without mitigation, implementation of the Approved Plans could result in a *significant impact* related to localized construction emissions.

Operation. Under the Approved Plans, long-term emissions would be generated by mobile sources and area sources, such as natural gas combustion. Table 4.3-9 in the EIR shows that operations of the Approved Plans would not generate emissions that exceed the SCAQMD regional significance thresholds.

Implementation of the Approved Plans would increase VMT (vehicle miles traveled) and vehicle hours travelled in both CPAs as a result of reasonably expected population growth. Despite an expected increase in total VMT (although per capita VMT is expected to decrease) total future daily mobile emissions under implementation of the Approved Plans are generally expected to decrease from existing emissions as a result of emission control regulations.

In 2001, the Basin met both the federal and state 8-hour Carbon Monoxide (CO) standards for the first time at all monitoring stations. CO attainment was also demonstrated in the 2003 AQMP. The CPAs do not include intersections that exceed 10,000 vehicles per hour.^{10, 11} There is no potential for the Approved Plans to generate significant localized CO concentrations at intersections within the CPAs. Furthermore, the Approved Plans would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, impacts related to regional operational emissions under the Approved Plans were found to be *less than significant*.

Mitigation Measure

Construction

AQ1 Any approval of a project located within a CPIO Subarea (except for Residential Subareas M, N, and O) shall ensure that all contractors include the following best management practices in contract specifications:

- Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations.
- Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g., engine catalysts) to the extent they are readily available and feasible.
- Use heavy duty diesel-fueled equipment that uses low NO_x diesel fuel to the extent it is readily available and feasible.
- Use construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible.
- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve

¹⁰ Iteris, Inc., *South Los Angeles Community Plan Transportation Improvement and Mitigation Programs*, 2016.

¹¹ Iteris, Inc., *Southeast Los Angeles Community Plan Transportation Improvement and Mitigation Programs*, 2016.

emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible, or solar where available.
- Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic.
- Construction contractors shall utilize super-compliant or pre-fabricated architectural coatings as defined by the South Coast Air Quality Management District (VOC standard of less than ten grams per liter).
- Construction contractors shall use pre-painted construction materials, as feasible.
- Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, as feasible.
- Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible.
- Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation.

Level of Significance of Impacts after Mitigation

Construction. Mitigation Measure **AQ1** would reduce regional and local emissions generated by various construction activities, including equipment operation, truck trips, and painting. A reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. A large construction project or multiple simultaneous projects within the project area could generate emissions that would exceed the significance thresholds despite Mitigation Measure **AQ1**. Therefore, the Approved Plans are considered to result in *significant and unavoidable impacts* at the regional and local level related to violating an air quality standard and/or contributing substantially to an existing or projected air quality violation.

Operation. Impacts related to operational regional emissions were determined to be *less than significant* without mitigation.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Construction. Impacts related to construction under the Modified Project would be similar to those under the Approved Plans as the Modified Project would result in similar levels of growth and therefore construction activities. Mitigation Measure **AQ1** would continue to apply and would reduce impacts; recent review of environmental analyses indicates projects are not resulting in significant adverse impacts after mitigation. Nonetheless, in the interests of being conservative, and to account for multiple simultaneous projects in the plan area, this Addendum continues to find this impact *significant and unavoidable* for construction. Impacts would not be substantially more severe because anticipated changes in growth would be minor (see Section 2.4, Plan Implementation and Changes to Growth Forecast).

TABLE 3-1: COMPARISON OF AIR QUALITY EMISSIONS - MODIFIED PROJECT VS. APPROVED PLANS (LBS/DAY)

	South Los Angeles Community Plan Area					Southeast Los Angeles Community Plan Area					South and Southeast Plan Areas
	Future vs EIR Existing ¹		Future % Change from Existing ¹		% Point Change Modified Project vs Approved Plans	Future vs EIR Existing ¹		Future % Change from Existing ¹		% Point Change Modified Project vs Approved Plans	% Point Change Modified Project vs Approved Plans
	Approved Plans	Modified Project	Approved Plans	Modified Project		Approved Plans	Modified Project	Approved Plans	Modified Project		
VOC	-2,867	-2,788	-42.1%	-41%	1.2	-3,142	-3,034	-42.2%	-40.8%	1.5	1.3
NOx	-10,375	-10,334	-80.4%	-80%	0.3	-11,953	-11,374	-82.4%	-81.9%	0.5	0.4
CO	-46,622	-46,322	-72.8%	-72.4%	0.5	-53,903	-53,342	-75.2%	-74.4%	0.8	0.6
Sox	-13.8	-13.0	-23%	-21.7%	1.3	-20.2	-18.7	-30.1%	-27.8%	2.3	1.8
PM10	77	107	4.4%	6.1%	1.7	-94	-31	-4.8%	-1.6%	3.2	2.5
PM2.5	-183.2	-177	-31.5%	-30.4%	1.1	-236	-223	-36.9%	-34.8%	2.1	1.6

1. Emissions under Existing and Approved Plans conditions have been recalculated using updated emission factors and mobile source modeling emissions calculations include an updated factor to account for conversion of peak period VMT to daily VMT; it is noted that comparison of Old Model VMT outputs and associated emissions to New Model VMT and associated emissions is not an apples to apples comparison because of differences in the two models, but for purposes of estimated emissions these calculations present a best estimate for this Addendum.

SOURCE: 2017 EIR and TAHA 2022

Operation. Despite increases in VMT, emission controls improve over time, and an overall decrease in emissions (with the exception of PM₁₀ in South Los Angeles) compared to 2017 EIR existing conditions (2010) continues to be expected under the Modified Project as for under the Approved Plans (see **Table 3-1**). With respect to PM₁₀, the minor increase in emissions in South Los Angeles (77 lbs/day under the Approved Plans and 107 lbs per day under the Modified Project) would continue to be less than the SCAQMD threshold of significance (150 lbs/day). For the two plans together PM₁₀ would not increase under the Approved Plans but would decrease by 17.2 lbs per day; under the Modified Project the two plans together would result in a net increase of 76 lbs per day well under the SCAQMD threshold of 150 lbs per day). Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not lead to additional emissions. Therefore, impacts would continue to be less than significant.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to the implementation of the air quality plan beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

New models have been developed to evaluate VMT (see Section 3.17, Transportation) and air quality. These new models have been used in the evaluation of the Modified Project. The models show decreasing VMT/per capita and decreasing emissions from a variety of sources; the results of these models continue to show less than significant impacts related to air emissions and consistency with the AQMP. Based on this and otherwise there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measure **AQ1** would continue to address impacts related to Air Quality and no other mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
(c) Expose sensitive receptors to substantial pollutant concentrations?	Construction: Significant and Unavoidable Operation: Less than Significant	No	No	No	AQ1

A. Impact Determination in the Certified EIR

Analysis

Construction. The greatest potential for exposure to substantial pollutant concentrations and TAC emissions during construction would be diesel particulate emissions associated with heavy-duty equipment operations and truck traffic.

Because no construction was proposed by the Approved Plans, the specific location of future construction activity within the CPAs was not known when the air quality analysis was completed. A construction health risk analysis would be speculative given the lack of a construction location and construction activities. However, it is reasonable to assume that some level of construction activity would occur adjacent to sensitive receptors (e.g., residences and schools). The magnitude of construction activity that would generate one pound of diesel particulate matter per day could be exemplified by the use of an excavator, a generator, a bulldozer, and a loader for 8 hours per day. This is considered a typical equipment inventory for in-fill construction projects, and therefore, without mitigation, implementation of the Approved Plans was determined to result in a *significant impact* related to substantial pollutant concentrations during construction activities.

Mitigation Measure **AQ1** would reduce TAC emissions generated by various construction activities, including equipment operation. For example, Tier 4 engines with horsepower ratings between 175 and 750 generate 90 percent less exhaust emissions, including particulate matter, than Tier 2 or 3 engines.¹² A reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. It is reasonable to assume that one or more construction projects within the CPAs could generate emissions that would exceed the significance thresholds despite Mitigation Measure **AQ1**, resulting in a *significant and unavoidable impact* related to exposure of sensitive receptors to substantial pollution concentrations. Refer to Mitigation Measure **AQ1**, above, related to the reduction of construction emissions.

Operation. The Approved Plans will not directly exacerbate an existing condition. In addition, new industrial sources of emissions are subject to SCAQMD Regulation XIII (New Source Review). The LAMC includes regulations for building standards and requirements to address cumulative health impacts resulting from incompatible land uses. Additionally, building

¹² USEPA, *Nonroad Diesel Engines General Information*, <https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-emissions-nonroad-vehicles-and-engines>, accessed on May 25, 2016.

requirements of the California Public Resources Code protects staff and students from health risks from exposure to TACs. The Approved Plans were not expected to expose sensitive receptors to substantial pollutant concentration, and a *less than significant* impact was determined to occur.

Mitigation Measures

Refer to Mitigation Measure **AQ1**, above.

Level of Significance of Impacts after Mitigation

Construction. As discussed above, regional and localized construction emissions could exceed the significance thresholds after the implementation of Mitigation Measure **AQ1**. Therefore, the Approved Plans were considered to result in a *significant and unavoidable* regional and localized construction impact.

Operation. *Less than significant* emissions from regional operations.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Construction. The Modified Project was found to result in similar construction emissions as those associated with the Approved Plans, and therefore was found to have similar impacts. Mitigation Measure **AQ1** would continue to be required and would continue to reduce emissions. Also, as noted in prior discussions, recent studies indicate projects are no longer resulting in significant impacts related to air quality including to sensitive receptors. Nonetheless, in the interests of being conservative, and to account for multiple simultaneous projects in the plan area, the impacts related to sensitive receptors were found to continue to be *significant and unavoidable* for construction as evaluated in the 2017 FEIR.

Operation. The Modified Project was found to not directly exacerbate an existing condition. New industrial sources of emissions are subject to SCAQMD Regulation XIII (New Source Review), and the LAMC includes regulations for building standards and requirements to address cumulative health impacts resulting from incompatible land uses. Additionally, building requirements of the California Public Resources Code protects staff and students from health risks from exposure to TACs. The Modified Project was found to not expose sensitive receptors to substantial pollutant concentration, and impacts were found to be the same as evaluated in the 2017 FEIR -- *less than significant*.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts analyzed related to sensitive receptors beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

As discussed in response to previous air quality checklist questions, new models have been developed to evaluate VMT (see Section 3.17, Transportation) and air quality. These new models have been used to evaluate impacts of updated growth forecasts anticipated under the Slauson Corridor TNP. Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. There is no 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 2017 FEIR was certified that shows the new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measure **AQ1** would continue to address impacts related to Air Quality and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant.	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans did not designate new industrial areas nor do they incentivize the industrial uses and operations that are associated with odor complaints. The CPAs are not anticipated to be developed with uses that are typically associated with odor complaints. In addition, the approved CPIO District includes the Compatible Industrial Subarea (Slauson Compatible Industrial) that establishes use restrictions allowing only light industrial uses that are compatible with residential uses and prohibiting noxious uses that would emit odors. This Subarea is applied to all parcels with an industrial land use designation that are located adjacent to residentially designated land uses. Therefore, impacts related to operational odors were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would not designate new industrial areas nor incentivize the industrial uses and operations that are associated with odor complaints. The proposed changes under the Modified Project would not require major revisions to the 2017 FEIR due to the involvement of new significant impacts or substantially more severe impacts related to odors beyond what was previously analyzed. Therefore, impacts would remain *less than significant*.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR involving new significant impacts or substantially more severe impacts related to odors beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that involves new significant impacts or substantially more severe impacts related to odors beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.4 BIOLOGICAL RESOURCES

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
BIOLOGICAL RESOURCES: Would the project:					
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Due to the fully urbanized character of the CPAs, and lack of active rare, endangered or threatened habitats within or near the CPAs, it is unlikely that candidate, sensitive, or special status species may be impacted directly or through habitat modification as a result of the Approved Plans. The CPAs are fully urbanized and the dense urban development that has occurred over the years has greatly impacted natural vegetation areas. There are no undeveloped natural open space areas within or near the CPAs.

Habitats and Ecosystems. There are currently no active rare, endangered or threatened habitats listed by the California Department of Fish and Wildlife (CDFW), or United States Fish and Wildlife Service (USFWS) in the CPAs, nor are there adopted Habitat Conservation Plans (HCPs), Significant Ecological Area (SEAs), Natural Community Conservation Plans (NCCPs) or other approved local, regional or state habitat conservation plans applicable to the CPAs. No sensitive ecosystems (plant communities) were listed as being historically identified to occur within or near the CPAs within the impact area.

Special Status Animal and Plant Species. Table 4.4-1 in the EIR shows two special status animal species were historically identified in the South Los Angeles CPA and one special-status plant species was historically identified in the Southeast Los Angeles CPA. While these special-status animal and plant species have been identified in the CPAs in the past, if such species currently exist, they would have to be located within the only open space areas of the CPAs, which mostly consist of utility corridors, parks, and recreation areas.

Protected Trees. The EIR states that there are approximately 232 heritage trees distributed throughout the South Los Angeles CPA parks and recreation center properties and 318 heritage trees distributed throughout the Southeast Los Angeles CPA parks and recreation center properties.¹³ Additionally, some ordinance protected trees may be located on private property and street rights-of-way.

¹³ City of Los Angeles, *NavigateLA*, website, <http://navigateLA.lacity.org/index01.cfm>, accessed on February 18, 2016.

Impacts to Special Status Animal and Plant Species and Protected Trees. No changes are proposed for existing open space and public facilities land uses in the CPAs, and therefore the Approved Plans will not impact the utility corridors, parks, or recreation areas of the CPAs that could provide limited habitat. No changes in land use designations or uses would occur on lands that contain open areas, which would protect any historically identified special-status species, as well as the approximately 232 and 318 heritage trees distributed throughout the CPAs parks and recreation center properties. In the event that the LADPW approves a tree removal, replacement of the tree is required with at least two trees of a protected variety. Thus, there would be no net loss of protected trees in the CPAs.

Conclusion. Impacts related to species identified as a candidate, sensitive, or special status species were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impact after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, none of the properties impacted by the Modified Project contain active rare, endangered or threatened habitats, nor are there adopted conservation plans applicable to the CPAs. The Modified Project will not impact the utility corridors, parks, or recreation areas of the CPAs and would not result in changes to land uses on lands containing open areas. Any protected trees that require removal to implement the Modified Project would be protected by City ordinance and require a permit approved by Los Angeles Department of Public Works (LADPW). Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to habitat or candidate, sensitive, or special status species beyond what was previously analyzed. No substantial new changes to existing regulations governing candidate, sensitive, or special status species have been adopted that are applicable to the CPAs that would result in new or more severe significant environmental impacts.

D. Any New Information Requiring New Analysis or Verification?

Since the certification of the 2017 FEIR, there is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
BIOLOGICAL RESOURCES: Would the project:					
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans would have no impact related to riparian habitats or other sensitive natural communities. There are no SEAs, NCCPs or HCPs located within or near the CPAs. Therefore, the Approved Plans would not impact SEAs, NCCPs or HCPs located beyond the CPAs.

There are no riparian habitats or other sensitive natural communities in or near the CPAs. Besides Compton Creek, which is neither identified as a riparian habitat nor considered a sensitive natural community, there are no other waterways, rivers, streams, or riparian habitats within or near the CPAs.

The Approved Plans include a change to the current land use and zoning of the Augustus F. Hawkins Nature Park, one of the two wetland parks, from Limited Manufacturing and MR1-1 (industrial) to Open Space and OS-1XL to be consistent with the existing park use on the site. The Approved Plans support the goals and policies of the CPAs related to biological resources, found in Table 4.4-3 in the EIR.

Therefore, implementation of the Approved Plans was found not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the CDFW or USFWS, and impacts related to riparian habitat or other sensitive natural communities would be *no impact*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impact after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, none of the properties impacted by the Modified Project are located within or near SEAs, NCCPs, HCPs, riparian habitats, or other sensitive natural communities. Implementation of the Modified Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the CDFW or USFWS. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to riparian habitat or any other sensitive natural communities beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to riparian habitat or other sensitive natural communities beyond what was previously analyzed. No substantial new changes to existing regulations governing riparian habitat or other sensitive natural communities have been adopted that are applicable to the CPAs that would result in new or more severe significant environmental impacts.

D. Any New Information Requiring New Analysis or Verification?

Since the certification of the 2017 FEIR, no new information of substantial importance has become available relative to riparian habitats or other sensitive natural communities, nor have substantial changes occurred to riparian habitats or other sensitive natural communities that would result in new or more severe significant environmental impacts. Therefore, there is no new information of substantial importance, which was not known and could not have been known which the exercise of reasonable diligence at the time the 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impact beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
BIOLOGICAL RESOURCES: Would the project:					
(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	No	No	No	No

As part of the 2018 CEQA Guidelines update, Appendix G Checklist Question IV(c) was modified to remove reference to Section 404 of the Clean Water Act. This modification does not affect the analysis of biological resources provided in the EIR.

A. Impact Determination in the Certified EIR

Analysis

The Augustus F. Hawkins Nature Park and the South Los Angeles Wetlands Park located within the Southeast Los Angeles CPA are wetland parks maintained as recreational facilities and are not federally protected wetlands as defined by Section 404 of the Clean Water Act.

With the exception of Compton Creek, no waterways, rivers, or streams are located within the CPAs. Compton Creek is not considered a federally protected wetland. Therefore, implementation of the Approved Plans was found not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. *No impact* would occur.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impact after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, none of the properties impacted by the Modified Project contain federally protected wetlands as defined by Section 404 of the Clean Water Act. The implementation of the Modified Project would not have a substantial adverse effect on federally protected wetlands. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes in the environment related to biological resources have occurred since certification of the 2017 FEIR. There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new significant impacts or substantially more severe impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to federally protected wetlands beyond. There are no new federally protected wetlands beyond have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
BIOLOGICAL RESOURCES: Would the project:					
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The CPAs do not provide viable linkages or migration corridors between large habitat areas for terrestrial wildlife or native resident or migratory fish, nor do they function as true major wildlife corridors. In addition, there are no native wildlife nursery sites located within the CPAs. Wildlife

movement between the CPAs and other regional open space lands is likely to be very restricted due to existing barriers (e.g., roads) and the lack of physical linkages.

The majority of new development is likely to occur within the Active Change Areas of the Approved Plans; however, development in Non-Change Areas could occur. Future development could occur in Active Change Areas and Non-Change Areas on vacant and undeveloped parcels throughout the CPAs with possible migratory or non-status nesting birds, which are protected by the Migratory Bird Treaty Act (MBTA) and CDFW. The Approved Plans do not introduce any features that would preclude implementation of MBTA and CDFW policies or procedures in any way.

The Approved Plans could result in some development on vacant and undeveloped parcels with non-status nesting birds. Compliance with federal and state regulations related to the protection of non-status nesting birds would reduce impacts to less than significant. Therefore, impacts to and native resident, migratory fish, and wildlife, established native resident or migratory wildlife corridors, or native wildlife nursery sites were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impact after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, the Modified Project would not impact any habitat linkages or migration corridors. Development under the Modified Project would comply with federal and state regulations related to the protection of non-status nesting birds. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes in the environment related to biological resources have occurred since certification of the 2017 Final EIR and no substantial new habitat linkages or migration corridors have been identified in the vicinity. Therefore, there are no changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new significant impacts or substantially more severe impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to habitat linkages or migration corridors beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
BIOLOGICAL RESOURCES: Would the project:					
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans include policies related to the protection of open space which are consistent with the policies set forth in the Open Space and Conservation sections of the City's Framework Element.

The Approved Plans would not conflict with any HCP or SEA as there are none located within or near the CPAs.

There are several locations within the CPAs that are known to have protected tree species. There are approximately 232 and 318 protected and heritage trees distributed throughout the parks and recreation center properties of the South Los Angeles and Southeast Los Angeles CPAs, respectively.¹⁴ The Approved Plans do not introduce any features that would preclude implementation of or alter the City of Los Angeles Tree Preservation Ordinance policies or procedures in any way.

Implementation of the Approved Plans would not conflict with any local policies or ordinances protecting biological resources, including protected trees. Therefore, impacts related to local policies or ordinances protecting biological resources were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impact after Mitigation

Less than Significant.

¹⁴ City of Los Angeles, *NavigateLA*. website, <http://navigate.lacity.org/index01.cfm>, accessed on February 18, 2016.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, the Modified Project would comply with City policies related to the protection of open space. The Modified Project would not conflict with any HCP or SEA, nor introduce any features that would conflict with the City of Los Angeles Tree Preservation Ordinance policies or procedures. Implementation of the Modified Project would not conflict with any local policies or ordinances protecting biological resources, including protected trees. Therefore, the proposed changes under the Modified Project would not require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken which will require major revisions of the 2017 FEIR due to the involvement of new significant impacts or substantially more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

In 2019, Mayor Eric Garcetti created the post of City Forest Officer within the Board of Public Works to implement the urban forestry goals outlined in Sustainable City pLAn, including planting 90,000 trees and increasing tree canopy by at least 50 percent by 2028 in LA's hottest, least shaded communities. The Office of City Forest Management is currently developing a citywide Urban Forest Management Plan. Implementation of the Modified Project would not conflict with the tree-planting goals and policies of the Urban Forest Management Plan or the Sustainable City pLAn. Therefore, there is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
BIOLOGICAL RESOURCES: Would the project:					
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No impact	No	No	No	No

A. Impact Determination in the EIR

Analysis

As discussed above, there are no HCPs, NCCPs, or SEAs within or near the CPAs. There are no NCCPs or other local, regional, or state HCPs in the CPAs or surrounding areas. Therefore, implementation of the Approved Plans was found not to conflict with the provisions of an adopted HCP, SEA, NCCP, or other approved local, regional, or state HCPs as the area is not subject to any such plans. *No impact* would occur.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, none of the properties impacted by the Modified Project are within HCPs, NCCPs, or SEAs. Implementation of the Modified Project would not conflict with the provisions of any adopted conservation plan. Therefore, there are no proposed changes under the Modified Project which would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes in the environment related to biological resources have occurred since certification of the 2017 FEIR. There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new significant impacts or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to habitat conservation plans relevant to the Modified Project. No new habitat conservation plans have been published relevant to Modified Project that would result in new or more severe

significant environmental impacts. Therefore, there is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.5 CULTURAL RESOURCES

As part of the 2018 CEQA Guidelines update a checklist question was moved from the Cultural Resources subsection to the Geology and Soils subsection of Appendix G.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
CULTURAL RESOURCES: Would the project:					
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	Significant and Unavoidable	No	No	No	No

A. Impact Determination in the Certified EIR

As part of the 2018 CEQA Guidelines update, minor wording changes were made to this checklist question these changes do not affect the analysis as presented in the 2017 EIR.

Analysis

The Approved Plans do not include changes that are intended to affect designated historical resources (e.g., HCMs, or properties within an HPOZ) or reasonably be expected to incentivize development of properties with designated historical resources. The Approved Plans do include specific policies and regulations intended to provide further protections for historical resources in the CPAs that have not yet been designated. Specifically, the Approved Plans establish CPIO Districts with Subareas in which demolition of “eligible historic resources” (non-designated historic resources identified in a survey, such as SurveyLA) in those subareas would no longer be ministerial “by-right” approvals, and therefore would be further protected under CEQA. The Approved Plans have a neutral or beneficial impact to designated historical resources and a beneficial impact to non-designated resources.

Designated Historical Resources. The designated resources in the CPAs include 113 HCMs in the South Los Angeles CPA, 27 HCMs in the Southeast Los Angeles CPA, and designated National Register, and/or California Register designation. Presently, the South Los Angeles CPA contains six adopted HPOZs: University Park, Adams-Normandie, Harvard Heights, Western Heights, and portions of West Adams Terrace and Jefferson Park. The Southeast Los Angeles CPA contains one adopted HPOZ, the Tifal Brothers East 52nd Place HPOZ. There is also one proposed HPOZ in the South Los Angeles CPA, Vermont Square, and one proposed HPOZ in the Southeast Los Angeles CPA, the 27th and 28th Streets Historic District.

Generally, it is not expected that designated historical resources would be impacted by the Approved Plans. The Approved Plans do not introduce any features that would preclude implementation of or alter the HPOZ Ordinance and the Cultural Heritage Ordinance policies or procedures in the HPOZ or Cultural Heritage Ordinance in any way. With that said, over the 20 plus year horizon of the Approved Plans, it is not impossible that one or more designated resources may be lost by redevelopment in the two CPAs. Additional losses could result during the life of the plan from factors such as “demolition by neglect,” illegal activities, fire or other remedy of unsafe conditions could occur during the life of the Approved Plans. Therefore,

although it is very unlikely, it is not impossible that future development under the Approved Plans could result in a potentially significant impact to a designated historical resource.

SurveyLA Identified Resources, South Los Angeles. In the South Los Angeles CPA, SurveyLA identifies nine historic districts. All of the historic districts identified by SurveyLA are located within the Proposed CPIO Character Residential Subarea, which would add an additional layer of design regulations in order to protect the historic character of those neighborhoods. The Character Residential CPIO Subarea requires that projects involving district contributors be evaluated by the Office of Historic Resources using the Secretary of the Interior's Standards for Rehabilitation. If a project does not comply with the Secretary's Standards, additional analysis and environmental review is required to determine if the project will result in a significant impact to a historical resource.

SurveyLA Identified Resources, Southeast Los Angeles. Aside from the existing, established 52nd Place Tifal Brothers Tract Historic Preservation Overlay Zone (HPOZ) in the Southeast Los Angeles CPA, SurveyLA identifies one eligible historic district (Goodyear Gardens). However, it is not located within the Approved Plan's Active Change Areas and the zoning and land use designation in the Approved Plans are consistent with the current development and uses in Goodyear Gardens. The Southeast Los Angeles CPIO includes mandatory regulations that protect identified, non-designated resources that are located within a CPIO Subarea.

However, potential historical resources identified through SurveyLA located outside the boundaries of the CPIO District Subareas are not protected under the CPIO's development regulations.

Based on the above, properties in SurveyLA that are not in a CPIO Subarea, while not many, could be impacted through subsequent development under the Approved Plans and even those in the CPIO Subareas could be impacted if the property owner conducts additional environmental analysis. Therefore, development under the Approved Plans could result in impacts to undesigned historical resources.

Conclusion. Based on the above, the Approved Plans' impacts related to historic resources were found to be *significant and unavoidable*.

Mitigation Measures

No feasible mitigation measures were identified.

Level of Significance of Impact after Mitigation

Significant and Unavoidable.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, the Modified Project is not expected to impact designated historical resources. However, is anticipated that over the course of project implementation, one or more designated resources may be lost by redevelopment, resulting in a potentially significant impact to a designated historical resource. The Modified Project in the South and Southeast Los Angeles CPAs would increase the allowable intensity and density of commercial, residential, and industrial development within the CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not lead to development of sites with historic resources. Development under the Modified Project would not preclude implementation of or alter the HPOZ Ordinance and the Cultural Heritage

Ordinance policies or procedures. As a conservative analysis, impacts to historic resources would continue to be *significant and unavoidable* under the Modified Project. Therefore, there are no proposed changes under the Modified Project involving new significant impact or substantially more severe impacts than what was disclosed in the 2017 FEIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

SurveyLA has not been updated for the South Los Angeles and Southeast Los Angeles CPAs since the certification of the 2017 FEIR, and no new historical resources have been identified or designated within the CPAs. Impacts related to historic resources would remain significant and unavoidable under the Modified Project. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No feasible mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
CULTURAL RESOURCES: Would the project:					
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	Less than Significant with Mitigation	No	No	No	CR1

A. Impact Determination in the Certified EIR

Analysis

The uppermost sediments within the CPAs are not likely to contain known archaeological resources. However, given the well-documented occupation of the Los Angeles Basin by indigenous tribes both prehistorically and historically, there is a reasonable potential that future

development that could occur under the Approved Plans could be located on a site with previously unknown archaeological resources. Under the Approved Plans, future development that would include ground-disturbing activities that would go beyond man-made fills is expected to occur primarily in the Active Change Areas (in CPIO Subareas), and to a lesser extent along industrial and commercial corridors within the Non-Change Areas, which are located within a CPIO Subarea. Although it is a misdemeanor for anyone to destroy or remove anything of archaeological interest, it could potentially occur through negligence during grading and excavation absent monitoring and enforcement. Therefore, without mitigation, impacts related to archeological resources were found to be *potentially significant*.

Mitigation Measures

Construction

CR1 Any approval of a project within a CPIO Subarea (excluding Residential Subareas M, N, and O) that involves construction-related soil disturbance shall require that if during construction activities any cultural materials are encountered, construction activities within a 50-meter radius shall be halted immediately and the project applicant shall notify the City. A qualified archeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to conduct a more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the project site. If the find were determined to be significant by the archeologist, the City and the archeologist would meet to determine the appropriate course of action. All cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.

Level of Significance of Impact after Mitigation

Implementation of Mitigation Measure **CR1** would reduce impacts related to archeological resources to *less than significant*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would increase the allowable intensity, density, and/or types of development within the South Los Angeles and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not lead to the development of additional sites and impacts to resources. Construction under the Modified Project would involve ground-disturbing activities of similar intensity to those analyzed under the 2017 FEIR. The Modified Project has a similar potential to encounter unknown archaeological resources. With the implementation of Mitigation Measure **CR1**, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or

more severe significant impacts related to archaeological resources beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to archaeological resources beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measure **CR1** would address impacts related to Cultural Resources and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
CULTURAL RESOURCES: Would the project:					
(c) Disturb any human remains, including those interred outside of dedicated cemeteries?	Less than Significant	No	No	No	No

A. Impact Determination in the EIR

Analysis

The South Los Angeles CPA contains one formal cemetery, the Angelus-Rosedale Cemetery, and no historic or prehistoric human remains are known to occur within the CPA outside of the one formal cemetery. There are no known formal cemeteries within the Southeast Los Angeles CPA, and no historic or prehistoric human remains are known to occur within the CPA. Furthermore, there is no history of any missions and their accompanying cemeteries in either of the CPAs. Nonetheless, while the potential to disturb human remains interred outside of formal cemeteries within the CPAs is considered low, given the level of past human activity, it is possible that unknown human remains could be located on sites that would be allowed to develop under the Approved Plans.

Compliance with applicable regulations would protect unknown and previously unidentified human remains. Therefore, impacts related to human remains were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impact after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, the potential for development under the Modified Project to disturb human remains interred outside of formal cemeteries is low. Construction under the Modified Project would involve ground-disturbing activities of similar intensity to those under the 2017 FEIR, and therefore has a similar potential to encounter unknown human remains. As with the Original Project, compliance with existing laws is anticipated. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to human remains beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts to human remains beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to human remains beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.6 ENERGY

As part of the 2018 CEQA Guidelines update, a new Energy section was created as a separate subsection which incorporated language from Appendix F of the CEQA Guidelines. The new CEQA Guidelines Section 15126.2(b) identifies “wasteful, inefficient, or unnecessary” energy consumption as a significant environmental impact. The EIR addressed Energy in different sections. See discussion below. The analysis presented in the EIR remains relevant to the modified checklist and is summarized as appropriate for each question below.

Issues	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
ENERGY: Would the project:					
(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than Significant	No	No	No	No
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than Significant	No	No	No	No

A. Impact Determination in the EIR

Analysis

Potential impacts related to energy as well as federal, state and local laws, regulations, plans, and guidelines related to Energy applicable to the Approved Plans are discussed in Section 4.16, Utilities and Services Systems, of the EIR. Section 3.7, Greenhouse Gas Emissions, of the EIR also includes a discussion of impacts related to energy. The analysis provided in the Section 3.16, Utilities and Services Systems, of the EIR, addresses whether the implementation of the Approved Plans would result in the wasteful or inefficient use of energy. The impact analysis concludes the Approved Plans would result in a less-than-significant impact related to energy. In addition, the analysis in Section 4.7, Greenhouse Gas Emissions, concludes that the Approved Plans would not conflict with a state or local plan for renewable energy or energy efficiency, and impacts related to energy were determined to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Table 3-8 in Section 3.19, Utilities and Service Systems of this Addendum identify the minor anticipated changes in the consumption of energy resources under the Modified Project in the South and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not

change development patterns, nor would it displace development or induce growth and therefore would not result in additional demand for energy. All additional incremental development under the Modified Project would be required to comply with the same federal, state, and local energy regulations that were discussed in Section 3.16, Utilities and Services Systems and Section 3.7, Greenhouse Gas Emissions the 2017 FEIR. Similar to the 2017 FEIR, the Modified Project would comply with applicable energy conservation plans and policies of the City and would not result in a wasteful or inefficient use of electricity or natural gas. Construction under the Modified Project would be required to comply with the Los Angeles Green Building Code and the California Green Building Code to avoid the wasteful consumption of resources. Incremental development under the Modified Project would comply with the land use goals and strategies of the SCAG RTP/SCS and the objectives of the Green LA Action Plan to further reduce operational energy consumption. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to energy impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Therefore, there are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to energy impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

The City's 2019 Sustainable City pLAN includes several targets for the purposes of reducing energy consumption levels and promoting energy conservation. Strategies of the pLAN include the reduction of non-renewable energy consumption, the increase in the production of renewable energy, the reduction of vehicle miles travelled per capita, and reducing building energy use. Changes proposed under the Modified Project would increase the intensity and density of residential, commercial, and industrial land uses. Development under the Modified Project would comply with the California and Los Angeles Green Building Codes and conform with the land use strategies included in the SCAG 2020-2045 RTP/SCS to ensure that the City is able to meet its energy efficiency targets. Therefore, there is no 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 2017 FEIR was certified that shows the new significant impacts or substantially more severe impacts related to energy impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.7 GEOLOGY AND SOILS

As part of the 2018 CEQA Guidelines update, questions were modified to focus on both the direct and indirect impacts associated with geology and soils and to move a checklist question from the Cultural Resources subsection to the Geology and Soils subsection of Appendix G. The analysis presented in the EIR remains relevant to the modified checklist questions and is summarized as appropriate for each question below.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	No Impact	No	No	No	No

A. Impact Determination in the Certified EIR

A review of the fault systems of Southern California revealed that no active or potentially active faults traverse the CPAs. Each of the identified active and potential active faults in the vicinity of the CPAs generally trend northwest to southeast outside of the CPAs. The CPAs are not located within an Alquist-Priolo Special Study Zone and Fault Rupture Study Area.¹⁵ The Approved Plans would not facilitate development on known faults or expose people to substantial risk of injury as a result of fault rupture. Therefore, it was determined that there would be *no impact* related to the rupture of a known earthquake fault.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project is not located within the vicinity of an Alquist-Priolo Earthquake Fault Zone or Fault Rupture Study Area. As with the 2017 FEIR, the Modified Project would not facilitate development on known faults or expose people to substantial risk of injury as a result of fault

¹⁵ City of Los Angeles, *GeoHub*, website, http://geohub.lacity.org/datasets/7f6e322db1d24909a90a4ddc2bba8d28_0, accessed on February 18, 2016.

rupture. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no proposed changes under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

No substantial changes in the environment related to Alquist-Priolo Special Study Zones and Fault Rupture Study Areas have occurred since certification of the 2017 FEIR, and no new Alquist-Priolo Special Study Zones and Fault Rupture Study Areas have been identified within the vicinity of the CPAs that would result in new or more severe significant environmental impacts. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
ii. Strong seismic ground shaking?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The type of development expected to occur under the Approved Plans is typical of urban environments and would not involve mining operations, deep excavation into the Earth, or boring of large areas creating unstable seismic conditions or stresses in the Earth's crust. Furthermore,

there are no active or potentially active faults that traverse the CPAs. Based on the above, future development under the Approved Plans would not exacerbate seismic conditions in the CPAs, therefore impacts related to strong seismic ground shaking were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, the Modified Project would not involve any activities which would create unstable seismic conditions or stresses in the Earth's crust, nor exacerbate seismic conditions in the CPAs. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts related to seismic ground shaking beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a or Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
iii. Seismic-related ground failure, including liquefaction?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Liquefaction-prone areas cover a large, central portion of the CPAs. The Approved Plans would not directly increase liquefaction hazards because they would not affect seismic conditions or alter underlying soil or groundwater characteristics that govern liquefaction potential. However, the Approved Plans would otherwise provide for development, which would increase the number of occupied structures in the CPAs that could, in turn, increase the number of people or structures that could be exposed to liquefaction and geologic hazards.

Under the provisions of California state law and the City's Building Code, all new construction in liquefaction-prone areas would be required to prepare a geotechnical report. Compliance with the recommendations of the geotechnical report, as well as the City's Building Code and Grading Code, would reduce the liquefaction-related hazards. This impact was found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in Chapter 2, Project Description of this Addendum, the Modified Project would increase the allowable intensity, density, and/or types of land uses in the within the South and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. Consistent with the City's regulatory compliance measures, all development under the Modified Project would be required to prepare a geotechnical report and comply with the City's Building Code and Grading Code. Impacts of the Modified Project would therefore be similar to those analyzed in the 2017 FEIR and remain less than significant.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to liquefaction and geologic hazards beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
iv. Landslides?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

It is the City's standard practice to require the preparation, review, and approval of geotechnical reports for new developments in landslide susceptible areas. However, the CPAs are relatively flat and do not contain any major hills or landforms. Additionally, there are no areas within the CPAs identified as landslide zone areas on the Seismic Hazards Zone Maps of the California Department of Conservation, Division of Mines and Geology. This impact was found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, development under the Modified Project would comply with the City's requirements related to geotechnical reports and the Building Code and Grading Code. The Modified Project would not increase the potential for landslides in the CPAs, nor exacerbate any existing hillside or landform conditions. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to landslides beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to landslides beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(b) Result in substantial soil erosion or the loss of topsoil?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Grading for most structures that would be a reasonably foreseeable effect of the project is expected to be minimal, consisting of grading for foundations, building pads, and utility trenches in areas that are already developed. Deeper excavations could accompany the emplacement of underground facilities.

All earthwork and grading activities require grading permits from the Department of Building and Safety that include requirements and standards designed to limit potential impacts to acceptable levels. All on-site grading and site preparation must comply with applicable provisions of the LAMC. The City requires the preparation of a site-specific geotechnical report to evaluate soils issues.

The National Pollutant Discharge Elimination System (NPDES) permit requires implementation of nonpoint source control of stormwater runoff through the application of a number of best management practices (BMPs). A Stormwater Pollution Prevention Plan (SWPPP) is required to describe the stormwater BMPs (structural and operational measures) that would control the quality and quantity of stormwater runoff. All new development permitted under the Approved Plans would be required to comply with the state NPDES permit process, the City's standard grading and building permit requirements, and the application of BMPs. Therefore, impacts related to soil erosion or loss of topsoil were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would increase the allowable intensity, density, and/or types of land uses within the South and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. Grading and ground-disturbing activities under the Modified Project would be similar to the Approved Plans and result in similar impacts related to soil erosion or loss of topsoil. All development under the Modified Project would be required to comply with the policies of the Department of Building and Safety, the applicable

provisions of the LAMC, and prepare a site-specific geotechnical report. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to soil erosion or loss of topsoil beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The Modified Project would not result in new or increased significant impacts beyond those already identified in the 2017 FEIR. Therefore, there are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to soil erosion or loss of topsoil beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to soil erosion or loss of topsoil beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Landslide. The potential for landslides in the CPAs is minimal due to the area's relatively flat topography and absence of major hills or landforms. Additionally, there are no areas within or near the CPAs identified as landslide zone areas on the Seismic Hazards Zone Maps of the

California Department of Conservation, Division of Mines and Geology. This impact is *less than significant*.

Lateral Spreading. Projects located in liquefaction zones are required incorporate seismic design features into grading and construction plans. Furthermore, compliance with the recommendations of the geotechnical report, as well as the City's Building Code and Grading Code, would reduce lateral spreading and other liquefaction-related hazards and thus would minimize the potential risk of loss, injury, or death due to lateral spreading to *less than significant*.

Subsidence or Collapse. There are currently no subsurface oil extraction facilities in the Southeast Los Angeles CPA. In the South Los Angeles CPA, there are currently three operational oil drilling facilities. Subsurface drilling has been taking place in the CPA for over five decades with no incidence of subsidence or collapse. Additionally, no mining activities or extraction of mineral resources occur within or near the CPAs. Therefore, impacts related to subsidence or collapse are *less than significant*.

Liquefaction. Under the provisions of California state law and the City's Building Code, all new construction in liquefaction-prone areas would be required to prepare a geotechnical report. Compliance with the recommendations of the geotechnical report, as well as the City's Building Code and Grading Code, would reduce the liquefaction-related hazards. This impact is *less than significant*.

Conclusion. As stated above, all on-site grading and site preparation must comply with the applicable provisions of the LAMC, which addresses grading, excavations, and fills, and the recommendations of the Geotechnical Report. Compliance with the City's Codes that implement the CBC, in combination with the City's standard grading and building permit requirements and the application of BMPs, would help to minimize impacts from unstable soils. Therefore, impacts related to unstable soils were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would increase the allowable intensity, density, and/or types of land uses within the South and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not lead to development of additional sites. Grading and ground-disturbing activities under the Modified Project would be similar to the Approved Project and would comply with all applicable City requirements and BMPs to minimize impacts from unstable soils. As previously discussed, there are no areas within or near the CPAs identified as landslide zone areas. Compliance with applicable Building Code and Grading Code requirements would minimize the potential for impacts related to lateral spreading and liquefaction. The Modified Project would not include any mining or mineral resource extraction activities. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to lateral spreading and liquefaction beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to lateral spreading and liquefaction beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to lateral spreading and liquefaction beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Expansive soils may be present within the CPAs. These locations are unknown; however, the existence of expansive soils would be uncovered in the geotechnical report required by state and City Building Codes.

Development is required to undergo analysis of geological and soil conditions applicable to the specific individual project, and restrictions on development would be applied in the event that geological or soil conditions pose a risk to safety as a result of site-specific geologic or soils instability, subsidence, collapse, and/or expansive soil.

Future development under the Approved Plans could be constructed in areas of expansive soils. The City requires, as a standard practice, the preparation, review, and approval of geotechnical reports for new developments. Compliance with the recommendations of the geotechnical report, as well as the City's Building and Grading Codes and the LAMC, are reasonably expected to be sufficient to reduce impacts from expansive soil-related hazards. Because development facilitated by the Approved Plans would be required to implement such appropriate design and construction measures, impacts related to expansive soils were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, development under the Modified Project would be required to comply with requirements related to the development of a geotechnical report and analysis of geological and soil conditions prior to construction. Development in areas of expansive soils would comply with the City's Building and Grading Codes and the LAMC to minimize impacts related to expansive soils. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to expansive soils beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to expansive soils beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to expansive soils beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

All portions of the CPAs are currently being served by a public sewerage system. The Approved Plans do not propose any development in areas not served by sewer service. New development in the CPAs would not utilize septic tanks. Therefore, there would be *no impact* related to construction on soils incapable of adequately supporting septic tanks.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Development under the Modified Project would be serviced by existing sewer lines in the CPAs and would not utilize septic tanks. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to septic systems or alternative wastewater disposal systems beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to septic systems or alternative wastewater disposal systems beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts impacts related to septic systems or alternative wastewater disposal systems beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than Significant with Mitigation	No	No	No	CR2

A. Impact Determination in the Certified EIR

Analysis

Unique Geological Feature. There are no known unique geological features in the CPAs. Therefore, *no impact* would occur.

Unique Paleontological Resources and Sites. The CPAs are highly urbanized the uppermost sediments of the CPAs are not likely to contain fossils. However, given the well-documented fossil richness of the Los Angeles Basin as discussed above, including those areas contained in the CPAs, there is a reasonable likelihood that future development allowed under the Approved Plans has the potential to impact previously undetected paleontological resources or sites during construction-related earth moving activities that would go beyond man-made fills.

Under the Approved Plans, future development that would include excavation or construction-related earth moving activities that would go beyond man-made fills is expected to occur primarily in the Active Change Areas (in the CPIO), and to a lesser extent along industrial and commercial corridors within the Non-Change Areas, which are located within a CPIO Subarea. Although it is a misdemeanor for anyone to destroy or remove anything of paleontological interest, it could potentially occur through negligence during grading and excavation absent monitoring and enforcement. Therefore, without mitigation, impacts related to paleontological resources were found to be *potentially significant*.

Mitigation Measures

Construction

CR2 Any approval of a project within a CPIO Subarea (excluding Residential Subareas M, N, and O) that involves construction-related soil disturbance shall require that during excavation and grading, if paleontological resources are uncovered, all work in that area shall be halted immediately and the project applicant shall notify the City. The project applicant shall retain a paleontologist to assess the nature, extent, and significance of any cultural materials that are encountered and to recommend appropriate methods to preserve any such resources. Said paleontologist will have the authority to put a hold on grading operations and mark, collect and evaluate any paleontological resources found on the site where it is discovered during construction. Said paleontologist shall be provided a reasonable amount of time to prepare and implement protection measures coordinating with the Department of Building and Safety. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.

Level of Significance of Impact after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would increase the allowable intensity, density, and/or types of land uses within the South and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not lead to development of additional sites. Grading and ground-disturbing activities under the Modified Project would be similar to the 2017 FEIR and result in similar impacts to paleontological resources and unique geological features. Similar to the Original Project, development under the Modified Project would also be required to implement Mitigation Measure **CR2** to reduce impacts to paleontological resources and unique geological features to less than significant levels. Therefore, the Modified Project does not propose changes which involve new significant impacts or substantially more severe impacts than what was analyzed in the 2017 FEIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to paleontological resources and unique geological features beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts related to paleontological resources and unique geological features beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measure **CR2** would continue to address impacts related to paleontological resources and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.8 GREENHOUSE GAS EMISSIONS

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GREENHOUSE GAS EMISSIONS: Would the project:					
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Implementation of the Approved Plans would generate GHG emissions through the construction and operation of future development projects. GHG emissions would specifically arise from construction and from sources associated with operation, including direct sources such as motor vehicles, natural gas consumption, solid waste handling/treatment, and indirect sources such as electricity generation. Table 4.7-2 in the EIR shows that, compared to existing conditions, with the Approved Plans, the South Los Angeles CPA would generate approximately 99,000 fewer metric tons of CO₂e Emissions per year. Although future conditions reflect increased development and associated energy use, future transportation emissions would be less than existing emissions due to lower vehicle exhaust emissions resulting from increased engine efficiency and cleaner burning fuels. Table 4.7-3 in the EIR shows that the Southeast Los Angeles CPA would generate approximately 21,500 fewer metric tons of CO₂e Emissions per year compared to existing conditions. Although future conditions reflect increased development and associated energy use, future transportation emissions would be less than existing emissions due to lower vehicle exhaust emissions resulting from increased engine efficiency and cleaner burning fuels. The South Los Angeles CPA and the Southeast Los Angeles CPA therefore demonstrates compliance with regional, state, and federal efforts to decrease climate impacts of development and transportation.

The Approved Plans are a planned response to forecast growth, so if growth does not occur in the CPAs, it would occur elsewhere in the City or region. The Approved Plans combine sustainable strategies to respond to state, regional and local policies aimed at reducing GHG emissions. If development were to occur elsewhere in a less sustainable fashion (Business as Usual or BAU), regional emissions would be greater. However, for land use plans such as the Approved Plans, full quantification of BAU is not possible because at this scale it is not possible to anticipate where growth would go and how different it would be as compared to the project in terms of proximity to transit, mix of uses and density. Therefore, a comparison of Approved Plans emissions in the future to emissions under BAU is not possible.

The Approved Plans would not increase emissions in the immediate plan areas compared to existing conditions, and therefore, considered in isolation, would contribute to reducing emissions in California below existing emissions and would contribute to the AB 32 goal of reducing future emissions to 1990 levels.

The Approved Plans are part of a regional strategy (identified in the 2016-2040 RTP/SCS and continued in the 2020 RTP/SCS) to direct projected growth to urban areas in order to achieve the following:

- Undertake modern, efficient construction techniques that result in using less energy and less water as compared to less dense development;
- Create a mix of uses that encourages pedestrian and bicycle activity, reducing vehicle trips; and
- Develop areas in close proximity to transit in order to reduce vehicular trips.

The Approved Plans would also be consistent with the City's Sustainable City pLAN by accommodating growth while providing transportation options. This strategy would result in lower per capita emissions than less dense growth and would contribute to the City reaching the 2025 Sustainable City pLAN reduction target of 45 percent. Therefore, impacts were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would result in minor changes in energy consumption (see Section 3.6, Energy and Section 3.19, Utilities and Service Systems) and VMT (see Section 3.17, Transportation) and therefore GHG emissions in the South and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not lead to generation of additional GHG emissions. The Modified Project would not result in new significant impacts related to GHG emissions (see **Table 3-2**). See also the discussion of GHG plans and policies below in response to the next checklist question. With that said, while the City quantifies GHG emissions, the City does not use a numeric threshold for GHG impacts.

Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

See discussion of the next checklist question. There are no substantial changes to the circumstances under which the Modified Project is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts to greenhouse gas emissions beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

See discussion of the next checklist question. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

TABLE 3-2: COMPARISON OF GHG EMISSIONS – MODIFIED PROJECT VS. APPROVED PLANS (MT/YEAR)

	South Los Angeles Community Plan Area					Southeast Los Angeles Community Plan Area					South and Southeast Plan Areas
Demographic	Future vs EIR Existing ¹		Future % Change from Existing ¹		% Point Change Modified Project vs Approved Plans	Future vs EIR Existing ¹		Future % Change from Existing ¹		% Point Change Modified Project vs Approved Plans	% Point Change Modified Project vs Approved Plans
	Approved Plans	Modified Project	Approved Plans	Modified Project		Approved Plans ¹	Modified Project	Approved Plans ¹	Modified Project		
Electricity Consumption	-201,296	-192,194	-41.6%	-39.9%	1.7	-242,500	-231,746	-39.1%	-37.3%	1.7	1.7
Natural Gas	95,928	102,567	31.1%	33.2%	2.2	62,703	71,773	19.5%	22.3%	2.8	2.5
Water Process	-60,116	-59,129	-57.7%	-56.8%	0.9	-120,940	-119,650	-69.8%	-69.1%	0.7	0.8
Waste Disposal	3,756	4,596	9.5%	11.6%	2.1	8,209	9,021	18.7%	20.6%	1.9	2
Area Sources	-9,224	-9,173	-80.7%	-80.2%	0.4	-7,629	-7,560	-75.6%	-74.9%	0.7	0.6
Mobile	-241,227	-230,020	-26%	-24.8%	1.2	-343,920	-320,157	-32.9%	-30.6%	2.3	1.8
TOTAL	-412,179	-384,074	-22%	-20.5%	1.5	-644,077	-598,318	-29.1%	-27%	2.1	1.8
1. GHG emissions under Existing and Approved Plans conditions have been recalculated using updated emission factors and mobile source modeling emissions calculations include an updated factor to account for conversion of peak period VMT to daily VMT; it is noted that comparison of Old Model VMT outputs and associated emissions to New Model VMT and associated emissions is not an apples to apples comparison because of differences in the two models, but for purposes of estimated emissions these calculations present a best estimate for this Addendum. SOURCE: 2017 EIR and TAHA 2022											

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GREENHOUSE GAS EMISSIONS: Would the project:					
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans would be entirely consistent with the 2016-2040 RTP/SCS, AB 32 and SB 375 goals. The Approved Plans include concentrated, mixed-use development adjacent to transit corridors in order to conserve resources, protect existing residential neighborhoods, and improve air quality by reducing the use of cars. The Approved Plans are expected to contribute to reductions in per capita GHG emissions when viewed at the regional level. The objectives and project features of the Approved Plans that are relevant to the GHG analysis are shown in Table 4.7-4 in the EIR.

The Citywide Ordinance on Transportation Demand Management (TDM) and Trip Reduction Measures (Ordinance No. 168,700) would continue to be implemented within the CPAs. This Ordinance calls for several measures to be taken by non-residential developments in an effort to reduce single-occupancy vehicle trips. In addition, the Approved Plans include Transportation Improvement and Mitigation Programs (TIMPs). According to the TIMPs prepared for the CPAs, the Approved Plans would improve traffic conditions within the CPAs compared to existing conditions with a slightly lower weighted average V/C ratio and fewer links at Level of Service (LOS) E or F.

The City of Los Angeles enacted its GreenLA CAP in 2007 to outline strategies for reducing the City's emissions of GHG and consequent effects on climate change. With regards to planning, elements of the CAP designed to aid in regional GHG reductions include promotion of high-density housing close to major transportation arteries, implementation of TOD, and expanding availability of City land for housing, mixed-use development, parks, and open space. The

Approved Plans would add substantial multi-family housing to the CPAs, incorporate TOD, and create more open space. Furthermore, implementation of the Approved Plans would encourage pedestrian-friendly, mixed-use neighborhoods that would require less use of passenger vehicles. The combination of these strategies is consistent with the goals of GreenLA.

In addition, individual projects constructed within the CPAs would be required to comply with the Los Angeles Green Building Code, which includes energy and water saving measures that reduce GHG emissions below 2013 Title 24 requirements

The Approved Plans would concentrate development around transit, comprise a wide mix of uses, and better accommodate pedestrians and bicyclists. These characteristics are anticipated to reduce per capita VMT and associated GHG emissions from cars and light trucks. The Approved Plans would be consistent with AB 32, SB 375, and the 2016-2040 RTP/SCS, regional and local strategies to reduce GHG, and can be expected to contribute to reductions in per capita GHG emissions when viewed at the regional level. Therefore, impacts related to GHG emissions under the Approved Plans were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would result in minor changes in energy consumption and therefore GHG emissions in the South and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not lead to generation of additional GHG emissions. The Modified Project would not result in new significant impacts related to GHG emissions. Similar to the Approved Plans, the Modified Project would be consistent with the SCAG RTP/SCS and SB 375 goals. The growth pattern encouraged by the Modified Project is consistent with AB 32 goals, the 2017 Scoping Plan, and the SCS. The Modified Project includes zone changes and General Plan Amendments with the goals of planning for building designs next to the Active Transportation Corridor bicycle/pedestrian path, planning for green jobs, and planning around transit. Air quality would improve substantially compared to the EIR existing conditions primarily as a result of emission controls, but also as a result of reducing the use of cars and contributing to reductions in per capita GHG emissions at the regional level. The Modified Project would continue to implement the Citywide Ordinance on TDM and Trip Reduction Measures (Ordinance No. 168,700) along with the TIMPs that are designed to improve traffic conditions. The Modified Project would encourage pedestrian-friendly, mixed-use neighborhoods that would require less use of passenger vehicles. The combination of these strategies is consistent with the goals of the City's GreenLA CAP. In addition, the Modified Project would still be required to comply with the Los Angeles Green Building Code, which includes energy and water saving measures that reduce GHG emissions below Title 24 requirements.

Similar to the Approved Plans, the Modified Project would concentrate development around transit, comprise a wide mix of uses, and better accommodate pedestrians and bicyclists. These characteristics are anticipated to reduce per capita GHG emissions associated with cars and light trucks. The Modified Project, similar to the Approved Plans, would be consistent with State,

regional and local strategies to reduce GHG, and can be expected to contribute to reductions in per capita GHG emissions when viewed at the regional level. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to GHG emissions beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Similar to the Approved Plans, the Modified Project is intended to concentrate development around transit, comprise a wide mix of uses, and better accommodate pedestrians and bicyclists. According to the VMT analysis prepared for the Modified Project, the VMT per service population would be similar to that of the Approved Plans. Similar to the Approved Plans, the total VMT per service population for the Modified Project would remain slightly greater than (i.e., better than) the City's threshold of significance which is 15 percent below the City average. This is consistent with the circumstances assessed for the Approved Plans for consistency with GHG reduction plans. Refer to the Transportation section of this Addendum for additional information related to comparing VMT metrics between the Modified Project and Approved Plans. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to GHG emissions beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts related to GHG emissions beyond what was previously analyzed. However, for informational purposes, as described above, the VMT analysis was also updated to reflect the Modified Project. There have been updates to applicable GHG reduction plans, policies, and regulations since the November 2017 adoption of the South Los Angeles and Southeast Los Angeles Community Plans and certification of the related 2017 FEIR (SCH Nos. 2008101097 and 2008101098). Key updates are listed below with a focus on State and City plans, policies, and regulations intended to further reduce impacts to less than significant.

- **California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24 Standards):** Located in Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," these energy efficiency standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The Approved Plans considered the 2013 Title 24 standards. The current Title 24 standards were implemented in 2019. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. Similar to the Approved Plans, land use development associated with the Modified Project are required to comply with Title 24 standards.
- **SB 375:** The Sustainable Communities and Climate Protection Act of 2008, or SB 375 (Chapter 728, Statutes of 2008) establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. In March 2018, the CARB updated the SB 375 targets for the SCAG region to require an eight percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions. As discussed further below, SCAG has adopted an updated RTP/SCS subsequent to the update of the

emission targets. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State’s GHG emission reduction goals. Similar to the Approved Plans, the Modified Project is consistent with the SB 375 targets.

- **SCAG RTP/SCS:** The most recent RTP/SCS -- the 2020-2045 RTP/SCS -- was adopted by SCAG in October 2020. Similar to prior RTP/SCS documents, the 2020-2045 RTP/SCS includes goals and policies to reduce air pollution by adding density in proximity to transit stations, mixed-use development and encouraging active transportation (i.e., non-motorized transportation such as bicycling). This is entirely consistent with the Modified Project plans to concentrate development around transit, comprise a wide mix of uses, and better accommodate pedestrians and bicyclists.
- **SB 32:** In 2006, the California State Legislature adopted AB 32 (codified in the California Health and Safety Code (HSC), Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. In 2016, the California State Legislature adopted SB 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amend HSC Division 25.5, establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of state climate policies reach disadvantaged communities. The new goals outlined in SB 32 update the scoping plan requirement of AB 32 and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Under HSC Division 25.5, the 2030 BAU forecast (“Reference Scenario” which includes 2020 GHG reduction policies and programs) is 389 MMTCO_{2e}, the 2030 emissions target is 260 million metric tons of CO_{2e}, and the Reduction below BAU Necessary to Achieve 40 percent below 1990 levels by 2030 is 129 million metric tons of CO_{2e} (33.2 percent). As previously discussed, the Modified Project is consistent with the 2020-2045 RTP/SCS and is therefore consistent with regional GHG reduction goals.
- **2017 Climate Change Scoping Plan:** In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan in December 2017. The 2017 Update builds upon the framework established by the 2008 Climate Change Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Scoping Plan discusses the role of local governments in meeting the State’s GHG reduction goals because local governments have jurisdiction and land use authority related to: community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures. For individual projects under CEQA, the 2017 Scoping Plan states that local governments can support climate action when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the Scoping Plan, the State’s long-term goals, and climate change science. The City of Los Angeles has not developed per capita targets for 2030 or 2050; however, the City recognizes that GHG emissions reductions are necessary in the public and private sectors. The City has taken the initiative in combating climate change by developing programs such as the Green New Deal and Green Building Code. Similar to the Approved Plans, the Modified Project would also be consistent with GHG reduction goals by accommodating growth while providing transportation options. This strategy would result in

lower per capita emissions than less dense growth and would contribute to the City reaching GHG reduction targets.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Plans would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.9 HAZARDS AND HAZARDOUS MATERIALS

The 2018 CEQA Guidelines update modified this section to delete a checklist question regarding safety hazards associated with proximity to a private airstrip and to clarify that checklist questions include both direct and indirect impacts associated with wildland fires. The analysis presented in the EIR remains relevant to the modified checklist questions and is summarized as appropriate for each question below.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans do not rezone any parcels in the CPAs to industrial, or otherwise incentivize large-scale industrial redevelopment, which would include uses that are typically associated with the transport, use, or disposal of hazardous materials. The Approved Plans reduce the amount of industrially designated land by approximately 46 percent (127 acres) in the South Los Angeles CPA and 27.5 percent (398 acres) in the Southeast Los Angeles CPA, and the areas that will remain industrially designated are already fully built out. Therefore, the Approved Plans reduce the likelihood that new industrial uses (that would routinely transport, use, or dispose of hazardous materials over current conditions in the CPAs) would be introduced in these areas. The Approved Plans also include a CPIO District for each CPA that implements certain goals and policies of the Community Plan policy document by providing regulations tailored to the specific needs of each area, including the industrial areas. The CPIOs establish development standards and restrictions on land use that address conflicts that can arise due to factors such as the use of potential environmental hazards, or the physical orientation of a building.

The Approved South Los Angeles Community Plan included six Active Change subareas that changed industrial zoning to Hybrid Industrial Land Use with a Commercial Manufacturing (CM) zone. The Approved Southeast Los Angeles Community Plan included 32 Active Change Subareas that changed industrially zoned land to Hybrid Industrial with a CM zone, with a few that were changed to Limited Industrial. Businesses redeveloping a site located in the Hybrid Industrial and Limited Industrial Subareas must comply with the development and design standards in the CPIO. Also, businesses locating in these subareas would potentially be quieter, cleaner and more compatible with surrounding residential. Furthermore, the CPIO prohibits new noxious uses in these Subareas.

While the routine transport, use, or disposal of hazardous materials currently occurs within the CPAs, it is subject to the federal, state, and local regulations as discussed below. The Approved Plans do not contain any specific regulations that would affect hazards or the handling of

hazardous materials except through the limitation of future uses identified as contributing to the presence of hazardous materials in the CPAs. Adherence to existing mandatory hazardous materials regulations related to the handling, use, and storage of hazardous materials would reduce the likelihood and severity of accidents which might occur during transit.

Employers and businesses are required to implement existing hazardous materials regulations, with compliance monitored by state (e.g., Occupational Safety and Health Administration (OSHA) in the workplace or California Department of Toxic Substances Control (DTSC) for hazardous waste) and local jurisdictions (e.g., the Los Angeles County Fire Department). Additionally, before construction activities can take place at documented hazardous materials sites, contamination must be remediated and cleaned up under the supervision of the DTSC.

Hazardous materials to be used or stored that are associated with the occupancy of future uses within the CPAs would consist mostly of typical household cleaning products and minor industrial related chemicals. The types of hazardous materials that could be present during operation of the commercial, residential and industrial uses of the Approved Plans could also include other maintenance products (e.g., paints and solvents); oils, lubricants and refrigerants associated with building mechanical and HVAC systems; and grounds and landscape maintenance products formulated with hazardous substances, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, pesticides/herbicides, and industrial related chemicals.

During the construction of new development, future projects within the CPAs may generate hazardous and/or toxic waste depending on the age of structures to be redeveloped or other potential soil or groundwater contamination based on previous uses. Operation of future development under the Approved Plans includes residential, commercial, industrial, public facilities and open space uses. It is reasonable to assume that hazardous materials would be encountered during rehabilitation and demolition of some of the structures. However, demolition permits are regulated by the City's Department of Building and Safety, and the strict adherence to asbestos abatement is required of demolition permits.

Conclusion. Implementation of the Approved Plans would decrease the amount of land designated as industrial in the CPAs, thereby decreasing the likelihood that new industrial land uses (that would increase the use, transport, and disposal of hazardous materials over current existing conditions in the CPAs) would be introduced over the life of the Approved Plans, and the land that will remain designated as industrial under the Approved Plans is already developed with industrial uses. In addition, some of the land currently developed with industrial uses in the areas that are being redesignated is expected to convert to non-industrial uses such as commercial and/or residential. While there are currently hazards and hazardous materials within the CPAs, they are subject to the federal, state, and local regulations mentioned above. In addition, any new hazards or hazardous materials introduced into the CPAs would similarly be subject to those same regulations. Therefore, compliance with all applicable local, state, and federal regulations would ensure that impacts related to the use, transport, and disposal of hazardous materials under the Approved Plans would be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Refer to Chapter 2, Project Description of this Addendum for a full discussion of the proposed zoning changes to industrial land uses under the Modified Project. The proposed zoning changes under the Modified Project would increase flexibility of allowable land uses, incentivize green employment uses, increase residential intensity, and to improve compatibility with surrounding land uses and visual characteristics. As with the 2017 FEIR, the Modified Project would not rezone any non-industrial parcels in the CPAs to industrial uses or other uses typically associated with the transport, use, or disposal of hazardous materials. Development under the Modified Project would be required to adhere to existing mandatory hazardous materials regulations related to the handling, use, and storage of hazardous materials. Any new hazards or hazardous materials introduced into the CPAs would similarly be subject to those same regulations. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to the handling, use, and storage of hazardous materials beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to the handling, use, and storage of hazardous materials beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to the handling, use, and storage of hazardous materials beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than Significant with Mitigation	No	No	No	HM1

A. Impact Determination in the Certified EIR

Analysis

The CPIOs establish Subareas with development standards and land use restrictions that in combination with proposed underlying zoning and height district regulations tailor development in order to implement the Approved Plans.¹⁶ Overall, the amount of industrially zoned land in the CPAs will decrease by 525 acres (30 percent), some of which is currently developed with industrial uses; the land that will remain designated as industrial under the Approved Plans is already developed with industrial uses.

As previously discussed, all future projects within the CPAs are required to conform with environmental regulations related to new construction and hazardous materials storage, use and transport.

Lead and Asbestos. Due to the age of development in the CPAs, some sites could be developed with structures containing asbestos containing materials (ACMs) or lead-based paint. Federal and state regulations govern the renovation and demolition of structures where materials containing lead and asbestos are present. Asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the State Department of Health Services. In addition, Cal/OSHA has regulations concerning the use of hazardous materials, including requirements for safety training, availability of safety equipment, hazardous materials exposure warnings, and emergency action and fire prevention plan preparation. All demolition that could result in the release of lead and/or asbestos must be conducted according to Cal/OSHA standards. Compliance with existing regulations would help to ensure that construction workers and the general public would not be exposed to any unusual or excessive risks related to lead and asbestos during construction activities. Therefore, impacts related to lead and asbestos would be *less than significant*.

Methane Zones. Methane zones occur primarily in the northern portions of the CPAs, and in smaller areas dotted throughout both CPAs. However, compliance with existing regulations would help to ensure that construction workers and the general public would not be exposed to any unusual or excessive risks related to methane during construction activities. Therefore, impacts related to methane zones would be *less than significant*.

¹⁶ Each CPIO District contains details on use limitations, including the specific limitation, applicable geography, exemptions, clarifications, and any additional conditions.

Existing Contaminated Sites. As described above, there are numerous properties within the CPAs where there may be ongoing utilization of chemicals of concern or where remediation activities are being implemented. Overall, there are 87 sites in the South Los Angeles CPA and 126 sites in the Southeast Los Angeles CPA.

However, compliance with existing regulations would reduce any impact and ensure that construction workers and the general public would not be exposed to any unusual or excessive risks related to the release of hazardous materials into the environment during construction activities on these sites with known, documented contamination. Therefore, impacts related to existing contaminated sites would be *less than significant*.

Underground Storage Tanks (USTs). If an unidentified UST were uncovered or disturbed during construction activities, it would be closed in place or removed pursuant to existing regulations. Potential risks, if any, posed by USTs would be minimized by managing the tank according to existing Los Angeles County standards as enforced and monitored by the Department of Environmental Health. If groundwater contamination is identified, remediation activities would be required by the Los Angeles Regional Water Quality Control Board (LARWQCB) prior to the commencement of any new construction activities. Therefore, impacts related to USTs would be *less than significant*.

Operational Effects. Development under the Approved Plans involving residential, commercial, public facilities, and open space would include the use of and storage of common hazardous materials such as paints, solvents, and cleaning products. Additionally, building mechanical systems, and grounds and landscape maintenance could also use a variety of products formulated with hazardous materials. Relatively small quantities of these materials that would be stored and used on individual project sites throughout the CPAs. Although common maintenance products and chemicals would also be used in new development projects, these hazardous materials would not pose any greater risk compared to other similar development or to existing conditions. Adherence to warning labels and storage recommendations from the individual manufacturers would help to ensure that persons in the CPAs would not be exposed to unusual or excessive risks from hazardous materials.

Furthermore, businesses are required to comply with health and safety, and environmental protection laws and regulations previously described, which require businesses handling or storing certain amounts of hazardous materials to prepare a hazardous materials business plan. The hazardous materials plan must include a Material Safety Data Sheet (MSDS) for each hazardous material used or stored on-site. Therefore, impacts related to operational effects would be *less than significant*.

Soil and Groundwater Contamination. Implementation of the Approved Plans may result in grading and excavation of sites for future development in the CPAs. If any unidentified sources of contamination are encountered during grading or excavation, removal activities could pose health and safety risks from exposure to hazardous materials or vapors. In addition, exposure to contaminants could occur if the contaminants migrate from the contaminated zone to surrounding areas either before or after the surrounding areas are developed, or if contaminated zones are disturbed by future development at the contaminated location. Therefore, impacts related to release of hazardous materials could be *potentially significant*.

Conclusion. Future development projects within the CPAs will be required to conform with all applicable environmental regulations related to new construction and hazardous materials storage, use and transport. Furthermore, potential hazards related to lead, asbestos, methane zones, and USTs are less than significant with compliance with existing regulations. In addition,

development of sites with known contaminants would be required to undergo remediation and cleanup before construction activities could begin.

The Approved Plans allow development of sites currently or historically used for industrial uses that may have used hazardous materials in their operations. Because unknowns may exist with regard to existing soil or other contaminants in the areas currently or historically zoned as industrial in the CPAs, there is the possibility that future development may uncover previously undiscovered soil and other forms of contamination. While all demolition and construction within the CPAs would be required to comply with all local, state, and federal regulations, further mitigation may be required to reduce risks associated with the potential for unknown toxic substances existing on sites previously used for industrial uses that used hazardous materials in the CPAs. These sites could have been previously occupied by a hazardous materials generating facility and would have the potential to create a significant hazard to the public or the environment unless an environmental site assessment is conducted to determine potential risks and appropriate mitigation. Therefore, without mitigation, the Approved Plans were found to result in a *potentially significant* impact related to hazards and hazardous materials before mitigation.

Mitigation Measure

Construction

HM1 Any project within a CPIO Subarea that involves construction-related soil disturbance located on land that is currently or was historically zoned as industrial shall ensure that a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code, section 65962.5, is conducted. A report setting forth the results of this database search shall be provided to the City (e.g., historical environmental reports prepared by Enviroscan, EDR or similar firms). If the report indicates the project site or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, a Phase I Environmental Site Assessment (ESA) shall be prepared. The Phase I ESA shall be prepared by a Registered Environmental Assessor (REA) in accordance with state standards/guidelines to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, state, and federal regulations and policies. Any further study found necessary by an REA or relevant federal, state, or local agency shall be performed prior to project approval or made a condition on the project if that is found to be adequate for remediation by an REA or the relevant federal, state, or local agency. Prior to the Department of Building and Safety's issuance of any permits that allow for grading or construction of the project site, the REA or relevant agency shall provide written confirmation to the City that such grading or construction may safely proceed. Written confirmation that required site remediation was completed consistent with the relevant federal, state or local requirements shall be provided to the City prior to issuance of certificates of occupancy.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As previously discussed, the Modified Project would not rezone any non-industrial parcels in the CPAs to industrial uses or other uses typically associated with the transport, use, or disposal of hazardous materials. Development under the Modified Project would be required to adhere to existing mandatory hazardous materials regulations related to the handling, use, and storage of hazardous materials. Compliance with existing regulations would help to ensure development under the Modified Project would minimize risks related to exposure to lead, asbestos, methane, and existing contamination sites. Businesses operating in the CPAs would be required to comply with health and safety, and environmental protection laws and regulations related to the handling or storing certain amounts of hazardous materials and to prepare a hazardous materials business plan. As with the 2017 FEIR, impacts related to soil and groundwater contamination under the Modified Project would remain potentially significant. The Modified Project would continue to require that Mitigation Measure **HM1** be implemented to reduce the significance of impacts related to hazards and hazardous materials. Impacts under the Modified Project would be similar to those analyzed in the 2017 FEIR. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to hazards and hazardous materials beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to hazards and hazardous materials beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

No new contaminated sites have been identified in the CPAs since the 2017 FEIR. No substantial changes in the environment have occurred since certification of the 2017 FEIR that would result in new or more severe significant environmental impacts related to the transport, use, or disposal of hazardous materials. The Modified Project would need to implement Mitigation Measure **HM1** to reduce the significance of impacts related to hazardous materials. Impacts under the Modified Project would be similar to those analyzed in the 2017 FEIR. Therefore, there is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts related to hazards and hazardous materials beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measure **HM1** would continue to address impacts related to hazards and hazardous materials and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than Significant with Mitigation	No	No	No	HM1

A. Impact Determination in the Certified EIR

Analysis

The CPAs contain 93 public schools.¹⁷ Many schools are located in close proximity to existing industrial land uses that may contain hazardous materials or are themselves generators or storage facilities that utilize hazardous materials. In addition, many schools have been constructed within or near industrial areas that were already developed with industrial uses. However, implementation of the Approved Plans would not increase the risk of hazardous materials, substances, and/or waste emissions by allowing, placing, or incentivizing new industrial businesses within a quarter-mile of public schools. The majority of the land uses surrounding those schools located in industrial areas are either Limited Industrial or Light Industrial land use designations that do not permit heavy industrial uses which would include uses that are typically associated with the use of hazardous materials. Furthermore, the proposed Industrial Subareas of the CPIO Districts are applied to industrial areas throughout the CPAs which establish use restrictions and development standards.

Compliance with existing federal, state, and local regulations during demolition and construction activities would ensure that schools, other nearby sensitive receptors, and the general public would not be exposed to any unusual or excessive risks related to hazardous materials during construction and operational activities.

Although the use of hazardous materials in the vicinity of schools is well-regulated, unknowns may exist with regard to existing (contamination) hazards in the CPAs within one-quarter mile of a school. Therefore, impacts related to hazardous waste emissions near a school resulting from future development on industrial land in the CPAs uncovering existing hazardous waste in soils or on the development site are considered potentially significant. Implementation of the Approved Plans was found to result in potentially significant impacts related to hazardous materials near schools before mitigation.

Mitigation Measures

Implementation of Mitigation Measure **HM1**, described above would reduce impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment near schools in the CPAs.

¹⁷ Los Angeles Unified School District, Facilities Division, Rena Perez, written correspondence, November 21, 2008.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As previously discussed, the Modified Project would not rezone any non-industrial parcels in the CPAs to industrial uses or other uses typically associated with the transport, use, or disposal of hazardous materials. The Modified Project does include a “Green Employment Use” incentive which could lead to green industries locating near schools. However, any uses that involved hazardous materials would be heavily regulated to ensure no potential impact on schools. Therefore, as with the 2017 FEIR, implementation of the Modified Project would not result in a significant impact on schools. Implementation Mitigation Measure **HM1** would further reduce potential impacts to schools. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to hazardous materials near schools beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to hazardous materials near schools beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to the transport, use, or disposal of hazardous materials near schools. No substantial changes in the environment have occurred since certification of the 2017 FEIR that would result in new or more severe significant environmental impacts related to the transport, use, or disposal of hazardous materials near schools. The Modified Project would need to implement Mitigation Measure **HM1** to reduce the significance of impacts related to hazards and hazardous materials. Impacts under the Modified Project would be similar to those analyzed in the 2017 FEIR. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to hazardous materials near schools beyond what was previously analyzed.

E. Certified EIR’s Mitigation Measures Addressing Impact

Mitigation Measure **HM1** would continue to address impacts related to hazards and hazardous materials and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The CPAs contain sites that have been identified on various regulatory databases as being contaminated from the release of hazardous substances in the soil or groundwater, including hazardous materials clean-up sites within the CPAs compiled pursuant to Section 65962.5. Although the majority of these sites have either been cleaned up or are in the process of being cleaned up, the potential remains for USTs or contaminated soils to be uncovered or encountered if development in CPAs leads to the development of these sites.

Implementation of the Approved Plans could lead to the location of new development on a site which is included on a list of hazardous materials sites. If contamination at any specific project site were to exceed regulatory action levels, the individual project applicant would be required to undertake remediation procedures prior to grading and development under the supervision of appropriate regulatory oversight agencies.

Consequently, if future development under the Approved Plans is located on a site that is included on a list of hazardous materials sites, remediation would be implemented to reduce or eliminate impacts. Therefore, compliance with all local, state and federal regulations and conditions of approval for all future development projects in the CPAs would ensure that contaminated sites undergo remediation activities prior to development activities. Because appropriate site investigation and remediation activities prior to development is required by law, and because all contaminated sites are required to be remediated prior to development, this impact was found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would increase the allowable intensity, density, and/or types of land uses within the South and Southeast Los Angeles CPAs. Implementation of the Modified Project within the South and Southeast Los

Angeles CPAs could therefore lead to development of additional sites containing contaminated soils or included on a list of hazardous materials sites. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not lead to the development of additional sites. However, as with the 2017 FEIR, development under the Modified Project would be required to comply with all local, state and federal regulations related to site remediation and investigation activities prior to the start of construction. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The CPAs are not located within an airport land use plan. The nearest general aviation reliever airports to the CPAs are the Hawthorne Municipal Airport (also known as Jack Northrop Field) and the Compton/Woodley Airport. The southern portion of both the CPAs are within the approach path of all three airports, Los Angeles International Airport (LAX), Hawthorne Municipal and Compton/Woodley Airports. LAX is the busiest airport with the most risk associated with flight path proximity. The Approved Plans are not located in an area designated as an “Airport Hazard Area” subject to the development conditions found in LAMC Section 12.50. Airport Approach Zoning Regulations, which would restrict height of proposed future development. Therefore, implementation of the Approved Plans was found not result in a safety hazard or be exposed to safety hazards related to the operation of an airport. *No impact* would occur.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would not include proposed changes which would increase the risk of potential impacts related to airport land use plans. There are no airport land use plans located within the CPAs. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to airport plans or safety hazards related to the operation of an airport beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to airport plans or safety hazards related to the operation of an airport beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts related to airport plans or safety hazards related to the operation of an airport beyond what was previously analyzed.

E. Certified EIR’s Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Construction and operation activities associated with development in CPAs have the potential to interfere with adopted emergency response or evacuation plans, primarily by temporary construction barricades or other obstructions that could impede emergency access. However, compliance with all local, state and federal regulations would ensure that impacts related to interference with adopted emergency plans, including temporary street closures, would serve to reduce impacts.

Although the Approved Plans accommodate an increase in population, impacts related to increased response times would be less than significant. Compliance with the policies of the Safety Element of the Los Angeles City General Plan and the Los Angeles County Operational Area Emergency Response Plan help minimize the potential impact of interference with the City and County emergency response plans.

City agencies, including the City Emergency Operations Organization (EOO), follow procedures contained in their emergency plans, under the discretion of the Mayor and Chief of Police. The City of Los Angeles Department of Transportation (LADOT) and the City of Los Angeles Fire Department (LAFD) would be responsible for ensuring that future development does not impair or physically interfere with an adopted emergency response or evacuation plan. The Approved Plans do not introduce any features that would preclude implementation of or alter these policies or procedures in any way. Furthermore, the Approved Plans would not impair implementation of, or physically interfere with, the Los Angeles County Operational Area Emergency Response Plan.¹⁸

Construction and operation activities within the CPAs with respect to emergency response or evacuation plans due to temporary construction barricades or other obstructions that could

¹⁸ County of Los Angeles Office of Emergency Management, *Operational Area Emergency Response Plan*, February 1998.

impede emergency access would be subject to the City's permitting process, and a street closure permit is required when a street closure becomes necessary for project completion. Compliance with existing regulations ensures that implementation of the Approved Plans would not impair or physically interfere with adopted emergency response plans or emergency evacuation plans. Therefore, impacts related to emergency response plans and emergency evacuation plans were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As identified in Chapter 2, Project Description of this Addendum and analyzed in Section 4.14, Population and Housing, the Modified Project would accommodate incrementally increased population, housing, and employment in the South and Southeast Los Angeles CPAs beyond what was evaluated in the 2017 FEIR. It is not anticipated that the incremental increase in population and employment would impact or result in the need to modify any existing emergency response routes. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not result in the need to modify existing emergency response routes. The Modified Project would not introduce any new infrastructure which would block or hinder existing emergency routes. As with the 2017 FEIR, development under the Modified Project would coordinate with LAFD and the LADOT to ensure that construction and operations would not impair or physically interfere with an adopted emergency response or evacuation plan. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to emergency response plans and emergency evacuation plans beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to emergency response plans and emergency evacuation plans beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to emergency response plans and emergency evacuation plans beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No Impact	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The CPAs are located in a highly urbanized portion of the City of Los Angeles and are not located in an area identified as a wildland fire hazard area, according to Exhibit D Selected Wildfire Hazard Areas of the Safety Element.¹⁹ There are no Very High Fire Hazard Severity Zones or Brush Clearance Zones located within the CPAs.²⁰ Implementation of the Approved Plans was found not to result in impacts to wildland fires and would not place residences in areas prone to wildfires. *No impact* would occur.

Mitigation Measures

No mitigation measures are required.

Level of Significance of Impacts after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, implementation of the Modified Project would not result in impacts to wildland fires and would not place residences in areas prone to wildfires, including Very High Fire Hazard Severity Zones and Brush Clearance Zones. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to wildland fires beyond what was previously analyzed.

¹⁹ City of Los Angeles, *City of Los Angeles General Plan Safety Element, Exhibit D- Selected Wildfire Hazard Areas*, 1996.

²⁰ Los Angeles Fire Department, *Brush Clearance Zones*, <http://www.lafd.org/fire-prevention/brush>, accessed October 2016.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to wildland fires beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts related to wildland fires beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.10 HYDROLOGY AND WATER QUALITY

The 2018 CEQA Guidelines update clarified the Appendix G questions related to Hydrology and Water Quality and eliminated redundancy. The analysis presented in the EIR remains relevant to the modified checklist questions and is summarized as appropriate for each question below.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

While there are hydrology and water quality resources of concern within the CPAs, they are subject to the federal, state, and local standards and regulations mentioned above. The Approved Plans and their implementing ordinances do not contain any specific guidelines or changes that would violate any water quality standards or waste discharge requirements.

The rate and volume of stormwater runoff as an indirect result of the Approved Plans would not result in a substantial increase in stormwater flows to the City's system that discharges to Compton Creek, Ballona Creek, the Dominguez Channel, or the Los Angeles River. The overall land use patterns of the CPAs would remain relatively unchanged, which would limit potential changes in the types of pollutants in stormwater runoff, compared to existing conditions. Since only a small percentage of the land in the CPAs is vacant or undeveloped, any new development in the CPAs, whether more intense than existing conditions or not, would not result in a substantial increase of impervious surfaces contributing to runoff.

In addition to federal and state regulations, as required by the City's Standard Urban Storm Water Mitigation Plan (SUSMP), all development projects (as applicable), including projects that could be constructed in the CPAs, are required to implement operational BMPs to control release of pollutants in stormwater runoff. The SUSMP identifies the types and size of private development projects that are subject to these requirements.

Site design or planning management BMPs would be used to minimize runoff from new development. Compliance with the SUSMP and Low Impact Development (LID) requirements would ensure that development projects occurring under the Approved Plans do not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality.

Furthermore, discharges associated with the Approved Plans would not create pollution, contamination or nuisance. Implementation of the Approved Plans would not compromise the beneficial uses of nearby waterbodies, or the facilities which serve those beneficial uses, nor

would it impair the waters of the state in a way that creates a hazard to public health or diminishes the community enjoyment of property.

Compliance with federal and state regulations, as well as the City's standard requirements and the proper implementation of LID and BMPs, would serve to reduce impacts resulting from future development in the CPAs due to implementation of the Approved Plans. Furthermore, the Approved Plans do not introduce any features that preclude implementation of or alter these policies and procedures in any way. Therefore, implementation of the Approved Plans would not violate any water quality standards or waste discharge requirements, and impacts were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impact after Mitigation

Less than significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would increase the allowable intensity, density, and/or types of development within the South Los Angeles and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. Construction under the Modified Project would involve ground-disturbing activities of similar intensity to those under the 2017 FEIR, and therefore result in similar impacts related to stormwater runoff and water quality standards. As with the 2017 FEIR, all future development under the Modified Project would be required to comply with federal, state, and City regulations, requirements, and BMPs to reduce impacts related to water quality and stormwater runoff. The Modified Project would not result in a substantial increase of impervious surfaces contributing to runoff. The Modified Project does not involve the introduction of new activities or features that could be sources of contaminants that would degrade groundwater quality. As a result, the Modified Project would not create or contribute runoff water that would exceed the pollutant profile associated with the existing conditions of the CPAs. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the EIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The South Los Angeles and Southeast Los Angeles CPAs are located within the geographic boundaries of the Central Basin of the Los Angeles Coastal Plain Groundwater Basin. Implementation of the Approved Plans would not involve direct groundwater withdrawal or injection that would create a net deficit in aquifer volume, yields or change the rate or direction of groundwater, nor result in a demonstrable or sustained reduction of groundwater recharge capacity, such that there would be a lowering of the local groundwater table level.

The CPAs are highly urbanized and covered largely by non-permeable surfaces (e.g., buildings, road, parking lots, etc.) that interfere with groundwater recharge. Therefore, the CPAs are not significant areas for groundwater recharge. Construction of future development in the CPAs as a result of implementation of the Approved Plans, whether more intense than existing conditions or not, would not result in a substantial increase in impervious surfaces that would further impact groundwater recharge. Further, while construction activities may use water provided by the Los Angeles Department of Water and Power (LADWP) for varying purposes, the duration of such activities and the amount of water used would be limited and does not have the potential to deplete groundwater supplies. Use of this water for construction would not reduce the yields of adjacent wells or well fields, or adversely change the rate or direction of flow of groundwater.

Future development would be subject to the City's stormwater quality BMPs that aid in ensuring that surface water is effectively maintained so that stormwater infiltration, if any, would not represent a substantial risk to groundwater quantity or quality. In addition, compliance with the City's Stormwater and Urban Runoff Pollution Control Ordinance and NPDES General Construction Activities Storm Water Permit (GCASP) permit requirements is mandatory. The

stormwater quality BMPs would aid in ensuring that surface water is effectively maintained so that stormwater infiltration, if any, would not represent a substantial risk to groundwater quantity or quality. Furthermore, implementation of the Approved Plans would not have a significant impact on groundwater level in a way that would change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for:

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

Additionally, the South Los Angeles CPIO and Southeast Los Angeles CPIO establish mandatory regulations for future development in Active Change areas that require projects to provide landscaping within setback areas and parking lots, which provide a means for infiltrating or detaining stormwater and have a beneficial impact on groundwater recharge. Implementation of the Approved Plans does not interfere with public uses of the groundwater supply, reduce the water yields of adjacent wells or well fields, adversely change the rate or direction of groundwater flow, or reduce groundwater recharge capacity. No other activities would occur as a result of the Approved Plans that would have an effect on groundwater. Compliance with applicable water quality and stormwater regulations would ensure that impacts would remain less than significant. Therefore, impacts related to groundwater were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impact after Mitigation

Less than significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Development under the Modified Project would not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. The Modified Project would not interfere with groundwater recharge since the CPAs are not significant areas for groundwater recharge. As with the 2017 FEIR, all future development under the Modified Project would be required to comply with federal, state, and City regulations, requirements, and BMPs to reduce impacts related to groundwater depletion and recharge. As demonstrated in **Table 3-8**, potable water demand under the Modified Project would slightly decrease compared to what was forecasted in the 2017 FEIR. The Modified Project would not introduce any new activities into the CPAs which would deplete groundwater or impede groundwater recharge. Additionally, as discussed in Section 4.19, Utilities and Service Systems of this Addendum, LADWP is anticipated to reduce per capita water consumption within its service area and to adequately meet the water consumption demand projected by the Modified Project. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to Section 3.19, Utilities and Service Systems of this Addendum for a discussion of new circumstances relative to current and future available water supplies. As discussed, these new circumstances are anticipated to result in an increase in water recycling and conservation and a decrease in water demand per capita, and do not show a significant impact to groundwater capacity. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

As discussed in the 2020 Urban Water Management Plans (UWMP), LADWP is anticipated to adequately meet the water consumption demand projected by the Modified Project. The Modified Project would not result in an unanticipated consumption of water which would impact the ability of LADWP to adequately meet water demand in the CPAs. Therefore, there is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a or Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
i. result in a substantial erosion or siltation on- or off-site;	Less than Significant	No	No	No	No

A. Impact Determination in the EIR

Analysis

The Approved Plans would not alter the existing drainage pattern of the CPAs through the alteration of the course of a stream or river that would result in erosion or siltation.

The Approved Plans would create new housing, population, and employment capacity in targeted areas, primarily TOD areas. Future development within the Active Change Areas of the Approved Plans would occur primarily as infill on previously developed or, to a lesser extent, vacant sites. Future development within the CPAs, regardless of building densities and lot coverage, would not result in a substantial increase in non-permeable surfaces such that surface drainage patterns would cause erosion or siltation.

Grading for new structures that would be a reasonably foreseeable effect of implementing the Approved Plans is expected to be minimal, consisting of grading for foundations, building pads, access roads, and utility trenches in areas that are already developed. Because the Approved Plans would otherwise continue to allow the development of the CPAs as envisioned by the existing Community Plans, such development could require grading on individual parcels, which could result in small, localized changes in surface drainage patterns that could cause increased erosion potential when soils are exposed during construction. However, as previously explained, all new development projects are subject to the City's SUSMP and grading requirements as part of the building permit process for all new development, including by-right projects. Compliance with the Department of Building and Safety grading and earthwork requirements and the applicable provisions of the LAMC would reduce erosion and siltation potential within the CPAs.

Compliance with state NPDES permit and applicable LAMC regulatory requirements, in combination with the City's standard grading and building permit requirements and the application of BMPs would minimize any potential water quality impacts from erosion and siltation. Therefore, implementation of the Approved Plans would not cause changes in surface drainage patterns and surface water bodies in a manner that could cause erosion or siltation, and impacts related to erosion and siltation were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would accommodate additional housing, population, and employment capacity in the South and Southeast Los Angeles CPAs beyond what was analyzed in the 2017 FEIR. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not substantially change drainage patterns. As with the 2017 FEIR, future development under the Modified Project would be primarily infill development and would not result in a substantial increase in non-permeable surfaces such that surface drainage patterns would cause erosion or siltation. Compliance with applicable federal, state, and local regulatory requirements would minimize any potential impacts related to erosion and siltation. Therefore, there are no proposed changes under the Modified

Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

No substantial changes in the environment have occurred since certification of the 2017 FEIR that would result in new or more severe significant environmental impacts related to erosion or siltation. Therefore, there is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the EIR, and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans would not alter the existing drainage pattern of the CPAs through the alteration of the course of a stream or river. The Approved Plans would maintain existing land uses in residential neighborhoods, and open space areas in the CPAs would be preserved. The existing drainage patterns of open space would remain unchanged. The Approved Plans would create new housing, population, and employment capacity in targeted areas, primarily TOD areas. Future development would be concentrated in areas of the CPAs containing impervious surfaces; therefore, implementation of the Approved Plans would result in a negligible increase in impervious surfaces compared to existing conditions. Little, if any, change in stormwater runoff volume is anticipated.

The City would also ensure that sufficient drainage capacity is available through building permit application review and approvals. With implementation of the existing City of Los Angeles standard procedures, the Approved Plans would not lead to a substantial increase in surface runoff resulting in flooding as a consequence of increased capacity for development.

Compliance with applicable water quality and stormwater regulations would ensure that the Approved Plans would not cause a substantial increase in the peak flow rates or volumes of stormwater runoff that would cause on-site or off-site flooding. Therefore, impacts related to surface runoff that would result in flooding were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would result in zoning changes which increase the allowable intensity, density, and/or types of land uses within the South and Southeast Los Angeles CPAs. These zoning changes would maintain existing residential and open space land uses and would primarily target industrial and commercial land uses. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. As previously discussed, the Modified Project is anticipated to result in similar impacts related to stormwater runoff as what was analyzed in the 2017 FEIR. Compliance with applicable federal, state, and local regulatory requirements would minimize any potential impacts to drainage patterns. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes in the environment have occurred since certification of the 2017 FEIR that would result in new or more severe significant environmental impacts related to surface runoff. There are no substantial changes to the circumstances under which the Modified Project

is being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Future development within the CPAs, including the Active Change Areas, would occur primarily as infill on previously developed sites containing impervious surfaces. Therefore, flows from areas of future development are already accounted for in system capacity. Little change in stormwater runoff to local waterways is anticipated. Implementation of the Approved Plans would not substantially reduce or increase the amount of surface water; or result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. Stormwater runoff within the South Los Angeles CPA would continue to be directed toward Ballona Creek and stormwater runoff within the Southeast Los

Angeles CPA would continue to be directed toward Compton Creek via storm drains, curbs and gutters (street flows), and urban sheet flow.

Implementation of the Approved Plans would not affect the rate or change the direction of movement of existing contamination; expand the area affected by contaminants; result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion); or cause regulatory water quality standards at an existing production well to be violated. New development in CPAs would result in a negligible increase in impermeable surfaces compared to existing conditions. On-site improvements incorporated into individual project design according to existing City standards and new CPIO requirements for permeable services would be implemented to help maintain system capacity. Compliance with the City's LID Ordinance and SUSMP through site design or planning management BMPs would minimize runoff from new development and prevent sediment and other pollutants from entering the storm drain system.

As a result, the Approved Plans would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Additionally, due to the highly urbanized nature of the CPAs, groundwater recharge is anticipated to be negligible in the CPAs. Compliance with applicable water quality and stormwater regulations, including stormwater BMPs as part of the SUSMP, would ensure that impacts would remain less than significant. Therefore, the impacts related to stormwater drainage and polluted runoff were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As previously discussed, new development in CPAs under the Modified Project would result in a negligible increase in impermeable surfaces compared to existing conditions. Implementation of the Modified Project would result in similar impacts to stormwater runoff as the 2017 FEIR. Compliance with federal, state, and local stormwater runoff management regulations would minimize runoff from new development and prevent sediment and other pollutants from entering the storm drain system. Groundwater recharge impacts would be similar to the 2017 FEIR. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes in the environment have occurred since certification of the 2017 FEIR that would result in new or more severe significant environmental impacts related to surface runoff or stormwater drainage. There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
iv. impede or redirect flood flows?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans maintain existing land uses in residential neighborhoods, open space areas in the CPAs would be preserved, and the existing drainage patterns of open space would remain unchanged. Future housing, population, and employment development would be concentrated in areas of the CPAs containing impervious surfaces. Some changes in runoff could occur because the Approved Plans could result in the construction of new development on vacant land. However, due to the highly urbanized nature of the CPA, the existence of vacant land is minimal and new development would occur primarily as infill on underutilized commercial or industrial lots. These changes would represent a negligible increase in impervious surfaces compared to existing conditions, and the runoff characteristics of the CPAs would remain unchanged. Therefore, implementation of the Approved Plans would result in a negligible increase in impervious surfaces compared to existing conditions. Little, if any, change in stormwater runoff volume is anticipated.

As a result, streams would not be substantially impacted in terms of siltation or runoff, and flood flows would be unaffected. Future development that occurs as a result of the Approved Plans would be subject to restrictions and requirements as part of the City's existing permitting process, as previously described. Furthermore, future development within Active Change Areas would be subject to the development standards in the CPIOs, which would require projects to provide landscaping within setback areas and parking lots, which could provide a means for infiltrating or detaining stormwater.

Compliance with applicable water quality and stormwater regulations would ensure that the Approved Plans would not substantially alter existing drainage patterns nor cause a substantial increase in the peak flow rates or volumes of stormwater runoff that would impede or redirect flood flows. Therefore, impacts related to surface runoff that would result in flooding were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The zoning changes proposed under the Modified Project would preserve existing residential and open space land uses in the CPAs. As with the 2017 FEIR, the Modified Project would result in a negligible increase in impervious surfaces compared to existing conditions. Furthermore, future development under the Modified Project would be subject to the development standards to provide a means for infiltrating or detaining stormwater. Compliance with applicable water quality and stormwater regulations would ensure that the Modified Project would not substantially alter existing drainage patterns nor cause a substantial increase in the peak flow rates or volumes of stormwater runoff that would impede or redirect flood flows. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes in the environment have occurred since certification of the 2017 FEIR that would result in new or more severe significant environmental impacts related to flood flows. There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Within the Southeast Los Angeles CPA, there are no areas designated as 100-year flood plains. Within the South Los Angeles CPA, there is a 100-year flood plain which intersects the CPA east of Van Ness Avenue, between Florence and Slauson Avenues. However, any new development that occurs in this 100-year flood plain would be subject to the restrictions and requirements as part of the City's existing permitting process. Compliance with the existing regulatory requirements related to flood plain management previously discussed would ensure that the approved South Los Angeles Community Plan would not place housing within a flood hazard area without incorporating proper floodplain management measures.

Prior to any building activity, the City reviews Federal Emergency Management Agency (FEMA) flood maps to verify whether the development site is within the current FEMA 100-year flood plain. Additionally, a detailed computerized flood hazard analysis would be required in accordance with current standards set forth by FEMA. If the detailed analysis shows that the proposed development area is outside of the 100-year flood plain and floodway, new development could be constructed with no further restrictions. If the analysis shows that the proposed development area is within the 100-year flood plain or floodway, appropriate flood plain management measures would be required to be incorporated into the design of all new buildings.

Aside from Compton Creek in the Southeast Los Angeles CPA, no other large bodies of water are present within the CPAs. The Compton Creek has been channelized as a flood control measure draining storm water from the Southeast Los Angeles CPA and directing it safely to the Pacific Ocean. The creek is not susceptible to seiche events during strong earthquakes and is not a potential source of inundation. The CPAs are located more than five miles inland from the Pacific Ocean. While the General Plan Safety Element identifies most of the CPAs as being located within an inundation zone, the CPAs are not located within a Tsunami Hazard Mitigation

Zone, and inundation by seiche, a surface wave created when a body of water is shaken, is unlikely to occur. Implementation of the Approved Plans would not expose people or structures to risk from seiche or tsunami, and there would be no impacts to the CPAs with respect to seiche and tsunami hazard. Therefore, implementation of the Approved Plans was found to result in a *less than significant* impact related to flood hazard area, tsunamis, or seiche zones.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Compliance with the existing regulatory requirements related to flood plain management previously discussed would ensure that the approved South Los Angeles Community Plan would not place housing within a flood hazard area without incorporating proper floodplain management measures. The Modified Project would not result in any development in areas which would increase exposure of persons and structures to flood, tsunami, or seiche hazard zones. Development under the Modified Project would coordinate with the City and FEMA to verify the location of development sites relative to any FEMA flood plains. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes in the environment have occurred since certification of the 2017 FEIR that would result in new or more severe significant environmental impacts related to floods, tsunamis, or seiche zones. There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The South Los Angeles and Southeast Los Angeles CPAs are located within the geographic boundaries of the Central Basin of the Los Angeles Coastal Plain Groundwater Basin and are therefore subject to the regulations and policies contained within the Los Angeles Regional Board's Basin Plan, which contains the Region's water quality regulations and programs to implement the regulations. Compliance with the SUSMP and LID requirements would ensure that development projects occurring under the Approved Plans do not conflict with any water quality standards or discharge requirements contained within the Basin Plan or obstruct implementation of the Basin Plan. In addition, compliance with the City's Stormwater and Urban Runoff Pollution Control Ordinance and NPDES GCASP permit requirements is mandatory.

The Approved Plans are located within the Water Replenishment District of Southern California and are subject to the regulations and policies contained within the GBMP, last updated in September 2016. The GBMP regulates groundwater replenishment and forecasts demand for groundwater usage. Groundwater from the Los Angeles Coastal Plain Groundwater Basin is not a substantial source of water for the region. Implementation of the Approved Plans would not involve direct groundwater withdrawal or injection that would create a net deficit in aquifer volume, yields or change the rate or direction of groundwater. Implementation of the Approved Plans would not interfere with public uses of the groundwater supply, reduce the water yields of adjacent wells or well fields, adversely change the rate or direction of groundwater flow, or reduce groundwater recharge capacity. No other activities would occur as a result of the Approved Plans that would have an effect on groundwater. The Approved Plans would therefore not conflict with the regulations of the GBMP or obstruct the implementation of the groundwater replenishment goals contained in the GBMP. Therefore, a *less than significant* impact related to water quality control plans or sustainable groundwater management plans was found to occur.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Section 4.19, Utilities and Service Systems of this Addendum, the Modified Project would not involve any direct groundwater withdrawal or injection. Impacts related to impervious surfaces would be similar under the Modified Project as with the 2017 FEIR, and all development under the Modified Project would be required to comply with federal, state, and local requirements related to water quality standards and stormwater runoff. The Modified Project would not conflict with the regulations or obstruct the implementation of any goals of applicable groundwater management plans. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Section 3.19, Utilities and Service Systems of this Addendum for further discussion of the 2020 UWMP and updates to the UWMP Act. As discussed in Section 3.19, the Modified Project would not result in an unanticipated consumption of water which would impact the ability of LADWP to adequately meet water demand in the CPAs in a way that would affect the applicable water quality plans or groundwater management plan. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.11 LAND USE AND PLANNING

As part of the 2018 CEQA Guidelines update, an Appendix G checklist question was revised to focus on conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Another checklist question was also deleted, as it addressed habitat conservation plans, which are already addressed in the Biological Resources checklist questions. The analysis presented in the EIR remains relevant to the modified checklist questions and is summarized as appropriate for each question below.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
LAND USE AND PLANNING: Would the project:					
(a) Physically divide an established community?	No Impact	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The CPAs are urbanized areas that are nearly fully developed and therefore most opportunities to build involve infill development or recycling previously developed property. The Approved Plans do not include zoning or land use designations that would substantially change existing land use patterns or connectivity in the area. Furthermore, the Approved Plans do not include any extension of roadways or other transit infrastructure through currently developed areas that could physically divide or isolate existing neighborhoods or an established community.

The Approved Plans resulted in the reallocation of land use designations in the South Los Angeles and Southeast Los Angeles CPAs. In each CPA, certain areas underwent General Plan land use amendments (GPAs), zone changes, and/or be subject to the newly established CPIO Districts (Change Areas), but the majority of land use designations in the CPAs remained unchanged and each parcel retained its existing General Plan land use designation and zone (Non-Change Areas). The majority of the changes as a result of the Approved Plans consisted of General Plan Amendments and/or zone changes to create consistency between the Land Use designations, zoning, and/or the actual built uses on parcels. In the Change Areas, the changes to General Plan land use designation or zoning expanded on supported and improved upon existing land uses, infrastructure and the surrounding community.

The Approved Plans, in both Change Areas and Non-Change Areas, generally seek to preserve low density, stable residential areas and would maintain the existing low to medium density residential land use designations for established residential neighborhoods throughout the CPAs. Most industrial land use designations in the CPAs were also maintained, though some designations were changed to reflect as-built conditions or, in areas adjacent to residential, to limit industrial uses to those that are more compatible with neighboring residential areas. In addition, certain parcels in both CPAs were updated to Public Facilities or Open Space to reflect new schools, pocket parks, and other public facilities.

In summary, the majority of land use designations in the CPAs were unchanged and each parcel retained its existing General Plan land use designation and zone (Non-Change Areas). The Active Change Areas support and improve upon existing land uses, infrastructure and the surrounding community and would not substantially change existing land use patterns or connectivity in the area. The Approved Plans do not introduce land uses that would divide existing neighborhoods but would encourage land uses that complement and enhance the existing neighborhoods of the CPAs. Residential neighborhoods would be preserved while major corridors would be enhanced to support complete streets, increased access, and connectivity to transit. *No impact* was found to occur.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would result in zoning changes which would increase the allowable intensity, density, and/or types of land uses within the South and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. The proposed zoning changes under the Modified Project would increase flexibility of allowable land uses, incentivize green employment uses, increase residential intensity, and to improve compatibility with surrounding land uses and visual characteristics. The Modified Project would preserve existing residential and open space land uses. These proposed zoning changes would not substantially change land use patterns in the CPAs, nor introduce any new infrastructure which could physically divide or isolate existing communities. As with the 2017 FEIR, the Modified Project would support complete streets, increased access, and connectivity to transit. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
LAND USE AND PLANNING: Would the project:					
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved plans include land use changes that are classified as Technical Corrections (TCs), Design and Use Changes (DUs), Active Changes (ACs), and Active Changes–Height District 2D (AC-2Ds). Table 4.10-8 in the 2017 FEIR provides a summary of these changes in acres for each CPA.

Applicable land use plans that influence development in the CPAs include the City's General Plan, the SCAG RTP/SCS, and the AQMP. The 2017 FEIR provides a consistency analysis for each of these plans.

City of Los Angeles General Plan Framework Element. The Approved Plans improve the link between the locations of land use and transportation in a manner that is consistent with the City's Framework Element. As previously discussed, implementation of the Approved Plans created new housing and employment opportunities, mostly in areas around transit identified for mixed-use. This is in accordance with the Framework Element's guiding policy to focus growth in higher-intensity commercial centers close to transportation and services. Under the Approved Plans, the CPAs' commercial areas serve as focal points and activity centers for surrounding neighborhoods by supporting new development that accommodates a variety of uses and encourages pedestrian activity in these commercial centers. The Approved Plans' land use changes also serve to create consistency with anticipated land uses. The Approved Plans foster quality development in transition areas. In some cases, the Approved Plans allow for increased FARs and height regulations. The Approved Plans facilitate mixed-use development in targeted areas, enable opportunities for increased housing and employment particularly along targeted commercial corridors and in TOD areas, and provide for more compatible uses and development.

Under the Approved Plans, areas designated and zoned for residential land uses generally remained designated and zoned to allow for residential land uses. The land use changes in residential neighborhoods were primarily limited to TCs or DUs intended to create consistency

with existing land uses, surrounding land uses, and/or the General Plan Framework Element. Additionally, the Approved Plans establish the CPIO Residential Subareas, which are intended to maintain and protect the existing scale and character of specific residential neighborhoods. The Approved Plans direct new housing and commercial development away from these existing residential neighborhoods towards major commercial corridors and in proximity to transit stations.

In general, established industrial areas in the CPAs are preserved for future industrial use and continue to serve as valuable sources of employment to the communities. However, in targeted areas, the Approved Plans re-designate industrially-zoned properties to a zone more consistent with the existing uses on the ground in areas where the existing uses are predominantly commercial and/or residential. The TCs would resolve the majority of these existing inconsistencies. The Approved Plans resulted in consistency with the City's General Plan Framework Element through the proposed General Plan amendments, zone changes, and CPIO. The CPIO directly implements the goals, policies, and programs of the Approved Plans and the City's Framework Element. The Approved Plans preserve the character of lower-density neighborhoods by maintaining lower-density land use designations, as well as the establishment of the CPIO Residential Subareas. The Approved Plans direct growth away from these existing residential neighborhoods towards corridors near commercial centers. Therefore, the Approved Plans are consistent with the Framework Element of the City of Los Angeles General Plan.

2013 to 2021 Housing Element. The 2013-2021 Housing Element of the General Plan update embodies the City's housing goals and policies and identifies the more detailed strategies the City will implement to achieve them. The Approved Plans accommodate employment and housing opportunities for a range of income levels, especially mixed-income and affordable housing. The creation of housing units and jobs was further pursuant to the SCAG Regional Housing Needs Assessment allocation and growth projections, thereby implementing the goals of the Housing Element. The Approved Plans would be consistent with adopted land use policies included in SCAG's 2012-2035 RTP/SCS. The Approved Plans would not conflict with, but would work to implement, key regional and local plans and policies applicable to the CPAs and surrounding areas.

Land Use Compatibility. The Approved Plans would not result in substantial increased potential for land use conflicts between existing and future land uses. In particular, the Approved Plans promote compatibility between industrial, residential, and other sensitive uses. Because of the land use incompatibilities existing prior to adoption of the Approved Plans between industrial and other uses, a set of compatibility standards were developed as part of the proposed CPIO Industrial Subareas to address issues such as buffering, screening, and restrictions on noxious uses.

TCs bring land use and zoning into consistency with the existing and surrounding uses, promote compatibility, and decrease the potential for land use conflicts. Approximately 8.3 percent (606 acres) of the South Los Angeles CPA and approximately 5.6 percent (407 acres) of the Southeast Los Angeles CPA were subject to the proposed TCs. DUs did not result in changes to existing or permitted land uses, building densities, heights, or intensities, but included the application of the CPIO which establishes more restrictive standards by requiring compliance with design regulations and use limitations that are in addition to current zoning requirements. Approximately 14.2 percent (1,031 acres) of the South Los Angeles CPA and approximately 13.6 percent (993 acres) of the Southeast Los Angeles CPA were subject to the proposed DUs. Although technically ACs may include an increase in permitted residential density or height, there is no increase in allowable square footage. ACs do not include an increase in FAR and will retain the existing allowable FAR of 1.5:1. ACs also include the application of the CPIO, which establishes

more restrictive regulations related to design regulations and use restrictions. ACs account for approximately 3.5 percent (254 acres) of the South Los Angeles CPA and approximately 3.2 percent (233 acres) of the Southeast Los Angeles CPA. ACs are primarily within select commercial and industrial areas.

Under the Approved Plans, housing and employment would be increased in areas where AC-2Ds are proposed primarily through an increase in the permitted FARs. The increased development potential within these targeted areas is consistent with the policies of the City's Framework Element, the Housing Element, other City policies, and SCAG policies. The AC-2Ds also implement the policies and programs of the Approved Plans, particularly those focused on TOD. AC-2Ds are located in targeted areas including adjacent to major boulevards and intersections of major bus routes and areas generally within one-quarter to one-half mile of LA Metro's Blue Line (A Line), Expo Line (E Line), and Green Line (C Line) stations. AC-2Ds allow for increased development potential and create opportunities for a mix of uses including retail, commercial offices, entertainment, restaurants, and housing that would support the community and enhance activity near transit. AC-2Ds account for approximately 4.4 percent (319 acres) of the South Los Angeles CPA and approximately 6.8 percent (497 acres) of the Southeast Los Angeles CPA.

AC-2Ds occur exclusively within the CPIO TOD Subareas established along the CPAs' major corridors and near transit centers. Accordingly, future development occurring in these areas is subject to use restrictions and development regulations tailored to each CPIO TOD Subarea. Permitted FARs and heights are tiered with a lower base FAR and height for by-right projects and increases in FAR and height as incentives for projects that incorporate desirable uses such as mixed-income or affordable housing. The CPIO regulations tailor the maximum heights and FARs to the context of each neighborhood where the specific subarea is applied. Future development would be required to incorporate design elements, such as building setbacks and step-backs, breaks in massing, building articulation, and screening, into the design of new buildings. Also, regulations ensure that future development does not overwhelm or encroach upon adjacent uses, particularly lower density residential.

Conclusion. As described above, the Approved Plans do not intensify development in residential areas, instead focusing Active Change Areas along major corridors and near transit centers. Furthermore, Active Change Areas occur within the CPIO which establishes development standards and use restrictions that address land use incompatibilities. Therefore, CPIO regulations ensures that impacts to land uses would be minimal, and the Approved Plans would not result in substantial increased potential for land use conflicts between existing and future land uses. Accordingly, land use incompatibilities resulting from implementation of the Approved Plans would not occur.

State and local agencies have issued guidance related to the proper siting of land uses that are sensitive to environmental impacts, including air quality and noise. Assessing potential impacts from existing land uses equates to assessing the environment's impact on the project. The California Supreme Court ruled that this analysis would not be consistent with CEQA.

In terms of air quality, placing sensitive land uses next to freeways could potentially pose a land use incompatibility. However, the City of Los Angeles adopted a Clean Up Green Up Ordinance (CUGU) which mandates that regularly occupied areas in mechanically ventilated buildings within 1,000 feet of a freeway be provided with air filtration media for outside and return air that meet a MERV of 13. The CUGU Ordinance requires that these filters be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual. Additionally, regularly occupied areas in all mechanically ventilated buildings shall be provided with air filtration media for outside and return air that meets

a MERV of 8. Land uses along the I-110, I-10, and I-405 would be subject to CUGU. While no impact determination is required under CEQA, these additions to CUGU are designed to address cumulative health impacts in highly polluted areas resulting from incompatible land use patterns within the City.

With regards to environmental impacts associated with noise, regulatory requirements ensure that residential buildings are designed to prevent unacceptable noise exposure. All residential structures erected under the Approved Plans would be subject to compliance with this criterion prior to inhabitation by future residents.

Based on the above, impacts related to consistency with applicable land use plans, policies, or regulations under the Approved Plans were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Refer to Chapter 2, Project Description of this Addendum for a full discussion of the proposed zoning changes under the Modified Project. The Modified Project does not conflict with any plans or policies similar to the Original Project. The proposed zoning changes under the Modified Project would incentivize green employment opportunities and more intense residential, commercial, and industrial development. The Modified Project would also increase land use flexibility, improve compatibility between land uses and visual characteristics, and extend TOD regulations within the CPAs. The Modified Project would preserve the character of lower-density neighborhoods and primarily direct growth towards corridors near commercial and industrial centers. These proposed changes would comply with the Framework Element's policies related to growth in higher-intensity commercial centers close to transportation and services.

Additionally, the Modified Project would increase the allowable height and FAR of residential units which set aside affordable housing, thereby accommodating housing opportunities for a range of income levels in compliance with the goals of the Housing Element and land use policies of the RTP/SCS.

To ensure compatibility between land uses and zones as required by State law, the Modified Project would target properties with inconsistent land uses not addressed in the 2017 FEIR. These properties would be rezoned to improve the consistency of existing land uses with the surrounding environment.

Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to Section 3.14, Population and Housing of this Addendum for a full discussion of SB 8, SB 9, and SB 10. The additional increase in allowable residential density around TOD that would occur as a result of these regulations is generally anticipated within the growth assumptions discussed in Chapter 2, Project Description of this Addendum and would not result in a conflict between the land use plans and policies and the Modified Project.

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. In addition, the Housing Element of the General Plan was updated for years 2021-2029 and was originally adopted by City Council in November 2021, followed by the adoption of targeted amendments adopted in June 2022 based on feedback from the California Department of Housing and Community Development. This new Housing Element cycle is still subject to the City's RHNA target allocation enacted for the previous cycle. The City has already met its RHNA target, however it is not expected to have produced enough housing in the affordable lower and moderate income categories. For the current Housing Element cycle, SCAG issued a target of 40 percent of new housing units to be designated for very low-and low-income households, a significant increase from the previous cycle. The Housing Element acknowledges that a lack of adequate resources for Affordable Housing will likely lead to the City falling short of SCAG and RHNA targets for affordable residential unit development.

The proposed zoning changes under the Modified Project would incentivize Affordable Housing development through height and FAR bonuses intended to increase residential density. The Modified Project would also continue to encourage residential and employment growth around TOD. As such, the Modified Project would be compatible with the goals and objectives of the updated Housing Element.

Therefore, there is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.12 MINERAL RESOURCES

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
MINERAL RESOURCES: Would the project:					
(b) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	No Impact	No	No	No	No
(c) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No Impact	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Portions of the Las Cienegas and Downtown Los Angeles oil fields underlay the northwestern portion of the Southeast Los Angeles CPA. Portions of both CPAs are zoned as part of the O District. In both CPAs, the Approved Plans retain the existing O District zoning which generally overlays existing oil fields and do not introduce new oil districts or oil producing uses. Both CPAs are known to contain areas where mineral resources are known or are likely to occur, including areas classified as MRZ-2. However, the Approved Plans do not include provisions to reduce the availability of these resources or include plans to extract known mineral resources in the CPAs.

Accordingly, implementation of the Approved Plans does not result in a loss of availability of known mineral resources. The Approved Plans do not include any components that would result in the extraction of these resources, or further preclude the extraction of such resources. Implementation of the Approved Plans would not result in the loss of availability of mineral resources, and *no impact* would occur.

The Approved Plans do not include any components that would result in the loss of availability or access to mineral resources. The Approved Plans would not result in the recovery of resources in the MRZ-2 nor would they further preclude the recovery of such resources. The Approved Plans do not allow any new development in areas within the MRZ-2, which are not already developed with physical structures, and would not result in further permanent loss of mineral resources located in the MRZ-2. Therefore, the Approved Plans would not result in the loss of access or availability of mineral resources from these areas.

The existing Conservation Element has policies which pertain to the loss of a known and/or locally important mineral resource. Additionally, the policies of the Approved Plans are consistent with these objectives and policies.

The Approved Plans do not include any components that would result in the extraction of sand, gravel, or oil resources or further preclude the extraction of such resources. The Approved Plans would not introduce new oil districts or oil producing uses and would retain the existing O District zoning and its corresponding permitting procedures. The Approved Plans introduce additional

policies relevant to new oil well operations as deemed necessary and consistent with the General Plan.

Implementation of the Approved Plans was found not to result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific land or other land use plan. Therefore, *no impact* was found to occur.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

None of the properties under the Modified Project are located in an MRZ-2 zone, nor are identified within an area containing mineral deposits of regional or statewide significance. As with the 2017 FEIR, the Modified Project does not include any components that would result in the extraction of mineral resources. The Modified Project would not reduce the availability of mineral resources within the CPAs nor result in a loss of availability of known mineral resources. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed. No substantial changes to Mineral Resources have occurred since certification of the EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.13 NOISE

As part of the 2018 CEQA Guidelines update, Appendix G checklist questions were revised to focus on impacts associated with the generation of noise and vibration noise levels. In addition, checklist questions were deleted and revised, as they were redundant. The analysis presented in the EIR remains relevant to the modified checklist questions and is summarized as appropriate for each question below.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
NOISE: Would the project result in:					
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Construction: Significant and Unavoidable Operation: Less Than Significant with Mitigation	No	No	No	N1, N2

A. Impact Determination in the Certified EIR

Analysis

Construction

Construction activity occurring within the CPAs would result in temporary increases in ambient noise levels 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. Construction activities typically require the use of numerous pieces of noise-generating equipment. Typical noise levels at 50 feet from various types of equipment that may be used during construction are listed in Table 4.12-5 in the EIR. The loudest noise levels are typically generated by impact equipment (e.g., pile drivers) and heavy-duty equipment (e.g., scrapers and graders).

Construction activities occurring within the CPAs are subject to Regulatory Compliance Measures associated with the City ordinances. Additionally, the LAMC establishes performance standards for powered equipment or tools. The maximum allowable noise level for most construction equipment within 500 feet of any residential zone is 75 dBA measured at 50 feet from the noise source.

Noise would be experienced by sensitive uses due to construction activities associated with development pursuant to the Approved Plans. Sensitive uses are located throughout the CPAs, and as specific development plans have not yet been determined at individual sites, for the purpose of this analysis it is assumed that sensitive receptors could be as close as 50 feet from where construction would take place. As shown in Table 4.12-5 in the EIR, sensitive receptors could experience noise levels ranging from 71 to 107 dBA L_{eq} . Typical construction noise levels could exceed the 75 dBA L_{eq} at 50 feet standard in the LAMC. Therefore, prior to implementation

of mitigation, the Approved Plans would result in a *significant impact* related to construction noise exceeding established standards.

Operation

The Approved Plans are designed to reduce conflicts and promote compatible development. There are areas where noise conflicts would exist, either on the boundary between zones or in area with mixed land uses. The proposed zoning would potentially have a greater noise impact on adjacent sensitive uses compared to existing zoning.

Commercial uses could be operational adjacent to residences, schools, or other existing sensitive uses and could potentially impact adjacent these sensitive uses.

It is not anticipated that new industrial land uses would generate more noise than existing manufacturing facilities, which typically include substantial operations of mechanical equipment. New industrial and hybrid industrial land uses would include the operations of some mechanical equipment (e.g., HVAC equipment); however, the noise generated by this equipment would be similar or less than the noise generated by heavier equipment that is typically associated with manufacturing facilities allowed in the existing manufacturing zones. Therefore, the approved zoning would have a lesser impact on adjacent sensitive uses compared to the existing zoning.

Under the Approved Plans, the majority of new large development that could potentially cause noise impacts would be located within the CPIO District Subareas because the Subareas cover nearly all commercial and industrial land in the CPAs. Most development in non-CPIO areas would not be expected to have noise impacts because development would be residential in nature and smaller than development along the commercial corridors and in industrial areas, and most projects would qualify for an infill exemption. Similarly, large-scale development is not anticipated in the Residential Subareas (M, N, and O) of the CPIOs, where new development would be limited to low- to medium-scale residential uses.

The City's existing development standards and the CPIO development standards would reduce the potential for land use inconsistencies. Foreseeable projects would be consistent with the LAMC and the CPIO development standards, which are anticipated to reduce potential noise impacts to a less than significant level. However, it is not possible to identify all projects and potential inconsistencies that would be developed after implementation of the Approved Plans. Therefore, prior to implementation of mitigation and due to the introduction of new land uses, the Approved Plans would result in a significant impact related to exposing persons to or generating noise levels in excess of established standards.

Table 4.12-6 in the EIR includes City policies in the Noise Element of the General Plan that are relevant to the Approved Plans. The Approved Plans would be consistent with the guidelines in the General Plan.

Mitigation Measures

Construction

- N1** Any approval of a project located within a CPIO Subarea (except for Residential Subareas M, N, and O) shall ensure that all contractors include the following best management practices in contract specifications, where applicable:
- Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences.

- The construction contractor shall locate construction staging areas away from sensitive uses.
- When construction activities are located in close proximity to noise-sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses.
- Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving.
- Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.
- The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.

Operation

N2 The following conditions shall apply to future development within the CPIO Subareas (except Residential Subareas M, N, and O):

- Industrial activity yards that include the operation of heavy equipment shall be shielded by sound barriers that block line-of-sight to sensitive receptors.
- Mechanical equipment (e.g., heating, ventilation and air conditioning (HVAC) Systems) shall be enclosed with sound buffering materials.
- Truck loading/unloading activity shall be prohibited between the hours of 10:00 p.m. and 7:00 a.m. when located within 200 feet of a residential land use.
- Parking structures located within 200 feet of any residential use shall be constructed with a solid wall abutting the residences and utilize textured surfaces on garage floors and ramps to minimize tire squeal.

Level of Significance of Impact after Mitigation

Implementation of Mitigation Measure **N1** would reduce construction noise levels at existing and future noise-sensitive receptors during construction activities associated with implementation of the Approved Plans (where those activities are located within non-Residential CPIO Subareas). Although most construction activities located in the Residential Subareas of the CPIOs or outside of the CPIOs are not anticipated to have noise impacts, it is possible that a small number of projects in these areas may have impacts. However, requiring Mitigation Measure N1 for all projects in the CPAs would be infeasible because the City as a policy matter has determined the use of staff resources to apply these mitigation measures to all residential projects in the CPIO Subareas (including M, N, and O) and outside the CPIO Subareas is not justified. It would require City staff to evaluate each and every project, including otherwise ministerial projects, to determine if that project, because of its unique characteristics, should be subject to this mitigation measure. Alternatively, it would require the rezoning every property in both CPAs (thousands of additional lots). From an implementation and administrative point of view requiring these procedures or actions would be extremely difficult and require an inordinate amount of staff time and resources to capture the small number of projects that could have noise impacts. In addition, as identified in Table 4.12-5 in the EIR noise levels from various mechanized construction equipment would exceed 75 dBA at distances of 50 feet from the equipment which could exceed the limitations established in LAMC Section 112.05. Depending on the location of construction activities, typical construction noise levels could still exceed 75 dBA despite implementation of mitigation. Implementation of environmental review on a discretionary project level (Mitigation Measure **N1**) would help to reduce this impact, but not necessarily to less than significant, because certain

construction activities may still be required in proximity to nearby sensitive receptors, and construction-related noise levels could exceed the 75 dBA threshold. Construction activity would be short-term and temporary at each location, although construction is anticipated to be ongoing somewhere in the area throughout the time frame of the Approved Plans. Regardless, impacts related to the generation of construction noise in excess of the LAMC standards under the Approved Plans would be *significant and unavoidable*.

Implementation of Mitigation Measure **N2** was incorporated into the environmental standards for projects in the non-residential CPIO Subareas. Implementation of these common industry standard mitigation measures is expected to reduce potential operational noise impacts from industrial and commercial operations to *less than significant*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Construction. The types of construction activities associated with the Modified Project would be similar to the types of construction activities considered as part of the Approved Plans. Noise levels would still 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. Noise levels associated with construction equipment would be the same as presented in Table 4.12-5 of the EIR. Similar to the Approved Plans, sensitive receptors could experience noise levels ranging from 71 to 107 dBA L_{eq} . Typical construction noise levels could exceed the 75 dBA L_{eq} at 50 feet standard in the LAMC. As discussed in the 2017 FEIR, even with implementation of Mitigation Measure **N1**, the development proposed under the Modified Project would result in potentially *significant and unavoidable* impacts related to construction noise. However, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

Operation. The Modified Project does not propose changes which involve new significant impacts or substantially more severe impacts related to operational noise. Similar to the Approved Plans, the Modified Project is designed to reduce conflicts and promote compatible development. However, the Modified Project would increase industrial zoning to provide more flexibility in the allowable land uses. The Industrial Subareas protect residential and other sensitive uses located adjacent to industrially zoned land from impacts associated with incompatibility of uses. The Industrial Subareas upgrade industrial development and design standards in order to encourage industry as a better neighbor to residences and other surrounding uses. Regardless, similar to the Approved Plans, there are areas where noise conflicts would exist, either on the boundary between zones or in area with mixed land uses. The proposed zoning would potentially have a greater noise impact on adjacent sensitive uses compared to existing zoning. The majority of new large development that could potentially cause noise impacts would be located within the CPIO District Subareas because the Subareas cover nearly all commercial and industrial land in the CPAs. The City's existing development standards and the CPIO development standards would reduce the potential for land use inconsistencies. Foreseeable projects would be consistent with the LAMC and the CPIO development standards, which are anticipated to reduce potential noise impacts to a less than significant level. However, it is not possible to identify all projects and potential inconsistencies that would be developed after implementation of the Approved Plans. Therefore, prior to implementation of mitigation and due to the introduction of new land uses, the Approved Plans would result in a significant impact related to exposing persons to or generating noise levels in excess of established standards. As discussed in the 2017 FEIR, with implementation of Mitigation Measure **N2**, the development anticipated under the Modified Project would result in a *less than significant* impact. Therefore, there are no

proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Construction. There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

Operation. There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Construction. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed. The potential sources of construction and associated noise levels are the same between the Modified Project and Approved Plans.

Operation. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed. The potential sources of operational noise and associated noise levels are the same between the Modified Project and Approved Plans.

E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measures **N1** and **N2** would continue to address impacts related to noise and no mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
NOISE: Would the project result in:					
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Construction: Significant and Unavoidable Operations: Less than Significant with Mitigation	No	No	No	N3, N4

A. Impact Determination in the Certified EIR

Analysis

Construction Vibration. Table 4.12-7 in the EIR shows construction equipment vibration levels based on various reference distances. Construction equipment would typically generate vibration levels up to 87 Vdb at 25 feet, although pile driving could generate a vibration level of 112 Vdb at 25 feet. It is possible that heavy equipment could operate within 25 feet of, or adjacent to nearby buildings. The vibration levels associated with this equipment could exceed the 90 VdB significance thresholds for buildings extremely susceptible to building damage (e.g., historic structures). In addition, vibration levels could exceed 98 VdB significance threshold for engineered concrete and masonry buildings without plaster (e.g., typical urban development), causing building damage or substantial human annoyance. Therefore, prior to implementation of mitigation, the Approved Plans were found to result in a *significant impact* related to construction vibration.

Operational Vibration. It is not anticipated that the CPAs will be developed with substantial sources of vibration (e.g., blasting operations). Operational groundborne vibration in the project vicinity would be generated by vehicular travel on the local roadways. According to the FTA, Transit Noise and Vibration Impact Assessment guidance document, vibration from traffic is rarely perceptible.²¹ Similar to existing conditions, traffic vibration levels even with the expected additional trips from the Approved Plans would not be perceptible by sensitive receptors. Therefore, impacts related to operational vibration under the Approved Plans were found to be *less than significant*.

Mitigation Measures

Construction

N3 Any approval of a project located within a CPIO Subarea (except for Residential Subareas M, N, and O) that is adjacent to buildings listed or determined eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, designated as a Historic-Cultural Monument by the City of Los Angeles, within a Historic Preservation Overlay Zone ("historic buildings"), or determined to be historically significant in SurveyLA or other historic resource survey meeting all of the requirements of Public Resources Code Section 5024.1(g), shall ensure all of the following requirements are or will be met:

²¹ FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

- Historic buildings adjacent to the project's construction zones are identified.
- A Vibration Control Plan is prepared and approved by the City.
- The Vibration Control Plan shall be completed by a qualified structural engineer.
- The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected buildings. The survey letter shall provide a shoring design to protect the identified land uses from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels such as sonic pile driving or caisson drilling instead of impact pile driving.

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

N4 Any approval of a project located within a CPIO Subarea (except for Residential Subareas M, N, and O) shall ensure that all contractors include the following best management practices in contract specifications, where applicable:

- Impact pile drivers shall be avoided where possible in vibration-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are alternatives that shall be utilized where geological conditions permit their use.
- The construction activities shall involve rubber-tired equipment rather than metal-tracked equipment.
- The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment where possible to avoid construction vibration impacts.

Level of Significance of Impact after Mitigation

Construction: *Significant and Unavoidable*. Although most construction activities located in the Residential Subareas of the CPIOs or outside of the CPIOs are not anticipated to have vibration impacts, it is possible that a small number of projects in these areas may have impacts.

Operation: *Less than significant*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Construction Vibration. As noted above, the types of construction activities associated with the Modified Project would be similar to the types of construction activities considered as part of the Approved Plans. Similar to the Approved Plans, sensitive receptors could experience vibration impacts. As discussed in the 2017 FEIR, even with implementation of Mitigation Measures **N3** and **N4**, the development proposed under the Modified Project would result in potentially significant impacts related to construction vibration. However, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

Operation. The Modified Project does not propose changes which involve new significant impacts or substantially more severe impacts related to operational vibration. As discussed in the 2017 FEIR, the development anticipated under the Modified Project would result in a *less than significant* impacts. Therefore, there are no substantial changes to the circumstances under

which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no changes in circumstances under which the Modified Project is being undertaken that would result in new or more severe significant impacts.

D. Any New Information Requiring New Analysis or Verification?

Construction. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed. The potential sources of construction and associated vibration are the same between the Modified Project and Approved Plans.

Operation. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed. The potential sources of operational vibration are the same between the Modified Project and Approved Plans.

E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measures **N3** and **N4** would continue to address impacts related to vibration and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
NOISE: Would the project result in:					
(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Southeast Los Angeles CPA is not located within an airport land use plan or within two miles of an airport, thus no impact would occur. Some areas within the South Los Angeles CPA are located within the Airport Influence Area for LAX.²² Any impacts that would occur to future residents or users in the South Los Angeles CPA from existing conditions from the noise related to Airport Influence Area would not be an impact under CEQA. Additionally, it is not reasonably foreseeable that the Approved Plans would exacerbate those existing conditions, as any increase in flight activity based on the increase in population in the CPAs would be at best negligible. Therefore, implementation of the Approved Plans was found to not expose people residing or working in the CPAs to excessive noise levels. *No impact* would occur.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

No Impact.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

There are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to being in the vicinity of an airport beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to being in the vicinity of an airport beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows these new significant impacts or substantially more severe impacts related to being in the vicinity of an airport beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

²² Los Angeles County Airport Land Use Commission, *Airport Influence Areas*, May 13, 2003.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.14 POPULATION AND HOUSING

As part of the 2018 CEQA Guidelines update, Appendix G checklist questions were clarified and combined to focus on potential impacts associated with unplanned growth. The analysis presented in the EIR remains relevant to the modified checklist questions and is summarized as appropriate for each question below.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
POPULATION AND HOUSING: Would the project:					
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Implementation of the Approved Plans increase reasonably expected housing and population compared to housing and population under the Previous Plans (i.e., the Community Plans in place prior to the adoption of the Approved Plans) for the CPAs in order to accommodate population growth and housing and employment demand projected by SCAG through the year 2035. The Approved Plans would not introduce unplanned infrastructure in the CPAs.

The Approved Plans outline a vision for the long-term physical and community enhancement of the CPAs. The Approved Plans provide strategies and specific implementing actions that will allow the vision of each CPA to be accomplished and establish standards for future development projects that enhance the character and sustainability of the communities. Furthermore, the Approved Plans follow smart growth principles and promote concentrated, mixed-use development adjacent to transit corridors in order to conserve resources, protect existing residential neighborhoods, and improve air quality by reducing vehicle miles traveled.

Population and Housing Growth. The Approved Plans allow for increased development in the CPAs within targeted areas to both accommodate housing and population growth projected by SCAG in 2035, and to be consistent with the City's General Plan Framework Element, which calls for growth to be focused in higher-intensity commercial centers close to transportation and services. The level of growth under the Approved Plans is also consistent with Citywide projections and is not considered substantial with respect to anticipated growth in the City as a whole. The Approved Plans direct growth to targeted areas that can accommodate greater development, including TOD areas, while protecting residential neighborhoods and established industrial areas. The Approved Plans' increase in reasonably expected development would facilitate projected growth through the use of General Plan amendments, zone changes, and the establishment of the South Los Angeles and Southeast Los Angeles CPIO Districts.

An increase in reasonably expected housing development and an associated increase in population capacity is needed both to accommodate population growth forecasted by SCAG and to be consistent with Framework policies that call for new housing to be located near transit. Accordingly, implementation of the Approved Plans would ensure that projected population growth is accommodated and would not result in unplanned population growth.

Employment Growth. The Approved Plans do not entitle new businesses or employment-generating uses that would induce population growth; rather they accommodate SCAG's employment demand for the CPAs. While the potential increase in jobs resulting from an increase in reasonably expected development under the Approved Plans would provide new employment opportunities, it would not include employment-generating uses that would induce substantial growth. As the South Los Angeles CPA is largely residential, is well served by public transportation, and is easily accessible by freeway, future employment opportunities would serve to accommodate demand for jobs by residents. Furthermore, the Southeast Los Angeles CPA has a large portion of land dedicated to industrial and commercial uses and the CPA also enjoys easy access to transit and freeways, and therefore more jobs may be provided locally. Cross migration from one CPA to the other would be achieved with the access to public transit and more intense development along transit corridors. Furthermore, the CPAs are urbanized communities with no undisturbed open land. As such, implementation of the Approved Plans would not cause growth or accelerate development in an undeveloped area that exceeds SCAG's 2035 projections.

Conclusion. The Approved Plans do not introduce new infrastructure or the extension of roads. Although they accommodate projected population growth by increasing reasonably expected development levels, thereby creating additional housing and employment opportunities, they do not entitle specific development projects for new housing or businesses. As discussed above, the Approved Plans do not induce substantial growth through employment-generating uses. Moreover, the adoption of the Approved Plans would not result in inconsistencies with adopted City or regional housing policies. The Approved Plans would not increase reasonably expected development in the CPAs in a way that would be inconsistent with growth projections, or in a way that would be inconsistent with City, regional and other adopted housing growth policies. The Approved Plans do not induce growth but rather accommodate anticipated growth. Therefore, impacts related to inducing substantial growth under the Approved Plans were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project designates properties on 502 acres within the South Los Angeles and Southeast Los Angeles CPAs for proposed General Plan land use and/or zone changes. These changes would modify the allowable intensity, density, and/or types of uses on those properties and thus increase the capacity for housing and jobs in the CPAs. In addition, the Modified Project provides revises CPIO provisions to encourage publicly accessible open space in exchange for existing development bonuses, along the active transportation corridor right-of-way within the

West Adams CPA. These changes would not result in changes to the land use density or intensity in the West Adams CPA.

The Modified Project includes new land use regulations would alter the CPIOs for the CPAs and include zone changes, General Plan amendments, and FAR and setback standards. The Modified Project incentivizes the construction of denser housing development—in conjunction with a set-aside of Affordable Dwelling units—in proximity to TOD within commercial manufacturing zoned sites that otherwise already allow multi-family uses. The Modified Project also incentivizes development that includes green employment uses within the South Los Angeles and Southeast Los Angeles CPAs.

The Modified Project further amends the existing South Los Angeles and Southeast Los Angeles CPIOs by creating a new CPIO chapter, “Chapter VI - Slauson Subareas,” to set forth zoning regulations and development standards for sites that are a part of the Slauson Corridor TNP. Chapter VI establishes new CPIO Subareas that offer incentives for Green Employment Uses and CPIO Affordable Housing Projects, as well as set forth Path-Abutting Building Design Standards for sites that abut the Active Transportation Corridor. Within the Slauson Corridor TNP, the Modified Project also includes incorporating previously undesignated sites into the CPIOs (see Chapter 2 Project Description).

Due to the proposed zoning changes in the Slauson Subareas, the Modified Project would accommodate incrementally increased population, housing, and employment in the South and Southeast Los Angeles CPAs beyond what was evaluated in the 2017 FEIR. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. **Table 3-3** below compares the change in reasonably foreseeable growth projections for the Modified Project as compared to those for the Approved Plans.

The 2017 FEIR determined that the Approved Plans would result in a less than significant impact due to consistency with adopted housing policies, including the 2008 RTP/SCS. The Modified Project is consistent with state, regional (SCAG RTP/SCS and RHNA) and local plans and policies to promote growth in proximity to transit.

As with the Approved Plans, the Modified Project would direct growth to targeted areas near public transit infrastructure and would not induce substantial growth through employment-generating uses, nor introduce new infrastructure or the extension of roads. Instead, the Modified Project increases allowable housing density and offers business and housing incentives under the regulations in the new CPIO Chapter VI. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed. As discussed further in D. below, recent US Census data indicates that employment growth is not occurring as anticipated and the forecast employment growth for the Modified Project is likely high.

TABLE 3-3: CHANGE IN GROWTH – MODIFIED PROJECT VS. APPROVED PLANS

	EIR Existing Conditions (2010)	Approved Plans 2035*	Modified Project 2035**	Approved Plans 2035 vs. Existing	Modified Project 2035 vs. Existing	Approved Plans 2035 Percentage Change vs. Existing	Modified Project 2035 Percentage Change vs. Existing	Percentage Point Change Modified Project vs. Approved Plans
SOUTH LOS ANGELES CPA								
Population (persons)	270,354	313,836	316,045	43,482	45,691	16.9%	17.1%	0.8
Dwelling Units	82,186	97,897	98,915	15,711	16,729	20.4%	20.4%	1.2
Employment (jobs)	51,078	69,470	72,792	18,392	21,714	42.5%	42.1%	6.5
SOUTHEAST LOS ANGELES CPA								
Population (persons)	278,337	320,337	322,351	42,000	43,014	15.1%	15.8%	0.7
Dwelling Units	68,651	80,487	80,931	11,836	12,280	17.2%	17.9%	0.6
Employment (jobs)	74,694	95,655	101,618	21,261	26,924	28.1%	36.0%	8.0
<p>* Reasonably expected growth from 2017 FEIR.</p> <p>** Reasonably expected growth estimated by City Planning using the same methodology as used in the 2017 FEIR.</p> <p>SOURCE: City of Los Angeles, Department of City Planning; 2017, 2022</p>								

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

On September 16, 2021, Governor Gavin Newsom signed three legislative bills intended to expand housing production (SB 8), streamline zoning processes for multi-family housing (SB 9), and increase residential density (SB 10). SB 8 reduces the ability of local jurisdictions to decrease the intensity of land uses, including reductions to height, density, or FAR. SB 9 allows up to two dwelling units on a single-family zoned parcels to be permitted on a ministerial basis. SB 10 allows local governments to pass ordinances to zone any parcel for up to 10 residential units if located within one-half mile of a major transit stop and urban infill sites. These state bills override local zoning controls and the City of Los Angeles has taken steps to address these laws. In addition to the land use and zoning changes proposed under the Modified Project, these bills would further increase the allowable intensity and density of residential unit construction within the CPAs. As discussed in Section 2.4, Plan Implementation and Changes to Growth Forecast, the impact of these bills is generally accounted for in the growth forecasts shown in **Tables 3-4** and **3-5**.

The Modified Project would not introduce any new infrastructure, nor any substantial employment-generating land uses, nor induce population growth, but would accommodate it. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed. To the contrary, since the certification of the 2017 FEIR, updates to the US Census and SCAG RTP/SCS have modified information regarding existing growth and demographic forecasts for the project area from the growth projections in the 2017 FEIR. The 2020 Decennial Census represents the most current and accurate count of existing population, and housing (housing units) numbers within the CPAs. The US Census On the Map database contains employment data for the CPAs including most recently for 2019.

As shown in **Table 3-4** below, *if it is assumed* that growth occurs at a linear pace each year, the 2020 Decennial Census data would indicate that the 2017 FEIR may have overestimated population, housing, and employment numbers within the CPAs. Similarly, the West Adams FEIR may have overestimated growth in that CPA. However, growth typically does not occur at a consistent pace. Growth tends to occur in bursts in response to economic stimuli and/or changes in infrastructure (such as the addition of transit).

The 2017 FEIR indicated that the Approved Plans would result in a significantly greater number of jobs than the actual conditions indicated by the US Census data. The decline in jobs in the project area may be due to lower density uses than in the past and those assumed in the 2017 FEIR (e.g., warehouse space typically employs far fewer people in the same space as compared to commercial uses). The 2017 FEIR analysis uses gross average assumptions regarding square feet of non-residential space per employee in order to estimate employment. Based on these recent data, City Planning finds that the employment forecasts in the 2017 FEIR and those identified above for the Modified Project are extremely high for the year 2035, in part because of over-estimates of employment density. This shows, relying on such estimates are conservative for purposes of impact analysis.

TABLE 3-4: CHANGE IN GROWTH – CENSUS VS. APPROVED PLANS

	EIR Existing Conditions	2020 Census	2020 Reasonably Expected Growth Approved Plans*	2020 Census Change vs. EIR Existing	Approved Plans* 2020 vs. EIR Existing	2020 Census Percentage Change vs. EIR Existing (%)	Approved Plans* 2020 Percentage vs. EIR Existing (%)	Percentage Point Change 2020 Census vs. 2020 Approved Plans*
SOUTH LOS ANGELES CPA								
Population (persons)	270,354	277,921	288,472	7,567	18,118	2.8	6.7	-3.9
Dwelling Units	82,186	86,832	88,732	4,646	6,546	5.7	8.0	-2.3
Employment (jobs)**	51,078	39,584	58,741	-11,494	7,663	-22.5	15.0	-37.5
SOUTHEAST LOS ANGELES CPA								
Population (persons)	278,337	285,585	295,837	7,248	17,500	2.6	6.3	-3.7
Dwelling Units	68,651	70,986	73,574	2,335	4,923	3.4	7.2	-3.8
Employment (jobs)**	74,694	45,835	83,553	-28,859	8,859	-38.6	11.9	-50.5
* Reasonably expected growth interpolated from 2017 FEIR assuming linear growth from EIR Existing (2010) to the 2017 FEIR horizon year (2035)								
**US Census employment data sourced from On the Map, which was most recently updated in 2019.								
SOURCE: City of Los Angeles, Department of City Planning, 2017, 2022; US Census Bureau, 2020								

TABLE 3-5: CHANGE IN GROWTH – 2020-2045 RTP/SCS VS. APPROVED PLANS

	EIR Existing Conditions	Approved Plans 2035*	2020-2045 RTP/SCS 2035**	Approved Plans 2035 vs. EIR Existing	2020-2045 RTP/SCS 2035 vs. EIR Existing	Percentage Change Approved Plans 2035 vs. EIR Existing	Percentage Change 2020-2045 RTP/SCS 2035 vs. EIR Existing	Percentage Point Change 2020-2045 RTP/SCS 2035 vs. Approved Plans 2035
SOUTH LOS ANGELES CPA								
Population (persons)	270,354	313,836	307,711	43,482	37,357	16.1%	13.8%	-2.3
Dwelling Units	82,186	97,897	93,594	15,711	11,408	19.1%	13.9%	-5.2
Employment (jobs)	51,078	69,470	69,376	18,392	18,298	36.0%	35.8%	-0.2
SOUTHEAST LOS ANGELES CPA								
Population (persons)	278,337	320,337	308,765	42,000	30,428	15.1%	10.9%	-4.2
Dwelling Units	68,651	80,487	75,422	11,836	6,771	17.2%	9.9%	-7.3
Employment (jobs)	74,694	95,655	63,908	21,261	-10,786	28.5%	-14.4%	-42.9
* Reasonably expected growth from 2017 FEIR.								
** Reasonably expected growth for the year 2035 identified in the 2020 – 2045 RTP/SCS								
SOURCE: City of Los Angeles, Department of City Planning, 2017; SCAG, 2020								

As shown in **Table 3-5**, data from the 2020 Decennial Census indicates less growth in population and substantially less growth in jobs for the South Los Angeles and Southeast Los Angeles CPAs combined than was anticipated in the 2017 FEIR (assuming linear growth). Similar patterns are evident in West Adams. In addition to new US Census data, the Southern California Association of Governments has updated their regional forecasts to reflect decrease statewide growth. In 2007, the State of California was forecast to grow to a population of 60 million by year 2050. However, since 2008 these population growth forecasts have been significantly reduced. This reduction in growth is carried through to the SCAG regional and local forecasts included in the 2020–2045 RTP/SCS.

Since the publication of the 2017 FEIR, SCAG has updated the RTP/SCS to reflect changes in regional growth forecasts. **Table 3-5** compares the change in reasonably foreseeable growth projections for the 2020-2045 RTP/SCS (for the year 2035) compared to those for the Approved Project. The table indicates less growth in population and substantially less growth in jobs for the South Los Angeles and Southeast Los Angeles CPAs combined than was analyzed in the 2017 FEIR. Similar patterns are evident in West Adams.

Based on the US Census data showing declines in jobs in the South Los Angeles and Southeast Los Angeles CPAs, and the substantially reduced job growth anticipated by the 2020-2045 RTP/SCS, the Department of City Planning finds that the factors used in the 2017 FEIR and this Addendum identify too much job growth in the project area and thus provide an overly conservative analysis of associated impacts. As such, even with the over-estimated job growth, associated impacts would not substantially increase as a result of the Modified Project.

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR for this issue and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
POPULATION AND HOUSING: Would the project:					
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans do not entitle specific development projects. No housing units are specifically proposed to be demolished, converted to market rate, or removed through other means as a result of the Approved Plans. Thus, it is not anticipated that the Approved Plans would result in substantial displacement of existing housing. The majority of new development would be expected to occur in the proposed Active Change Areas of the CPAs located along major corridors and at transit station areas where it is not anticipated that substantial numbers of housing units presently exist.

Although the City has analyzed the entire South Los Angeles and Southeast Los Angeles CPAs, only certain areas underwent zone changes and/or amendments to General Plan land use designations, and/or are located within the newly established CPIO Districts. The Active Change Areas within the CPAs are primarily zoned for industrial and commercial uses that contain little to no housing. Future development occurring in the Non-Change Areas (including most residential neighborhoods) would be subject to the existing land use designations and zoning under the Previous Plans. Generally, the areas of the CPAs currently designated and zoned for residential land uses remain designated and zoned to allow for residential land uses, and the residential neighborhoods in the CPAs did not change significantly due to the Approved Plans. The Approved Plans would serve to stabilize and improve existing residential neighborhoods and would help minimize the displacement of existing housing in residential neighborhoods as the majority of new housing developed under the Approved Plans would be located in the proposed Active Change Areas along major corridors and at transit station areas. In a few cases Active Change Areas are proposed on land that is currently planned and zoned residential, but these instances are limited and occur along major corridors or in close proximity to Metro light rail stations.

The Approved Plans would accommodate housing demand projected by SCAG by the year 2035. As previously discussed, many Active Change Areas in the CPAs allow for increased housing opportunities through mixed-use residential development with greater floor area and height along select corridors and near transit stations. This targeted growth is primarily located on major commercial corridors where the majority of the existing uses include retail and commercial uses. There are generally no Active Change Areas proposed within residential neighborhoods. In a few cases Active Change Areas are proposed on land that is currently planned and zoned residential, but these instances are limited and occur along major corridors or in close proximity to Metro light rail stations. Therefore, implementation of the Approved Plans was found to not displace substantial numbers of existing housing, and impacts related to housing displacement were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 2017 FEIR determined that the Approved Plans would result in a less than significant impact related to population, housing, and employment. As shown in **Table 3-4**, the Modified Project would accommodate incrementally greater population, housing, and employment numbers in the South and Southeast CPAs than evaluated in the 2017 FEIR. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. The Modified Project would not include changes that would result in new or substantially more severe impacts related to displacement. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to Section 3.14, Population and Housing for discussion of SB 8, SB 9, and SB 10. The additional increase in allowable residential density that would occur as a result of these regulations is generally anticipated within the growth assumptions discussed in Chapter 2, Project Description of this Addendum (see Section 2.4, Plan Implementation and Changes to Growth Forecast). The majority of new development under the Modified Project would be expected to occur in the proposed Active Change Areas of the CPAs located along major corridors and at transit station areas. However, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the EIR for this issue and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.15 PUBLIC SERVICES

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
PUBLIC SERVICES: Would the project:					
(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
i. Fire Protection?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans do not constitute a commitment to any project-specific construction. Land uses in the CPAs are not expected to change dramatically. Increased population, by itself, would not increase demand for fire services. Project impacts regarding fire services are evaluated by the City of Los Angeles Fire Department (LAFD) on a project-by project basis. During the building permit project-level review process, the LAFD reviews the project plans to determine the project's effect on fire protection and emergency medical services. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response time, and response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials.

The Approved Plans are not expected to result in increases to industrial land uses or new heavy manufacturing or other activities that may involve the use of large quantities of toxic combustible substances. Rather, the Approved Plans are expected to reduce the industrial uses. The Approved Plans reduce the amount of industrially designated land by approximately 46 percent (127 acres) in the South Los Angeles CPA and 27.5 percent (398 acres) in the Southeast Los Angeles CPA, and the areas that will remain industrially designated are already built out. In addition, some of the land currently residential but planned industrial would be planned residential. Therefore, the Approved Plans reduce the likelihood that new industrial uses (that would use hazardous materials over current conditions in the CPAs) would be introduced in these areas that increase the demand on fire services. The Approved Plans would not place development in areas prone to wildfires, necessitating increased fire protection services.

California state law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. Generally, multi-lane arterial roadways allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. Additionally, the LAFD in collaboration with the Los Angeles

Department of Transportation (LADOT) has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling on designated streets in the City. Designated emergency routes within both of the CPAs include the I-10, I-110, and I-105 freeways, Western Avenue, Slauson Avenue, Martin Luther King Jr. Boulevard, and Florence Avenue.²³ These emergency response routes would be maintained, and the Approved Plans would not introduce new streets or otherwise alter the overall land use pattern in either of the CPAs. All development within the CPAs would be required to be designed in accordance with City standards, which include provisions that address emergency access (e.g., minimum street widths, minimum turning radii, maximum lengths of cul-de-sacs, etc.). Individual projects would also be required to develop a construction staging and traffic management plan, as necessary to ensure emergency access is maintained, consistent with LAFD requirements.

The CPAs are currently sufficiently served by 10 fire stations within the boundaries of the CPAs. There are two additional stations in close proximity to the CPAs that could dispatch fire protection service as needed in extreme situations. As development occurs over the lifetime of the Approved Plans, it is expected that fire protection service levels will be evaluated and maintained. In conformance with existing policies, procedures and practices related to fire protection and emergency services, the LAFD will maintain acceptable emergency response times through the provision of additional personnel and equipment as needed.

Based on the above, it is possible that the reasonably expected development from the Approved Plans could result in the need and construction of new or expanded fire stations or facilities. No new fire stations are planned or proposed in the Approved Plans. It is assumed that if new facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use. In addition, should new facilities be needed, such facilities will be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size. The CPAs are urbanized areas and new facilities would not involve expansion of the urban sphere beyond current boundaries and thus there would be no need for new or expanded infrastructure. Based on the urban location and the relatively small size of typical facilities, the construction of a new fire facility or expansion of an existing facility would be less than significant impact and or possibly qualify for an infill exemption. To the extent that any significant impacts could result from the unique characteristics of the specific project site, those impacts would be speculative at this time. Therefore, impacts related to fire protection and emergency services were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 2017 FEIR determined that the Approved Plans would result in a less than significant impact related to fire protection services. As discussed in Chapter 2, Project Description, of this Addendum and analyzed in Section 3.14, Population and Housing, due to the proposed zoning changes in the Slauson Subareas of the South Los Angeles and Southeast Los Angeles CPAs, the Modified Project would accommodate incrementally increased population, housing, and

²³ City of Los Angeles, Department of City Planning, *Safety Element of the Los Angeles City General Plan*, Exhibit H, 1996.

employment beyond what was evaluated in the 2017 FEIR. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. The Modified Project could therefore incrementally increase the demand for fire services in the South Los Angeles and Southeast Los Angeles CPAs. However, the LAFD would continue to maintain acceptable service levels through the provision of additional personnel and equipment as needed in conformance with existing regulations. It is not anticipated that the incremental increase in population and employment would result in the need for new or expanded fire protection facilities. No new fire stations are planned or proposed under the Modified Project. As discussed in the 2017 FEIR, it is assumed that if new or expanded public service facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use. As discussed in the 2017 FEIR, any new fire protection facilities that may need to be constructed or expanded in the project area in the future would be expected to result in less than significant impacts. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to fire protection services beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to Section 3.14 for discussion of SB 8, SB 9, and SB 10. These bills would increase the allowable intensity and density of residential unit construction. However, growth that would occur as a result of these regulations is generally anticipated within the growth assumptions discussed in Chapter 2, Project Description. The Modified Project would not introduce any new infrastructure which would block or hinder existing emergency routes. While the Modified Project would accommodate additional growth in non-residential development, it would not be expected to result in substantial growth in population and employment-generation beyond what can be accommodated by existing infrastructure. The Modified Project would therefore not result in significant impacts related to the provision of new or expanded fire protection facilities. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to police protection services beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, and Section 3.14, Population and Housing, of this Addendum for discussion of a comparison of population, housing, and employment forecasts under the Modified Project as compared to the 2020 Decennial Census, the 2020 growth forecast interpolated from the 2017 FEIR, and more recent growth forecasts in the SCAG 2020-2045 RTP/SCS. The 2017 FEIR estimated greater population, housing, and significantly greater employment numbers within the CPAs than the actual conditions indicated by the US Census data and more than the recent forecasts in the 2020-2045 RTP/SCS. As such, the Department of City Planning believes that the employment forecasts in the 2017 FEIR and those presented in this document for the Modified Project are extremely conservative (high) because of over-estimates of employment density. U.S. Census data indicates 3.8 percent less growth in population and 45.2 percent less growth in jobs for the South Los Angeles and Southeast Los Angeles CPAs combined than the 2017 FEIR data interpolated for the year 2020.

In addition to new US Census data, the SCAG has updated their regional and local forecasts to reflect a decrease in statewide growth. In 2007, the State of California was forecast to grow to a population of 60 million by year 2050. However, since 2008 these population growth forecasts have been significantly reduced. This reduction in growth is carried through to the SCAG regional

forecasts included in the 2020 – 2045 RTP/SCS. The 2017 FEIR estimated 3.2 percent greater growth in population and 25.6 percent greater growth in jobs for the South Los Angeles and Southeast Los Angeles CPAs combined than the 2020-2045 RTP/SCS by year 2035. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to police protection services beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a or Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
PUBLIC SERVICES: Would the project:					
(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
ii. Police Protection?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The increase in resident population, employment and development in the CPAs associated with the proposed land use changes is generally anticipated and planned for by the City at a citywide level. These increases will take place over time, and the totals are not anticipated to be reached until 2035. The Approved Plans do not contain any specific regulations that would affect police protection services. The Approved Plans do not constitute a commitment to any project-specific construction; however, the reasonably expected development from the Approved Plans would result in development throughout the CPAs, with more intense development expected particularly

within the Active Change Areas which are primarily located along established commercial corridors and near public transit.

Although there is no direct proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls for police response would be anticipated to increase with the increase in people, commercial and retail land uses, and dwelling units in the CPAs. Such calls are typical of problems experienced in existing developed areas of the City and do not represent unique law enforcement issues that would be created specifically by implementation of the Approved Plans. To ensure that necessary police services, facilities, and equipment are provided for the public safety need of all neighborhoods, demand for existing and projected police services and facilities is monitored and forecasted by the Los Angeles Police Department (LAPD) in order to maintain standards. Accordingly, as development occurs over the lifetime of the Approved Plans, police protection services levels will be evaluated and maintained in accordance with existing policies, procedures and practice.

All development is subject to LAMC regulations and standards and the Framework Element of the General Plan. Compliance with these regulations would increase the efficiency of the delivery of police protection services and help reduce the need to construct new police stations.

Designated emergency routes within the CPAs include the I-10, I-110, and I-105 freeways, Western Avenue, Slauson Avenue, Martin Luther King Jr. Boulevard, and Florence Avenue. These emergency response routes would be maintained in their existing locations and the Approved Plans would not introduce new streets or otherwise change the overall land use pattern in the CPAs.²⁴ All development within the CPAs would be required to be designed in accordance with City standards. Individual projects would be required to develop a construction staging and traffic management plan, as necessary to ensure emergency access is maintained, consistent with LAPD requirements. Compliance with these standards would help minimize potential emergency access impacts. Furthermore, California state law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. Generally, multi-lane arterial roadways allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. Nevertheless, the increase in people and dwelling units in the CPAs created through development allowed under the Approved Plans could potentially increase the demand for police protection services. While implementation of the Approved Plans may require increased police protection services over the course of the planning period, existing operational structures, policies, and regulations will help ensure that the LAPD can adequately plan for and serve the new growth.

No new police stations or facilities are planned or proposed in the Approved Plans. It is assumed that if new or expanded police facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use. In addition, should new facilities be needed, such facilities will be located on parcels that are infill on lots that are between 0.5 and 1 acres in size. Based on the urban location and size, the construction of a new police facilities or expansion of an existing facility would be less than significant impact and or possibly qualify for an infill exemption. To the extent that any significant impacts could result from the unique characteristics of the specific project site, those impacts would be speculative at this time. Therefore, impacts related to police services were found to be *less than significant*.

²⁴ City of Los Angeles, Department of City Planning, *Safety Element of the Los Angeles City General Plan*, Exhibit H, 1996.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 2017 FEIR determined that the Approved Plans would result in a less than significant impact related to police protection services. As noted above, the Modified Project would accommodate incrementally increased population, housing, and employment in the South Los and Southeast Los Angeles CPAs beyond what was evaluated in the 2017 FEIR. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. The Modified Project could therefore increase incrementally the demand for police protection services in the South Los Angeles and Southeast Los Angeles CPAs. The LAPD would continue to maintain acceptable service levels through the provision of additional personnel and equipment as needed. It is not anticipated that the incremental increase in population and employment would result in the need for new or expanded police protection facilities. No new police stations are planned or proposed under the Modified Project. As discussed in the 2017 FEIR, it is assumed that if new or expanded public service facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use. As discussed in the 2017 FEIR, any new police protection facilities that may need to be constructed or expanded in the project area in the future would be expected to result in less than significant impacts. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to police protection services beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. The Modified Project would not introduce any new infrastructure which would block, hinder, or delay police vehicle from responding to emergencies. The Modified Project would not be expected to result in substantial growth in population and employment-generating beyond what can be accommodated by existing infrastructure. The Modified Project would therefore not result in significant impacts related to the provision of new or expanded police protection facilities. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to police protection services beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. As discussed in Section 3.14, the 2017 FEIR forecasted greater population, housing, and employment data than indicated by the 2020 U.S. Census data and more than the recent forecasts in the 2020-2045 RTP/SCS. As such, City Planning believes that the employment forecasts in the 2017 FEIR and those presented in this document for the Modified Project are extremely conservative (high) because of over-estimates of employment density. In addition to new U.S. Census data, A reduction in growth is carried

through to the SCAG regional forecasts included in the 2020–2045 RTP/SCS. With an over-estimated job growth, associated impacts would not substantially increase as a result of the Modified Project. US Census data indicates less growth in population and substantially less growth in jobs for the South Los Angeles and Southeast Los Angeles CPAs combined than the 2017 FEIR data interpolated for the year 2020. The 2017 FEIR estimated greater growth in population and substantially greater growth in jobs for the South Los Angeles and Southeast Los Angeles CPAs combined than the 2020-2045 RTP/SCS by year 2035. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to police protection services beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the EIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
PUBLIC SERVICES: Would the project:					
(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
iii. Schools?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans do not contain any specific regulations that would affect public schools. The Approved Plans do not constitute a commitment to any project-specific construction; however, the Reasonably Expected Development from the Approved Plans would result in development throughout the CPAs, with more intense development expected within the Active Change Areas, which are primarily located along established commercial corridors and near public transit.

Table 4.14-13 in the EIR shows the estimated generation of elementary, middle, and high school students that could be anticipated within the CPAs. It is expected that the number of students generated overall by the Approved Plans could be lower as some may choose to go to a private or charter school.

Los Angeles Unified School District (LAUSD) enrollment forecasts are limited to five-year increments, and do not extend out to 2035, and thus a comparison to LAUSD forecasts for the plan horizon year is not possible. However, the General Plan Framework Element calls for the City to participate in the development of demographic estimates for school planning, to cooperate with LAUSD to expand school facilities commensurate with population growth, to explore alternatives for new school sites, and to strategize on planning and access for school facilities.

Existing public (non-charter) elementary, middle and high schools serving the CPAs have the capacity to accommodate additional students. Nonetheless, as future development in the CPAs occurs, the student population would increase enrollment at non-charter public schools with additional elementary school students, middle school students, and high school students.

Conformance to California Government Code Section 65995 and fees collected under SB 50 (i.e., School Facilities Act of 1998) are deemed to provide full and complete mitigation of school facilities impacts. Such development would assist in funding efforts necessary to alleviate school overcrowding and would ensure that new development under the Approved Plans would bear its fair share of the cost of housing additional students generated. Therefore, with payment of appropriate fees, impacts related to public schools were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 2017 FEIR estimated the number of students generated by the Approved Plans based on the proposed units and non-residential buildable square footage in each CPA using LAUSD student generation rates. As identified in Chapter 2, Project Description of this Addendum and analyzed in Section 3.14, Population and Housing, the Modified Project would increase the number of units and buildable square footage and thus would increase the reasonably anticipated population and employment in the South Los Angeles and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. **Table 3-6** below compares the number of generated students estimated in the 2017 EIR with the Modified Project. As demonstrated, due to the increased allowable density in the CPAs, the Modified Project would generate approximately eight percent more students in the South Los Angeles CPA and 5 percent more students in the Southeast Los Angeles CPA than what was estimated in the 2017 FEIR.

TABLE 3-6: ANTICIPATED STUDENT GENERATION IN THE CPAS

Use	Units/Buildable Square Feet 2035 vs EIR Existing		Student	2035 % Change from Existing		% Point Change Modified Project vs 2017 EIR
	2017 EIR	Modified Project	Generation Rate	2017 EIR	Modified Project	
SOUTH LOS ANGELES CPA						
Elementary School Students						
Residential DU /a/	15,711	16,736	0.1496 per DU	19.1%	20.4%	1.2
Commercial /b/	7,157,678	7,220,504	0.0238 per 1,000 sq. ft.	56.1%	56.6%	0.5
Light Industrial /c/	-4,671,237	-3,329,501	0.0287 per 1,000 sq. ft.	-61.7%	-44.0%	17.7
Total Elementary School Students Generated				18.6%	20.1%	1.5
Middle School Students						
Residential DU /a/	15,711	16,736	0.0763 per DU	19.1%	20.4%	1.2
Commercial /b/	7,157,678	7,220,504	0.0123 per 1,000 sq. ft.	56.1%	56.6%	0.5
Light Industrial /c/	-4,671,237	-3,329,501	0.0150 per 1,000 sq. ft.	-61.7%	-44.0%	17.7
Total Middle School Students Generated				18.6%	20.1%	1.5
High School Students						
Residential DU /a/	15,711	16,736	0.0921 per DU	19.1%	20.4%	1.2
Commercial /b/	7,157,678	7,220,504	0.0123 per 1,000 sq. ft.	56.1%	56.6%	0.5
Light Industrial /c/	-4,671,237	-3,329,501	0.0148 per 1,000 sq. ft.	-61.7%	-44.0%	17.7
Total High School Students Generated				18.7%	20.2%	1.5
Total Students Generated by Approved Plan				18.6%	20.1%	1.5
SOUTHEAST LOS ANGELES CPA						
Elementary School Students						
Residential DU /a/	11,836	12,066	0.1496 per DU	17.2%	17.6%	0.3
Commercial /b/	4,708,225	4,769,005	0.0238 per 1,000 sq. ft.	34.2%	34.6%	0.4
Light Industrial /c/	3,410,383	5,651,100	0.0287 per 1,000 sq. ft.	12.4%	20.6%	8.2
Total Elementary School Students Generated				17.4%	18.3%	0.9
Middle School Students						
Residential DU /a/	11,836	12,066	0.0763 per DU	17.2%	17.6%	0.3
Commercial /b/	4,708,225	4,769,005	0.0123 per 1,000 sq. ft.	34.2%	34.6%	0.4
Light Industrial /c/	3,410,383	5,651,100	0.0150 per 1,000 sq. ft.	12.4%	20.6%	8.2
Total Middle School Students Generated				17.4%	18.3%	0.9
High School Students						
Residential DU /a/	11,836	12,066	0.0921 per DU	17.2%	17.6%	0.3
Commercial /b/	4,708,225	4,769,005	0.0123 per 1,000 sq. ft.	34.2%	34.6%	0.4
Light Industrial /c/	3,410,383	5,651,100	0.0148 per 1,000 sq. ft.	12.4%	20.6%	8.2
Total High School Students Generated				17.4%	18.2%	0.8
Total Students Generated by Approved Plan				17.4%	18.2%	0.9
/a/ The student generation rate for multi-family units was used to determine the students generated by the residential component of the proposed project.						
/b/ The student generation rate for retail and services was utilized to determine the students generated by the commercial component of the proposed project. For purposes of this analysis, commercial land use is composed of regional commercial, neighborhood commercial, and community commercial.						
/c/ For purposes of this study, light industrial land use is comprised of limited industrial and hybrid industrial.						
SOURCES: City of Los Angeles, Department of City Planning, Demographic Research Unit, Statistical Information, December 2012, City of Los Angeles, Final SELA NCP Population and Employment Tables, Current and Proposed Plans, December 15, 2011. TAHA, Southeast Los Angeles 2008 Existing Development Based on Assessor Roll and Building Footprints, 2013. Los Angeles Unified School District Commercial/Industrial Development Fee Justification Study, 2008 and Los Angeles Unified School District School Facilities Analysis, 2009. TAHA, 2022.						

As with the Approved Plans, under the Modified Project, schools would collect development impact fees to pay for new schools and facilities to accommodate additional growth, if necessary. Conformance to California Government Code Section 65995 and fees collected under SB 50 (i.e., School Facilities Act of 1998) are deemed to provide full and complete mitigation of school facilities impacts. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to schools beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to schools beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

As discussed in Section 3.14, the 2017 FEIR forecasted development that implies (assuming linear growth) greater population, housing, and employment data than the conditions indicated by the 2020 US Census data and the recent forecasts in the 2020-2045 RTP/SCS. Census data indicates less growth in population and substantially less growth in jobs for the South Los Angeles and Southeast Los Angeles CPAs combined than the 2017 FEIR data interpolated for the year 2020 (assuming linear growth). The 2017 FEIR estimated greater growth in population and greater growth in jobs for the South Los Angeles and Southeast Los Angeles CPAs combined than the 2020-2045 RTP/SCS by year 2035.

Additionally, LAUSD has seen significant decreases in total enrollment numbers in recent years and is expected to see further declines in the coming decade. K-12 enrollment numbers decreased by 9.6 percent between the 2019-2020 and 2021-2022 academic years.²⁵ Therefore, the generated development under the Modified Project would likely be able to accommodate more students than would actually be matriculated into the LAUSD system. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to schools beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a or Subsequent or Supplemental EIR.

²⁵ LAUSD. 2022. "LAUSD Open Data. Data by Year: K-12 Enrollment 2019-2022." <https://my.lausd.net/opendata/dashboard?language=en&key=2>. Accessed June 13, 2022.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
PUBLIC SERVICES: Would the project:					
(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
iv. Parks?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Implementation of the Approved Plans would exacerbate an existing deficit in parks and recreational facilities in the CPAs by allowing for an increase in population and the development of new housing that would generate increased demand for parkland in the CPAs. As shown in Table 4.14-18 in the EIR, the existing deficit of parks and recreational facilities in the CPAs could grow to a total of 5,857.1 acres (existing deficit plus increased demand) of parks and recreational facilities cumulatively in both CPAs based on the City's Public Recreation Plan standards. Implementation of the Approved Plans would likely warrant the need for the construction of new parks and recreational facilities.

No new parks or recreational facilities are planned or proposed in the Approved Plans. Nevertheless, new park facilities could be constructed, including consistent with the Quimby Act and the City's park standards discussed above. If new park facilities are constructed, it is reasonably expected that such facilities would occur where allowed under the designated land use. The CPAs are urbanized areas and new facilities would not involve expansion of the urban sphere beyond current boundaries and thus there would be no need for new or expanded infrastructure. Generally, development of parks in the CPAs would be expected to have impacts consistent with those analyzed in this EIR or potentially be eligible for an infill exemption. Impacts related to future park sites would be speculative at this time. Therefore, impacts related to the construction or expansion of new parks or recreational facilities were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum and analyzed in Section 3.14, Population and Housing, due to the proposed zoning changes in the Slauson Subareas of the South Los Angeles and Southeast Los Angeles CPAs, the Modified Project would accommodate incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. As discussed in Chapter 2, Project Description (Section 2.4, Plan Implementation and Changes to Growth Forecast), the Modified Project would not change development patterns, nor would it displace development or induce growth in the West Adams CPA. The Modified Project could therefore increase incrementally the demand for parks and recreational facilities in the South Los Angeles and Southeast Los Angeles CPAs. It is not anticipated that the incremental increase in population and employment would result in the need for new or expanded parks or recreational facilities. No new parks or recreational facilities are planned or proposed under the Modified Project. However, park and recreational facilities are being planned by the City on the northeast corner of Slauson Avenue and South Figueroa Street, as well the northeast corner of Slauson Avenue and Budlong Avenue. As discussed in the 2017 FEIR, any parks or recreational facilities that may need to be constructed or expanded in the future to accommodate the increased population, housing, and employment in the project area would result in a less than significant impact. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to the construction of new parks or recreational facilities beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to the construction of new parks or recreational facilities beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Section 3.14 for discussion of a comparison of population, housing, and employment forecasts under the Modified Project as compared to the 2020 Decennial Census, the 2020 growth forecast interpolated from the 2017 FEIR, and more recent growth forecasts in the SCAG 2020-2045 RTP/SCS. The 2017 FEIR estimated greater population, housing, and significantly greater employment numbers within the CPAs than the actual conditions indicated by the US Census data and more than the recent forecasts in the 2020-2045 RTP/SCS. US Census data indicates less growth in population and substantially less growth in jobs for the South and Southeast CPAs combined than the 2017 FEIR data interpolated for the year 2020. The 2017 FEIR estimated greater growth in population and substantially greater growth in jobs for the South Los Angeles and Southeast Los Angeles CPAs combined than the 2020-2045 RTP/SCS by year 2035.

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR.

Because growth was slower than previously estimated, there has been a lower corresponding increase in demand for park and recreational facilities than anticipated and a lower potential for the need for new or expanded parks or recreational facilities. As noted above, park and

recreational facilities are being planned by the City on the northeast corner of Slauson Avenue and South Figueroa Street, as well the northeast corner of Slauson Avenue and Budlong Avenue that would help address demand for such facilities. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to the construction of new parks or recreational facilities beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
PUBLIC SERVICES: Would the project:					
(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
v. Other Public Facilities?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The expected population is anticipated to increase the demand for library services and resources of the Los Angeles Public Library (LAPL) System. The Approved Plans do not include any specific feature or development project that would include library facilities.

Currently, The LAPL operates eight libraries which serve the CPAs. Combined, the four libraries in the South Los Angeles CPA serve a population of approximately 280,000 residents and provide 37,750 square feet of library space, while the four libraries in the Southeast Los Angeles CPA serve a population of approximately 225,000 residents and provide 44,172 square feet of library space. The LAPL Branch Facilities Plan identifies one new library facility of 14,500 square feet

for the Southeast Los Angeles CPA on its proposed project list, although no site has been selected. The current level of service (280,000 and 225,000) would not accommodate the reasonably expected population of the Approved Plans, which would result in a service population of 313,836 in the South Los Angeles CPA. Therefore, the increase in people and dwelling units in the CPAs created through development allowed under the Approved Plans would increase the demand for library services.

Aside from the previously mentioned planned library facility, no additional libraries are planned or proposed at this time and funds available to meet demands for facilities have not been identified. If new libraries are constructed to meet the current and foreseeable unmet demand, it is expected that such facilities would occur where allowed under the designated land use. In addition, should new facilities be needed, such facilities will be located on parcels that are infill opportunities on lots that are between 0.5 and one acre in size. The CPAs are urbanized areas and new facilities would not involve expansion of the urban sphere beyond current boundaries and thus there would be no need for new or expanded infrastructure. Generally, development of libraries in the CPAs would be expected to have impacts consistent with those analyzed and identified in this EIR or potentially be eligible for an infill exemption. Any significant impacts related to the specific future library site would be speculative at this time. Therefore, impacts related to the construction of a new library were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description and analyzed in Section 3.14, Population and Housing of this Addendum, due to the proposed zoning changes in the Slauson Subareas of the South Los Angeles and Southeast Los Angeles CPAs, the Modified Project would accommodate incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. The Modified Project could therefore increase incrementally the demand for library services in the South Los Angeles and Southeast Los Angeles CPAs. The 2017 FEIR determined that the LAPL's current level of service could not accommodate the demographic increase expected under the Approved Plans. However, as discussed in the 2017 FEIR, any library facilities that may need to be constructed or expanded in the future to accommodate the increased population, housing, and employment in the project area would be expected to result in less than significant impacts. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to the construction of library facilities beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or

more severe significant impacts related to the construction of library facilities beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

The 2017 FEIR estimated greater population, housing, and significantly greater employment numbers within the CPAs than the actual conditions indicated by the US Census data. Because growth was slower than previously estimated, there has been a lower corresponding increase in demand for library facilities than anticipated and a lower potential for the need for new or expanded library facilities. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to the construction of library facilities beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.16 RECREATION

The EIR addressed impacts to parks in the Public Services section of the 2017 FEIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
RECREATION: Would the project:					
(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated	Significant and Unavoidable ²⁶	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Under the Approved Plans, all existing parks and recreational facilities in the CPAs remain. However, the Approved Plans allocate more land as open space. Changes to the amount of land designated as open space and public facilities address existing inconsistencies between existing land uses, zoning, and General Plan designations, primarily due to the construction of new pocket parks and several new public schools.

The Approved Plans do not constitute a commitment to any project-specific construction; however, the Reasonably Expected Development from the Approved Plans results in development throughout the CPAs, with more intense development expected particularly within the Active Change Areas. The population growth associated with the Approved Plans increases demand for park space and leads to a deficit of parks and recreational facilities in the CPAs. The additional demand for parklands associated with the Approved Plans cannot be accommodated. Additionally, implementation of the Approved Plans has the potential to increase the use of existing neighborhood, community, and regional parks, as well as other recreational facilities, which could accelerate the physical deterioration of these existing facilities.

The General Plan Framework calls for the City to monitor park and recreation statistics to identify existing and future park and recreation needs in the City, develop a strategy to purchase and develop parks, prioritize park projects in areas of the City with the greatest existing deficiencies, establish joint-use agreements with the Los Angeles Unified School District (LAUSD) to expand recreational opportunities, and to maximize the opportunities to develop parklands, including nontraditional public park spaces. Since 2012, the Los Angeles Department of Recreation and Parks (LA RAP) has implemented the 50 Parks Initiative which plans to develop, or has developed, approximately 10 pocket parks within each of the two CPAs. Further, the City's Mobility Plan identifies a Bicycle Enhanced Network and Neighborhood Enhanced Network that enhances access to the City's open spaces, including neighborhood parks, through bike paths and shared use paths. In addition, LA Metro is repurposing the underused railroad right-of-way along Slauson Avenue and turning the Harbor Subdivision into the Active Transportation Corridor,

²⁶ This impact is addressed in Impact 4.14.4 of the 2017 FEIR.

a new multi-modal corridor that will link the Blue Line (A Line), Silver Line (J Line), and Crenshaw Line /LAX Line (K Line).

Future development under the Approved Plans is subject to the Quimby Act and residential projects would be required to dedicate land for park and recreation purposes, or pay a fee in lieu thereof, prior to obtaining a permit. The dedication of land for park and recreation purposes or payment of fees helps to offset the demand created by future development under the Approved Plans.

Conclusion. Implementation of the Approved Plans increases the population and dwelling units in the CPAs which would in turn increase the use and deterioration of existing parks and recreational facilities. As discussed above, compliance with existing regulations helps to relieve the demand on existing parks through the provision of new parks. However, none of these measures reduce the substantial deficit in parks and recreational facilities existing in the CPAs that would reduce the physical deterioration of existing parks to the extent that would make the impact less than significant. Therefore, the Approved Plans were found to result in a *significant and unavoidable* impact related to parks and recreational facilities.

Mitigation Measures

No feasible mitigation measures were identified that could reduce the significant impact to parks and recreation to less than significant.

Level of Significance of Impacts after Mitigation

Significant and unavoidable.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description, of this Addendum and analyzed in Section 3.14, Population and Housing the Modified Project would accommodate incrementally increased population, housing, and employment in the South Los Angeles and Southeast Los Angeles CPAs beyond what was evaluated in the 2017 FEIR. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. The additional allowable population growth estimated under the Modified Project in the South and Southeast Los Angeles CPAs could therefore increase incrementally the demand for park space and lead to a further deficit of parks and recreational facilities in the CPAs. However, it is not anticipated that the incremental increase in population and employment would result in the need for new or expanded recreational facilities because the anticipated changes in population and housing are not substantial in the context of the overall analysis (see Section 2.4, Plan Implementation and Changes to Growth Forecast). No new parks or recreational facilities are planned or proposed under the Modified Project. However, park and recreational facilities are being planned by the City on the northeast corner of Slauson Avenue and South Figueroa Street, as well the northeast corner of Slauson Avenue and Budlong Avenue, which would help reduce impacts to existing parks from the Modified Project. Any future development under the Modified Project would be subject to the Quimby Act and in lieu development fees, as with the Approved Plans, the Modified Project would result in a significant and unavoidable impact related to parks and recreational facilities similar to that under the Approved Plans. Impacts would not be substantially more severe because the anticipated changes in population and housing are not substantial in the context of the overall analysis and therefore impacts would be similar (see Section 2.4, Plan Implementation and Changes to Growth Forecast). Therefore, there are no proposed changes under the Modified

Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. Park and recreational facilities are being planned by the City on the northeast corner of Slauson Avenue and South Figueroa Street, as well the northeast corner of Slauson Avenue and Budlong Avenue, which would help reduce impacts to existing parks from the Modified Project. There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Section 3.14 Population and Housing for discussion of the comparison of population, housing, and employment data within the CPAs. Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. The 2017 FEIR estimated greater population, housing, and significantly greater employment numbers within the CPAs than the actual conditions indicated by the US Census data. Because growth was slower than previously estimated, there has been a lower corresponding increase in demand for park and recreational facilities than anticipated and a lower potential for the need for new or expanded parks or recreational facilities. As noted above, park and recreational facilities are being planned by the City on the northeast corner of Slauson Avenue and South Figueroa Street, as well the northeast corner of Slauson Avenue and Budlong Avenue that would help address increased demand for such facilities. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the EIR, and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a or Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
RECREATION: Would the project:					
(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? ²⁷	Less than significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

As discussed above, implementation of the Approved Plans increases demand for parkland in the CPAs, thereby exacerbating an existing deficit in parks and recreational facilities in the CPAs. As shown in Table 4.14-16 in the 2017 FEIR, there is an existing total deficit of 5,857.1 acres (existing deficit plus increased demand) of parks and recreational facilities cumulatively in both CPAs based on the City's Public Recreation Plan standards. Implementation of the Approved Plans warrants the need for the construction of new parks and recreational facilities. However, no new parks or recreational facilities are planned or proposed in the Approved Plans. Nevertheless, new park facilities could be constructed consistent with the Quimby Act and the City's park standards. If new park facilities are constructed, it is reasonably expected that such facilities would occur where allowed under the designated land use. The CPAs are urbanized areas and new facilities would not involve expansion of the urban sphere beyond current boundaries and thus there would be no need for new or expanded infrastructure. Generally, development of parks in the CPAs would be expected to have impacts consistent with those analyzed in the 2017 FEIR or potentially be eligible for an infill exemption. Impacts related to future park sites would be speculative at this time. Therefore, impacts related to the construction of new parks or recreational facilities were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, the Modified Project would incrementally increase the demand for parklands in the South and Southeast Los Angeles CPAs and therefore exacerbate the existing deficit in parks and recreational facilities in the CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. No new parks or recreational facilities are planned or proposed under the Modified Project. Although any future development under the Modified Project would be subject to the Quimby Act and in

²⁷ This impact is Impact 4.14-5 in the 2017 FEIR.

lieu development fees, as with the Approved Plans, the Modified Project would result in a less than significant impact related to parks and recreational facilities. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. As noted above, park and recreational facilities are being planned by the City on the northeast corner of Slauson Avenue and South Figueroa Street, as well the northeast corner of Slauson Avenue and Budlong Avenue that would help address demand for such facilities. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Section 3.14 for discussion of the comparison of population, housing, and employment data within the CPAs. Refer to Chapter 2, Project Description (Section 2.4, Plan Implementation and Changes to Growth Forecast), for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. The 2017 FEIR estimated greater population, housing, and significantly greater employment numbers within the CPAs than the actual conditions indicated by the U.S. Census data. Because growth was slower than previously estimated, there has been a lower corresponding increase in demand for park and recreational facilities than anticipated and a lower potential for the need for new or expanded parks or recreational facilities. The total change in population and employment anticipated to result from the Modified Project is minor in the context of impacts of the two community plans and would not result in a new impact or substantially more severe impacts. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.17 TRANSPORTATION

Since preparation of the 2017 FEIR, State and County criteria for evaluating transportation impacts have changed to focus on impacts associated with vehicle trips and vehicle miles travelled. Impacts related to delay and level of service are no longer considered impacts under CEQA (although these issues are still considered as part of the overall planning process). The delay-based analyses included in the EIR are omitted from the summary below because it is no longer relevant to the CEQA analysis.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRANSPORTATION: Would the project:					
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ²⁸	Less than significant ²⁹	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans would improve the link between the locations of land use and transportation in a manner that is consistent with the City's Framework Element. As previously discussed, implementation of the Approved Plans would create new housing and employment opportunities, mostly in areas around transit identified for mixed-use, in accordance with the Framework Element. In addition to consistency with the local General Plan, the Approved Plans are consistent with several regionally-adopted land use plans, policies, and regulations that include transportation strategies.

The Approved Plans each include a Transportation Improvement and Mitigation Plan (TIMP) that provides recommendations to guide future transportation-related decisions in the CPAs consistent with regional, state and local regulatory plans. The Approved Plans also establish programs to maintain a diverse multi-modal transportation system that provides mobility options for the community, including street improvements, transit service, and bike paths consistent with regional, state and local regulatory plans.

Implementation of the Approved Plans would change existing land uses and intensify land uses in areas that are well-served by transit, which would support shorter trip lengths resulting in a lower VMT per capita. As shown in Table 4.15-8 in the EIR, with the implementation of the Approved Plans, per capita VMT is anticipated to be reduced in both CPAs. The VMT per capita would continue to be below the per capita VMT in Los Angeles County and the City as a whole.

²⁸ This impact is addressed in Impact 4.15-1 in the 2017 FEIR.

²⁹ The EIR found impacts related to the CMP to be significant for the South Los Angeles CPA (as a result of reductions in travel lanes to accommodate bicycle facilities on Manchester Avenue); as this conclusion was based on analysis of levels of service and delay, and since these metrics are no longer relevant to CEQA this impact conclusion is not relevant.

and would be less than the existing per capita VMT in both CPAs.³⁰ Thus, the Approved Plans would result in a reduction of VMT and impacts to the circulation system would be less than significant.

Based on the above, the Approved Plans would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Therefore, impacts related to consistency with applicable plans, ordinances, or policies under the Approved Plans would be *less than significant*.

Implementation of the Approved Plans would create new housing and employment opportunities, mostly in areas around transit identified for mixed-use, in accordance with the Framework Element. Under the Approved Plans, the CPAs' commercial areas will serve as focal points and activity centers for surrounding neighborhoods by supporting new development that accommodates a variety of uses and encourages pedestrian activity in these commercial centers. These changes would facilitate mixed-use development that increases housing and employment opportunities along targeted commercial corridors and in TOD areas, providing increased access to public transit. In addition to consistency with the local General Plan, the Approved Plans are consistent with several regionally adopted land use plans, policies, and regulations that include transportation and multi-modal strategies.

The Approved Plans would not conflict with adopted policies or plans for public transportation, bicycle, and pedestrian facilities but rather enhance and expand upon them by encouraging their growth and improvement. Therefore, impacts related to public transportation, bicycle, and pedestrian facilities were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would continue to enhance access to transit stations to encourage transit use and active transportation through the incentivization of mixed-income multi-family buildings and green employment uses near existing transit service and the future Active Transportation Corridor, and would not conflict with any program, plan, ordinance or policy addressing the circulation system. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to public transportation, bicycle, and pedestrian facilities beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or

³⁰ It is noted that the 2017 FEIR used an older traffic model to calculate peak period VMT that was then used to estimate daily VMT. The results from the older model are not directly comparable to the results of the New Model used in the analysis of the Modified Project below because of the many refinements made to the model over time.

more severe significant impacts related to public transportation, bicycle, and pedestrian facilities beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

The Citywide Travel Demand Model (New Model) was updated in 2018 to align with the 2016 SCAG RTP/SCS projections. As indicated in the Traffic Model Technical Memorandum (**Appendix B**), the New Model is considered to be a substantially improved tool for evaluating traffic impacts and was therefore used in the analysis of the traffic impacts (see analysis of the next question below) of the Modified Project as compared to traffic impacts of the Approved Plans in this Addendum. The New Model was used to calculate VMT per service population and evaluate consistency with related policies. Using the New Model does not show a conflict with any City transportation plan. Development under the Modified Project will be subject to using the New Model. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 EIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRANSPORTATION: Would the project:					
(b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? ³¹	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Implementation of the Approved Plans would change existing land uses and intensify land uses in areas that are well-served by transit, which support shorter trip lengths resulting in a lower VMT per capita. As shown in Table 4.15-8 in the 2017 FEIR, with the implementation of the Approved

³¹ Since certification of the 2017 FEIR the approach to the analysis of traffic impacts has been revised (in response to SB 743) to address VMT rather than delay. Although to the extent that delay results in other secondary impacts, such as noise or safety. Information related to automobile delay is taken into consideration including as part of the emergency access analysis. The 2017 FEIR provided an analysis of VMT for informational purposes, but no threshold had been developed at that time.

Plans, the per capita VMT was anticipated to be reduced (EIR existing [2010], compared to 2035) in both CPAs. The per capita VMT was expected to continue to be below the EIR existing (2010) Los Angeles County average (20 VMT per capita) and the City average (13 VMT per capita). The Approved Plans were considered to have a *less than significant* on VMT (although no thresholds were specifically identified).

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The analysis of traffic impacts as a result of the Modified Project is based on the City of Los Angeles Travel Demand Model (i.e., Citywide Model). The Citywide Model was originally developed in 2010 from the SCAG 2008 model. However, since the 2008 SCAG RTP model used socioeconomic and network data from 2003, this data was updated to represent 2008 conditions. The Citywide Model was further updated in 2018 to be consistent with the 2016 SCAG RTP/SCS Model (this model is herein referred to as the New Model). While the New Citywide Model has a horizon year five years later than the model used in the 2017 FEIR, the City's approach to forecasting a horizon year is based on land use and not dependent on annual socio-economic growth. The New Model's 2040 analysis year represents a more realistic timeframe for the anticipated development to occur. In addition, the New Model is generally conservative in its estimates of employment and population, in comparison to the model used in the 2017 FEIR. The New Model represents a substantially improved tool.

The Traffic Analysis Zones (TAZ's) in the New Model were modified to include residential and non-residential land use that is reasonably expected to result from the Modified Project. For each TAZ, data from three major socioeconomic categories (population, households, and employment) were obtained and further disaggregated into secondary categories (e.g., household size, age, income level, employment type, etc.).

Both the Approved Plans and the Modified Project were evaluated using the New Model, in order to allow an "apples to apples" comparison of VMT impacts. This approach was taken, as opposed to comparing the New Model results for the Modified Project to the 2017 FEIR model results. Directly comparing the 2017 FEIR model results to results from the New Model is not useful given the refinements to model assumptions between the model used in the 2017 FEIR and the New Model.

The VMT outputs from the New Model were reviewed to determine the per capita and per service population VMT under the Modified Project as compared to under the Approved Plans. VMT under both the Approved Plans and under the Modified Project were compared to the Citywide average VMT (per capita and per service population).

As shown in **Table 3-7**, home-based Daily VMT per capita is forecast to be reduced under the Modified Project, as compared to under the Approved Plans. Daily VMT per Service Population is forecast to increase slightly under the Modified Project, as compared to under the Approved Plans but as identified below still below the 2016 model baseline and therefore below the threshold of significance.

TABLE 3-7: FUTURE VMT – APPROVED PLANS AND MODIFIED PROJECT COMPARED TO THRESHOLDS

Area	Year 2040 With Approved Plans					Year 2040 With Modified Project				
	Population	Employment	VMT	Home-Based VMT per Capita	VMT per Service Population	Population	Employment	VMT	Home-Based VMT per Capita	VMT per Service Population
South Los Angeles	338,070	67,241	6,191,016	7.88	15.27	340,878	70,391	6,292,054	7.86	15.30
Southeast Los Angeles	310,782	92,564	6,329,562	7.45	15.69	315,719	100,006	6,543,815	7.43	15.74
City of Los Angeles	4,611,858	2,170,359	126,095,288	10.77	18.59	4,619,603	2,180,951	126,385,198	10.77	18.58
15% below SCAG average (2016)										28.82
Average VMT per service population in South Los Angeles for model baseline year (2016)										16.84
Average VMT per service population in Southeast Los Angeles for model baseline year (2016)										16.03
SOURCE: Iteris, 2022.										

The magnitude of increase between Modified Project and Approved Plans is within the margin of error that can be expected when comparing regional travel-demand model outputs of multiple scenarios. The increase is attributed to the work-based VMT from the new non-residential land use. While the addition of non-residential land use within the same TAZ as residential land use should lead to internal capture of vehicle trips (i.e., shorter trip lengths) as well as shifts in travel mode (i.e., to walking and biking trips as opposed to vehicle trips), the travel-demand model is not sensitive enough to assign trip productions and attractions such that new employment serves new residents. Instead, the New Model assigns work-based VMT as under current work patterns which results in longer VMT for the new non-residential land uses. Detailed VMT output data is provided in **Appendix C**.

Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore the Modified Project would not affect VMT within that CPA.

The Total Daily VMT per capita is the Total Daily VMT divided by the total population of the respective CPA. The Total Daily VMT per service population is the total VMT divided by the total population plus total employment within each respective CPA. **Table 3-7** summarizes the future year 2040 VMT results for the CPAs (as well as the City of Los Angeles) under both the Approved Plans and Modified Project.

The City's (new) thresholds of significance are:

- VMT per service population that is 15 percent below the SCAG regional average for the baseline year in the most recent RTP/SCS (2019 is the baseline year in the 2020 RTP/SCS), and
- The VMT per service in the horizon year does not exceed the average total VMT per service population in the plan area for the baseline year from the most recent locally validated travel demand forecasting model.

As shown in **Table 3-7**, the VMT per service population of the CPAs under the Modified Project (and the Approved Plans) would be below these thresholds. The Modified Project would result in similar VMT per capita and per service population as compared to under the Approved Plans and both would result in *less than significant impacts*.

Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

As discussed above, the City has identified new thresholds of significance for VMT impacts. These new thresholds are used in the analysis above. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

The Citywide Model represents a new and substantially improved tool to be used in the analysis of planning and other projects. The Citywide Model includes updated socioeconomic data. The Citywide Model is used in the analysis of traffic impacts above. While VMT was analyzed in the 2017 FEIR, no threshold of significance was identified. Using the New Model and the new

thresholds of significance, the analysis above indicates that both the Approved Plans and the Modified Project would result in less than significant impacts with respect to VMT. There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRANSPORTATION: Would the project:					
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans do not introduce new streets or otherwise change the overall land use pattern in the CPAs. The Approved Plans describe the reasonably expected future development for a portion of the City and do not constitute a commitment to any project-specific development. Furthermore, none of the regulations included in the Approved Plans would promote sharp curves, dangerous intersections, or incompatible uses that could present safety hazards. Therefore, impacts related to increased hazards due to a design feature or incompatible use were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

There are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to increased hazards due to a design feature or incompatible use beyond what was previously analyzed. No roadway or other changes are proposed which could increase such hazards.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts hazards due to a design feature or incompatible use beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts hazards due to a design feature or incompatible use beyond what was previously analyzed. For the reasons stated above, the Citywide Model represents a new and substantially improved tool utilized for analysis purposes but is not new information requiring new analysis or verification.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRANSPORTATION: Would the project:					
(d) Result in inadequate emergency access?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Emergency response routes in the CPAs would be maintained in their existing locations and the Approved Plans would not introduce new streets or otherwise change the overall land use pattern in the CPAs. All development within the CPAs would be required to be designed in accordance with City standards, which include provisions that address emergency access (e.g., minimum street widths, minimum turning radii, maximum lengths of cul-de-sacs, etc.). Compliance with these standards would help minimize potential emergency access impacts.

Construction and operation activities within the CPAs with respect to emergency access due to temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, which is coordinated with the Los Angeles Police and Fire Departments to ensure that emergency access is maintained at all times and that the Approved Plans would not interfere with adopted emergency response or evacuation plans. Furthermore, California state law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. Generally, multi-lane arterial roadways allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. Additionally, the LAFD in collaboration with LADOT has developed a FPS, a system that automatically turns traffic lights to green for emergency vehicles traveling on designated streets in the City.

The goals, objectives, and policies of the Safety Element of the Los Angeles City General Plan provide guidance for procedures for maintaining emergency access.³² These policies would help minimize the potential impact of interference with the County and City emergency response plans. Therefore, impacts related to emergency access would be *less than significant*.

Mitigation Measures

No mitigation measures are required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would not alter any emergency routes in the CPAs and would not include any new streets or otherwise change the conditions related to emergency access and the conclusions in the 2017 Final EIR, including existing regulatory requirements of drivers to yield the right of way to emergency vehicles. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to emergency access beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

CEQA has been amended to remove delay as a metric for the evaluation of traffic impacts. However, delay remains a factor to consider in the evaluation of emergency access and continues

³² City of Los Angeles, *Safety Element of the Los Angeles City General Plan*, August 1996.

to be a component of the analysis above. There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to emergency access beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to emergency access beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.18 TRIBAL CULTURAL RESOURCES

Assembly Bill 52 (Chapter 532, Statutes 2014) required an update to Appendix G of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. Appendix G contains a statement in the Environmental Checklist Form at the beginning of Appendix G regarding notice and consultation between lead agencies and California Native American Tribes. Appendix G also has a new section, Tribal Cultural Resources. The 2017 EIR discusses Tribal Cultural Resources as part of the overall analysis of Cultural Resources.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRIBAL CULTURAL RESOURCES: Would the project:					
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	Less than significant with Mitigation.	No	No	No	CR1
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Less than significant with Mitigation.	No	No	No	CR1

A. Impact Determination in the Certified EIR

Analysis

The CPAs are highly urbanized and any tribal cultural resources that may have existed at the surface have likely been disturbed by past development. Therefore, the uppermost sediments within the CPAs are not likely to contain known tribal cultural resources. However, given the well-documented occupation of the Los Angeles Basin by indigenous tribes both prehistorically and historically, there is a reasonable potential that future development that could occur under the Approved Plans could be located on a site with previously unknown tribal cultural resources. Therefore, there is potential that new development under the Approved Plans includes ground-disturbing activities that would go beyond man-made fills could impact previously undetected tribal

cultural resources. However, impacts to unknown tribal cultural resources in the residentially-zoned areas of the CPAs (areas outside the CPIO Subareas and CPIO Subareas M, N, and O) are not foreseeable because future development in these areas is not anticipated to be of the size that would include the type of excavation or ground-disturbing activities that would go beyond man-made fills.

Under the Approved Plans, future development that includes ground-disturbing activities that would go beyond man-made fills is expected to occur primarily in the Active Change Areas (in CPIO Subareas), and to a lesser extent along industrial and commercial corridors within the Non-Change Areas, which are located within a CPIO Subarea. Although it is a misdemeanor for anyone to destroy or remove anything of archaeological interest, it could potentially occur through negligence during grading and excavation absent monitoring and enforcement. Therefore, without mitigation, impacts related to archeological resources were found to be *potentially significant*.

Mitigation Measures

Refer to Mitigation Measure **CR1** under Section 3.5, Cultural Resources.

Level of Significance of Impact after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would increase the allowable intensity, density, and/or types of development within the South and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. Construction under the Modified Project would involve ground-disturbing activities of similar intensity to those under the 2017 FEIR, and therefore has a similar potential to encounter unknown tribal cultural resources. As with the 2017 FEIR, without implementation of Mitigation Measure **CR1**, the development proposed under the Modified Project would result in potentially significant impacts related to Tribal Cultural Resources. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to Tribal Cultural Resources beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to Tribal Cultural Resources beyond what was previously analyzed. No substantial changes to Tribal Cultural Resources have occurred since certification of the 2017 FEIR, and no substantial new changes in Tribal Cultural Resources have been identified within the CPAs that would result in new or more severe significant environmental impacts.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that

shows new significant impacts or substantially more severe impacts related to Tribal Cultural Resources beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measure **CR1** would address impacts related to Tribal Cultural Resources and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.19 UTILITIES AND SERVICE SYSTEMS

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Future development under the Approved Plans would occur incrementally over time with the reasonably expected development of the CPAs not anticipated to be reached until 2035. By 2035, the demand for water compared to 2010 existing conditions is estimated to increase by nine percent in the South Los Angeles CPA and by eleven percent in the Southeast Los Angeles CPA. However, due to water conservation measures, the net increase in water demand in the CPAs may be less than anticipated.

Based on the water treatment capacity of 600 million gallons per day at the Los Angeles Aqueduct Filtration Plant, the anticipated water usage increase of 9 and 11 percent as a result of the Approved Plans would be within the capacity of the Filtration Plant. However, the LADWP has initiated a comprehensive modernization and upgrade program at the Los Angeles Aqueduct Filtration Plant and continues to invest in improving drinking water quality through its Capital Improvement Program. Thus, the construction of new water treatment plants is not anticipated to occur as a result of the approval of the Approved Plans.

Reasonably expected development from the Approved Plans could potentially exceed the capacity of existing and/or planned water conveyance facilities, or the capacity of existing and planned fire hydrants. Local water delivery lines may need to be augmented in certain locations, and it is possible that the construction of new water lines or new water treatment facilities may be necessary for new development occurring in the CPAs. The City requires that applicants coordinate with the LADWP in order to ensure that existing and/or planned water conveyance facilities are capable of meeting water demand/pressure requirements. In coordination with the LADWP, project applicants are required to identify specific on- and off-site improvements needed to ensure that impacts related to water supply and conveyance demand/pressure requirements are addressed prior to issuance of a certificate of occupancy. Water supply and conveyance demand/pressure clearance from LADWP are required at the time that a water connection permit application is submitted. In addition, the City requires applicants to coordinate with the LAFD and Building and Safety Department in order to ensure that existing and/or planned fire hydrants are capable of meeting fire flow demand/pressure requirements. The issuance of building permits is dependent upon submission, review, approval, and testing of fire flow demand and pressure

requirements, as established by the Los Angeles Fire Department and Building Safety Department prior to occupancy.

LADWP provides the City's water distribution services, and installs and maintains the water distribution system. It has developed the Water Infrastructure Plan (January 2015) to establish the goals and targets for replacing and/or upgrading infrastructure. Through infrastructure projects, the LADWP replaces or upgrades major system components that are outdated or malfunctioning. Trunk lines are supply pipelines that deliver and redistribute large amounts of water throughout the City of Los Angeles assuring a reliable supply is available. LADWP will replace 435 miles in the next 10 years with F-grade pipe having high priority, which will eliminate nearly all current D- and F-rated pipes.

Implementation of the Approved Plans could require the construction of new or upgraded water distribution facilities. However, if new facilities are determined to be necessary at some point in the future, the construction of such infrastructure would not be expected to result in significant environmental impacts. To the extent that any significant impacts could result from the unique characteristics of the specific project site, those impacts would be speculative at this time. Therefore, impacts related to the construction of new water conveyance infrastructure and water treatment facilities or expansion of existing facilities under the Approved Plans would be *less than significant*.

The amount of wastewater generated under the Approved Plan is estimated to increase by 15 percent for both the South Los Angeles CPA and the Southeast Los Angeles CPA. The Approved Plans would increase existing demand for electricity by less than one percent, which is reflected in LADWP's projected increase in peak demand for electricity. Natural gas usage is estimated to increase by three percent in the South Los Angeles CPA and by five percent in the Southeast Los Angeles CPA. Impacts to telecommunication facilities were not analyzed in the 2017 EIR.

When compared to the maximum capacity of all four wastewater treatment plants (HTP, TIWRP, DCTWRP, and LAGWRP), wastewater generation of the two CPAs under the Approved Plans represents an incremental increase in the City's total wastewater treatment capacity.

Implementation of the Approved Plans would not substantially reduce or increase the amount of stormwater runoff. Stormwater runoff within the South Los Angeles CPA would continue to be directed toward Ballona Creek and stormwater runoff within the Southeast Los Angeles CPA would continue to be directed toward Compton Creek via storm drains, curbs and gutters (street flows), and urban sheet flow.

The increase in electricity generation under the Approved Plans would not exceed the potential of LADWP or the capacity of the distribution infrastructure, and there is no need for new (off-site) electrical generation facilities or major enhancements to accommodate the Approved Plans. The Approved Plans would consume less than one percent of SoCalGas' 2030 projected available supply of natural gas, taking into account the current trend of energy efficient practices and a decreased dependency on natural gases.

The Approved Plans do not propose the construction of new or upgraded water distribution, wastewater treatment, electricity generation, natural gas generation, solid waste disposal, or telecommunication facilities. However, if new facilities are determined to be necessary at some point in the future, the construction of such infrastructure would not be expected to result in significant environmental impacts. To the extent that any significant impacts could result from the unique characteristics of a specific project site, those impacts would be speculative at this time. Therefore, impacts related to the construction of new or expanded water, wastewater treatment,

stormwater drainage, electrical power, natural gas, or telecommunication facilities under the Approved Plans were found to be *less than significant*.

Mitigation Measures

No mitigation measures are required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 2017 FEIR determined that the Approved Plans would result in a less than significant impact related to water, wastewater treatment, storm water drainage, electric power, natural gas, and telecommunications facilities. No new water, wastewater treatment, storm water drainage, electric power, natural gas, and telecommunications facilities are planned or proposed under the Modified Project. As identified in Chapter 2, Project Description of this Addendum and analyzed in Section 3.14, Population and Housing, due to the proposed zoning changes in the Slauson Subareas of the South and Southeast Los Angeles CPAs, the Modified Project would accommodate incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth; therefore there would be no change in demand for utilities in this CPA. The Modified Project could therefore increase incrementally the demand for new or expanded utilities systems in the South and Southeast CPAs. **Table 3-8** below shows the anticipated changes in consumption of electricity, natural gas, and water, and the disposal of solid waste and wastewater due to the increased allowable density under the Modified Project. The Modified Project does not anticipate impacts related to the construction of new or expanded telecommunication facilities.

As shown in the table below, compared to the 2017 FEIR, the Modified Project is anticipated to result in negligible changes to demand for utilities.

As under the Approved Plans, all development under the Modified Project would be required to comply with the same federal, state, and local utilities and service systems regulations that were discussed in the 2017 EIR. Water conservation measures, programs, and policies, including the LADWP Capital Improvement Program, would continue to apply under the Modified Project, and therefore net demand for water in the CPAs may be lower than anticipated. The HTP, TIWRP, DCTWRP, and LAGWRP wastewater treatment plants would continue to serve the CPAs and have sufficient capacity to serve the incremental increase in wastewater disposal under the Modified Project. LADWP would continue to upgrade sewer lines through capital improvement projects throughout the City system. The Modified Project would result in an incremental increase in the amount of solid waste disposal generated under the 2017 FEIR. The estimates contained in the 2017 EIR were conservative and did not account for AB 939. At least 50 percent of solid waste is required to be diverted to recycling in compliance with AB 939. Moreover, the DWP and LASANs plan for citywide population as projected by SCAG for water supply, wastewater treatment capacity and facilities, and solid waste landfill capacity. The Modified Project is not anticipated to affect the citywide growth forecasts. The Modified Project is not anticipated to result in the need for new or expanded telecommunication facilities.

Similar to the Approved Plan, the Modified Project would comply with applicable energy conservation plans and policies of the City and would not result in a wasteful or inefficient use of electricity or natural gas.

TABLE 3-8: SUMMARY OF UTILITIES 2017 EIR VS. MODIFIED PROJECT

	South Los Angeles Community Plan Area					Southeast Los Angeles Community Plan Area					South and Southeast Plan Areas
	2035 vs EIR Existing		2035 % Change from Existing		% Point Change Modified Project vs Approved Plans	2035 vs EIR Existing		2035 % Change from Existing		% Point Change Modified Project vs Approved Plans	% Point Change Modified Project vs Approved Plans
	Approved Plans	Modified Project	Approved Plans	Modified Project		Approved Plans	Modified Project	Approved Plans	Modified Project		
Electricity Consumption (kWH/day)	82,727	90,791	3.5%	3.8%	0.3	142,658	252,291	4.7%	8.3%	3.6	2.2
Electricity --Water Process (kWH/day)	(130,840)	(129,302)	-25.6%	-25.3%	0.3	(400,211)	(396,110)	-47.1%	-46.6%	0.5	0.4
Natural Gas (kBTU/day)	1,817,323	1,910,679	31.6%	33.2%	1.6	1,256,104	1,337,020	21.0%	22.3%	1.4	1.5
Solid Waste (tons/day)	46.3	40.2	13.3%	11.6%	-1.8	65.1	79.2	16.9%	20.6%	3.7	1.1
Water (gal/day)	23,151,689	23,092,272	55.2%	55.1%	-0.1	3,574,988	3,867,446	5.1%	5.5%	0.4	0.2
Wastewater (gal/day)	(369,119)	122,944	-1.5%	0.5%	2.1	2,227,185	3,925,176	6.1%	10.7%	4.6	3.6
SOURCE: 2017 EIR and TAHA 2022											

Based on the above, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunication facilities beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to Section 3.14, Population and Housing for discussion of SB 8, SB 9, and SB 10. These bills would increase the allowable intensity and density of residential unit construction. However, growth that would occur as a result of these regulations is generally anticipated within the growth assumptions discussed in Chapter 2, Project Description. The Modified Project would not introduce any new infrastructure, nor induce unexpected population growth, and is not expected to result in growth beyond what can be accommodated by existing utilities infrastructure. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunication facilities beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

Refer to Chapter 2, Project Description, and Section 3.14, Population and Housing, for discussion of a comparison of population, housing, and employment forecasts under the Modified Project as compared to the 2020 Census, the 2020 growth forecast interpolated from the 2017 FEIR, and more recent growth forecasts in the SCAG 2020-2045 RTP/SCS. Census data and the growth estimates in the 2020-2045 RTP/SCS Census data indicates that the 2017 FEIR overestimated projections for population and employment growth. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunication facilities beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

The demand for water in the CPAs is estimated to increase 9 percent and 11 percent increase in water usage, respectively. The calculated water demand does not take into account reductions in water use by sector anticipated for the City as a whole. Therefore, given the long lifespan of the Approved Plans, it is important to consider the City's commitment to water conservation in conjunction with supply and demand forecasts to fully evaluate the impact of the Approved Plans on water supplies. State legislation, which postdates several City water conservation ordinances, has only strengthened the City's commitment to water conservation and provides added assurance that the City will continue its leadership role in managing demand for water in the near and distant future. Total anticipated citywide water savings from conservation is projected to be 53,420 acre-feet in Fiscal Year 2029/2030, which is 17.4 billion gallons of water.

The City of Los Angeles' policy is that future water needs shall be met by expanding water recycling and conservation. All new development within the CPAs under the Approved Plans would be required to implement the water conservation measures described in the Regulatory Framework section. New development within the CPAs would be required to comply with the Water Efficiency Requirements Ordinance - City Ordinance No. 180822, Los Angeles Green Building Code Ordinance - City Ordinance No. 181480, and the 2010 California Green Building Standard Code. Note that any existing development within the CPAs that is not redeveloped would not be required to conform to these measures, although community pressure and pricing controls are anticipated to continue to reduce water demand from existing uses.

As previously discussed, the increase in water demand has been planned for by the City, and LADWP prepares an UWMP every five years. The anticipated increase in demand generated within the CPAs under the Approved Plans is within the 2015 UWMP's projected water supplies for normal, single-dry, and multiple-dry years through 2035, and falls within the 2015 UWMP's 25-year water demand growth projection. Additionally, water conservation efforts, a cornerstone of the City's water policy agenda, which have shown to be historically effective, can be relied on to effectively attenuate some of the added demand for water resources as the Approved Plans are implemented. Moreover, the impacts to water demand for future water resources are minimized as implementation of the Approved Plans would occur incrementally through the year 2035. In addition, the Approved Plans respond to regional growth policies to concentrate growth around transit, resulting in more efficient water use in the region (as a result of more multi-family dwellings as compared to single-family dwellings). Therefore, impacts related to water supplies under the Approved Plans were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As identified in Chapter 2, Project Description of this Addendum and analyzed in Section 4.14, Population and Housing, due to the proposed zoning changes in the Slauson Subareas of the South and Southeast Los Angeles CPAs, the Modified Project would accommodate incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth. Water demand forecasting is driven by demographic changes such as an increase in population, employment, and land use development. DWP plans for citywide population forecasts from SCAG for water supplies. In any case, as demonstrated in **Table 3-8**, water demand under the Modified Project would slightly decrease compared to the Approved Plans. The Modified Project would not change citywide forecasts for population growth.

As with the Approved Plans, the Modified Project would minimize impacts to water demand for future water resources through incremental implementation through the year 2035. In addition, the Modified Project would adhere to regional growth policies and prioritize growth of multi-family dwelling units around transit over development of single-family dwelling units, resulting in more efficient water use in the region. Development under the Modified Project would be required to comply with the City's Water Efficiency Requirements, the Los Angeles Green Building Code, and the 2010 California Green Building Standard Code. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to water supplies beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Since the publication of the 2015 UWMP, a number of major developments have occurred which affect future available water supplies. The City adopted the 2020 UWMP and MWD adopted their 2020 UWMP. The current drought and the historic drought between 2012 and 2017 altered water supply levels, future water supply forecasts, and state and local water conservation policies. The 2019 Los Angeles Sustainable City pLAn, developed in collaboration with LADWP, includes targets to increase local water supplies through recycled water, stormwater capture, conservation, and water use efficiency. In July 2020, the Office of Governor Gavin Newsom issued the Water Resilience Portfolio to address the state's water challenges, focusing on maintaining access to clean drinking water, establishing voluntary agreements to collaboratively manage water resources and protect fish and wildlife, and advancing the Delta Conveyance Project. These new circumstances are anticipated to result in an increase in water recycling and conservation and a decrease in water demand per capita. Despite the on-going recent drought, DWP continues to forecast adequate water supply for the City's population. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to water supplies beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

The 2020 UWMP has added multiple new requirements since the completion of the 2015 UWMP (evaluated in the 2017 FEIR), such as inclusion of a water shortage contingency plan with six standard water shortage levels, a drought risk assessment for a five-year historic sequence, considerations for climate change impacts, and an annual water supply and demand assessment after 2020.

Since the publication of the 2017 FEIR, the LADWP has released the 2020 UWMP as an update to the 2015 UWMP. The 2020 UWMP incorporates the new requirements of the UWMP Act as well as updated water demand and supply availability forecasts. The 2020 UWMP is based on forecast growth in the City of Los Angeles as a whole. The Modified Project would not change the growth forecast of the City of Los Angeles as a whole. According to the 2020 UWMP, LADWP is anticipated to increase its recycled water use and increase stormwater capture via groundwater recharge to reduce per capita water consumption in the LADWP service area. The projected water supply under multiple dry year conditions is similar to that under single dry year conditions, and LADWP anticipates that water supply demands would be met by the available supplies under normal, dry, and multiple dry years. The LADWP is anticipated to adequately meet the water consumption demand of forecast growth including the incremental increases in growth accommodated by the Modified Project. The Modified Project would not result in an unanticipated consumption of water which would impact the ability of LADWP to adequately meet water demand in the CPAs. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to water supplies beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Future development under the Approved Plans would occur incrementally over time with the reasonably expected development of the CPAs not anticipated to be reached until 2035. The amount of wastewater generated in the South Los Angeles CPA under the Approved Plans is estimated to increase by 15 percent compared to 2010. In the Southeast Los Angeles CPA, wastewater generation is estimated to increase by 15 percent.

It is important to consider the existing and anticipated wastewater generation of the CPAs in relation to current average daily flows experienced by all four treatment plants, as well as proportionally to remaining capacity of the system. Currently, the four wastewater treatment plants service the CPAs (HTP, TIWRP, DCTWRP, and LAGWRP), which have a collective maximum capacity of 580 million gallons per day (mgd). When compared to the maximum capacity of all four treatment plants, wastewater generation of the two CPAs under the Approved Plans represents an incremental increase in the City's total wastewater treatment capacity.

Although the existing treatment plants have ample capacity, the City is proactively undertaking capital improvement projects to not only maintain the existing infrastructure but also enhance and expand capacity at the four treatment plants. The City maintains the Wastewater Capital Improvement Program (WCIP) that contains the capital projects and estimated costs for the renewal of the City's infrastructure at ten year intervals. The WCIP was originally adopted in 2006 and most recently updated in 2013 and covers a fiscal period of 2013/2014 to 2022/2023. The WCIP was developed and evaluated according to projections and preferences contained in the City of Los Angeles IRP, which anticipates that average daily wastewater flows in year 2020 will increase to 531.4 mgd.

To meet anticipated increased wastewater flows, the IRP evaluates five alternatives, and identifies a preferred alternative that addresses the need for increased treatment capacity from the system but does not identify the need to build new treatment plants to meet the anticipated increase in wastewater generation.

Fiscal Year 2013/2014 WCIP recognizes necessary projects to maintain, bolster, and expand the existing system. Many of these upgrades are already funded and under construction and all upgrades are scheduled to be completed by 2020. With completion of these projects, the City will ensure that the HTP complies with RWQCB permit requirements and will refurbish various plant facilities in order to meet future operating requirements.

The CPAs are partially located within areas known to have constrained sewer capacity. Placing additional stress in these areas could result in an inability to accommodate the projected increased wastewater flow demand. Although the Approved Plans include Active Change Areas within sewer capacity constrained areas, with ACs and AC-2Ds in South Los Angeles and ACs in Southeast Los Angeles, all future projects are evaluated for adequate sewer capacity prior to the issuance of building permits. A Sewer Capacity Availability Request (SCAR) evaluates the existing wastewater collection system to determine whether adequate capacity exists to convey project-related wastewater to the appropriate treatment plant. If capacity is available, the Department of Building and Safety accepts project plans and specifications for plan check; otherwise, projects are placed on a waiting list to receive an allocation of forthcoming capacity, or applicants are required to construct a connection to the nearest wastewater line with available capacity.

All development activities that require sewer connection permits are evaluated by the BOS Wastewater Engineering Services Division under the purview of existing capacity of sewer lines in the development site's vicinity at the time of development. By doing so, each new development must adhere to the most current Sewer Design Manual specifications as well as appropriate Standard Plan requirements.

The City also has immediate response and reporting procedures in place to attend to any unexpected sewer overflows. The procedures are maintained in the Wastewater Collection Systems Division's up-to-date Sanitary Sewer Overflow Response and Reporting Procedures. Moreover, the City proactively monitors the sewer system to preemptively identify and resolve deficiencies before they can become problematic. System deficiencies in need of rehabilitation are then included in the WCIP, which are attended to according to their associated priority ranking.

The cumulative result of requiring new developments to meet rigorous design and performance standards in conjunction with a ready overflow response plan and proactive monitoring practices has resulted in the absence of wet-weather overflows since 2006. Table 4.16-10 in the EIR, illustrates that none of the primary sewer reaches in the CPAs have a structural condition ranking lower than a D. Of the 26 sewer reaches listed in Table 4.16-10, only four have a D level ranking, which requires them to be scheduled for rehabilitation. Consequently, those D level ranked sewer reaches are being addressed by corresponding capital improvement projects listed above.

Implementation of the Approved Plans could require the construction of new or upgraded wastewater facilities, such as sewer lines (not major facilities like a treatment plant). However, if new facilities are determined to be necessary at some point in the future, the construction of such infrastructure would not be expected to result in significant environmental impacts. To the extent that any significant impacts could result from the unique characteristics of the specific project site, those impacts would be speculative at this time. Therefore, impacts related to construction of new wastewater facilities or expansion of existing facilities under the Approved Plans were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As demonstrated in **Table 3-8**, the Modified Project is anticipated to result in an incremental increase in wastewater disposal compared to the Approved Plans. As with the Approved Plans, wastewater generation within the South and Southeast Los Angeles CPAs under the Modified Project would be minor in the context of the City's total wastewater treatment capacity. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not change demand for wastewater. Development under the Modified Project would be required to comply with the City's Water Efficiency Requirements, the Los Angeles Green Building Code, and the 2010 California Green Building Standard Code all of which would reduce water use and therefore wastewater generation. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to wastewater treatment facilities beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

On Sunday, July 11, 2021, the HTP unexpectedly flooded, resulting in the overflow of 17 million gallons of untreated wastewater into Santa Monica Bay. The flooding also submerged parts of HTP under untreated wastewater, resulting in major damage to equipment that process wastewater. Information on the flood's impacts to HTP's daily wastewater treatment capacity levels has not been published at this time. HTP is currently undergoing projects to mitigate future overflows and other impacts to plant capacity.

As part of the City's 2019 Sustainable City pLAN, LASAN is developing the Hyperion 2035 plan for recycling 100 percent of the water flowing by 2035. Under this program, HTP would produce up to 170 mgd of recycled water for potable use, the current secondary wastewater treatment process will be replaced, and additional treatment processes for excess wet weather flows will also be implemented. These projects would increase the daily wastewater treatment processing levels and capacity of the facility.

Additionally, LAGWRP is currently undergoing the Campus Improvement Project, which includes five concurrent projects intended to improve daily wastewater and recycled water treatment operations and increase processing capacity at the plant. Other ongoing projects at the TIWRP and DCTWRP will improve the quality of the water supply in the project area.

With the incremental implementation of development under the Modified Project occurring concurrently with these projects, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to wastewater treatment facilities beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

According to the 2020 UWMP, the LADWP's Bureau of Sanitation and Environment is working with the Bureau of Engineering (BOE) non-potable water reuse projects for irrigation and industrial uses, as well as a project to replenish groundwater with recycled water. Additionally, the LA Sustainable City pLAN includes targets to recycle 100 percent of all wastewater for beneficial reuse by 2035. No new wastewater treatment facilities are planned for future development under the 2020 UWMP.

The WCIP was updated for Fiscal Years 2018-2019 through 2027-2028 and includes projects to upgrade the reliability and capacity of the existing wastewater treatment system. With completion of these projects, the City will ensure that the wastewater treatment system would meet future operating requirements. The incremental increase in allowable development density under the Modified Project would not prevent the City from reaching its wastewater recycling targets. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to wastewater treatment facilities beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than Significant	No	No	No	No

A. Impact Determination in the Certified EIR

Analysis

Solid waste generated in the CPAs is disposed of at a number of landfills in the County of Los Angeles with, as of 2014, a combined remaining capacity of approximately 147 million tons of solid waste. The total permitted daily intake capacity of these landfills in 2010 was 41,300 tons per day; however, the average daily disposal rate was 2,423 tons for the entire City, representing just 5.9 percent of daily capacity.

The amount of solid waste generated in the South Los Angeles CPA under the Approved Plan is estimated to be 328 tons per day. This is an eight percent increase (25 tons/day) in solid waste generation compared to 2010. In the Southeast Los Angeles CPA, the amount of solid waste generated under the Approved Plan is estimated to increase to 431 tons per day. Compared to 2010, this is an approximately nine percent increase (35 tons/day) in solid waste generation. The calculation of the Approved Plans' estimated solid waste generation is a worst-case-scenario and does not take into consideration the City's successful efforts to divert disposal of solid waste by 50 percent, in compliance with AB 939. As the combined daily intake capacity of the landfills serving the CPAs is 41,300 tons per day, there is ample capacity to accommodate the estimated daily intake of an additional 60 tons per day that would be generated within the CPAs. Therefore, impacts related to solid waste under the Approved Plans were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Solid waste generation is driven by demographic changes such as an increase in population, employment, and land use development. As identified in Chapter 2, Project Description of this Addendum and analyzed in Section 4.14, Population and Housing, the Modified Project would accommodate incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR in the South and Southeast Los Angeles CPAs. Within West Adams the Modified Project would not change development patterns, nor would it displace development or induce growth and therefore would not generate additional demand for solid waste. As shown in **Table 3-9**, the Modified Project would result in a negligible increase in solid waste disposal compared to the Approved Plans and therefore would not result in a substantial difference in the ability of the Los Angeles County landfills to accommodate waste from the CPAs under the Modified Project as compared to the Approved Plans. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to solid waste beyond what was previously analyzed.

TABLE 3-9: SOLID WASTE FACILITIES SERVING THE CITY OF LOS ANGELES				
Facility Name	Location	2020 Annual Reporting vs 2014 Annual Reporting		
		Remaining Permitted Capacity (million tons)	Permitted Daily Intake (tons/day)	Annual Disposal (million tons/year)
CLASS III LANDFILLS				
Antelope Valley	Palmdale	-32%	100%	176%
Calabasas	Agoura	-38%	0%	89%
Chiquita Canyon	Castaic	219%	100%	219%
Lancaster	Lancaster	-18%	0%	2,669%
Puente Hills	Whittier	-8%	0%	0%
Sunshine Canyon	LA City	-35%	0%	70%
Scholl Canyon	Whittier	-11%	0%	13,040%
Southeast - Resource Recovery Facility/a/	Long Beach	N/A	78%	782%
Azusa Land Reclamation	Azusa	8%	23%	439%
Total Class III Landfill		8%	18%	155%
SOURCE: California Department of Resources Recvclng and Recoverv, 2022				

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The Approved Plans determined the existing conditions for the solid waste disposal facilities servicing the project area using statistics provided in the Countywide Integrated Waste Management Plan 2014 Annual Report. Published in October 2021, the 2020 Annual Report provided the most current summary of the current existing capacity and annual disposal rates for the solid waste disposal facilities which would service the Modified Project. **Table 3-9** below compares the capacity levels and disposal rates of the facilities between the 2014 Annual Report and the 2020 Annual Report. Since the publication of the 2017 FEIR, the Commerce - Refuse to Energy Facility site has closed, and solid waste originally destined for this facility has been diverted to other facilities. In total, the facilities which would service the CPAs have substantially

increased their remaining capacity, their permitted daily intake of solid waste, and their annual disposal levels. The Lancaster and Scholl Canyon Landfills have seen the most significant expansions in their annual disposal rates. As a result of the increased permitted capacity of the solid waste facilities servicing the project area, these facilities are anticipated to accommodate the incremental increase in solid waste disposal rates under the Modified Project. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to solid waste beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

The Solid Waste Integrated Resources Plan (SWIRP) - most commonly known as the City's Zero Waste Plan - lays out a long-term plan through 2030 for the City's solid waste programs, policies and environmental infrastructure. Investment in such infrastructure will help to achieve Mayor Garcetti's goals as outlined in the Mayor's Sustainability Plan and will create jobs in the local economy.

The 2019 Sustainable City pLAn includes a target to reduce municipal solid waste generation per capita by at least 15 percent by 2030 and to increase the proportion of waste products and recyclables productively reused and/or repurposed within the County to at least 50 percent by 2035. The incremental increase in allowable development density under the Modified Project is not anticipated to prevent the City from reaching its solid waste recycling and reduction targets. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts related to solid waste beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than Significant	No	No	No	No

A. Impact Determination in the EIR

Analysis

Implementation of the Approved Plans would be consistent with all waste reduction goals set forth by the Source Reduction and Recycling Element or its updates, CiSWMPP, RENEW LA, and the Framework Element, which are discussed in the Regulatory Framework section. The Approved Plans do not conflict with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, CiSWMPP, Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Compliance with LAMC Section 66.32 would ensure that at least 50 percent of the demolition and construction waste generated by the future development would be diverted from landfills serving the City of Los Angeles. According to Los Angeles County Department of Public Works' 2014 Annual Report, landfills serving the City of Los Angeles have various closure dates depending on maximum capacity. Expansion of existing landfills has extended adequate capacity to accommodate anticipated growth to lessen the impact of eventual closures. Construction that may occur under the Approved Plans could be accommodated. Currently, the CPAs represent an average daily disposal rate that is only 1.67 percent of the available daily intake capacity. For the City of Los Angeles, the current average daily disposal rate uses 5.9 percent of daily intake capacity.

The Approved Plans could result in development and redevelopment of land uses that would generate solid waste. All solid waste-generating activities within the City of Los Angeles are subject to the requirements set forth in AB 939 and other local ordinances. Future development permitted under the Approved Plans would comply with the applicable solid waste policies and objectives, and therefore impacts related to compliance with federal, state, and local statutes and regulations related to solid waste were found to be *less than significant*.

Mitigation Measures

No mitigation measures were required.

Level of Significance of Impacts after Mitigation

Less than Significant.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the Approved Plans, the incremental increase of development under the Modified Project would be subject to the waste reduction goals and requirements set forth by the City of Los Angeles General Plan, the City's recycling programs and ordinances, AB 939, and other local policies. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to solid waste disposal facilities beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

As identified in **Table 3-9**, the solid waste disposal facilities have expanded permitted capacity and increased their annual disposal rates to meet the incremental increases in solid waste generation due to population and employment growth. The incremental increase in waste

generated during construction and operations would be accommodated by the existing solid waste disposal facilities, and the Modified Project would not violate any federal, state, or local waste management plans. Therefore, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to solid waste disposal facilities beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

As identified in Section 3.19 Impact d), the City's Zero Waste Plan and the 2019 Sustainable City pLAn includes programs and policies to reduce municipal solid waste generation per capita and divert at least 50 percent of solid waste to recycling. The incremental increase in allowable development density under the Modified Project is not anticipated to prevent the City from reaching the solid waste recycling and reduction targets included in these plans. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond related to solid waste disposal facilities what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR and no new mitigation measures are required.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

3.20 MANDATORY FINDINGS OF SIGNIFICANCE

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
MANDATORY FINDINGS OF SIGNIFICANCE:					
(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Significant and Unavoidable	No	No	No	AQ1, CR1, CR2, HM1, N1, N2, N3, N4

A. Impact Determination in the EIR

Analysis

The Original Project was determined to have the potential to degrade the quality of the environment, specifically due to significant or potentially significant impacts related to Aesthetics (shade and shadow in Southeast Los Angeles)³³, Air Quality (construction), Cultural Resources (historic resources, archeological resources – including Tribal Cultural Resources and paleontological resources), Hazards and Hazardous Materials, Noise, Recreation (deterioration of existing parks) and Transportation³⁴. Impacts related to shade and shadows under the Original Project were considered to be significant and unavoidable in the Southeast Los Angeles CPA.

A *significant and unavoidable impact* to Air Quality was identified as a result of construction emissions (to both regional emissions and sensitive receptors); Mitigation Measure **AQ1** (generally implementing regulations) would reduce the significance of air quality impacts but not to a less than significant level.

Impacts related to contamination of the environment from unknown hazardous materials were identified as potentially significant; Mitigation Measure **HM1** (requiring a search of databases and follow up testing and appropriate action) would reduce impacts to a *less than significant level*.

A *significant and unavoidable impact* was identified to historic Cultural Resources as a result of redevelopment. A potentially significant impact to Cultural Resources, Tribal Cultural Resources and Paleontological Resources could occur through negligence during grading and excavation absent monitoring and enforcement. Mitigation Measures **CR1** and **CR 2** would establish protocols for the handling of prehistoric, archaeological, tribal cultural and paleontological resources

³³ The City has updated their approach to thresholds and shade and shadow analyses; such impacts are generally no longer considered significant.

³⁴ The 2017 FEIR found significant impacts related to delay (CMP roadway and freeway segments). Impacts related to the CMP and roadways were associated with delay and are no longer considered impacts under CEQA. However, information related to delay is taken into consideration as part of the emergency access analysis.

encountered during construction activities and would reduce these impacts to a less than significant level.

Mitigation Measure **N1** would reduce noise-related construction impacts but not to a less than significant level; construction noise would remain *significant and unavoidable*. Mitigation Measures **N3** and **N4** would reduce construction related vibration impacts but not to a less than significant level; construction vibration would remain *significant and unavoidable*. Implementation of Mitigation Measure **N2** (shielding noise sources and limiting truck activity) would reduce operational noise impacts to a *less than significant level*.

A *significant and unavoidable impact* was anticipated to Recreation due to the deficit in parks and the increased use and deterioration of existing parks by the increased population in the CPAs.

The CPAs are fully urbanized environment and dense urban development has occurred over many years. There are no undeveloped natural open spaces, nor any adopted HCPs, SEAs, NCCPs, or other sensitive ecosystems listed within or near the CPAs. The Original Project would have no impact to riparian habitats or other sensitive natural communities. Compliance with federal and state regulations related to the protection of non-status nesting birds would reduce impacts to less than significant. Therefore, the Original Project would not substantially reduce any wildlife or fish habitats, cause fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or threaten rare or endangered species.

Even with incorporation of the mitigation measures listed above, the Original Project was found to result in *significant and unavoidable impacts* which would degrade the quality of the environment.³⁵

Mitigation Measures

Mitigation Measures **AQ1**, **CR1**, **HM1**, **N1**, **N2**, **N3**, and **N4**.

Level of Significance of Impacts after Mitigation

Air Quality: With implementation of **AQ1**, construction of the Modified Project would result in a *significant and unavoidable impact*.

Cultural Resources: Implementation of Mitigation Measure **CR1** would reduce impacts related to archeological resources to *less than significant* but impacts to historical resources would remain *significant and unavoidable*.

Geology (Paleontological Resources): Implementation of Mitigation Measure **CR2** would reduce impacts related to paleontological resources to a *less than significant* level.

Hazards and Hazardous Materials: Implementation of Mitigation Measure **HM1** would reduce impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment in the CPAs to a *less than significant* level.

Noise and Vibration: Even with implementation of Mitigation Measure **N1**, construction noise levels could still exceed applicable thresholds, resulting in *significant and unavoidable* impacts. Implementation of Mitigation Measure **N2** would reduce operational noise impacts to a *less than*

³⁵ As noted above, the 2017 FEIR identified impacts to shade and shadows and traffic-related delay to be significant. While the Slauson Corridor TNP and Modified Project would not substantially change the conditions that led to these impacts being found significant, due to changes in the City's approach to shade and shadow and changes in state and City regulations regarding evaluation of traffic impacts, these impacts are no longer considered significant. (Delay continues to be considered in the evaluation of emergency access.)

significant level. Even with implementation of Mitigation Measures **N3** and **N4**, construction vibrational impacts would remain *significant and unavoidable*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would accommodate an allowable increase in the intensity, density, and/or types of land uses in the CPAs. Construction related impacts, including impacts related to grading or ground-disturbing activities; noise, vibration and pollution emissions from construction equipment; the discovery of previously unknown archaeological resources; and the handling, storage, and transportation of hazardous materials would be similar the 2017 FEIR. The Modified Project is not anticipated to substantially increase the significance of impacts beyond what was analyzed in the 2017 FEIR.

As with the Approved Plan, the Modified Project would not impact any undeveloped natural open spaces other sensitive ecosystems, nor conflict with the regulations and provisions of any adopted HCPs, SEAs, or NCCPs. The Modified Project would have no impact to riparian habitats or other sensitive natural communities, nor on any active rare, endangered, or threatened habitats. Development under the Modified Project would be required to comply with federal, state, and local regulations related to the protection of wildlife, habitats, ecosystems, and species. Impacts identified for the Approved Plans would remain *significant and unavoidable* but would not be substantially more severe. Therefore, there are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. Therefore, there is no new information requiring new analysis or verification. There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

As noted in the discussion of Air Quality checklist questions, emission controls continue to reduce emissions and recent project analyses no longer are showing significant air quality impacts. Nonetheless, to reflect the potential for multiple projects in the plan areas and in the interests of being conservative, the Addendum continues to consider emissions during construction to be significant. However, there are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows the Modified Project involves new significant impacts or substantially more severe impacts related to wildlife species and habitats, plant or animal community ranges, endangered species, or historical and cultural resources beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measures **AQ1, CR1, CR2, HM1, N1, N2, N3, and N4** would address impacts and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent EIR or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
MANDATORY FINDINGS OF SIGNIFICANCE:					
(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)?	Significant and Unavoidable	No	No	No	AQ1, CR1, CR2, HM1, N1, N2, N3, N4

A. Impact Determination in the Certified EIR

Analysis

As noted above, the Approved Plans resulted in significant adverse impacts. There are no impacts under the Approved Plans that are individually limited that are not already considered significant; however, the significant impacts identified above could add to cumulative impacts (although some impacts tend to be fairly localized).

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

There are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

As noted in the discussion of Air Quality checklist questions, emission controls continue to reduce emissions and recent project analyses no longer are showing significant air quality impacts. Nonetheless, to reflect the potential for multiple projects in the plan areas and in the interests of being conservative, the Addendum continues to consider emissions during construction to be

significant. There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

New traffic modeling and air quality modeling tools have been developed to evaluate VMT (see Section 3.17, Transportation) and air quality. These new models were used to evaluate impacts of updated growth forecasts anticipated under the Modified Project. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

Refer to Chapter 2, Project Description, for discussion of recent state housing laws and how they do not affect the analyses presented in the 2017 FEIR. Therefore, there is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measures **AQ1, CR1, CR2 HM1, N1, N2, N3, and N4** would address impacts and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
MANDATORY FINDINGS OF SIGNIFICANCE:					
(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Significant and Unavoidable	No	No	No	AQ1, CR1, CR2, HM1, N1, N2, N3, N4

A. Impact Determination in the Certified EIR

Analysis

The Approved Plans resulted in environmental effects which may potentially result in substantial adverse effects on human beings, both directly and indirectly. The development of taller buildings than the existing environment could create shadows that would extend onto shadow-sensitive

uses such as residences, schools, open space, parks, and public facilities, creating impacts to humans which were considered significant and unavoidable.³⁶

As discussed in Section 3.2, Air Quality, a potentially significant Air Quality impact during construction could occur, which could indirectly result in impacts to human health through exposure to high pollutant concentrations. Mitigation Measure **AQ1** would require various measures including implementing regulations to reduce the significance of air quality impacts. As noted in the discussion of Air Quality checklist questions, emission controls continue to reduce emissions and recent project analyses no longer are showing significant air quality impacts. Nonetheless, to reflect the potential for multiple projects in the plan areas and in the interests of being conservative, the Addendum continues to consider emissions during construction to be significant.

Impacts to historic resources are considered significant and unavoidable as it is possible that one or more designated resources may be lost by redevelopment. Impacts to archeological, Tribal Cultural Resources and paleontological resources would be mitigated (Mitigation Measures **CR1** and **CR2**) to a less than significant level.

Unidentified sources of contamination encountered during grading or excavation could directly pose health and safety risks to humans from exposure to hazardous materials or vapors. Contaminants could migrate from the contaminated zone to surrounding areas either before or after the surrounding areas are developed, or if contaminated zones are disturbed by future development at the contaminated location. Impacts related to hazardous waste emissions resulting from future development on industrial land in the CPAs could uncover existing hazardous waste in soils near schools and other sensitive receptors. However, Mitigation Measure **HM1** would reduce the potential for contamination exposure and other impacts related to hazardous materials to less than significant levels.

Construction-generated noise and vibration levels would exceed applicable LAMC standards and thresholds. Construction activity would be short-term and temporary at each location, although construction is anticipated to be ongoing somewhere in the area throughout the time frame of the Approved Plans. Noise and vibration levels would result in substantial human annoyance and could directly impact the health of human residents. Mitigation Measures **N1**, **N3** and **N4** would reduce the significance of construction noise and vibration impacts to the greatest extent possible. Regardless, impacts related to the generation of construction noise in excess of the LAMC standards under the Original Project would be *significant and unavoidable*. Operational impacts from adjacent industrial activities would be reduced to a less than significant level through Mitigation Measure **N2**.

The Approved Plans were also considered to have a significant impact on roadway and freeway congestion (delay); however, these impacts are no longer considered significant under CEQA.³⁷

Even with incorporation of the mitigation measures listed above, the Approved Plans would directly and indirectly cause substantial adverse effects on human beings which were found to be *significant and unavoidable*.

³⁶ The City has updated their approach to thresholds and shade and shadow analyses; such impacts are evaluated on a case-by-case basis and are generally no longer considered significant.

³⁷ The 2017 FEIR found significant impacts related to delay (CMP roadway and freeway segments). Impacts related to the CMP and roadways were associated with delay and are no longer considered impacts under CEQA. However, information related to delay is taken into consideration as part of the emergency access analysis.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As with the 2017 FEIR, the Modified Project would result in direct impacts and indirect impacts. Even with incorporation of Mitigation Measures **AQ1**, **CR1**, **CR2**, **HM1**, and **N1** through **N4**, the Modified Project would directly and indirectly cause substantial adverse effects on human beings which are significant and unavoidable, but in a similar manner as the Original Project. There are no proposed changes under the Modified Project that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts beyond what was previously analyzed.

D. Any New Information Requiring New Analysis or Verification?

There is no 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 2017 FEIR was certified that shows new significant impacts or substantially more severe impacts beyond what was previously analyzed.

E. EIR's Mitigation Measures Addressing Impact

Mitigation Measures **AQ1**, **HM1**, **N1**, **N2**, **N3**, and **N4** would address impacts and no new mitigation measures are warranted.

F. Conclusion

The Modified Project would not result in any of the conditions set forth in Public Resources Code Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

4 CONCLUSION

As demonstrated by the discussion above, none of the conditions described in Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Subsequent or Supplemental EIR would occur.

Appendix A

Air Quality Emissions Calculations

SLAUSON TNP AIR QUALITY EMISSIONS SUMMARY TABLE

South Los Angeles		Daily Pollutant Emissions (lbs./day)					
Source Category		VOC	NOX	CO	SOX	PM10	PM2.5
Existing Conditions (2010)							
Area		3,291.5	71.0	4,273.3	0.8	43.7	44.3
Energy		62.0	535.1	262.9	3.4	42.9	42.9
Mobile		3,448.0	12,305.9	59,475.8	55.8	1,678.1	494.6
Subtotal		6,801.5	12,912.0	64,012.1	60.0	1,764.6	581.8
EIR Approved Plan (2035)							
Area		3,369.0	41.5	4,581.1	0.2	2.3	3.0
Energy		81.3	699.0	327.2	4.4	56.2	56.2
Mobile		484.7	1,796.2	12,481.9	41.6	1,783.2	339.5
Subtotal		3,935.0	2,536.6	17,390.3	46.2	1,841.7	398.7
Net Change from Existing		-2,866.5	-10,375.4	-46,621.8	-13.8	77.0	-183.2
% Change from Existing		-42.1%	-80.4%	-72.8%	-23.0%	4.4%	-31.5%
Slauson TNP (2035)							
Area		3,438.5	42.3	4,670.2	0.2	2.4	3.2
Energy		82.6	710.7	334.4	4.5	57.1	57.1
Mobile		492.6	1,825.5	12,685.6	42.3	1,812.3	345.0
Subtotal		4,013.8	2,578.5	17,690.2	47.0	1,871.8	405.2
Net Change from Existing		-2,787.7	-10,333.6	-46,321.8	-13.0	107.1	-176.6
% Change from Existing		-41.0%	-80.0%	-72.4%	-21.7%	6.1%	-30.4%
Percentage Point Change from Approved Plan		1.2%	0.3%	0.5%	1.3%	1.7%	1.1%

Southeast Los Angeles		Daily Pollutant Emissions (lbs./day)					
Source Category		VOC	NOX	CO	SOX	PM10	PM2.5
Existing Conditions (2010)							
Area		3,488.7	66.7	4,357.4	0.7	37.6	38.5
Energy		64.6	561.7	307.3	3.5	44.6	44.6
Mobile		3,886.7	13,871.7	67,043.2	62.9	1,891.6	557.6
Subtotal		7,440.0	14,500.0	71,707.9	67.2	1,973.8	640.7
EIR Approved Plan (2035)							
Area		3,725.4	41.9	4,692.3	0.2	3.2	4.2
Energy		77.2	669.1	351.5	4.2	53.3	53.3
Mobile		495.6	1,836.4	12,761.3	42.5	1,823.1	347.1
Subtotal		4,298.1	2,547.3	17,805.0	46.9	1,879.6	404.6
Net Change from Existing		-3,141.9	-11,952.7	-53,902.9	-20.2	-94.3	-236.1
% Change from Existing		-42.2%	-82.4%	-75.2%	-30.1%	-4.8%	-36.9%
Slauson TNP (2035)							
Area		3,814.9	42.9	4,811.8	0.2	3.3	4.4
Energy		79.0	685.1	361.2	4.3	54.6	54.6
Mobile		512.4	1,898.5	13,193.2	44.0	1,884.8	358.8
Subtotal		4,406.3	2,626.5	18,366.2	48.5	1,942.7	417.7
Net Change from Existing		-3,033.7	-11,873.5	-53,341.7	-18.7	-31.2	-223.0
% Change from Existing		-40.8%	-81.9%	-74.4%	-27.8%	-1.6%	-34.8%
Percentage Point Change from Approved Plan		1.5%	0.5%	0.8%	2.3%	3.2%	2.1%

SLAUSON TNP AIR QUALITY EMISSIONS SUMMARY TABLE

Combined South & Southeast Los		Daily Pollutant Emissions (lbs./day)				
Source Category	VOC	NOX	CO	SOX	PM10	PM2.5
Existing Conditions (2010)						
Area	6,780.2	137.7	8,630.7	1.6	81.3	82.8
Energy	126.6	1,096.8	570.3	6.9	87.5	87.5
Mobile	7,334.7	26,177.6	126,519.0	118.7	3,569.8	1,052.2
Subtotal	14,241.5	27,412.0	135,720.0	127.2	3,738.5	1,222.5
EIR Approved Plan (2035)						
Area	7,094.4	83.4	9,273.4	0.4	5.5	7.3
Energy	158.5	1,368.1	678.7	8.6	109.5	109.5
Mobile	980.3	3,632.5	25,243.2	84.1	3,606.3	686.5
Subtotal	8,233.1	5,083.9	35,195.3	93.2	3,721.3	803.2
Net Change from Existing	-6,008.4	-22,328.1	-100,524.7	-34.0	-17.2	-419.3
% Change from Existing	-42.2%	-81.5%	-74.1%	-26.7%	-0.5%	-34.3%
Slauson TNP (2035)						
Area	7,253.5	85.2	9,482.0	0.4	5.7	7.5
Energy	161.6	1,395.8	695.6	8.8	111.7	111.7
Mobile	1,005.0	3,724.0	25,878.9	86.2	3,697.1	703.8
Subtotal	8,420.1	5,205.0	36,056.4	95.5	3,814.4	823.0
Net Change from Existing	-5,821.5	-22,207.1	-99,663.5	-31.7	75.9	-399.6
SCAQMD THRESHOLD	55	55	550	150	150	55
% Change from Existing	-40.9%	-81.0%	-73.4%	-24.9%	2.0%	-32.7%
Percentage Point Change from Approved Plan	1.3%	0.4%	0.6%	1.8%	2.5%	1.6%

Appendix B

Greenhouse Gas Emissions Calculations

Slauson TNP Greenhouse Gas Emissions Summary Table

	<u>South Los Angeles Community Plan Area</u>			<u>Southeast Los Angeles Community Plan Area</u>			<u>Combined South & Southeast LA Community Plan Analysis</u>		
	Existing 2010	SLA: Previous DCP xls + Validated Slauson TAZs	SLA: Modified Plan (with TNP TAZs increased)	Existing 2010	SELA: Previous DCP xls + Validated Slauson TAZs	SELA: Modified Plan (with TNP TAZs increased)	Existing 2010	SELA: Previous DCP xls + Validated Slauson TAZs	SELA: Modified Plan (with TNP TAZs increased)
Summary by Source (MTCO2e/year)									
Electricity	483,732.2	282,436.4	290,818.0	620,863.0	378,363.1	389,116.9	1,104,595.2	660,799.6	679,934.9
Natural Gas	308,719.2	404,647.1	411,286.4	321,405.4	384,108.6	393,178.0	630,124.7	788,755.7	804,464.3
Energy Subtotal	792,451.5	687,083.5	702,104.4	942,268.4	762,471.7	782,294.9	1,734,719.9	1,449,555.2	1,484,399.3
Water Processes	104,191.3	44,075.4	45,062.2	173,192.0	52,251.8	53,541.9	277,383.3	96,327.1	98,604.1
Waste Disposal	39,521.0	43,277.4	44,116.8	43,786.0	51,994.8	52,807.5	83,307.0	95,272.2	96,924.3
Area Sources	11,431.9	2,207.6	2,259.0	10,087.3	2,458.7	2,527.2	21,519.3	4,666.3	4,786.2
Mobile	927,894.0	686,666.5	697,873.1	1,045,953.3	702,033.1	725,796.7	1,973,847.3	1,388,699.6	1,423,669.8
Total	1,875,489.6	1,463,310.4	1,491,415.4	2,215,287.1	1,571,210.1	1,616,968.2	4,090,776.7	3,034,520.4	3,108,383.6
Net Change from Existing		-412,179.2	-384,074.2		-644,077.1	-598,318.9		-1,056,256.3	-982,393.1
% Change from Existing		-22.0%	-20.5%		-29.1%	-27.0%		-25.8%	-24.0%
Difference in % Change			1.5%			2.1%			1.8%
Change from 2035 Old Plan			28,105.0			45,758.2			73,863.2

South Los Angeles Community Plan Area				Southeast Los Angeles Community Plan Area			Combined South & Southeast LA Community Plan Analysis		
Electricity Consumption (MTCO2e/year)									
SF Rez	135,438.1	72,095.5	72,419.6	128,383.0	84,489.9	84,230.6	263,821.1	156,585.4	156,650.2
MF Rez	107,072.5	85,424.3	86,536.1	80,990.2	54,797.2	56,717.5	188,062.7	140,221.4	143,253.6
Commercial	163,205.4	103,169.1	103,614.8	131,895.1	95,975.2	96,212.7	295,100.5	199,144.3	199,827.5
Industrial	54,739.7	11,008.4	17,454.4	251,654.5	125,721.6	136,201.6	306,394.2	136,730.0	153,656.0
Pub. Fac.	23,253.9	10,715.6	10,769.5	27,857.0	17,361.3	15,736.5	51,110.9	28,076.9	26,505.9
Open Space	22.6	23.7	23.7	83.1	17.9	17.9	105.7	41.6	41.6
Subtotal	483,732.2	282,436.4	290,818.0	620,863.0	378,363.1	389,116.9	1,104,595.2	660,799.6	679,934.9
Net Change from Existing		-201,295.8	-192,914.2		-242,499.8	-231,746.1		-443,795.6	-424,660.2
% Change from Existing	-	-41.6%	-39.9%	-	-39.1%	-37.3%	-	-40.2%	-38.4%
Difference in % Change	-		1.7%	-		1.7%	-		1.7%
Natural Gas Cobustion (MTCO2e/year)									
SF Rez	171,564.6	116,181.0	116,703.3	162,627.6	136,154.5	135,736.6	334,192.2	252,335.5	252,439.9
MF Rez	90,593.7	249,089.9	252,331.7	68,525.5	159,783.9	165,383.4	159,119.2	408,873.7	417,715.2
Commercial	27,305.7	30,711.3	30,844.0	22,067.2	28,569.9	28,640.6	49,373.0	59,281.2	59,484.6
Industrial	13,272.6	4,649.0	7,371.2	61,018.1	53,093.9	57,519.7	74,290.7	57,742.9	64,891.0
Pub. Fac.	5,982.7	4,015.9	4,036.1	7,166.9	6,506.5	5,897.6	13,149.6	10,522.4	9,933.7
Open Space	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Subtotal	308,719.2	404,647.1	411,286.4	321,405.4	384,108.6	393,178.0	630,124.7	788,755.7	804,464.3
Net Change from Existing		95,927.8	102,567.1		62,703.2	71,772.5		158,631.0	174,339.7
% Change from Existing	-	31.1%	33.2%	-	19.5%	22.3%	-	25.2%	27.7%
Difference in % Change	-		2.2%	-		2.8%	-		2.5%

Slauson TNP Greenhouse Gas Emissions Summary Table

Water Processes (MTCO2e/year)									
SF Rez	28,569.6	7,476.7	7,510.3	27,081.4	8,762.1	8,735.2	55,651.0	16,238.8	16,245.6
MF Rez	26,476.9	9,265.0	9,385.6	20,027.3	5,943.2	6,151.5	46,504.2	15,208.3	15,537.1
Commercial	17,746.3	6,704.8	6,733.7	14,341.7	6,237.3	6,252.7	32,088.0	12,942.0	12,986.4
Industrial	11,400.8	1,360.9	2,157.9	52,412.8	15,542.7	16,838.3	63,813.6	16,903.6	18,996.1
Pub. Fac.	5,733.0	1,333.9	1,340.7	6,867.8	2,161.3	1,959.0	12,600.8	3,495.2	3,299.6
Open Space	14,264.7	17,934.0	17,934.0	52,461.0	13,605.2	13,605.2	66,725.7	31,539.2	31,539.2
Subtotal	104,191.3	44,075.4	45,062.2	173,192.0	52,251.8	53,541.9	277,383.3	96,327.1	98,604.1
Net Change from Existing		-60,115.9	-59,129.1		-120,940.3	-119,650.1		-181,056.2	-178,779.2
% Change from Existing	-	-57.7%	-56.8%	-	-69.8%	-69.1%	-	-65.3%	-64.5%
Difference in % Change	-		0.9%	-		0.7%	-		0.8%
Solid Waste (MTCO2e/year)									
SF Rez	12,569.6	11,559.6	11,611.6	11,914.8	13,546.9	13,505.3	24,484.4	25,106.5	25,116.9
MF Rez	6,939.1	9,588.3	9,713.0	5,248.8	6,150.6	6,366.1	12,187.9	15,738.8	16,079.2
Commercial	14,788.4	18,922.3	19,004.1	11,951.3	17,602.9	17,646.4	26,739.7	36,525.2	36,650.5
Industrial	2,467.3	973.4	1,543.3	11,342.9	11,116.2	12,042.8	13,810.2	12,089.5	13,586.1
Pub. Fac.	2,746.2	2,186.3	2,197.3	3,289.8	3,542.2	3,210.7	6,036.0	5,728.5	5,407.9
Open Space	10.5	47.6	47.6	38.5	36.1	36.1	48.9	83.7	83.7
Subtotal	39,521.0	43,277.4	44,116.8	43,786.0	51,994.8	52,807.5	83,307.0	95,272.2	96,924.3
Net Change from Existing		3,756.4	4,595.8		8,208.8	9,021.4		11,965.1	13,617.3
% Change from Existing	-	9.5%	11.6%	-	18.7%	20.6%	-	14.4%	16.3%
Difference in % Change	-		2.1%	-		1.9%	-		2.0%
Area Sources (MTCO2e/year)									
SF Rez	4,494.9	537.6	540.0	4,260.7	630.0	628.1	8,755.6	1,167.6	1,168.1
MF Rez	6,413.9	1,152.6	1,167.6	4,851.5	739.3	765.2	11,265.4	1,891.9	1,932.8
Commercial	316.4	404.8	406.6	255.7	376.6	377.5	572.1	781.4	784.1
Industrial	138.1	54.5	86.4	634.8	622.1	674.0	772.9	676.6	760.4
Pub. Fac.	67.7	53.9	54.2	81.1	87.4	79.2	148.9	141.3	133.4
Open Space	0.9	4.3	4.3	3.4	3.2	3.2	4.4	7.5	7.5
Subtotal	11,431.9	2,207.6	2,259.0	10,087.3	2,458.7	2,527.2	21,519.3	4,666.3	4,786.2
Net Change from Existing		-9,224.3	-9,173.0		-7,628.7	-7,560.1		-16,853.0	-16,733.1
% Change from Existing	-	-80.7%	-80.2%	-	-75.6%	-74.9%	-	-78.3%	-77.8%
Difference in % Change	-		0.4%	-		0.7%	-		0.6%
Mobile Sources									
Subtotal	927,894.0	686,666.5	697,873.1	1,045,953.3	702,033.1	725,796.7	1,973,847.3	1,388,699.6	1,423,669.8
Net Change from Existing		-241,227.5	-230,020.9		-343,920.2	-320,156.6		-585,147.7	-550,177.5
% Change from Existing	-	-26.0%	-24.8%	-	-32.9%	-30.6%	-	-29.6%	-27.9%
Difference in % Change	-		1.2%	-		2.3%	-		1.8%

Appendix C

Traffic Analysis

DRAFT TECHNICAL MEMORANDUM

To: Steven Katigbak, City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012

From: Iteris, Inc. and
Terry A. Hayes Associates Inc.

Date: May 11, 2022

RE: **DRAFT** Slauson Corridor Transit Neighborhood Plan (TNP) Transportation Study –
Transportation Model Methodology

This memorandum documents the rationale for use of the updated City of Los Angeles Travel Demand Model as compared to the older version of the model used in the 2016 South and Southeast Community Plan EIR (2016 EIR).

The TAHA Team has contributed understanding of land use assumptions and growth used in the modeling process. The City of Los Angeles plans to prepare a Transit Neighborhood Plan for the Slauson Corridor. We understand that the City seeks to increase jobs and housing in proximity to transit. Iteris completed the traffic study for the 2016 EIR. The City of Los Angeles Travel Demand model used in the 2016 EIR (referred to herein as the “Old Model”) was developed in 2010 from the 2008 SCAG Regional Transportation Plan Regional (RTP) Regional Travel Demand Model. As a result of the recession, growth in the Los Angeles area was mostly stagnant between 2008 and 2013 with patchy growth thereafter. The recent 2020 Census shows that growth is not on track to meet the projections evaluated in the 2016 EIR.

The Citywide Travel Demand Model was updated in 2018 (referred to herein as the “New Model”) to align with the 2016 SCAG RTP/SCS Model -- including a base year of 2016 and a horizon year of 2040. Additional refinements and improvements were included in the New Model (see below). While the New Model has a horizon year five years later than the 2016 EIR, in community planning documents the approach to forecasting a horizon year is based on land use and not dependent on annual socio-economic growth. The New Model is generally conservative in its estimates of employment and population:

1. **Existing and Future Employment is High in both the New Model and the Old Model.** The City’s travel demand model uses averaged assumptions regarding square feet of non-residential space per employee in order to estimate employment. Based on 2019 US Census On the Map data, employment estimates appear high in the 2016 EIR and in the New Model, potentially because the large amount of warehouse and other uses that have lower employment densities in these areas than assumed in the models. For the two CPAs together, the New Model anticipates 6.8% fewer total jobs than the Old Model, however this total still appears high as compared to recent trends.
2. **South CPA Future Population is Higher, and Southeast Population is Lower in the New Model.** Based on the 2020 Census data, recent trends and the 2020 RTP/SCS, the New Model appears to

over-estimate future population in the South CPA (the New Model assumes 3.41 persons per household as compared to 2020 Census data that shows 3.2 persons per household and the 2020 RTP/SCS that shows 3.19 persons per household); the population in the Southeast CPA and households is less in the New Model than in the Old Model and less than indicated in the 2020 RTP/SCS. However, the total population of the two CPAs is about 3% higher in the New Model as compared to the Old Model.

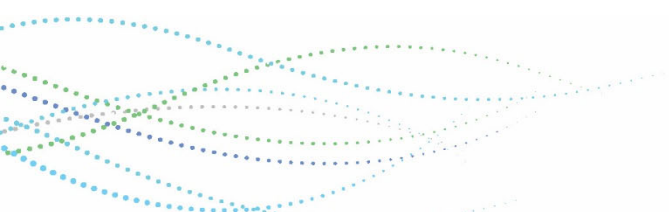
The City's Travel Demand Model is used as part of the environmental review process to estimate vehicle miles travelled (VMT) and in particular VMT per service population (per resident and/or per employee). The conservative population included in the New Model will result in higher total VMT but would not result in a meaningful effect on per service population VMT. Higher VMT will result in higher air emissions. However, operational emissions under future conditions are expected to be reduced substantially as a result of emissions controls and therefore even the higher VMT is not expected to result in a significant increase in emissions compared to the CEQA baseline.

With respect to other issue areas evaluated in the 2016 EIR, the identification of impacts is generally based on residential units and non-residential square feet. The 2016 EIR is based on data included in the Old Model (to estimate households) and data from On the Map (to estimate employment and building areas) in order to estimate water consumption, solid waste generation, etc. The 2016 EIR analyses are considered reasonable and/or conservative for all issue areas based on TAHAs review of available sources including socioeconomic data from the following: the Old Model, the New Model, the 2016 RTP/SCS, the 2020 RTP, the 2020 Census, and the 2019 On the Map data.

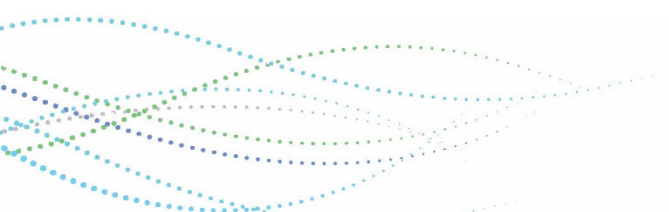
With respect to evaluation of transportation impacts, the New Model represents a new and substantially improved tool. In addition, as noted above, the New Model includes conservative assumptions with respect to population and while less than the Old Model still represents a conservative assumption of employment in the two CPAs. We therefore recommend use of the New Model (as opposed to the Old Model) for the evaluation of the Slauson Transit Neighborhood Plan transportation impacts. We plan to compare conditions with and without the Slauson TNP in order to provide an apples-to-apples comparison of impacts using the New Model.

New Model Improvements

- **TAZ System** – The Old Model was comprised of two separate models, and each disaggregated the SCAG zone system within that particular planning area while keeping the SCAG Tier 1 TAZ system outside the planning area. On the other hand, the New (Citywide) Model consists of a uniform TAZ system across the two planning areas, which is more appropriate for analysis of the Slauson Transit Corridor which straddles both the South and Southeast Los Angeles Community Plan Areas (as well as a portion of West Adams).
- **Socioeconomic Data/Trip Generation** – The New Model uses more recent socioeconomic data than the Old Model. In 2007, the State of California was forecast to grow to a population of 60 million by year 2050. However, since 2008 these population growth forecasts have been significantly reduced to 44 million meaning that the City of Los Angeles model will generate forecasts more in line with the current more modest population growth forecasts.

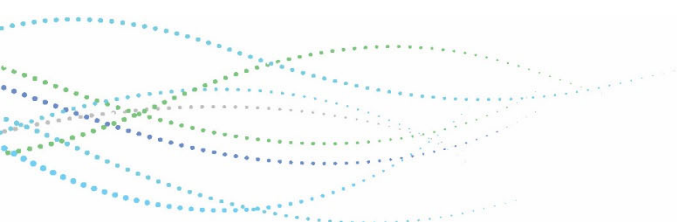


- **Trip Distribution** – The New Model’s trip distribution was further calibrated using information on travel behavior provided by StreetLight Data. StreetLight is a data analytics company which uses anonymized data from millions of internet-connected devices (including cell phones and GPS navigation units) to provide aggregated information on travel origins and destinations across a large region. The Citywide Model area was divided into over 60 regions for which StreetLight data was collected. The StreetLight data indicated the SCAG model was over predicting the average trip lengths within the City. The model’s k-factor adjustments that were subsequently made increased the likelihood of shorter vehicle trips occurring between neighboring zones, thus better representing observed travel patterns within the City.
- **Highway and Transit Network** – The New Model has a more up to date highway network than the Old Model. In addition, the New Model used General Transit Feed Specification (GTFS) data from major transit operators to build the transit networks which results in a more up to date and accurate transit network. The New Model also better represents changes in transit operations compared to 2003 with the opening of several light rail lines and major restructuring of bus services.
- **Model Validation** – The New Model was validated against the 2016 RTP/SCS model and is therefore more up to date, in terms of base year traffic volumes, compared to the Old Model.
- **Transit Performance Measures** – The New Model includes the ability to report system ridership by mode and carrier, a feature that is not available at the same level of detail in the Old Model.
- **Vehicle Miles/Hours Travelled** – The New Model calculates Vehicle Miles Travelled (VMT) and Vehicle Hours Travelled (VHT) automatically. While this performance metric can be generated from the Old Model, it is not an automated model output.
- **2040 Horizon** – The New Model has a horizon year of 2040 as compared to 2035 under the Old Model. This analysis year represents a more realistic timeframe for the anticipated development to occur.



Appendix A

Supporting Socio-economic Data

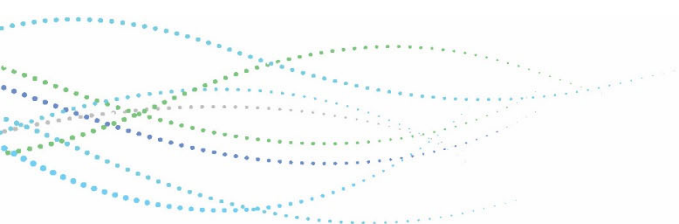


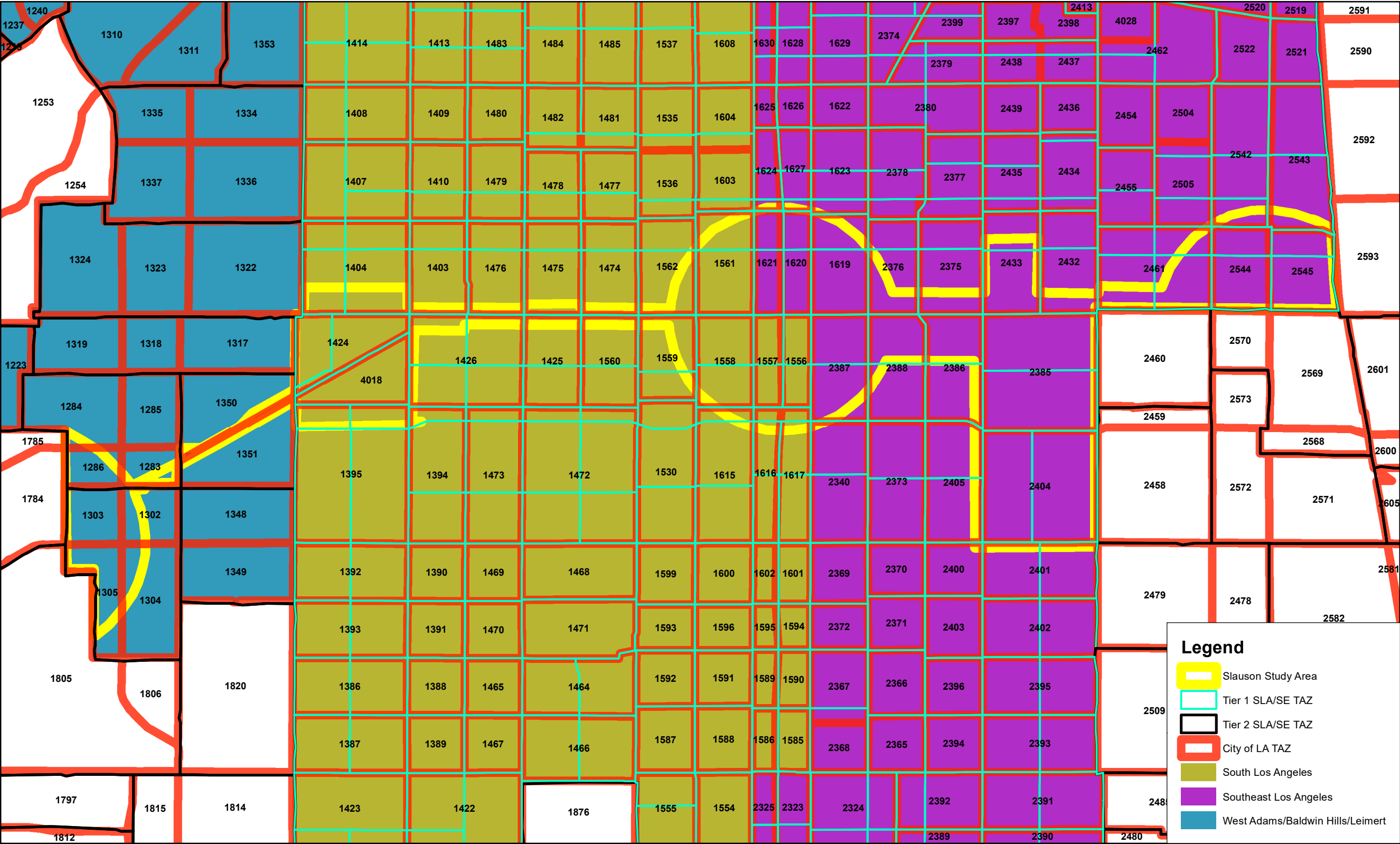
	2010	2016				2020					2035				2040				2045			
	Project EIR	Project EIR (Interpolated 2010 +6 yrs)	LADOT Citywide New Model	SCAG 2016 RTP	SCAG 2020 RTP (2019)	Project EIR (Interpolated 2010 +10 yrs)	LADOT Citywide New Model (Interpolated 2016 +4 yrs)	SCAG 2016 RTP	SCAG 2020 RTP	Census (2019 jobs -- onthemap)	Project EIR	LADOT Citywide New Model	SCAG 2016 RTP	SCAG 2020 RTP	Project EIR (Interpolated 2010 + 30 Years)	LADOT Citywide New Model	SCAG 2016 RTP	SCAG 2020 RTP (Interpolated 2035+5 Years)	Project EIR (Interpolated 2010+35 Years)	LADOT Citywide New Model (Interpolated 2035 +10 Years	SCAG 2016 (Interpolated 2035 + 10 Years	SCAG 2020 RTP
South																						
Pop	270,354	281,225	281,932	281,493	275,687	288,472	290,996	289,279	285,736	277,921	313,836	326,778	323,135	307,711	322,532	338,580	337,442	315,944	331,229	350,382	351,749	324,176
HH	82,186	86,114	80,721	80,649	76,971	88,732	83,686	84,553	81,044	86,832	97,897	95,393	94,736	93,594	101,039	99,254	98,939	97,615	104,181	103,115	103,142	101,636
Jobs	51,078	55,676	48,905	48,908	61,053	58,741	50,685	54,325	62,770	39,584	69,470	57,712	64,783	69,376	73,148	60,030	68,066	71,060	76,827	62,348	71,349	72,743
Pers/du	3.3	3.3	3.5	3.5	3.6	3.3	3.5	3.4	3.5	3.2	3.2	3.4	3.4	3.3	3.2	3.4	3.4	3.2	3.2	3.4	3.4	3.19
SE																						
Pop	278,337	288,837	286,990	285,388	286,853	295,837	291,188	288,426	293,771	285,585	320,337	307,761	304,148	308,765	328,737	313,227	312,696	314,588	337,137	318,693	321,244	320,410
HH	68,651	71,605	66,316	66,039	63,991	73,574	67,573	67,893	66,799	70,986	80,467	72,534	71,906	75,422	82,830	74,170	73,772	78,184	85,193	75,806	75,638	80,946
Jobs	74,694	80,009	60,111	59,605	51,392	83,553	65,547	69,197	53,985	45,835	95,955	87,009	87,664	63,908	100,207	94,088	93,367	66,441	104,459	101,167	99,070	68,974
Pers/du	4.1	4.0	4.3	4.3	4.5	4.0	4.3	4.2	4.4	4.0	4.0	4.2	4.2	4.1	4.0	4.2	4.2	4.0	4.0	4.2	4.2	3.96

Old Model = Project EIR
New Model = LADOT Citywide New Model

Appendix B

TAZ Maps







NOT TO SCALE

